



PROCESS SAFETY MANUAL

*Injury and Illness Prevention Program
Code of Safe Practices
Safety Standards (Procedures)
General Safety Policies*

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FORM NUMBER

Employee Warning Record	<u>2021</u>
Safety Meeting/Training Record	<u>2031</u>
Action Item Matrix	<u>2041</u>
Personal Injury Report	<u>2051</u>
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Respiratory Fit Test Record	<u>5071</u>

INTRODUCTION AND PURPOSE

The Company will institute and administer a comprehensive and continuous occupational Injury and Illness Prevention Program. The health and safety of an individual employee takes precedence over all other concerns. In support of this commitment, the Company provides measures to control workplace hazards through communications, periodic inspections, incident investigation, mitigation, compliance audits and employee training. Under all circumstances, it is the intent of the Company to comply with all applicable federal, state and local regulations and to provide a safe and healthful work environment for our employees.

To help us achieve an injury-free workplace, we have developed this Safety Manual, an integrated plan to manage and improve Company safety performance. As part of this process, we intend to hire employees and contractors with an exemplary safety attitude. We do this knowing we must cooperate and work as a team to obtain the desired results.

This manual is divided into five sections (Foreword, Injury and Illness Prevention Program, Code of Safe Practices, Safety Standards, and General Safety Policies).

Section 1.00 Foreword

Includes an overview of program contents, introduction and scope, and a policy statement endorsing the system as appropriate for the company.

Section 2.00 Injury and Illness Prevention Program (IIPP)

An IIPP is an element required by California Code of Regulation 3203 for all employers. It consists of seven established criteria (responsibilities, compliance/disciplinary policy, communication, identification of workplace hazards, accident reporting and investigating, employee training and record keeping). The IIPP is the core of the administrative portion of the manual.

Section 3.00 Code of Safe Practices (Tailgate Safety-Meeting Topics)

The written Safety Rules section of the program are not necessarily required by any regulatory body, however much of the contents reflect current laws and such should be used to complement independent study or assist in tailgate safety meetings.

Section 4.00 Safety Standards (procedures)

Safety standards included in section 4.00 are written job procedures developed to be utilized in most of the daily activities of the company. Most of the written job procedures are regulatory required and reference applicable federal and/or state laws within the text of the documents.

Section 5.00 General Safety Policies

An attempt was made to encompass all other written safety material that was not necessarily a daily function of the business, however deemed important, into a group called General Safety Guidelines. Within this section you will find general information relating to a multitude of safety requirements.

POLICY STATEMENT

To All Company Employees:

Safety is of primary importance in our operations. No business objective is so important that it will be pursued at the sacrifice of safety. Each of us has the responsibility to make the safety of our co-workers and ourselves a basic concern. This objective is fundamental to our well being, as well as the efficient operation of our business. Every employee has the responsibility to prevent accidents and injuries by following established working rules, by practicing the principles taught in safety training and by providing ideas on how our safety efforts might be further strengthened.

We have instituted this Environmental, Health and Safety (EHS) system which, with your help, will succeed in providing safe and healthy working conditions.

This program is designed to:

- 1) Assign Responsibilities to employees to carry out the necessary elements of the program;
- 2) Establish a Compliance/Disciplinary Policy for employees that fail to carryout their duties with regard to safe operations. Additionally, reward those that continue to work safely;
- 3) Develop a system to communicate with our employees concerning safety matters and to encourage feedback;
- 4) Identify and evaluate jobsite hazards;
- 5) Establish methods for investigating and correcting unsafe, or unhealthy conditions;
- 6) Establish a training and retraining program for employees and;
- 7) Maintain and continually improve the ongoing integrity of the system.

We are committed to conducting operations in a manner that protects personnel safety, the quality of our environment and maximizes production. The cooperation of all people in our organization is expected. The results will be worth the effort.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steven Bennett', written over a horizontal line.

Steven Bennett
President

RESPONSIBILITIES

DIVISION SAFETY OFFICER

The Division Safety Officer has primary authority and responsibility to ensure company implementation of the management system and to ensure the health and safety of company personnel, subcontractors and customers. This is accomplished by communicating the company's emphasis on health and safety, analyzing work procedures for hazard identification and correction, ensuring regular workplace inspections, providing health and safety training, and encouraging prompt employee reporting of health and safety concerns without fear of reprisal.

The Division Safety Officer has responsibility for:

- Ensuring that the Safety Committee, if utilized, is aware of all accidents which have occurred, and all hazards which have been observed since the last meeting
- Working with employees and subcontractors to address safety concerns
- Assisting in the coordination of required health and safety training
- Serving as liaison for employees and others, on environmental, health and safety issues the company cannot immediately resolve
- Maintaining copies of safety meeting minutes and other safety-related records
- The Division Safety Officer will have ultimate responsibility for the safety performance of their division to ensure that it is implemented uniformly and equally throughout the company.

The Division Safety Officer may seek assistance from other members of the company as necessary to meet these responsibilities.

SUPERVISORS/FOREMAN

Supervisors play a key role in the implementation of the company's environmental, health and safety management system. Supervisors may include Management, Superintendents, Field Supervisors, or any other lead man on a project. They are responsible for:

- Communicating to their subordinates and subcontractors the company's emphasis on protecting health and safety
- Ensuring periodic, documented inspection of workspaces under their authority
- Promptly correcting identified hazards
- Modeling and enforcing safe and healthful work practices
- Providing, where appropriate, safety training and personal protective equipment

- Implementing measures to eliminate or control workplace hazards
- Stopping any employee's work that poses an imminent hazard to either the employee or any other individual
- Encouraging employees to report health and safety issues to the Division Safety Officer without fear of reprisal

INDIVIDUAL EMPLOYEES

It is the responsibility of individual employees to comply with all applicable health and safety regulations, company policies, and established work practices. This includes but is not limited to:

- Observing health and safety-related signs, posters, warning signals and directions
- Reviewing the area emergency plan and assembly area
- Learning about the potential hazards of assigned tasks and work areas
- Taking part in appropriate health and safety training
- Following all safe operating procedures and precautions
- Using proper personal protective equipment
- Warning coworkers about defective equipment and other hazards
- Reporting unsafe conditions immediately to a supervisor, and stopping work if an imminent hazard is presented
- Participating in workplace safety inspections

SUBCONTRACTORS

Each subcontractor is responsible for working in a safe manner to prevent injuries. Subcontractors must adhere to the safety policy of the Company and take responsibility for their own safety programs which shall include:

- Safe work practices
- Safe equipment
- Implementation of accident prevention methods, and
- Maintaining a safe job site

COMPLIANCE/DISCIPLINARY POLICY

All company personnel have the responsibility for complying with safe and healthful work practices, including applicable regulations, company policy, and safety procedures. Overall performance of maintenance in a safe and healthful work environment should be recognized by the supervisor and noted in performance evaluations. Employees will not be discriminated against for work-related injuries, and injuries will not be included in performance evaluations, unless the injuries were a result of an unsafe act on the part of the employee. Implementation of this policy will be by the president, safety department, project manager, project superintendent and/or combination thereof.

Standard progressive disciplinary measures in accordance with the applicable personnel policy or labor contract will result when employees fail to comply with applicable regulations, company policy, and/or company safety procedures. All personnel will be given instruction and an opportunity to correct unsafe behavior. Repeated failure to comply or willful and intentional non-compliance may result in disciplinary measures up to and including termination. Employees will be disciplined for unsafe practices in accordance with the company employee warning system.

Employee Warning System

Willful violations of work practices will result in disciplinary action in accordance with the following company policy:

1. **Verbal Warning** - As the first step in correcting unacceptable behavior, the supervisor shall review the pertinent facts with the employee. The supervisor will consider the severity of the problem and the employee's past performance. A verbal warning will be issued to the employee, which will be documented by the supervisor in the employee's personnel file.
2. **Written Warning** - If the unacceptable performance continues a written warning will be issued. The written warning will clearly state the policy that was violated and steps the employee must take to correct it. Probation will be part of the written warning. It may also include time off without pay. At the completion of the probation period, the supervisor will meet with the employee to determine if the employee has achieved the required level of performance.
3. **Termination** - The third step in solving unacceptable behavior is termination. The employee may be terminated if performance is not improved within a reasonable amount of time.

The Company reserves the right to bypass the company "Employee Warning System" and terminate employees "at will" for any reason management deems necessary.

General Requirements

1. The site supervisors and/or foreman will be responsible for enforcement of the disciplinary policy.
2. The following is considered a safety violation. Not following verbal or written safety procedures, guidelines, rules, horse play, failure to wear selected PPE, abuse of selected PPE, etc.
3. After disciplinary action is taken management will meet with employee(s) to discuss the infraction and inform the individual(s) of the rule or procedure that was violated and the corrective action to be taken.
4. Company officials must conduct periodic inspections of work areas to ensure compliance with safety rules and policies. Supervisors must have a commitment to the safety goals of the company and take active role in the process. These actions shall include physical inspections by company officials that indicate violations showing overall lack of commitment to company safety goals. Action by supervisors shall be under the same level of disciplinary actions.

Safety Incentive Program

Company Management enthusiastically supports the protection of employee safety and health. This support is demonstrated, in part, through programs to provide recognition and extra incentives for employees to work safely and efficiently. Management provides employees the opportunity to earn awards for their own safe, efficient work, and the safe efficient work of their team members. The make-up of the program is described below. Specific awards are described in management bulletins available from the Plant Manager.

The safety incentive awards are intended to help maintain constant safety and health awareness. They are not to be considered a substitute for any element of this EH&S Management system.

Safety Incentive Programs change from time to time, but a typical list of incentives are listed below:

- **Cash**
- **Company jacket**
- **Company shirt or hat**
- **Gift certificates**
- **Event tickets**
- **Other appropriate items**

SAFETY AWARD ELIGIBILITY

Regular hourly field and yard employees Temporary and salaried employees are excluded from eligibility.

The following requirements need to be fulfilled for an employee to be eligible for the company safety incentive award:

Eligibility will be determined by division, by quarter. Divisions will be ineligible if the following reports are not faxed to corporate office within 24 hours of the meeting or inspection:

1. Weekly tailgate meeting minutes, held by a corporate office approved division safety officer or division manager.
2. A copy of the manager's monthly safety inspection.
3. A copy of the managers monthly "Safety underwriting" meeting minutes.

***Please note that there will be no allowances given for late reports/inspections or reports/inspections that are not performed by a corporate approved safety officer or Division manager.**

Cash bonus award:

This award will be based upon the actual number of divisions that qualify for this program. Should up to Seven (7) divisions qualify for this program the amounts will be calculated based upon the number of employees eligible in that division at \$40.00 per person. Should Eight (8) divisions qualify for this program the award will be based upon \$45.00 per employee. Should all divisions qualify the award will be based upon \$55.00 per employee. The division manager will determine the actual cash award given to any individual employee. In no case will anyone employee receive more than \$100.00, in any quarter.

GENERAL REQUIREMENTS

1. Employees will have no OSHA recordable injury during a six (6) month period, as defined below:
 - Any injury that results in a lost workday
 - Any other injury that does not result in a lost workday, but does require medical treatment (other than first aid); involves loss of consciousness; results in restriction of work or motion; or results in the termination of employment.
2. Employee has not caused any vehicle damage, or accidents
3. Employee has not caused damage to company tools or equipment
4. Employee must comply with all company safety rules, including personal protective equipment – hard hat, steel toed boots, safety glasses, hearing protection, etc...
5. Employee needs to attend all required safety meetings and training sessions
6. Employee must turn in all company paperwork, on time
7. No unexcused absences for scheduled work. You must call in if you are sick, otherwise it will be considered unexcused and you will forfeit your bonus for the given period.
8. If you are late to work one (1) time you will lose 25% of your bonus, two (2) times 50%, three (3) times 100%, if you are still employed.
9. Employee must be working for the Company on the last day of the bonus period.

EMPLOYEE WARNING RECORD

GENERAL INFORMATION			
Employee's Name			
Date of Warning			
Check One:			
<input type="checkbox"/> Attendance	<input type="checkbox"/> Insubordination	<input type="checkbox"/> Work Quality	
<input type="checkbox"/> Carelessness	<input type="checkbox"/> Lateness/Early Quit	<input type="checkbox"/> Unauthorized Absence	
<input type="checkbox"/> Safety Violation	<input type="checkbox"/> Willful Damage to Equipment	<input type="checkbox"/> Refusal to Work Overtime	
If other than above explain:			
<input type="checkbox"/> Verbal Warning	<input type="checkbox"/> Written Warning	<input type="checkbox"/> Termination	
EMPLOYER STATEMENT			
DISCIPLINARY ACTION TAKEN		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Explain:			
Supervisor Signature		Date	
Signature of Witness		Date	
EMPLOYEE STATEMENT			
	I have read this "WARNING" and agree with the statements		
	I disagree with the employer's description of the violation.		
The reasons are:			
Employee Signature		Date	

COMMUNICATIONS

The elements of the Company Environmental Health and Safety (EHS) system shall be communicated to all employees in a readily understandable manner and shall include at a minimum, regularly scheduled monthly safety meetings, daily safety meetings for non routine projects, and anonymous communications.

A. Monthly Managers Safety Meetings

Monthly managers safety meetings are normally held at the shop. At times, the regularly scheduled monthly safety meetings may be postponed and/or held at other locations due to work schedules. If a scheduled safety meeting is postponed the company may require additional meetings to ensure a minimum of twelve are held throughout the year. These meetings will be organized and instructed by the facility supervisor and / or Safety Representative. At times the monthly safety meetings may be instructed by invited guest speakers, such as industry consultants or insurance representatives.

Planned monthly safety meetings may also include training sessions according to the company's required training schedule, or other related topics deemed necessary by the Safety Representative.

B. Weekly Safety Meetings

Weekly safety meetings shall be required for any non-routine, hazardous, or large scale projects (i.e., lockout tagout, excavations greater than five feet deep.....). It shall be standard practice to include both subcontractor and company personnel into safety meetings relating to an effected project.

Documentation of required safety meetings shall be performed on the company "Safety Meeting/Training Record" (Form 2031) a copy of which shall be sent to the main office upon completion within 24 hour.

C. Anonymous Communication

A system for communicating safety concerns without fear of reprisal has been established by the company. The purpose of which is to allow an employee a way to voice concerns about safety. Safety suggestions shall be evaluated daily and corrections shall be made in a timely manner.

In addition to these communication tools the Company shall use other bulletin board postings, inter-company memos and safety meeting minutes to inform employees of company safety performance.

SAFETY MEETING/TRAINING RECORD

Date: _____

Type of Meeting: ☐ Daily/Tailgate ☐ Monthly ☐ Other: _____

Topic of Meeting/Training Session: _____

Location: _____ Prepared by: _____

Other Issues/Suggestions Raised: _____

Follow-up
Required: _____

Name	Company	Name	Company
1.		16.	
2.		17.	
3.		18.	
4.		19.	
5.		20.	
6.		21.	
7.		22.	
8.		23.	
9.		24.	
10.		25.	
11.		26.	
12.		27.	
13.		28.	
14.		29.	
15.		30.	

*Completed copies of this form must be routed to the Safety Representative
and kept in the safety files for at least one year.*

IDENTIFICATION AND CORRECTION OF WORKPLACE HAZARDS

Regular, periodic workplace safety inspections must be conducted by the company. The inspections should be noted on a "Action Item Matrix" *report* (Form 2041) or other documentation, and the company must maintain copies of this documentation for at least one year. These regular inspections will be supplemented with additional inspections whenever new substances, processes, procedures, or equipment introduced into the workplace represent a new occupational safety and health hazard or whenever supervisors are made aware of a new or previously unrecognized hazard.

Generally, supervisors are responsible for identification and correction of hazards that their employees and/or contractors are exposed and should ensure that the work areas they exercise control over are inspected regularly. Supervisors should check for safe work practices with each visit to the workplace and should provide immediate verbal feedback where hazards are observed.

A hazard Assessment report may also be complete and submitted by an employee anonymously, or as a referral to the Safety Representative as a result of a condition discovered during an inspection, or which the responsible supervisor could not determine an immediate remedy.

General Requirements

1. In addition to the hazard assessment methods mentioned above the Company uses several other processes to identify potential hazards such as JSA's, JHA's, and facility wide or area specific analysis/inspections.
2. Employees and/or sub-contractors must be actively involved in the hazard identification process. Identified hazards must be reviewed with all employees concerned.
3. The hazard identification process is used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable
4. Hazards are classified/prioritized and addressed based on the risk associated with the task. Refer to the Action Item Matrix (attached) which outlines severity and probability.
5. Identified hazards are addressed and mitigated via the Action Item Matrix (attached). This form documents and assigns responsibilities to appropriate personnel until action items are completed.
6. Employees will be trained in the hazard identification process including the use and care of proper PPE.

**SAFETY INSPECTION
YARD/SHOP AREA**

A. GENERAL

1. Inside/store/office/warehouse:

- | | | |
|--|-----|----|
| a. Are the floors clean and clear? | Yes | No |
| b. Are there any tripping hazards on the floors? | Yes | No |
| c. Are OSHA & WC postings clearly visible to employees? | Yes | No |
| d. Is there any material, pallets or debris in the aisles? | Yes | No |

2. Outside/Yard:

- | | | |
|---|-----|----|
| a. Are grounds free of trash and debris? | Yes | No |
| b. Are lines clearly marked (parking, handicapped, etc.)? | Yes | No |
| c. Are materials safely stored/stacked and shelves orderly? | Yes | No |

B. FIRE SAFETY

1. Sprinklers:

- | | | |
|--|-----|----|
| a. Do sprinklers have at least 18" of clearance? | Yes | No |
|--|-----|----|

2. Fire Extinguishers:

- | | | |
|--|-----|----|
| a. Are there any extinguishers that haven't been inspected and installed for the month? | Yes | No |
| b. Have extinguishers had their annual servicing – gauge charged/pin in place? | Yes | No |
| c. Are there elevated signs showing each location and the ground marked with red safety paint? | Yes | No |

C. ELECTRICAL:

1. Electrical Panels:

- | | | |
|--|-----|----|
| a. Is there a 36" clearance zone marked and clear circuits marked? | Yes | No |
| b. Is the ground marked highlighting the clearance? | | |
| c. Are breakers labeled and panels in good condition? | Yes | No |

2. Emergency Exits/Lights:

- | | | |
|---|-----|----|
| a. Are emergency exit lights in good condition? | Yes | No |
| b. Are there any exits that aren't fully illuminated? | Yes | No |

3. Extension Cords/Outlets:

- | | | |
|--|-----|----|
| a. Are extension cords being used only on a temporary basis? | Yes | No |
| b. Are there any outlets that aren't marked for voltage/phase? | Yes | No |

D. FLAMMABLES/HAZARDOUS MATERIALS:

- | | | |
|--|-----|----|
| 1. Are flammables properly stored in containers marked and covered at all times? | Yes | No |
| 2. Are there any containers that aren't closed and covered at all times? | Yes | No |
| 3. Are Material Safety Data Sheets current and accessible? | Yes | No |

E. PERSONAL PROTECTIVE EQUIPMENT:

1. Eye Protection:

- | | | |
|--|-----|----|
| a. Are employees wearing safety glasses/goggles? | Yes | No |
| b. Do prescription safety glasses have shields? | Yes | No |

2. Welding:

- | | | |
|---|-----|----|
| a. Are compressed gas bottles secured? | Yes | No |
| b. Are welders wearing proper PPE flame resistant clothing, face shields and approved leather welding gloves? | Yes | No |
| c. Is area clear of combustible materials and housekeeping maintained? | Yes | No |
| d. Are leads free of cracks? | Yes | No |
| e. Are strikers being used instead of BIC lighters? | Yes | No |
| f. Are respirators fit, tested, stored and cleaned properly? | Yes | No |

3. <u>Other:</u>			
	a. Are dust masks supplied when needed?	Yes	No
	b. Are ear plugs used?	Yes	No
F.	<u>MACHINERY:</u>		
	1. <u>Forklifts:</u>		
	a. Are forklift safe operating rules posted?	Yes	No
	b. Are drivers logging inspections daily?	Yes	No
	c. Do all forklifts have seatbelts?	Yes	No
	d. Are there any forklifts whose horn and back up signals don't work?	Yes	No
	e. Are connectors and cables in good repair?	Yes	No
G.	<u>TOOLS:</u>		
	1. Are there any shafts, handles or guards on tools that are in need of repair?	Yes	No
	2. Are tools stored, cleaned and protected from damage?	Yes	No
	3. Are damaged or malfunctioning tools tagged out?	Yes	No
	4. Are emergency stops marked/unblocked and tested?	Yes	No
H.	<u>VEHICLES:</u>		
	1. <u>Vehicles Inspection:</u>		
	a. Are tires checked for tread, bulges and correct air pressure?	Yes	No
	b. Are all fluids being checked?	Yes	No
	c. Are there any vehicles with mirrors or windows that have cracks?	Yes	No
	d. Are all lights in working order?	Yes	No
	e. Is the brake pressure/response being checked?	Yes	No
	f. Are all seatbelts in proper working order?	Yes	No
	g. Are turn signals and horn operating?	Yes	No
	2. Are vehicle maintenance records up to date for all rolling stock?	Yes	No
	3. Are vehicles being loaded/unloaded in a safe manner?	Yes	No
I.	<u>FIRST AID:</u>		
	1. Are first aid kits posted, accessible and properly filled?	Yes	No
	2. Are items removed and replaced when expired?	Yes	No
	3. Is emergency eye wash/safety shower operable upon monthly inspection and immediately accessible and routinely replaced?	Yes	No

IS WATER READILY AVAILABLE TO ALL EMPLOYEES?	Yes	No
--	-----	----

COMMENTS: (for every "No" answer, explain corrective action needed):

Signature

Date

**SAFETY INSPECTION
JOBSITE/FIELD**

A. GENERAL

- | | | |
|---|-----|----|
| 1. Are the public and other trades protected from any dangers posed by our work? | Yes | No |
| 2. Is the work area inspected and free from hazards? | Yes | No |
| 3. Are MSDS available and reviewed? | Yes | No |
| 4. Are flammable liquids stored in approved safety cans and storage containers labeled properly? | Yes | No |
| 5. Are lock out-tag out procedures reviewed and measures taken for any defective or damaged tools? | Yes | No |
| 6. Is a first aid kit onsite? | Yes | No |
| 7. Are all hoses, cords, cables, nylon strapping, metal binding, shovels, rakes, etc. placed neatly outside of common employee travelways which supplies safe access? | Yes | No |
| 8. Is Foreman aware of where hospital is and has phone numbers for all emergency contacts? | Yes | No |
| 9. Is a fire extinguisher readily available? | Yes | No |
| 10. Are stretching exercises done prior to working? | Yes | No |

B. MATERIAL HANDLING:

- | | | |
|---|-----|----|
| 1. Are employees using proper lifting techniques when lifting objects manually? | Yes | No |
| 1. Are machines being used to lift heavy objects? | Yes | No |
| 2. Are all chains and straps being used according to their capacity rating? | Yes | No |
| 3. Are there any hooks being used for lifting that do not have a safety latch in place? | Yes | No |

C. EQUIPMENT/MACHINE GUARDING:

- | | | |
|--|-----|----|
| 1. Are all rotating or moving equipment parts properly guarded? | Yes | No |
| 2. Are there any moving parts of equipment or machinery needing guards or that employees report needing guards? | Yes | No |
| 3. Are employees properly using point of operation guards and following required operating procedures? | Yes | No |
| 4. Are employees in work areas round machinery avoiding long hair, jewelry and loose fitting clothing which might get caught? | Yes | No |
| 5. Are proper lockout/tagout measures being taken for any defective or damaged tools? | Yes | No |
| 6. Does all electrical equipment including power cords appear to be in good working repair? (no splits, frays or missing ground) | Yes | No |
| 7. Have employees been trained in using equipment properly to avoid injury? | Yes | No |

D. PERSONAL PROTECTIVE EQUIPMENT:

- | | | |
|--|-----|----|
| 1. <u>Eye Protection:</u> | | |
| a. Are employees wearing safety glasses/goggles? | Yes | No |
| b. Do prescription safety glasses have shields? | Yes | No |
| 2. <u>Other:</u> | | |
| a. Are dust masks supplied when needed? | Yes | No |
| b. Are ear plugs used when needed? | Yes | No |

G. VEHICLES:

1. Vehicles Inspection:

a. Are tires checked for tread, bulges and correct air pressure?	Yes	No
b. Are all fluids being checked?	Yes	No
c. Are there any vehicles with mirrors or windows that have cracks?	Yes	No
d. Are all lights in working order?	Yes	No
e. Is the brake pressure/response being checked?	Yes	No
f. Are all seatbelts in proper working order?	Yes	No
g. Are turn signals and horn operating?	Yes	No
h. Are vehicle maintenance records up to date for all rolling stock?	Yes	No
i. Are vehicles being loaded/unloaded in a safe manner?	Yes	No
j. Are warning cones available	Yes	No
k. Are accident/injury forms in the glove compartment?	Yes	No
l. Is a Safety Manual in the truck?	Yes	No

IS WATER READILY AVAILABLE TO ALL EMPLOYEES? Yes No

COMMENTS: (for every "No" answer, explain corrective action needed):

Signature _____

Date _____

ACCIDENT REPORTING AND INVESTIGATING

I. PURPOSE

All accidents, injuries or potential accidents involving Company employees, subcontractors or properties shall be reported and investigated, and measures shall be taken to prevent reoccurrence of the incident. The following outlines the basic procedure for personnel to follow after an incident. This procedure defines specific responsibilities, incident reporting, and investigation criteria. Blank reports and instructions for reporting an incident online are included within the appendices.

II. RESPONSIBILITIES

FIRST RESPONDER MUST:

1. Notify The Job Site Supervisor Of Any Accident, Injury, Unsafe Condition Or Practice
2. Control The Scene, i.e. Ensure Proper Care For Injured Personnel, Evacuate The Area, And Tag Unsafe Equipment.

SUPERVISOR MUST:

1. Ensure Local Emergency Services Are Provided, If Required,
2. Immediately Notify The Safety Representative
3. Issue Report, Investigate And Implement Corrective Measures
4. Route Reports To The Main Office Within 24 Hours.

SAFETY OFFICER MUST:

1. Ensure a Post Accident Drug Test Is completed.
2. Review Reports For Accuracy,
3. Ensure Reports Are Routed To Specified Company Departments,
4. Determine Whether Further Investigation Is Warranted,
5. Ensure Appropriate Government Agencies Are Notified.
6. Notify appropriate clients; as required.

III. GENERAL REQUIREMENTS

1. While all incidents should be investigated, the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method. Minor incident shall be investigated and root causes addressed. Serious incidents shall utilize Tap Root or an equivalent process.
2. Serious incidents must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the client as soon as possible, or in a timely manner (within 24 hours of incident).
3. Site Supervisors, with the assistance of the Safety Representative have the responsibility for reporting and investigation of an incident.
4. Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques. Training requirements relative to incident investigation and reporting (Awareness, First Responder, Investigation, and training frequency) should be identified in the program.
5. Proper equipment must be available to assist in conducting an investigation. Equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, marking devices such as flags, equipment manuals, etc.
6. Supervisors must identify evidence immediately following the incident. This might include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions.
7. Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.
8. Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed
9. All incidents that are investigated will result in corrective actions taken to prevent reoccurrence.
10. Written incident reports will be prepared and include an incident report form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, investigation member names, narrative of the event, findings and

recommendations. Photographs, witness statements, drawings, etc. should be included

11. Lessons learned shall be reviewed and communicated. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

IV. INCIDENT REPORTING

Employees who are injured at work must report the injury to their supervisor **immediately**, regardless of severity. Subcontractors who are injured or involved in an accident must report the incident to Company personnel. In either case, if immediate medical treatment beyond first aid is needed, call 911, or refer to site-specific emergency phone list. The injured party must be taken to the appropriate hospital or medical center. If non-emergency medical treatment for work-related injuries, or illnesses, is needed you must still inform your supervisor as to the extent of the injury.

If the injured employee received medical treatment, the supervisor must obtain a medical release form before allowing the employee to return to work. The health care provider may stipulate work tasks that must be avoided or work conditions that must be altered before the employee resumes his or her full duties.

GUIDELINES FOR REPORTING AN INCIDENT:

- Gather all relevant information before beginning work on the report. It is important that every question on the report be answered thoroughly.
- Interview witnesses. Obtain the address and phone number of affected parties.
- Obtain a driver license number and insurance policy information from the other driver if the report is for an auto accident.
- Give specific and factual details of what took place. For example, stating "Injury to hand" is not as specific as "abrasions to right index finger."
- A copy of any Accident Report should always be placed in the safety file.

If an incident involves a subcontractor, request an internal report from the subcontractor and attach a copy of their accident report to the printed report. Documentation of an incident shall be performed on one of the following reports:

FORM	DESCRIPTION	USE
2051	Personal Injury Report	To report and investigate a Company employee work related illness or injury.
2052	Vehicle Accident Report	To report a Company vehicle accident
2053	Physical Damage Loss Report	To report and investigate any Company property damage or Loss.
2054	General Liability Report	To report and investigate any Subcontractor employee injury or Loss.

2055	Investigation Report	To Investigate all work related accidents and near misses. This report may also be used to investigate an incident further than the initial report, or investigate a vehicle accident.
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Following the report of every incident a thorough investigation must be performed.

V. INCIDENT INVESTIGATION

Every incident including a near miss must be investigated to determine cause. Measures must then be taken to prevent reoccurrence. All of the company accident reports have a provision for identifying the root cause of an accident, and corrective action required to prevent any similar accident in the future. A separate Accident Investigation Report may be necessary for vehicle accidents and incidents deemed needing closer examination by the Safety Representative.

The site supervisor is responsible for ensuring an investigation is performed to determine and correct the cause(s) of the incident. Specific procedures that can be used to investigate workplace accidents and hazardous substance exposures include the following:

GUIDELINES FOR INVESTIGATING AN INCIDENT:

- Interviewing injured personnel and witnesses.
- Examining the injured employee's work site for contributing factors.
- Reviewing established procedures to ensure they are adequate and were followed.
- Reviewing training records of affected employees.
- Determining all contributing causes to the accident.
- Recording all findings and actions taken.
- Follow up on findings to ensure hazards are abated.

The supervisor's findings and corrective action required shall be documented and presented to the Safety Representative. If the supervisor is unable to determine the cause(s) and appropriate corrective action, other resources should be sought. Available resources include the President, Superintendents, Safety Representative, and/or other local management personnel.

The Safety Representative will review each accident or injury report to ensure that the investigation was thorough and that all corrective action was taken. A report with incomplete data, or inconclusive root cause and corrective action identified will be routed back to the supervisor for further follow-up.

ID

PERSONAL INJURY REPORT

Date of incident:

Time of incident:

Date reported:

Time reported:

Supervisor:

AREA INFORMATION

Job Site:

Region

District

Client

PERSON INJURED

First Name:

Last Name:

Phone:

Years in Industry:

Address:

City:

State:

Zip:

Job Title:

Social Security Number:

Hire Date:

Birth date:

Sex:

Marital Status:

MEDICAL INFORMATION

Sent to Doctor?

Name of Physician:

Physician's Phone:

Hospital Address:

WITNESS 1

Witness First Name:

Last Name:

Phone:

Address:

City:

State:

Zip:

WITNESS 2

Witness First Name:

Last Name:

Phone:

Address:

City:

State:

Zip:

REPORT SUMMARY

Description of Incident

Root Cause

Corrective Action

INJURY STATISTICS

Type of Work

Type of Injury

Body Part

Fatality

OSHA

LWD

RWD

Person Responsible for Corrective Action

Report Prepared By:

ID

VEHICLE ACCIDENT REPORT

Date of incident:

Time of incident:

Date reported:

Time reported:

Supervisor:

AREA INFORMATION

Jobsite

Region

District

INSURED (COMPANY) VEHICLE/DRIVER

First Name:

Last Name:

Phone:

Driver's License Number:

Address:

City:

State:

Zip:

Job Title:

Year of Vehicle:

Make:

Model:

License Plate Number:

Vehicle ID Number:

Describe damage to company vehicle including exact point of impact:

OTHER VEHICLE/DRIVER

First Name:

Last Name:

Phone:

Driver's License Number:

Address:

City:

State:

Zip:

Job Title:

Year of Vehicle:

Make:

Model:

License Plate Number:

Vehicle ID Number:

Name of Owner (if different from driver)

Owner's Phone

Vehicle Insured?

Insurance Company

Policy Number

Where can vehicle be seen?

When?

Describe damage to company vehicle including exact point of impact:

INJURED PERSON(S) (including all passengers, continue on back if necessary)

First Name:

Last Name:

Phone:

Age:

Address:

City:

State:

Zip:

Sex:

WITNESS 1 (continue on back if necessary)

Witness First Name:

Last Name:

Phone:

Address:

City:

State:

Zip:

REPORT SUMMARY

Description of Incident

Root Cause

Corrective Action

Police Report Taken?

Police Division:

Report Prepared By:

ID

PHYSICAL DAMAGE LOSS REPORT

Date of incident:

Time of incident:

Date reported:

Time reported:

Supervisor:

AREA INFORMATION

Job Site:

Region

District

Client

AUTHORITY CONTACTED

Police Called?

Which One?

Contact Person:

Phone:

LOSS INFORMATION

Kind of Loss (fire, theft, ect..)

Probable amount of loss

REPORT SUMMARY

Description of Incident

Root Cause

Corrective Action

Person Responsible for Corrective Action

Report Prepared By:

GENERAL LIABILITY REPORT

Date of incident: Time of incident: Date reported: Time reported: Supervisor:

AREA INFORMATION

Job Site: Region: District: Client:

PERSON INJURED

First Name: Last Name: Phone: Years in Industry:
 Address: City: State: Zip: Job Title:
 Social Security Number: Hire Date: Birth date: Sex: Marital Status:

INJURED PERSON'S EMPLOYER INFORMATION

Employer: Employer Contact: Phone:
 Address: City: State: Zip:

MEDICAL INFORMATION

Sent to Doctor? Name of Physician: Physician's Phone: Hospital Address:

WITNESS 1

Witness First Name: Last Name: Phone:
 Address: City: State: Zip:

WITNESS 2

Witness First Name: Last Name: Phone:
 Address: City: State: Zip:

REPORT SUMMARY

Description of Incident

Root Cause

Corrective Action

INJURY STATISTICS

Type of Work: Type of Injury: Body Part: Fatality: OSHA: LWD: RWD:

Person Responsible for Corrective Action

Report Prepared By:

ID

INCIDENT INVESTIGATION REPORT

Date of incident:

Time of incident:

Date reported:

Time reported:

Supervisor:

AREA INFORMATION

Job Site:

Region

District

Client

PERSON(S) INVOLVED

(1)First Name:

Last Name:

Phone:

Years in Industry:

Address:

City:

State:

Zip:

Job Title:

(2)First Name:

Last Name:

Phone:

Years in Industry:

Address:

City:

State:

Zip:

Job Title:

REPORT SUMMARY

Description of Incident

Root Cause

Corrective Action

INJURY STATISTICS

Type of Work

Type of Injury

Body Part

Fatality

OSHA

LWD

RWD

Person Responsible for Corrective Action

Report Prepared By:

TRAINING AND INSTRUCTION

I. SCOPE

Employee safety training is provided at no cost to the employee. Safety training may be presented by a knowledgeable Supervisor, other Company personnel, or by representatives from other relevant specialty companies. Regardless of the instructor, all safety training must be documented using the "Safety Meeting / Training Record" (Form 2031) or an equivalent record that includes all the information required on the Form. The company must retain this documentation for at least one year.

II. INITIAL TRAINING

When the safety management system is first implemented, all company personnel will be trained on the contents, including individual responsibilities under the program, and the availability of the written procedures. Training will also be provided on how to report unsafe acts and conditions, how to access the safety related resources, and where to obtain information on workplace safety and health issues.

Personnel hired after the initial training session will be oriented on this material as soon as possible by the Safety Representative or appropriate supervisor. These individual training sessions will be documented using the, "New Employee Checklist" (Form 4081), or equivalent. The company must also keep this document for at least one year.

III. TRAINING ON SPECIFIC HAZARDS

Supervisors require training on the hazards to which the employees under their immediate control may be exposed. This training aids a Supervisor in understanding and enforcing proper protective measures.

All Supervisors must ensure that the personnel they supervise receive appropriate training on the specific hazards of work they perform, and the proper precautions for protection against those hazards. Training is particularly important for new employees and whenever a new hazard is introduced into the workplace. Such hazards may include new equipment, hazardous materials, or procedures. Health and Safety training is also required when employees are given new job assignments on which they have not previously been trained and whenever a supervisor is made aware of a new or previously unrecognized hazard.

Specific topics which may be appropriate to company personnel include but are not limited to the company "Required Training Schedule (Form 2061).

REQUIRED TRAINING SCHEDULE

Course			Required				
Tracking Code	Reference Regulation	Description	Supervisor	Field	Dur	Freq	Man
QUALIFIED EMPLOYEE TRAINING							
QET01	CFR 1910.151, CCR 3400	Bloodborne Pathogens	ALL	ALL	N/R	1yr	Yes
QET02	CFR 1910.1030, CCR 5193	CPR/First Aid	ALL	ALL	N/R	2yr	Yes
QET03	CFR 1910.157, CCR 4848	Fire Equipment/Fire Watch	ALL	ALL	N/R	1yr	Yes
QET04	CFR 1910.1200, CCR 5194	Hazardous Communication	ALL	ALL	N/R	Initial	Yes
QET05	CFR 1910.147, CCR 3314	Lockout/Tagout/Blockout	ALL	ALL	N/R	Initial	Yes
QET06	CFR 1910.146, CCR5157	Confined Space Awareness	ALL	ALL	N/R	Initial	Yes
QET07	CFR 1910.132, CCR 3380	Personal Protective Equipment	ALL	ALL	N/R	Initial	Yes
JOB SPECIFIC TRAINING							
JST01	CFR 1910.146, CCR5157	Confined Space Awareness	W/R	W/R	N/R	Initial	Yes
JST02	CFR 1926.104, CCR 1670	Fall Protection Awareness	W/R	W/R	N/R	Initial	Yes
JST03	CFR 1910.38, CCR 3220	Emergency Response/Action Plan	ALL	ALL	ALL	Initial	Yes
JST04	CFR 1910.331, CCR 2982	Electrical Safety (low voltage)	ALL	ALL	N/T	Initial	Yes
REQUIRING THE USE OF RESPIRATOR							
RUS01	CFR 1910.134, CCR 5144	Respiratory Protection Plan	W/R	W/R	N/R	1yr	Yes
RUS02	CFR 1910.134, CCR 5144	Respirator Fit Test	W/R	W/R	N/R	1yr	Yes
RUS03	CFR 1910.134, CCR 5144	Respiratory Medical	W/R	W/A	N/R	Initial	Yes
HEAVY EQUIPMENT RELATED							
HER01	CFR 1910.178, CCR 3668	Forklift Operating and Rules	W/R	W/R	N/R	3 yr	Yes
HER02	CCR 1540-1541	Trenching and Excavating	W/R	W/R	N/R	W/R	Yes
CALIFORNIA SPECIFIC							
CAL01	CCR 3395	Heat Stress	W/R	W/R	N/R	1yr	Yes
CAL02	CCR 3203	IIPP (SB198)/Safe Practices	ALL	ALL	N/R	Initial	Yes
CAL03	AB 1825	Harassment	ALL	ALL	N/R	2yr	Yes
DOT SPECIFIC							
DOT01	49 CFR 199.19(c), & .241	Supervisor Drug/Alcohol	W/R	Supv.	N/R	Initial	Yes
OPTIONAL TRAINING							
OPT01	BEST PRACTICES	Asbestos Awareness	W/R	W/R	N/R	W/R	No
OPT02	BEST PRACTICES	Back Injury Protection	W/R	W/R	N/R	W/R	No
OPT03	BEST PRACTICES	Benzene Awareness	W/R	W/R	N/R	W/R	No
OPT04	BEST PRACTICES	Defensive Driving	W/R	W/R	N/R	W/R	No
OPT05	BEST PRACTICES	Endangered Species	W/R	W/R	N/R	W/R	No
OPT06	BEST PRACTICES	Ergonomics	W/R	W/R	N/R	W/R	No
OPT07	BEST PRACTICES	Explosives	W/R	W/R	N/R	W/R	No
OPT08	BEST PRACTICES	Hazardous Waste Management	W/R	W/R	N/R	W/R	No
OPT09	BEST PRACTICES	Housekeeping	W/R	W/R	N/R	W/R	No
OPT10	BEST PRACTICES	Office Safety	W/R	W/R	N/R	W/R	No
OPT11	BEST PRACTICES	Safe Work Permits	W/R	W/R	N/R	W/R	No
OPT12	BEST PRACTICES	Slips, Trips, Falls	W/R	W/R	N/R	W/R	No
OPT13	BEST PRACTICES	Stairs and Ladders	W/R	W/R	N/R	W/R	No

Abbreviation Key

Dur = Duration, Freq = Frequency, Man = Mandate by Agency, 8Ref. = Annual 8 Hr Refresher
 N/R = NoTime Requirement W/R = When Required for Position

MAINTENANCE OF RECORDS

Documents related to the Environmental, Health and Safety (EHS) system are maintained in the main office. Certain documents related to the program must be kept by the company for at least one year. These records include:

- Employee safety meeting / training records, including the names of all attendees and instructors, the training date, and material covered (Form 2031)
- Records of scheduled and periodic workplace inspections, including the persons conducting the inspection, any identified unsafe acts, or conditions, and corrective action taken (Form 2041)
- Incident/Investigations Reports
(Forms 2051, 2052, 2053, 2054, and 2055)
- Applicable Training Records

Other records relating to this EHS management system shall be kept on file for a time frame deemed adequate by the Safety Representative.

COMPRESSED GAS CYLINDERS

GENERAL REQUIREMENTS

1. Employees in charge of the oxygen or fuel-gas supply equipment including generators, and oxygen or fuel-gas distribution piping systems shall be instructed for this work before being left in charge.
2. Rules and instructions covering the operation and maintenance of oxygen or fuel-gas supply equipment including generators, and oxygen or fuel-gas distribution piping systems shall be readily available.
3. Specific procedures must be used when possible evolution's of hazardous fumes, gases or dust to the metals are involved. Any welding, cutting or burning of lead base metals, zinc, cadmium, mercury, beryllium or exotic metals or paints not listed here shall have proper ventilation or respiratory protection.
4. A fire prevention and suppression procedure shall be established whenever any welding and cutting operations are taking place.
5. Cylinders must be kept in the upright position during use and storage. Welding fuel-gas cylinders shall be placed with valve end up whenever they are in use. Liquefied gases shall be stored and shipped with the valve end up.
6. Cylinders shall be handled carefully. Rough handling, knocks, and falls are liable to damage the cylinder, valve or safety devices and result in leakage.
7. Before connecting a regulator to a cylinder valve, the valve shall be opened slightly and closed immediately. (This action is generally termed "cracking" and is intended to clear the valve of dust or dirt that might otherwise enter the regulator.) The valve shall be opened while standing to one side of the outlet; never in front of it. A fuel-gas cylinder valve shall never be opened up, cracked near other welding work or near sparks, flame, or other possible sources of ignition.
8. Cylinders containing oxygen or acetylene or other fuel or gas shall not be taken into confined spaces.
9. Cylinders having leaking fuse plugs or other leaking safety devices shall be plainly tagged, and the supplier shall be promptly notified of the condition and his instructions followed. A warning shall be placed near the cylinders prohibiting any approach to them with a lighted cigarette or other source of ignition.

A. Handling Cylinders

1. Do not move or store cylinders without properly installing the protective cap over the valve.
2. Cylinders are smooth, heavy and difficult to hand carry. When they must be moved without a cart, use a carrier or get help.
3. Cylinders moved by a crane or derrick should be secured in a basket or similar device and should not be dropped. Use of slings, ropes or electromagnets is prohibited.
4. Cylinders should not be allowed to strike each other.
5. Cylinders should not be used for rollers, supports, or any purpose other than to contain gas.

B. Using Cylinders

1. Threads on a regulator or fitting must correspond to those on the cylinder valve outlet. Do not force or modify connections.
2. Never use a cylinder of compressed gas without a pressure-reducing regulator to the cylinder valve, except where the total system is specifically designed to handle maximum cylinder pressure.
3. Use regulators and pressure gauges only with gases and pressure ratings for which they are designed and intended.
4. Close the cylinder valve before attempting to stop leaks between the cylinder and regulator.
5. Never permit sparks, molten metal, electric currents, excessive heat or flames to contact the cylinder or attachments.
6. Never use oil or grease as a lubricant on valves or attachments to oxygen cylinders.

C. Storing Cylinders

1. Cylinders should be properly secured with chain to prevent falling.
2. Oxygen cylinders should not be stored within 20 feet of combustible gas cylinders or near any other substance where a fire could result, unless protected by a wall at least five feet high having a fire resistance rating of at least 30 minutes.
3. Cylinders should be stored in a safe, dry, well-ventilated area that limits corrosion damage and deterioration. Hydro-test should be current.
4. Empty and full cylinders should be stored separately, and plainly identified.

ELECTRICAL AWARENESS

ELECTRICAL AWARENESS

1. Training requirements for employees in safety related work practices that pertain to their respective job assignments include: (Employees who face a risk of electric shock but who are not qualified persons shall be trained and familiar with electrically related safety practices. Employees trained in safety related work practices that pertain to their respective job assignments. 3. Electrical clearance distances for personnel working around live feeds.
2. Safe work practices shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.
3. Conductors and parts of electrical equipment that have been deenergized but not been locked or tagged out shall be treated as live parts.
4. While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
5. Employees shall not work on or near exposed energized parts. Applies to work performed on exposed live parts (involving either direct contact or by means of tools or materials) or near enough to them for employees to be exposed to any hazard they present.
6. Only qualified persons may work on electric circuit parts or equipment that have not been deenergized. Such persons shall be made familiar with the use of special precautionary techniques, PPE, insulating & shielding materials and insulated tools.
7. When working under overhead lines clearance distance must be provided or lines shall be deenergized and grounded.
8. Unqualified persons must maintain an approach distances of 10' for 50kV plus 4" for every additional 10kV.

9. Qualified employees must adhere to the approach distances in Table S5. Refer to table for higher line voltages. Unqualified personnel shall not approach live electrical.

TABLE S5

Voltage range (phase to phase) Minimum approach distance	
300V and less	Avoid Contact
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm).
Over 750V, not over 2kV	1 ft. 6 in. (46 cm).
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm).
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm).
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm).
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm).
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm).

10. Vehicular and mechanical equipment must maintain clearance distances of 10 ft. at all times.
11. Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
12. Protective shields, protective barriers or insulating materials as necessary shall be used when working in confined or enclosed work spaces where electrical hazards may exist.
13. Portable ladders shall have non-conductive side rails.
14. Conductive items of jewelry or clothing shall not be worn unless they are rendered non-conductive by covering, wrapping or other insulating means.

GENERAL REQUIREMENTS (State specific)

1. Only qualified persons shall work on electrical equipment or systems.
2. Work shall not be performed on exposed energized parts of equipment or systems until the following conditions are met:
 - Responsible supervision has determined that the work is to be performed while the equipment or systems are energized.
 - Involved personnel have received instructions on the work techniques and hazards involved in working on energized equipment.
 - Suitable personal protective equipment and safe guards are provided and used

3. Duties of the authorized person after the required work on an energized system or equipment include: (1) Removing from the work area any temporary personnel protective equipment and (2) reinstalling all permanent barriers or covers.
4. All electrical equipment and systems shall be treated as energized until tested or otherwise proven to be de-energized.
5. While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
6. Suitable temporary barriers, or barricades, shall be installed when access to opened enclosures containing exposed energized equipment is not under the control of an authorized person.
7. Conductive measuring tapes, ropes or similar devices shall not be used when working on or near exposed energized conductors or parts of equipment
conductive fish tapes shall not be used in raceways entering enclosures containing exposed energized parts unless such parts are isolated by suitable barriers.

USE OF PORTABLE ELECTRIC EQUIPMENT (Cords and Plugs)

1. All cord- and plug- connected electric equipment, flexible cord sets (extension cords), and portable electric equipment shall be handled in a manner that will not cause damage.
2. Company policy and the National Electric Code (NEC) requires the use of an approved ground fault circuit interrupter (GFCI) for used on all portable equipment tool cords.
3. Flexible electric cords connected to equipment may not be used for raising or lowering the equipment.
4. Flexible cords may not be fastened with staples or otherwise hung in such a fashion as could damage the outer jacket or insulation.
5. Portable cord and plug connected equipment and flexible cord sets (extension cords) shall be visually inspected for external defects (such as loose parts, deformed and missing pins, or damage to outer jacket or insulation) and for evidence of possible internal damage (such as pinched or crushed outer jacket) before use on any shift. However, cord- and plug- connected equipment and flexible cord sets (extension cords) which remain connected once they are put in place and are not exposed to damage need not be visually inspected until they are relocated.

6. If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service, and no employee may use it until necessary repair and tests have been made to render the equipment safe.
7. Whenever an attachment plug is to be connected to a receptacle (including any on a cord set), the relationship of the plug and receptacle contacts shall first be checked to ensure that they are of proper mating configurations.
8. A flexible cord used with grounding-type equipment shall contain an equipment grounding conductor.
9. Attachment plugs and receptacles may not be connected or altered in a manner that would prevent proper continuity of the equipment grounding conductor at the point where plugs are attached to receptacles. Additionally, those devices may not be altered to allow the grounding pole of a plug to be inserted into slots intended for connection to the current-carrying conductors.
10. Adapters that interrupt the continuity of the equipment grounding connection may not be used.
11. Portable electric equipment and flexible cords used in highly conductive work locations (such as those inundated with water or other conductive liquids), or in job locations where employees are likely to contact water or conductive liquids, shall be *approved* for those locations.

HEALTH AND PHYSICAL REQUIREMENTS

1. All personnel must be physically and mentally fit for duty. Fitness for duty is the ability to work safely.
2. Workers who are not fit for duty will not be allowed on the job site.
3. Personnel shall NEVER work under the influence of any form of intoxicant or drug.
4. Personnel may never perform work if they are under the influence of a medicine that could affect their ability to work safely.
5. Employees must never come to work if they are feeling tired, or sick.
6. Personnel taking prescription medicine must notify their supervisor and have a valid prescription or label for use of their medicine.
7. Supervisors shall watch for workers that are unfit for duty. They will take appropriate steps, such as, take a worker home, or arrange for other transportation when he or she seems unfit for duty.

HEAVY EQUIPMENT

1. When working near any piece of operated equipment such as a stinger truck, backhoe, crane, backhoe, dozer or pick-up truck, make sure the operator of the equipment is aware that you are in the vicinity of the work area. You should always try to make eye contact with an operator so as to be sure that they see you.
2. When working with or near heavy equipment, frequently check around yourself and make sure you are not between the equipment or load and a stationary object. If you see others in a potential "pinch point" warn them immediately.
3. Standing under any suspended load is strictly prohibited.
4. Heavy equipment always has the right-of-way.

HOUSEKEEPING

1. Scrap lumber and debris must be kept reasonably clear from work surfaces, passageways and stairs.
2. Every job site, shop or office shall be kept in an orderly manner.
3. Storage facilities, vehicles and equipment shall be kept in a safe, clean condition.
4. Combustible scrap and debris shall be removed at regular intervals during the course of construction.
5. Proper containers shall be provided for the collection and separation of waste, trash and oily rags.
6. Piping shall be properly stored on racks, or chocked to prevent movement.
7. Materials for the job shall be kept in an orderly fashion not to interfere with the work at hand.

LADDERS

1. Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use.
2. Ladder safe work practices must be followed. This includes not standing on the top two rungs of a step ladder, facing the ladder when ascending or descending, and instructing employees to not carry objects that could cause injury in the event of a fall.
3. Ladders shall not be loaded beyond the maximum intended load for which they were built, nor beyond the manufacturer's rated capacity.
4. Ladders shall be used only for the purpose for which they were designed. Never use ladder in a horizontal position or as scaffolding, do not place ladders on top of boxes, barrels, crates, etc.
5. Ladders shall be inspected by a competent person for visible defects prior to each use, on a periodic basis and after any occurrence that could affect their safe use.
6. Portable and fixed ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components, shall either be immediately marked in a manner that readily identifies them as defective, or be tagged with "Do Not Use" or similar language, and shall be withdrawn from service until repaired.
7. The ladder side rails shall extend at least 3 feet (.9m) above the upper landing surface. When ladders are not able to be extended then the ladder shall be secured at its top to a rigid support that will not deflect.
8. Ladders shall be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter (1/4) of the working length of the ladder. (The distance along the ladder between the foot and the top support.)
9. Ladders shall be placed on stable, level surface. Employees may not stand on top two rungs, or top of step ladders. Employees may not carry anything in hands that could cause injury in case of fall. Employees must face the ladder when ascending or descending.
10. Always face the ladder when climbing or descending.
11. Never stand on the top three rungs of a ladder.

12. No ladder shall be erected within 10 feet of a power line.
13. All ladders must be secured from movement.
14. Extension ladders must have both top and bottom tied off before work is performed.
15. Metal ladders must never be used where there is an exposure to electrical hazards. They shall have non-conductive side rails.
16. All ladders shall be erected so at least three feet of the rails extend over the landing.
17. Ladders shall be of the proper size and design for which it is used.
18. Any ladder found in an unsafe condition shall be removed from service.
19. It is prohibited to place a ladder in front of doors opening toward the ladder except when the door is blocked open, locked or guarded.
20. It is prohibited to place ladders on boxes, barrels, or other unstable bases to obtain additional height.
21. Employees are prohibited from using ladders that are broken, missing steps, rungs, or cleats, broken side rails or other faulty equipment.
22. It is required that when portable rung or cleat type ladders are used the base is so placed that slipping will not occur, or it is lashed or otherwise held in place.
23. Employees are prohibited from using ladders as guys, braces, skids, gin poles, or for other than their intended purposes.

LIFTING

1. No employee shall be required to lift more than they can easily manage.
2. Use a forklift or other lifting device on heavy lifts.
3. When material must be carried, use proper lifting and carrying techniques:
 - a. Keep feet apart, one along side and one behind the object to be lifted. Feet should be comfortably spread to give stability.
 - b. Keep back arched. An arched back means the spine, back muscles and body are in correct alignment.
 - c. Grip the object with your whole hand, both the palm and fingers.
 - d. Keep the elbows and arms tucked to side of body. This reduces fatigue in chest and arm muscles and is the position where the most power can be generated for lifting. This position also helps control the body's center of gravity.
 - e. Keep head high and chin tucked in.
 - f. Keep your body weight (center of gravity) directly over your feet. Start the lift with the thrust of the foot behind the object being lifted. Bring the load close to your body for the most efficient carrying position. Lift smoothly. Do not jerk up, back or rotate quickly.
 - g. To raise an object above shoulder height, first lift the waist height.
 - h. To change direction, turn the entire body, including the feet. DO NOT twist your body at the waist while lifting.
 - i. Do not carry an object that is too big to see over or around.
 - j. For objects that are too large or bulky to be carried by one person, use proper moving equipment or GET HELP.

General Requirements

1. Before manual lifting is performed, a hazard assessment must be completed. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if two-man lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried.
2. Training on proper lifting techniques shall be provided. The intent is to avoid musculoskeletal injuries. Training must include general principles of ergonomics, recognition of hazards and injuries, procedures for reporting hazardous conditions, and methods and procedures for early reporting of injuries. Additionally, job specific training shall be given on safe lifting and work practices, hazards, and controls.
3. Any injury caused by improper lifting shall be investigated. Investigation findings shall be incorporated into work procedures to avoid future injuries. Musculoskeletal injuries caused by improper lifting must be investigated and documented.
4. Where use of lifting equipment is impractical or not possible, two man lifts must be used.
5. Site supervision must periodically evaluate work areas and employees' work techniques to assess the potential for and prevention of injuries. New operations shall be evaluated to engineer out hazards before work processes are implemented.
6. Manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists must be provided for employees. Other engineering controls such as conveyors, lift tables, and work station design should be considered.
7. Use of provided manual lifting equipment by employees must be enforced by site supervisors.

LOADING AND HAULING EQUIPMENT

1. All loads hauled on vehicles **MUST** be securely tied down with approved rope, straps or chains.
2. Under no circumstances shall a load be hauled with out proper tie downs.
3. When loading a flat bed place load as far forward as possible preferably against a stationary object such as a head ache rack. When this is not feasible place the load centered over the rear axle.
4. Before hauling a load make a quick walk around the vehicle to assure all tool boxes are closed and that the load is secure.
5. When hauling a load check to be sure the load stays secure while under way. It's a good idea to pull over and re-tighten your load periodically.
6. It's the driver's responsibility to assure that the vehicle is rated for the weight that is carried on it.

MACHINE GUARDING

Machine guards are your first line of defense against injuries caused by machine operation. Each machine must have adequate safeguards to protect operators from the machine's hazards.

Hazards Involved with Machine Operation

Each machine has its own unique mechanical and non-mechanical hazards. Machines can cause severe injuries: *amputations, fractures, lacerations, or crushing injuries*. Machines can also cause minor injuries: bruises, abrasions, sprains or strains, burns, or cuts.

Examples of mechanical hazards that can hit, grab, crush, or trap an operator are:

- Hazardous motions-rotating machine parts, reciprocating motions (sliding parts or up/down motions), and transverse motions (materials moving in a continuous line-a power transmission belt).
- Points of operation-the areas where the machine cuts, shapes, bores, or forms the stock being fed through it.
- Pinch points and shear points-areas where a part of the body can be caught between a moving part and a stationary object.

Examples of non-mechanical hazards that can injure operators, or other people in the area, include chips, splashes, sparks, or sprays that are created as the machine is running.

Methods of Safeguarding

There are five general types of safeguards that can be used to protect workers:

- Guards-These are physical barriers that prevent contact. They can be fixed, interlocked, adjustable, or self-adjusting.
- Devices-These limit or prevent access to the hazardous area. These devices can be: presence-sensing devices, pullback or restraint straps, safety trip controls, two-hand controls, or gates.
- Automated feeding and ejection mechanisms-These eliminate the operator's exposure to the point of operation while handling stock.
- Machine location, or distance-This method removes the hazard from the operator's work area.
- Miscellaneous aids-These methods can be used to protect both operators and people in the area. Examples include shields to contain chips, sparks, or sprays; holding tools that an operator uses to handle materials going into the point of operation; and awareness barriers to warn people about hazards in the area.

Operating Instructions

Following the machine's operating instructions ensures that the machine is being run correctly and safely. Understand how the machine works, and reduce your risk of injury, by following the instructions. Each machine should have its own set of operating instructions that outline:

- What to look for during the pre-start-up inspection.
- The location of the machine's control panel(s), and how each control functions to operate the machine.
- How to adjust the machine (including how to adjust any adjustable guards), and how to feed stock into the machine during the job set-up.
- How to start, run, and shut-down the machine under normal operations.
- How to perform emergency shut-down procedures.

The pre-start-up inspection procedures include an inspection of the machine's safeguards. Check that fixed guards are secure, in proper alignment, and intact. Check adjustable guards for proper operation and damage. Test trip cables, electrical sensing devices, safety tripods, interlocks, etc. to make sure that they are functioning properly before you start the job.

Missing or Damaged Guards

Report a machine that is missing a guard. It is unsafe to operate the machine until the guard is replaced. If your inspection shows a damaged guard, also report it. The damaged guard may not be providing adequate protection. If a guard becomes damaged while you are operating the machine, stop the machine and have the guard inspected. It may need to be replaced or repaired before you can continue to work safely.

Maintenance Allowed During Normal Operation

Routine adjustments or lubrication that can be done without removing or bypassing a guard may be done without taking any extra precautions.

Ask your supervisor about extra precautions that need to be taken if routine or repeated adjustments, tool changes, or other minor work requires that a guard be removed or bypassed.

Know When to Use Lockout/Tagout

If unexpected machine start-up could cause injury, use a lockout/tagout program. Any major repair or tool change that would expose workers to the machine's hazards requires lockout/tagout. For example, if a machine gets jammed, and a guard has to be removed or bypassed in order to remove the jam, the machine needs to be locked out to protect the person who is reaching into the point of operation to clear it.

OFFICE SAFETY RULES

Many people have the misconception that office work is not hazardous and consider office injuries inconsequential. The listed precautions, along with each individual's safe behavior, can serve as a basis for an effective office safety program and the prevention of unsafe acts and conditions.

A. Examples of Office Incidents

- Falls from chairs
- Slips, trips and falls on the same level or from elevations
- Lifting or moving heavy or bulky objects
- Repetitive or awkward movements (ergonomics)
- Falling objects or encounters with fixed or moving objects
- Pinches, mashes or abrasions
- Eye strain or muscle aches

B. Precautions

1. Safety meetings should be held at regular intervals by office supervisors.
2. Office personnel going to field locations should be aware of the training and personal protective equipment that will be required for their visit. Ensure you bring the equipment with you, or make arrangements for the field to furnish the equipment before you arrive.
3. Be familiar with the location of the fire alarm pull station nearest to your work station.
4. Become familiar with emergency procedures and know the appropriate evacuation route for your work station. Evacuation routes for each floor and building area are clearly marked. Personnel are responsible for visitor orientation and evacuation.
5. Properly position a chair before sitting down, and once seated, keep at least one foot and all chair legs on the floor at all times.
6. Keep all passageways, entryways, aisles, storerooms, service rooms and work areas clean, orderly, sanitary and well maintained, with no obstructions.

7. Aisles and hallways shall provide unobstructed movement and immediate access to emergency exits and to fire protection equipment.
8. Safely stack materials and boxes to avoid creating a hazard.
9. File drawers and desk drawers should not be left open. Do not overload top drawers so that files tip over. Secure file cabinets and bookcases as appropriate. Keep heavy files in lower drawers.
10. Do not open a file drawer if someone is working underneath.
11. Each work station should be arranged to meet specific individual needs. Select the proper chair, adjust the chair height, organize the desk, position the video display terminal (VDT) screen, and position the keyboard to suit the individual.
12. When working at a VDT or PC for long hours, periodically change position, stand up, or stretch to relieve muscle tension and eye strain.
13. Lighting should be installed or positioned to minimize direct or reflected glare or harsh shadows and to counteract potential stress and eye fatigue in VDT users.
14. Use of extension cords should be minimized and arranged to avoid tripping hazards and electrical overload.
15. Do not pull an electrical cord to shut off power to any equipment.
16. Disconnect (unplug) the power source before trying to remove jammed materials from a machine.
17. Installation or repair of any electrical equipment shall be done by qualified workers using only approved materials.
18. Office machines with moving parts, high temperature hazards, and electrical shock potential shall not be operated without proper safeguards in place.
19. Keep flammable or combustible material and residue in a building or operating area to a minimum. Stored in metal safety cans or storage cabinets which meet Underwriter's Laboratories, Inc. or Factory Mutual approval.
20. Keep food, drink and excessive combustible materials away from electrical equipment, computers, work stations or PC's. Damage to circuitry or destructive fires may result.
21. Secure paper cutter blades in the down position when not in use.

- 22. Store Xacto knives, thumb tacks and other sharp objects in proper containers or with the blades and points covered or shielded. Secure sharp edges before disposing of these items.
- 23. Do not scoot across the floor while sitting in a chair and do not lean sideways from a chair to pick up an object.
- 24. Use only stools or step ladders to reach materials stored above eye level. Rolling stools and ladders should be equipped with brakes that operate automatically when weight is applied. Chairs are unacceptable to use as climbing devices.
- 25. When moving equipment, furniture, or boxes, use proper carts, dollies or trucks.

PERSONAL PROTECTIVE EQUIPMENT

Personal Protective Equipment (PPE) is among the most obvious forms of controlling incidents in the work place. Each person employed at the Company shall be made available the proper PPE for the task at hand. It is the employee's responsibility to then follow proper maintenance, and replacement procedures to ensure paramount protection during their course of employment. There are no excuses for not donning the proper PPE. When in doubt an employee should consult a Supervisor, Safety Representative, or simply look up requirements on a safety data sheet.

PPE shall be provided, used and maintained in a sanitary and reliable condition. PPE hazard assessments shall be via appropriate Job Safety Analysis (JSA) and/or applicable safe work procedures. It is essential that each employee is properly fitted to the PPE selected. Defective or damaged PPE shall NOT be used. Employee owned equipment shall be maintained in accordance with the provisions outlined below:

EYE and FACE PROTECTION

1. ANSI Z 87.1 approved, safety glasses with side shields are required on all job sites by all personnel.
2. Full face shields in combination with ANSI approved safety glasses are required when engaging in any activity that includes hazards to the unprotected face and eyes from chipped or flying particles. Some examples are chipping, scraping, buffing, grinding, etc.
3. Contact lenses should not be worn on job sites where there is a risk of liquid spray from hydrocarbons, chemicals, acid, caustics, or any liquid substances that can burn, or be corrosive to the eye. Wearers of contact lenses must inform their supervisors and co-workers that they wear the lenses so that the proper emergency treatment can be given if necessary.
4. Splash proof goggles are required when handling hazardous chemical liquids, powders, or vapors. Goggles are also required when an individual is in the immediate vicinity of these chemicals.
5. Beards that constitute a hazard while a person is near moving machinery or rotating tools are not permitted.

FOOT PROTECTION

1. ASTM Rated F2413-05 M I/75 C75 approved steel toe boots must be worn on all job sites.
2. Hobnailed boots, or boots with protruding nails or metal taps are PROHIBITED.

3. Non-slip soles that are oil resistant are recommended.
4. Lace up boots are highly preferred to slip on type, due to the increased ankle support.

HAND PROTECTION

1. Heavy leather gloves shall be worn any time an employee is using an abrasive grinder.
2. Leather or leather palm gloves should be worn when wire rope is being handled.
3. Chemical resistant gloves must be worn when acids, solvents, caustic soda, and soda ash are handled.
4. Insulated gloves must be worn when regular work gloves cannot adequately protect against burns.

HEAD PROTECTION

1. Hardhats must meet ANSI-Z89.1, type I or Type II, specifications.
2. Hard hats must be worn by all employees on all job sites that have overhead hazards.
3. They must be worn in the appropriate manner. Not Backwards!
4. Metal hard hats are not allowed under any circumstances.
5. Long hair enough to constitute a hazard while a person is working near moving machinery or rotating tools and equipment must be secured by a net or tied back. Hair styles that make it impossible for a person to properly wear a hard hat are NOT PERMITTED.

BODY PROTECTION

1. The wearing of jewelry such as rings, watchbands or neck chains on the job is discouraged because it can cause or contribute to accidents and injury.
2. Loose clothing is strictly prohibited. This includes neck ties, over sized jackets, and baggy clothes.

HEARING PROTECTION

1. Noise levels above 90 dBA require hearing protection. If a person has to speak up to be heard then hearing protection will be required.
2. Appropriate hearing protection is provided by the Company and must be worn by all personnel in areas where signs are posted warning of excessive noise levels. Hearing protection must also be worn in areas that are not posted, but suspected of temporary excessive noise, such as where jack hammering or sand blasting are taking place.
3. Refer to Hearing Conservation Program section for additional information regarding hearing protection.

RESPIRATORY PROTECTION

1. When appropriate engineering, or operational controls are not practical to limit harmful exposure to air borne contaminants, a MSHA or NIOSH approved respirator must be worn by employees.
2. Refer to Respiratory Protection Program section for additional information on Respiratory Protection.

TRAINING

When PPE is necessary for work assignment training will be provided. Appropriate training will cover:

- What PPE is necessary;
- How to properly don, doff, adjust & wear PPE;
- The limitations of PPE;
- The proper care, maintenance, useful life & disposal of PPE.

Retraining is required when the workplace changes, making the earlier training obsolete; the type of PPE changes; or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding. Certification records must include the employee name, the dates of training, and the certification subject.

HAZARD ASSESSMENT AND EQUIPMENT SELECTION

The Company shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE). If such hazards are present, or likely to be present, the Company shall:

- Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment;
- Communicate selection decisions to each affected employee; and,
- Select PPE that properly fits each affected employee.

The Company shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.

DEFECTIVE AND DAMAGED EQUIPMENT

Defective or damaged personal protective equipment shall not be used. Any damaged or defective PPE shall be removed from service and properly disposed.

PPE HAZARD ASSESMENT RESPONSIBILITIES

It is a management responsibility to identify the need for, and to provide personal protective equipment for the work force. OSHA requires formal analysis and definition of such equipment, as well as training on how to use, and when and where such equipment is required.

In order to meet these requirements, and in order to maintain a safe working environment, it will be necessary for all supervisors and managers to analyze the potential job hazards within their area.

Each job must be evaluated for Personal Protective Equipment needs. The following table shall be used to evaluate core tasks within the Company. Contact the Company Safety Representative to evaluate PPE needs for tasks not found on the assessment form.

PPE HAZARD ASSESSMENT

Tasks, Job Classification or Workstation	Potential Hazard	Type of PPE Required
Arc Welding or Cutting	Electric shock, metal sparks, molten and hot metal, UV, IR, arc visible light, falling, dropping, rolling and sharp objects.	Insulated/heat and puncture resistant gloves, steel toed boots, hard hat, safety glasses, welding shield or helmet with appropriate eye shade.
General Mechanical	Flying particles, falling, falling objects, cuts/puncture, lifting/carrying, noise	Safety glasses, steel toed boots, hard hat, cut/puncture resistant gloves, fall protection when working at elevations. Appropriate respirator. When using high speed power tools, a face shield.
Metal Grinding	Flying particles, falling, falling objects, cuts/punctures, lifting/carrying	Safety glasses, steel toed boots, hard hat, cut/puncture resistant gloves, fall protection when working at elevations. When using high speed power tools, a face shield.
General Maintenance Work	Rough surfaced materials, lifting/carrying	Cut/puncture resistant gloves, safety glasses, steel toed boots.
Welder Helper	Flying particles, falling, falling objects, cuts/puncture, lifting/carrying, noise	Safety glasses, steel toed boots, hard hat, cut/puncture resistant gloves, fall protection when working at elevations. When using high speed power tools, a face shield.
Painting Work	Flying particles, falling, falling objects, cuts/puncture, respiratory hazards, lifting/carrying, cleaning solvents	Safety glasses, steel toed boots, hard hat, cut/puncture resistant gloves, fall protection when working at elevations. Appropriate respirator. When using high speed power tools, a face shield.
Working with chemicals (corrosives, solvents, toxics, etc.)	Refer to chemical specific MSDS for health and physical hazards.	Safety glasses, goggles for splash hazard Light chemical resistant gloves Lab coat, closed shoe, pants Use PPE for applicable tasks as identified on the specific MSDS.
Working with human waste and/or small volumes of human blood, body fluids or other potentially infectious materials (OPIM) as defined in the Bloodborne Pathogen Exposure Control Plan	Potentially infected with infectious disease (BBP) Potential spread of infectious disease	Safety glasses, face shield if washing down, disposable nitrile gloves, closed shoe, pants.

The Company Safety Representative will assess the workplace to determine if hazards are present or likely to be present which requires the use of Personal Protective Equipment (PPE). If hazards are present or likely to be present, the you must:

- Select the type of PPE that will protect the employee
- Require the employee to use the PPE
- Communicate selection decisions to each affected employee

The Company Safety Representative shall verify the hazard assessment has been performed through a written certification. The certification shall:

- Identify the workplace where assessment was performed.
- Name the person certifying that the assessment was performed.
- Give the date(s) that the hazard assessment was performed.
- Be identifiable as a document of certification of hazard assessment.

Assure that defective or damaged PPE not be used.

The Company Safety Representative will provide training to each employee who is required by this section to use PPE. Each employee shall be trained to know at least the following:

- When PPE is necessary;
- What PPE is necessary;
- How to put on, take off, adjust, and wear PPE;
- Limitations of PPE; and
- Proper care, maintenance, useful life, and disposal of the PPE.

Before being allowed to perform work that requires the use of PPE, each employee shall;

- Demonstrate an understanding of training provided;
- Demonstrate ability to properly use PPE.

When anyone has reason to believe that an employee does not understand the training or possess the skill required to wear the PPE the employer shall retrain the employee. Other circumstances where retraining is required include, but not limited to:

- Changes in the workplace that render previous training obsolete.
- Changes in PPE that render previous training obsolete.
- Employee does not retain understanding or skill to use PPE.

The site supervisor shall verify that each affected employee receives and understands the required training. The verification shall:

- Be a written certification.
- Show the name of the employee trained.
- Show the date(s) of training.
- Identify the subject of certification.

The hazard assessment must indicate a determination if hazards are present or are likely to be present, which necessitate the use of PPE.

General Requirements

1. Each employee who may need to wear PPE shall be properly trained. Proper training includes at least, when PPE is necessary, what PPE is necessary, how to properly don, doff, adjust & wear PPE, the limitations of PPE, the proper care, maintenance, useful life and disposal of PPE.
2. Retraining will be conducted when the workplace changes making the earlier training obsolete, the type of PPE changes or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding. Retraining of the employee is required when the workplace changes, making the earlier training obsolete, the type of PPE changes or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding.
3. PPE training must be documented. The certification must include the employee name, the dates of training, and the certification subject.
4. Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.
5. If employees provide their own PPE, the Company shall be responsible to assure its adequacy, including proper maintenance, and sanitation of such equipment. If used, it must be adequate for use, inspected, maintained, and kept sanitary as per Company policy

6. A written hazard assessment must be performed and signed. The hazard assessment must indicate a determination if hazards are present or are likely to be present, which necessitate the use of PPE. Certifier's name, signature, date(s) and identification of assessment documents
7. Selected PPE must be fitted to each affected employee. Fitting must include proper donning, doffing, cleaning, and maintenance.
8. Defective or damaged PPE shall not be used

PIPE HANDLING

1. Do not stand on loads or pipe.
2. Do not stand under any suspended pipe.
3. Do not stand between the truck or any other piece of equipment and a suspended piece of pipe.
4. DO NOT stand between the truck and/or any other piece of equipment and a suspended piece of pipe.

PUBLIC PROTECTION

1. No visitors are allowed onto any job sites without expressed permission from Company management.
2. No visitors shall be allowed on to any job site without proper personal protective equipment, i.e., hard hat, safety glasses, steel toed boots.
3. Warning signs, barriers or devices shall be placed where necessary to provide adequate warning of hazards to the public.
4. Heavy equipment and tools will be secured when company personnel are not present.
5. Job sites will be left clean and free of obvious hazards to the public prior to the end of each shift.

SLIPS, TRIPS AND FALLS

Slips, trips, and falls are a major contributor to injuries and lost time accidents. Be careful and observe the following rules.

1. Remove any spilled liquid from the floor immediately.
2. Good traction helps prevent slipping. The soles of some boots may increase the chance of slipping; therefore, wear boots that provide good traction.
3. Good housekeeping helps prevent tripping.
4. In addition to tools used in day-to-day operations, many items can cause tripping. Be alert for tripping hazards such as garden hoses, shovels, rakes, concrete bumpers in parking lots, uneven grating in catwalks, extension cords, loose shoe laces, etc. Take action to prevent tripping hazards where possible.
5. Every opening in a deck, a floor, or the ground, and pits which a person could accidentally step into should be constantly attended, protected by barricades or standard railings, or roped off before any grating or boards are removed, or before any holes are opened.
6. Tools, equipment, and materials **MUST NOT** be left on walkways or stairs.

TOOLS (HAND, POWER, AND PNEUMATIC)

1. All hand and power tools shall be maintained in a safe condition.
2. Guards shall be in place and operable at all times while the tool is in use. The guard may not be manipulated in such way that will comprise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in ANSI B15.1. Never remove safety guards from power tools.
3. Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases shall be provided with particular PPE, necessary to protect them from the hazard.
4. Any tool which is not in compliance with any applicable requirement of this part is prohibited. Such tool shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.
5. Pneumatic power tools shall be secured to the air hose either by an approved quick connect fitting or by Chicago fittings with safety clips.
6. Before servicing any power tool, such as changing drill bits, saw blades, or grinding wheels, you must unplug the tool first.
7. NEVER plug in a wheel grinder or wire brush without first making sure the power switch is in the "off" position.
8. All tools and equipment shall be maintained in good condition.
9. Only appropriate tools shall be used for the job.
10. Files shall be equipped with handles and not used to punch or pry.
11. A screwdriver shall not be used as a chisel.
12. Wheelbarrows shall not be pushed with handles in an upright position.
13. Portable electric tools shall not be lifted or lowered by means of the power cord. Ropes shall be used.
14. Boards must not be thrown or left around with nails protruding. The nails should be removed or bent down.
15. Electric cords shall not be exposed to damage from vehicles driving over them.

TRAFFIC SAFETY AND CONTROLS

All traffic control devices, affecting public traffic, shall be placed according to Cal-Trans traffic manuals and Cal-OSHA standards. No changes shall be made to traffic control device configuration unless directed to do so by an authorized personnel. The safety of the public and fellow workers is dependent on proper traffic control. All employees performing traffic control, and their supervisors, are trained in traffic control techniques in accordance with Cal/OSHA.

GENERAL RULES

1. No employee should commence work without approval and use of appropriate safety devices
2. Signs and devices, used for traffic control, must be in position before work begins. Placement of warning signs will be in accordance with "Manual of Traffic Controls For Construction and Maintenance Work Zones – 1996 published by the California Department of Transportation (CalTrans).
3. Flaggers must be trained in traffic control techniques, have all necessary protective clothing and use appropriate devices to control or otherwise direct traffic through the job site.
4. Any work site, which encroaches upon public streets, walks or right of ways, should conform to the current laws and regulations established by the work area traffic handbook or other similar publication, which may be obtained from your supervisor.
5. A plan of action at a tailgate conference should be conducted with all involved personnel before work begins.
6. No employee should set up cones while sitting or standing on a running board.
7. When traffic control is set up, a supervisor should drive through the work area to check clearly defined pathways for motorists.
8. When possible, trucks and equipment should be placed between the work site and oncoming traffic for the protection of the crew.
9. Check placement of lighted barricades at night to see that they are properly placed and functioning.
10. Use flashing and warning lights on vehicles when appropriate.
11. During non-business hours, traffic must safely pass through the work zone.

WELDING

The following rules and procedures apply when trained employees, involved in mechanical, repair or construction projects are authorized to use welding equipment:

1. Proper precautions for fire prevention shall be taken in areas where welding and other "hot" works are being conducted.
2. Whenever welding or cutting must be performed around dry grass or combustibles, a "fire watch" shall be posted and one individual will maintain fire-fighting apparatus. The person assigned fire watch duties shall have no other duties.
3. Hot work permits must be applied for whenever conditions identified by the Company require.
4. Flameproof shields protect employees from arc rays while arc welding and cutting.
5. No welding, cutting, nor heating shall be done where the application of flammable paints, other flammable compounds or heavy dust concentrations creates a fire hazard.
6. Grounding of the machine frame and safety ground connections of portable machines must be checked periodically. Electrodes must be removed from the holders when not in use. All electric power to the welder must be shut off when no one is in attendance.
7. Suitable fire extinguishing equipment must be available for immediate use before starting to ignite the welding torch. The welder is strictly forbidden to coil or loop the welding electrode cable around his/her body.
8. Mechanical ventilation or airline respirators shall be provided when welding, cutting or heating zinc, lead, cadmium, mercury, or beryllium bearing based or coated materials in enclosed spaces.
9. Employees, exposed to the hazards created by welding, cutting or brazing operations, must be protected with personal protective equipment and clothing to include: Eye protection, helmets and gloves.
10. Check for adequate ventilation where welding or cutting is performed. When working in confined spaces, environmental monitoring tests should be taken and means should be provided for quick removal of welders in case of an emergency.

CONFINED SPACES

Our Company does not perform work that requires personnel to enter confined spaces. Entry of confined spaces requires special training, supervision and testing that are beyond the scope of our work. Do not enter any situation (such as a vacuum truck tank) where lack of oxygen or harmful gases could be encountered on a jobsite, and immediately ask your supervisor for instructions if you are unsure of any condition.

A Confined Space is a space that: 1) Is large enough and so configured that an employee can bodily enter and perform assigned work: and, 2) Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, vacuum truck tank, and pits), and 3) Is not designed for continuous employee occupancy.

A Confined Space Entry is an action by which a person passes through an opening into a permit required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrants body breaks the plane of an opening into the space.

Permit Required Confined Space: A confined space that has one or more of the following:

- Contains a hazardous atmosphere (or has potential to contain one).
- Contains a material that has potential for engulfing an entrant.
- Has an internal configuration in which an entrant could be trapped or asphyxiated.
- Contains any other recognized serious safety or health hazard.

Hazardous atmospheres include those that expose employees to the risk of death, incapacitation, or impairment of ability to self-rescue, injury, or acute illness.

CRANE SAFETY

A. Crane Operator Qualification

1. Cranes should be operated only by the following:
 - a. Qualified operators designated by the Company
 - b. Trainee under direct supervision of a qualified operator
 - c. Maintenance, test personnel and inspectors, when necessary in the performance of their duties
2. No one, other than personnel specified above should enter a crane cab, with the exception of persons such as oilers and supervisors, whose duties require them to do so, and then only in the performance of their duties and with the knowledge of the operator or other appointed persons.

B. Safety Precautions

1. A standard hand signal system should be used on all crane operations.
2. When there are several riggers, only one rigger should be designated as signalman.
3. The operator should never start machine movement until the signalman is within sight and hand signals are understood.
4. Obey an emergency stop signal given by anyone.
5. Radio communication should be used in addition to hand signals when possible.
6. All cranes should have load charts and boom angle indicators located at the operator's position. Offshore cranes should have dynamic load charts installed in the cab.
7. While the crane is in operation, the operator should neither perform any other work nor leave the controls until the load has been safely landed.
8. Tag lines for controlling loads should be used whenever possible.
9. All hooks used should be self-closing.
10. Cranes should be placed on a firm level foundation and properly secured in place before being operated.
11. No one should ride on leads, buckets, or hooks suspended from crane, boom or derrick.

12. Heavy machinery, equipment, or parts thereof which are suspended by slings or hoists should also be substantially blocked or cribbed before workers are permitted to work underneath or between them.
13. All personnel should stand clear of a cable under tension.
14. The crane operator should not carry a load above personnel on the floor.
15. An appropriate fire extinguisher should be in the cab of the crane, when applicable.
16. Offshore personnel baskets should be used only for transferring personnel and their personal equipment.
17. Special planning and precautions should be taken offshore with regard to rigging and clearance of the area (including Production Deck) when lifting extremely heavy loads or hazardous material, such as tanks containing liquid nitrogen or pressurized hydrocarbons.
18. Loads should be marked with their weight in a location visible to the crane operator before being transported offshore.
19. When working with a crane never place any part of the machine or load within Fifteen feet of a power line.
20. Never exceed load capacities specified by the manufacturer.
21. A mobile crane is least stable when operating from the side position.
22. A qualified spotter should assist the operator in placing or retrieving a load. Use only one spotter. A confused operator is more likely to have accidents.
23. The crane operator is responsible for the condition of the cable and associated rigging.
24. When equipment is moved with a crane a tag line must be attached to the load, so the oiler/helper can stand in the clear and still control the load. An exception to this rule is when a tag line presents additional hazards such as catching on a stationary object.

DIG ALERT CALL 811

GENERAL REQUIREMENTS

The approximate location of subsurface installations, such as sewer, telephone, fuel, electric, water lines, or any other subsurface installations that reasonably may be expected to be encountered during excavation work, shall be determined prior to opening an excavation.

Excavation shall not commence until:

1. The proposed excavation area has been marked as specified by the Dig Alert (Dial 811) system; Delineation of the proposed excavation site is mandatory. Mark the area to be excavated with water soluble or chalk based white paint on paved surfaces or with other suitable markings such as flags or stakes on unpaved areas.
2. Call at least Two (2) full working days prior to digging.
3. Your permit for digging will not be valid without a Dig Alert ticket number.
4. If the members have facilities within the work area, they will mark them prior to the start of your excavation and if not, they will let you know there is no conflict.
5. The Law requires you to hand expose to the point of no conflict 24" on either side of the underground facility, so you know its exact location before using power equipment.
6. The Site Supervisor has received a positive response from all known owner/operators of subsurface installations within the boundaries of the proposed project; those responses confirm that the owner/operators have located their installations, and those responses either advise the excavator of those locations or advise the excavator that the owner/operator does not operate a subsurface installation that would be affected by the proposed excavation.
7. When the excavation is proposed within 10 feet of a high priority subsurface installation, the Site Supervisor shall be notified by the facility owner/operator of the existence of the high priority subsurface installation before the legal excavation start date and time in accordance with the Dig Alert (811) system, and an onsite meeting involving the excavator and the subsurface installation owner/operator's representative shall be scheduled by the excavator and the owner/operator at a mutually agreed on time to determine the action or activities required to verify the location of such installations.
8. When excavation operations approach the approximate location of subsurface installations, the exact location of the installations shall be determined by safe and acceptable means that will prevent damage to the subsurface installation.

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EMERGENCY RESPONSE/EMERGENCY ACTION

I. PURPOSE

The Company will make an organized effort to protect personnel from injury and to minimize property damage in an emergency event. Resources will be made available to respond to an emergency by using trained employees and additional outside response agencies. All employees shall be aware of these emergency response procedures. These emergency response procedures supplement any response plans required by specific standards.

The purpose of the Emergency Response Procedure is to establish a systematic method for ensuring safe working conditions and procedures are followed during an emergency condition.

II. SCOPE

This standard will define: the type of work requiring an Emergency Response Plan, the qualifications of personnel involved in the response procedure, and instructions on how to properly implement the plan.

III. REFERENCES

TITLE 8 CCR, subsection 3220, *Emergency Action Plan*
29 CFR 1910.38, *Emergency Action Plans*

IV. EVACUATION ROUTES/PROCEDURES

Company supervisory personnel must review the site-specific Emergency Action Plan prior to commencing work. In the event of an emergency that necessitates an evacuation of a work site, the following procedures will be implemented:

- Evacuation notification should be made using the car horn, bull horn, hand-held radios or other communication methods.
- All personnel should evacuate upwind of any activities. Ensure that a predetermined meeting location is identified off-site in case of an emergency, so that all personnel can be accounted for in the event of an emergency.

Personnel will be expected to proceed to the closest exit with their buddy and mobilize to the safe distance area associated with the evacuation route. Personnel will remain at that designated safe briefing area until an authorized individual provides further instructions.

Management shall ensure that emergency programs are instituted at all sites, and that they are reviewed frequently. All employees are encouraged to contribute to the development of the emergency response/action program. As a minimum site specific emergency action plans shall include the following:

- Procedures to be followed by employees who remain to perform or shut down critical operations before they evacuate;
- Emergency escape procedures and emergency escape routes;
- Procedures to account for all employees after an emergency evacuation has been completed;
- Rescue and medical duties for those employees who are to perform them;
- The preferred means for reporting fires and other emergencies;
- Names and phone numbers of nearest emergency services.

The site specific plan must detail evacuation procedures and meeting places in case of an emergency, emergency fire fighting procedures, and emergency rescue procedures for "man down" situations. The supervisor must ensure that every employee at each job site is familiar with the Plan. The Emergency Plan must be maintained by the Safety Representative to reflect changes in the job.

V. EMERGENCY RESPONSE GUIDELINES

A. INJURIES

You must report any injury to your Supervisor immediately. In the event of an injury, the following procedures should be performed:

- 1) Provide first aid to the injury
- 2) Shut down operations if necessary.
- 3) Control access to the area.
- 4) Instruct all personnel involved not to discuss the accident with anyone except the immediate Supervisor.
- 5) Supervisors must prepare an accident report by the end of that workday to be turned into the main office.

B. FIRE OR EXPLOSION

In the event of a fire or explosion, the fire department should be contacted immediately. Upon the arrival of the fire department, the person in charge, or designated alternative will advise the fire officer of the location, nature, and identification of the hazardous materials on-site. If it is safe to do so, site personnel may use fire-fighting equipment available on-site to control or extinguish the fire and remove or isolate flammable or other hazardous materials which may contribute to the fire. Company personnel should not attempt to fight a fire beyond the incipient stage.

Report a fire to your supervisor immediately. Supervisors shall ensure that the fire is reported directly to the Fire Department, or 911.

1. Stay on the line until the Fire Department tells you to hang up. Be sure the Fire Department has all pertinent information such as:
 - Exact Location
 - Your name, Company name and purpose of call
 - Description of the type of fire
 - Your phone number
 - Location where someone will meet the Fire Department
2. Isolate all fuel and electrical sources if possible.
3. Try to put out the fire if you have the proper equipment and are trained. Never endanger yourself or others.
4. Stay out of the way when the Fire Department arrives. Be ready to help if you have the proper training.
5. After the fire is extinguished, stand by in case of a re-start.

C. EARTHQUAKES

Earthquakes are a frequent occurrence in the Pacific, but major earthquakes are a rare occurrence. Most injuries from earthquakes occur from falling objects and debris. The safest place to be in an earthquake is outdoors away from buildings and wires.

During an earthquake:

Remain calm as you will be better able to access your situation.

If you are indoors:

If you are Indoors

- Stand under a doorway, get under heavy furniture or stand against a wall in the center of the building. Keep away from windows and outside doors.
- Get under a heavy piece of furniture or move toward a interior wall
- Stay clear of windows, bookcases and mirrors
- Turn off any gas appliances

If you are Outdoors

- Stay away from buildings, poles, wires, and windows.
- Get into a open area away from buildings, trees, walks or power lines
- Sit or lie down and brace yourself

If you are in a vehicle:

- Pull off the road away from overpasses, bridges or power lines
- Stay in your vehicle

After an earthquake aftershocks can occur. Report any broken power, gas, or water lines and stay tuned to local radio and television stations for Civil Defense messages.

In all cases follow your supervisors instructions after the earthquake. Stay away from power lines and shut off any leaking fuel sources.

D. VEHICLE ACCIDENTS

If you are involved in a vehicle accident you must follow the procedures listed below:

- 1) Set out emergency reflectors to protect yourself and others. These are located under the seat in all Company vehicles.
- 2) Administer first aid to injured persons.
- 3) Notify the appropriate emergency personnel, including the local Police Department.
- 4) Notify your Supervisor.
- 5) Exchange drivers license numbers, insurance Company and policy number with other driver(s) involved. All Company vehicles are required to have the vehicle insurance I.D. card in the glove compartment.
- 6) Complete a Vehicle Accident Report with the Safety Representative at the main office.
- 7) Take pictures of damage to

E. CHEMICAL SPILLS

- 1) Try to contain the spill if possible.
- 2) Notify your immediate Supervisor and standby for further instructions.

F. EMERGENCY EQUIPMENT

General emergency equipment and supplies in Company vehicles shall include the following:

- First-aid kit
- Bloodborne Pathogen kit, barriers, gloves, ect..
- Fire extinguisher
- Communication device (radio or mobile telephone)

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FALL PROTECTION

I. PURPOSE

This standard establishes procedures necessary for protection of employees working in elevated positions. It is designed to maintain a safe environment for personnel working above four (4) feet from the ground level.

II. SCOPE

This standard describes the personnel training requirements, minimum fall protective equipment, and safe work practices to be taken while working in elevated positions.

III. REFERENCE

TITLE 8 CCR, subsection 3299, Personal Fall Protection
TITLE 8 CCR, subsection 1670, Personal Fall Arrest Systems
29 CFR 1926.503, Fall Protection

IV. WORKING SURFACES ELEVATED MORE THAN FOUR (4) FEET

Working surfaces that are more than four feet above ground or more than four feet above an adjacent platform or work surface ☐☐ must be equipped with protective handrails/guardrails, or another means of fall protection must be provided.

V. WORKING AT ELEVATIONS GREATER THAN SIX (6) FEET

Appropriate fall protection must be used at all times while personnel are working at elevations greater than six feet above the ground or an adjacent platform/working surface (measured by the level of the workers' feet).

Personnel climbing to or from such working surfaces should use a ladder, stairs, or an appropriate means of fall protection (i.e., safety climbs).

VI. QUALIFICATION OF PERSONNEL

Specific fall protection plan(s) shall be developed by qualified/competent personnel. This task should be completed by the job site supervisor, i.e. Site Foreman.

In rare circumstances, where no other alternative methods have been implemented a safety monitoring system shall be implemented and Competent personnel assigned monitoring duties shall: recognize fall protection hazards, warn employees if they are unaware of a fall hazard or are acting in an unsafe manner, stay on working surfaces and in visible light, and stay close enough for verbal communications, not have any other duties that would take monitors attention from the monitoring function.

VII. GENERAL REQUIREMENTS

1. A training program shall be provided for each employee who might be exposed to fall hazards. Employees shall receive training pertaining to the recognition and elimination of fall hazards. Training shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to follow to minimize these hazards.
2. Re-training shall be provided when the following are noted: 1) Deficiencies in training. 2) Work place changes. 3) Fall protection systems or equipment changes that render previous training obsolete.
3. Written certification records shall be maintained showing the following: 1) Who was trained, when, dates of training 2) Signature of person providing training and date Company determined training was deemed adequate.
4. Fall protection is required whenever employees are potentially exposed to falls from heights. For general industry every wall opening from which there is a drop of more than 4 feet shall be guarded. For Construction, each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.
5. Site specific plans shall be developed by a qualified person. The fall protection plan shall be prepared in accordance with this program and by a qualified person for the specified work site.
6. Accident investigations shall be conducted to evaluate the fall protection plan for potential updates to practices, procedures or training in order to prevent reoccurrence
7. When purchasing equipment and raw materials for use in fall protection systems applicable ANSI & ASTM requirements should be met.
8. Site Supervisors shall provide for prompt rescue of employees in the event of a fall or shall assure the employees are able to rescue themselves when working from heights.
9. Full body safety harnesses are required anytime a person is working over 6 feet off the ground or above the existing walking or working surface. Standard waist type safety belts are strictly prohibited.
10. Any time a person is working over 6 feet off the ground they must be tied off to a stationary object capable of withstanding 5,400 pounds.

11. Approved rope grabs and safety lines shall be used any time a worker is required to work in an area with out adequate tie off protection, such as while using a spider basket or shuttling.
12. A full body harness **must** be worn whenever fall protection is required. Safety harnesses **should** fit snugly and comfortably.
13. When safety harnesses are used for fall protection, they **must** use lanyards with shock/absorber systems.
14. When working at elevations where it is necessary to disengage a lanyard to move around equipment or obstacles, a double lanyard **must** be utilized to assure fall protection.
15. All equipment **must** be inspected for excessive wear or damage prior to each use.
16. Modifications to any fall protection equipment, other than those performed by the manufacturer, may result in premature failure of the equipment and are **strictly prohibited**.
17. All equipment **must** be worn in accordance with the manufacturer's recommendations.
18. Any fall protection equipment that is worn or damaged **must** be destroyed so that it is no longer usable, and then discarded.
19. Safety belts, harnesses, and lanyards that have been used to stop a fall **must** be destroyed and discarded.
20. Safety harnesses shall be stored properly and inspected on a regular basis for excessive wear. Worn or damaged harnesses shall be destroyed prior to discarding.
21. Anytime personnel work from heights provisions for prompt rescue of employees in the event of a fall and/or supervisors shall assure the employees are able to rescue themselves.

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I. INTRODUCTION

It is the policy of the Company that all employees who operate or anticipate operating a forklift during their employment must complete forklift safety training and comply with this program. Only trained and certified operators, including supervisors, are allowed to operate Industrial Lift Trucks.

II. REFERENCE

The following requirements are incorporated into the forklift safety program.

Title 8 CCR 3650-3668 *Industrial Trucks*
29 CFR 1910.178, *Powered Industrial Trucks*,
29 CFR 1926.602, *Material Handling Equipment*, and
NFPA 505, *Fire Safety Standard for Powered Industrial Trucks Including Type Designations, Areas of Use, Maintenance, and Operation*.

III. SCOPE

This program covers all persons who are employed by the Company and related facilities who are designated responsibility to operate a forklift.

IV. RESPONSIBILITIES

- The Company will provide forklift training
- Departmental supervisors are responsible for ensuring employees attend training and that forklifts are repaired when malfunctioning

V. GENERAL REQUIREMENTS

All powered industrial trucks acquired and used after February 15, 1972 are required to meet the design and construction requirements for powered industrial trucks established in the American National Standards Institute (ANSI) Standard for Powered Industrial Trucks, Part II, ANSI B56.1-1969, except for vehicles intended primarily for earth moving or over-the-road hauling. Approved trucks are required to bear a label or some other identifying mark indicating approval by the testing laboratory.

Nameplates and markings must be in place and must be maintained in a legible condition.

Modifications and additions which affect capacity and safe operation without the manufacturer's prior written approval are prohibited. Capacity, operation, and maintenance instruction plates, tags, or decals should be modified accordingly. All Company forklifts are used in unclassified locations according to 29 CFR 1910.178 Table N-1. If the location is classified as hazardous, 29 CFR 1910.178 (c) should be consulted in order to determine the appropriate type of forklift.

High lift rider trucks must be equipped with an overhead guard manufactured in accordance with 29 CFR 1910.178 (a)(2), unless operating conditions do not permit the use of the guard. The overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., but not to withstand the impact of a falling capacity load.

VI. TRAINING

Forklift operators are required to attend and pass forklift safety training at least every three years, operate and maintain their vehicles in a safe manner according to their training, and report all vehicle problems to their supervisor. Training will include: lecture, discussion, and/or interactive computer learning, videos, and written materials. Forklift operator training includes instructor demonstrations and trainee exercises. Operator evaluation (critiques) are documented on the evaluation form shown in appendix B. All operator training and evaluation shall be conducted by persons who have the knowledge, training and experience to train powered industrial truck operators and evaluate their competence.

TRAINING PROGRAM CONTENT

Powered industrial truck operators shall receive initial training in the following topics:

1. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate;
2. Differences between the truck and the automobile;
3. Truck controls and instrumentation: where they are located, what they do, and how they work;
4. Engine or motor operation;
5. Steering and maneuvering;
6. Visibility (including restrictions due to loading);
7. Fork and attachment adaptation, operation, and use limitations;
8. Vehicle capacity;
9. Vehicle stability;
10. Any vehicle inspection and maintenance that the operator will be required to perform;
11. Refueling and/or charging and recharging of batteries;
12. Operating limitations;
13. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.
14. Surface conditions where the vehicle will be operated;
15. Composition of loads to be carried and load stability;
16. Load manipulation, stacking, and unstacking;
17. Pedestrian traffic in areas where the vehicle will be operated;
18. Narrow aisles and other restricted places where the vehicle will be operated;
19. Hazardous (classified) locations where the vehicle will be operated;
20. Ramps and other sloped surfaces that could affect the vehicle's stability;
21. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust;
22. Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.
23. The requirements of applicable OSHA regulations.

REFRESHER TRAINING

Refresher training in relevant topics shall be provided to the operator when:

1. The operator has been observed to operate the vehicle in an unsafe manner;
2. The operator has been involved in an accident or near-miss incident;
3. The operator has received an evaluation that reveals that the operator is not operating the truck safely;
4. The operator is assigned to drive a different type of truck; or
5. A condition in the workplace changes in a manner that could affect safe operation of the truck.
6. An evaluation of each powered industrial truck operator's performance shall be conducted **at least once every three years**.

Employer certification must include operator name, training date, evaluation date, and trainer/evaluator name.

VII. INSPECTIONS

PRE-USE INSPECTION (Daily)

A daily pre-use inspection identifies potential hazards that may be encountered from a damaged forklift and should be performed at least daily. If at any time a forklift is found to be in need of repair, defective, or in any way unsafe, remove it from service until it has been restored to safe operating condition.

The pre-use inspection process is as follows:

1. Inspect the mast for broken or cracked weld points and any other obvious damage.
2. Ensure roller tracks are greased and that chains are free to travel.
3. Forks should be equally spaced and free from cracks along the blade and at the heels.
4. Check hydraulic fluid levels.
5. Check each hydraulic line and fitting for excessive wear or crimping.
6. Check lift and tilt cylinders for damage or leaking fluid.
7. Inspect mounting hardware on the cylinders.
8. Check tires for excessive wear, splitting or missing tire material.
9. Check pneumatic tires for proper pressure indicated on the tire.

POWER SOURCE INSPECTION

Battery Power

Batteries contain acid so protective gloves, goggles, and long sleeves must be worn when working with batteries.

Batteries should be inspected for:

1. cracks or holes,
2. securely sealed cells,
3. frayed cables,
4. broken insulation,
5. tight connections, and
6. clogged vent caps.

Propane Power

1. The propane tank should be inspected for cracks, broken weld points, and other damage.
2. All valves, nozzles, and hoses should be secure and do not leak.
3. If damage is found, the equipment should not be operated until the damage has been corrected.

VIII. FUEL HANDLING AND STORAGE

Store and handle liquid fuels such as gasoline and diesel in accordance with NFPA Flammable and Combustible Liquids Code (NFPA No. 30-1969).

Store and handle liquefied petroleum gas in accordance with NFPA Storage and Handling of Liquefied Petroleum Gases (NFPA No. 58-1969).

Turn off engine before filling fuel tanks.

IX. BATTERY HANDLING AND STORAGE

DESIGNATED AREAS

1. Locate battery charging installations in designated areas that provide flushing and neutralizing of spilled electrolyte, fire protection, protection of charging apparatus, damage by trucks, and adequate ventilation for dispersal of battery gassing fumes.
2. Battery handling equipment and a carboy tilter or siphon for handling electrolyte should be provided.
3. Smoking is prohibited in the designated area.

CHARGING BATTERIES

1. When charging batteries, pour acid into water; not water into acid.
2. Properly position forklift and apply brake before attempting to change or charge batteries.
3. Ensure vent caps are functioning and the battery (or compartment) cover(s) are open to dissipate heat.
4. Prevent open flames, sparks, or electric arcs in battery charging areas.
5. Keep tools and other metallic objects away from the top of uncovered batteries.

X. MAINTENANCE

- Do not use open flames to check for electrolyte level in storage batteries or liquid fuel level in tanks.
- Conduct repairs to fuel and ignition systems of forklifts which involve fire hazards in designated locations.
- Disconnect batteries prior to repairing electrical systems.
- Use only replacement parts equivalent with those in the original design.
- Do not alter the relative positions of various parts from what they were received from the manufacturer. Do not add any parts not supplied by the manufacturer nor delete any parts supplied by the manufacturer (no additional counterweighting of forklifts unless approved by the manufacturer).
- Keep forklift mufflers in proper working condition and free of debris.
- Keep the forklift in clean condition, free of lint, excess oil, and grease.

XI. GENERAL FORKLIFT SAFETY

The most common forklift accidents are caused: when a person is struck by the forklift, stock is shoved into or falls upon another person or falls upon the forklift operator, the operator is injured when getting on or off the forklift, when the forklift collides with another forklift or other vehicle, when the forklift falls off the dock or tips over, where the operator is struck by passing objects, or the forklift tips over because the rated capacity is exceeded or the load is handled improperly.

When mounting or dismounting a forklift, always:

- face the vehicle,
- never jump off,
- use a three-point stance (always have both hands and one foot or vice-versa in contact with the unit),
- wear proper shoes (oil resistant and non-slippery),
- wear proper clothing (do not wear loose clothing or dangling jewelry), and
- restrain long hair.

After mounting the vehicle, always fasten the seat belt, apply the brake, and shift to neutral. Also, check around the forklift for clearance and pedestrians before moving.

XII. FORKLIFT OPERATING GUIDELINES

- A. Only trained and authorized personnel are permitted to operate a forklift.
- B. Do not stand or pass under the elevated portion of any forklift.
- C. Passengers are prohibited from riding on forklifts.
- D. Do not place arms or legs between the uprights of the mast or outside the running lines of the truck.

- E. A forklift is considered unattended when the operator is 25 feet or more away from the vehicle and it remains in his view, or whenever the operator leaves the vehicle and it is not in his view. When a forklift is left unattended:
 - 1. fully lower load engaging means,
 - 2. neutralize controls,
 - 3. shut off power; and
 - 4. set brakes.
- F. When the forklift operator is dismounted, within 25 feet and in view of the forklift, then fully lower the engaging means, neutralize the controls, and set the brakes to prevent movement.
- G. Maintain a safe distance from the edge of ramps or platforms while on any elevated dock or platform.
- H. Forklifts are not to be used to open or close freight doors.
- I. Where general lighting is less than two lumens per square foot, provide auxiliary directional lighting on the truck.
- J. Fixed jacks may be necessary to support a semi trailer and prevent upending during the loading or unloading when the trailer is not coupled to a tractor.
- K. Set brakes and block wheels to prevent movement of trucks and trailers while loading or unloading.
- L. Check the flooring of trucks and trailers for breaks and weakness before loading or unloading.
- M. Check for sufficient headroom under overhead hazards such as lights, pipes, or sprinkler systems.
- N. Use only approved forklifts in hazardous locations.
- O. The brakes of highway trucks shall be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks.

XIII. HANDLING AND MOVING LOADS

TO PICK UP A LOAD

- 1. Only pick up stable and safely arranged loads within the rated capacity of the forklift.
- 2. Adjust long or high (including multiple tiered) loads which may affect capacity.
- 3. Square up on the center of the load and approach it straight with forks in traveling position.
- 4. Stop when the tips of the forks are about a foot away from the load.
- 5. Level the forks and slowly drive forward until the load is resting against the backrest.
- 6. Lift the load high enough to clear whatever is under it.
- 7. Carefully tilt the mast back to stabilize the load.

DRIVING WITH A LOAD

1. Starts and stops should be gradual.
2. Observe all traffic regulations and keep forklift under control at all times.
3. Reduce speed and sound horn at cross aisles and other locations where vision is obstructed.
4. Pedestrians have the right-of-way. Always be aware of their presence especially in aisles and doorways.
5. Do not drive forklift up to anyone standing in front of a bench or other fixed object.
6. Keep a clear view of the path of travel. Always look in the direction of travel.
7. Always travel with a load tilted slightly back for added stability. Do not lift or lower the load when the forklift is in motion.
8. Travel with the load at a height of four to six inches at the tips and two inches at the heels to clear most uneven surfaces and avoid debris.
9. Horse play is not permitted.
10. Slow down for wet, slippery or uneven floors.
11. Avoid running over loose objects on the roadway surface.
12. Properly secure dockboards and bridgeplates before driving over them. Drive over slowly and never exceed their rated capacity.
13. Drive in reverse rather than looking around the load if you are unable to see over it.
14. Travel down inclines in reverse and up inclines going forward. Ascend and descend grades slowly. If the grade is in excess of 10 percent, drive with load up grade.

SAFE STEERING

1. Never make a turn at normal traveling speed, always slow down to maintain balance.
2. Stay wide when turning into an aisle to help clear the sides and square up with the destination.
3. Allow enough room for forks to clear the sides before turning, when backing out of an aisle.
4. When negotiating turns, turn the steering wheel in a smooth sweeping motion. At very low speeds, turn the steering wheel at a moderate, even rate.

TO PUT A LOAD DOWN

1. Square up and stop about a foot away.
2. Level the forks and then drive the rest of the way in.
3. Lower the load.
4. Tilt the forks slightly forward to avoid hooking the load.
5. Look over both shoulders and back straight out until the forks clear the pallet.

APPENDIX A – FORKLIFT PRE-USE INSPECTION FORM

FORKLIFT PRE-USE INSPECTION (COMPLETE PRIOR TO START OF EACH SHIFT)				
	DATE	TRUCK NO.	LOCATION	SHIFT
	TYPE: <input type="checkbox"/> INTERNAL COMBUSTION <input type="checkbox"/> ELECTRIC		HOUR METER:	
	OPERATOR'S SIGNATURE		SUPERVISOR'S SIGNATURE	
CHECK OFF INSPECTED AND CLEARED ITEMS "✓" CHECK ANY DEFECTIVE WITH AN "X" AND GIVE DETAILS BELOW.				
<input type="checkbox"/>	ACCELERATOR	<input type="checkbox"/>	HOUR METER	
<input type="checkbox"/>	ALARMS	<input type="checkbox"/>	HYDRAULIC CONTROLS	
<input type="checkbox"/>	BATTERY CONNECTOR	<input type="checkbox"/>	LIGHTS – HEAD AND TAIL	
<input type="checkbox"/>	BATTERY – INDICATOR	<input type="checkbox"/>	LIGHTS-WARNING	
<input type="checkbox"/>	BELTS	<input type="checkbox"/>	MAST	
<input type="checkbox"/>	BRAKES-PARKING	<input type="checkbox"/>	OIL LEAKS	
<input type="checkbox"/>	BRAKES-SERVICE	<input type="checkbox"/>	OIL PRESSURE	
<input type="checkbox"/>	CABLES	<input type="checkbox"/>	OVERHEAD GUARD	
<input type="checkbox"/>	ENGINE OIL LEVEL	<input type="checkbox"/>	RADIATOR LEVEL	
<input type="checkbox"/>	FORKS	<input type="checkbox"/>	SAFETY EQUIPMENT	
<input type="checkbox"/>	FUEL LEVEL	<input type="checkbox"/>	STEERING	
<input type="checkbox"/>	GAUGES	<input type="checkbox"/>	TIRES	
<input type="checkbox"/>	HORN	<input type="checkbox"/>	UNUSUAL NOISES	
<input type="checkbox"/>	HOSES	<input type="checkbox"/>	OTHER	
	DETAILS:			
ORIGINAL				

APPENDIX B – FORKLIFT OPERATOR PERFORMANCE EVALUATION

Employee Name	Employee ID Number	Date			Time:
		N/A	Yes	No	Comments
1. Followed proper instructions for maintenance-conducted inspections					
2. Shows familiarity with truck controls					
3. Approached load properly					
4. Checked for overhead clearances and hazards					
5. Load balanced and secured properly					
6. Forks placed under load completely					
7. Lifted load properly					
8. Maneuvered properly					
9. Sounded horn at intersections					
10. Kept a clear view of direction of travel					
11. Turned corners correctly – was aware of rear swing					
12. Yielded to pedestrians					
13. Drove under control; Forklift and load stable					
14. Traveled with load at proper height					
15. Lowered load smoothly/slowly					
16. Stops smoothly/completely					
17. Demo: place loads within marked area					
18. Demo: drive backward when required					
19. Demo: check load weights					
20. Demo: place forks on ground when parked, controls neutralized, brake on set, power off					
Total Rating					
Evaluator		Signature			Date

ORIGINAL

5182

APPENDIX C – CALOSHA - FORKLIFT OPERATING RULES

OPERATING RULES FOR INDUSTRIAL TRUCKS

General Industry Safety Order 3664
Operating Rules (Part (a)) .

- (a) Every employer using industrial trucks or industrial tow tractors shall post and enforce a set of operating rules including the appropriate rules listed in Section 3650.

General Industry Safety Order 3650
Industrial Trucks. General (Part(s)) .

- (t) Industrial trucks and tow tractors shall be operated in a safe manner in accordance with the following operating rules:
- (1) Only drivers authorized by the employer and trained in the safe operations of industrial trucks or industrial tow tractors pursuant to Section 3668 shall be permitted to operate such vehicles.
- (2) Stunt driving and horseplay are prohibited.
- (3) No riders shall be permitted on vehicles unless provided with adequate riding facilities.
- (4) Employees shall not ride on the forks of lift trucks.
- (5) Employees shall not place any part of their bodies outside the running lines of an industrial truck or between mast uprights or other parts of the truck where shear or crushing hazards exist.
- (6) Employees shall not be allowed to stand, pass, or work under the elevated portion of any industrial truck, loaded or empty, unless it is effectively blocked to prevent it from falling.
- (7) Drivers shall check the vehicle at the beginning of each shift, and if it is found to be unsafe, the matter shall be reported immediately to a foreman or mechanic, and the vehicle shall not be put in service again until it has been made safe. Attention shall be given to the proper functioning of tires, horn, lights, battery, controller, brakes, steering mechanism, cooling system, and the lift system for fork lifts (forks, chains, cable, and limit switches).
- (8) No truck shall be operated with a leak in the fuel system.
- (9) Vehicles shall not exceed the authorized or safe speed, always maintaining a safe distance from other vehicles, keeping the truck under positive control at all times and all established traffic regulations shall be observed. For trucks traveling in the same direction, a safe distance may be considered to be approximately 3 truck lengths or

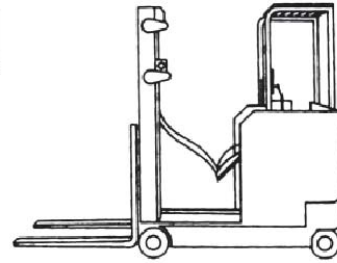
preferably a time lapse — 3 seconds — passing the same point.

- (10) Trucks traveling in the same direction shall not be passed at intersections, blind spots, or dangerous locations.
- (11) The driver shall slow down and sound the horn at cross aisles and other locations where vision is obstructed. If the load being carried obstructs forward view, the driver shall be required to travel with the load trailing.
- (12) Operators shall look in the direction of travel and shall not move a vehicle until certain that all persons are in the clear.
- (13) Trucks shall not be driven up to anyone standing in front of a bench or other fixed object of such size that the person could be caught between the truck and object.
- (14) Grades shall be ascended or descended slowly.
- (A) When ascending or descending grades in excess of 10 percent, loaded trucks shall be driven with the load upgrade.
- (B) On all grades the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.
- (C) Motorized hand and hand/rider trucks shall be operated on all grades with the load-engaging means downgrade.
- (15) The forks shall always be carried as low as possible, consistent with safe operations.
- (16) When leaving a vehicle unattended (the operator is over 25 feet (7.6 meters) from or out of sight of the industrial truck), the brakes are set, the mast is brought to the vertical position, and forks are left in the down position, either:
- (A) The power shall be shut off and, when left on an incline, the wheels shall be blocked; or
- (B) The power may remain on provided the wheels are blocked, front and rear.
- (17) When the operator of an industrial truck is dismounted and within 25 feet (7.6 meters) of the truck which remains in the operator's view, the load engaging means shall be fully lowered, controls placed in neutral, and the brakes set to prevent movement.

continued...

LEFT (1/2)

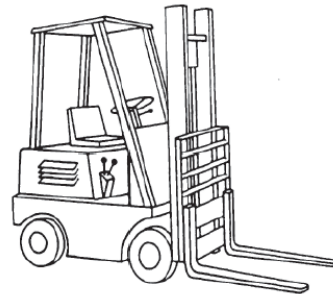
Operating rules for industrial trucks contained on this poster are current through Register 2002, No. 22 California Code of Regulations (operative 6-27-2002). Other rules may also apply.



Exception: Forks on fork-equipped industrial trucks may be in the raised position for loading and unloading if the forks are raised no more than 42 inches above the level where the operator/loaders are standing, and the power is shut off, controls placed in neutral and the brakes set. If on an incline, the wheels shall be blocked.

- (18) Vehicles shall not be run onto any elevator unless the driver is specifically authorized to do so. Before entering an elevator, the driver shall determine that the capacity of the elevator will not be exceeded. Once on an elevator, the industrial truck's power shall be shut off and the brakes set.
- (19) Motorized hand trucks shall enter elevators or other confined areas with the load end forward.
- (20) Vehicles shall not be operated on floors, sidewalk doors, or platforms that will not safely support the loaded vehicle.
- (21) Prior to driving onto trucks, trailers and railroad cars, their flooring shall be checked for breaks and other structural weaknesses.
- (22) Vehicles shall not be driven in and out of highway trucks and trailers at loading docks until such trucks or trailers are securely blocked or restrained and the brakes set.
- (23) To prevent railroad cars from moving during loading or unloading operations, the car brakes shall be set, wheel chocks or other recognized positive stops used, and blue flags or lights displayed in accordance with applicable regulations promulgated by the Public Utilities Commission.
- (24) The width of one tire on the powered industrial truck shall be the minimum distance maintained from the edge by the truck while it is on any elevated dock, platform, freight car or truck.
- (25) Railroad tracks shall be crossed diagonally, wherever possible. Parking closer than 8 1/2 feet from the centerline of railroad tracks is prohibited.
- (26) Trucks shall not be loaded in excess of their rated capacity.
- (27) A loaded vehicle shall not be moved until the load is safe and secure.
- (28) Extreme care shall be taken when tilting loads. Tilting forward with the load engaging means elevated shall be prohibited except when picking up a load. Elevated loads shall not be tilted forward except when the load is being deposited onto a storage rack

- or equivalent. When stacking or tiering, backward tilt shall be limited to that necessary to stabilize the load.
- (29) The load engaging device shall be placed in such a manner that the load will be securely held or supported.
- (30) Special precautions shall be taken in the securing and handling of loads by trucks equipped with attachments, and during the operation of these trucks after the loads have been removed.
- (31) When powered industrial trucks are used to open and close doors, the following provisions shall be complied with:
 - (A) A device specifically designed for opening or closing doors shall be attached to the truck.
 - (B) The force applied by the device to the door shall be applied parallel to the direction of travel of the door.
 - (C) The entire door opening operation shall be in full view of the operator.
 - (D) The truck operator and other employees shall be clear of the area where the door might fall while being opened.
- (32) If loads are lifted by two or more trucks working in unison, the total weight of the load shall not exceed the combined rated lifting capacity of all trucks involved.



S-503-04/07

(2/2) RIGHT

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Appendix A - Guidelines for Heat Exposure Limits

HEAT ILLNESS

I. OBJECTIVE

Many workers at Company locations work in hot environments. Working in hot conditions poses many safety and health hazards to the workers. This policy addresses ways to minimize and control these hazards. The objective of this policy is to reduce the risk of illness, injury or fatality to Company employees, contractors and related personnel from heat related disorders.

California Employers with any outdoor places of employment must comply with the Heat Illness Prevention Standard T8 CCR 3395. These procedures have been created to assist the employer in crafting their heat illness prevention procedures, and to reduce the risk of work related heat illnesses among their employees.

II. AUTHORITY

Title 8 CCR 3395, Heat Illness Standard

III. POLICY

This policy sets forth Company requirements for work in hot environments.

IV. DEFINITIONS

"Acclimatization" means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.

"Heat Illness" means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

"Environmental risk factors for heat illness" means working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees.

"Personal risk factors for heat illness" means factors such as an individual's age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention or other physiological responses to heat.

"Preventative recovery period" means a period of time to recover from the heat in order to prevent heat illness.

"Shade" means blockage of direct sunlight. Canopies, umbrellas and other temporary structures or devices may be used to provide shade. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning.

V. RESPONSIBILITIES

Safety Manager is available to monitor the heat exposure of individual jobs and make recommendations to reduce heat stress risk. If employees must work for extended periods (i.e. more than 1 continuous hour/day) outdoors during hot weather or above the threshold limit value (TLV) for heat exposure.

Supervisors have the primary responsibility for the implementation of the Heat Stress Prevention Program in their work area. The supervisor has ultimate responsibility for the safety of the employees. This includes evaluation of the work to be performed, providing ready access to drinking water or electrolyte replacement drinks, ensuring workers are familiar with the signs and symptoms of heat related disorder, allow for acclimatization of workers in hot environments, adoption of work rest regimes and scheduling of work to reduce heat stresses as appropriate and providing training for employees.

Employees are responsible for attending training and following the instructions given. They are also responsible for monitoring themselves for signs and symptoms of heat stress.

VI. GENERAL REQUIREMENTS

1. Employees shall have access to potable drinking water. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity throughout the work shift.
2. Employees suffering from heat illness or believing a preventative recovery period is needed, shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling. Such access to shade shall be permitted at all times.
3. Supervisors must receive training in the prevention of heat related illnesses prior to supervising employees working in heat.
4. Supervisors must be trained in the employer's heat illness procedures to prevent heat illness and procedures to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.

5. Procedures must be in place to control the effects of environmental factors that can contribute to heat related illness. The most common environmental factors are air temperature, humidity, radiant heat sources and air circulation. Refer to section VII for specific requirements.
6. Physical factors that contribute to heat related illness should be taken into consideration before performing a task. The most common physical factors that can contribute to heat related illness are type of work, level of physical activity and duration, and clothing color, weight and breathability.
7. Supervisors must ensure personal factors that contribute to heat related illness are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. The most common personal factors that can contribute to heat related illness are age, weight/fitness, drug/alcohol use, prior heat-related illness, etc.
8. Employees will have access to shade. At or below 80 degrees Fahrenheit all employees shall have timely access to shade upon request. For temperatures at or above 80 degrees Fahrenheit, one or more areas with shade shall be provided at all times while employees are present. Shade shall accommodate the number of employees on recovery or rest periods.
9. High-heat procedures shall be followed when the temperature exceeds 95 degrees Fahrenheit. High-heat procedures shall include, but are not limited to:
 - Effective communication by voice, observation or electronic means
 - Observation of employees for alertness and signs/symptoms of heat illness
 - Designating one or more employees on each worksite as authorized to call for emergency medical services
 - Reminding employees to drink water throughout the shift
 - Pre-shift meetings before beginning work to review the high heat procedures, encourage drinking water, and remind employees of their right to take a cool-down rest when necessary.

Refer to section X of this policy for additional guidance on high heat procedures.

VII. PROCEDURES

These procedures are not intended to supersede or replace the application of any other Title 8 regulation, particularly T8 3203 Injury and Illness Prevention Program (IIPP). Title 8 CCR 3203 requires an employer to establish, implement, and maintain an effective IIPP.

There are other standards that apply to Heat Illness Prevention some of the provisions that were already required by regulation include:

- Providing for Emergency Medical Services (EMS)
- Providing adequate supply of Potable Water
- Keeping drinking water fresh and suitably cool
- Keeping clean drinking cups available
- Provide CPR/First Aid training for any remote location.

The key elements within this Heat Illness Prevention Program are those contained in Title 8 of the California Code of Regulations, Section 3395 (T8 CCR 3395) and consist of the following:

1. Provisions for Water
2. Access to Shade
3. Written Procedures
4. Training

VIII. PROVISIONS FOR WATER

Water is a key preventive measure to minimize the risk of heat related illnesses.

3395 (c) Employees shall have access to potable drinking water meeting the requirements of Sections 1524, 3363, and 3457, as applicable. Where the supply of water is not plumbed or otherwise continuously supplied, water shall be provided in sufficient quantity at the beginning of the work shift to provide **one quart per employee per hour for drinking** for the entire shift.

Supervisors may begin the shift with smaller quantities of water if they have effective procedures for replenishment during the shift as needed to allow employees to drink one quart or more per hour. The frequent drinking of water, as described in (e), shall be encouraged.

Procedures for Provisions of Water

1. Bring at least 2 quarts per employee at the start of the shift, and Supervisor/designated person will monitor water containers every 30 minutes, and employees are encouraged to report to supervisor/designated person low levels or dirty water.
2. Supervisor will provide frequent reminders to employees to drink frequently, and more water breaks will be provided.
3. On days that will exceed 75 degrees F, every morning there will be short tailgate meetings to remind workers about the importance of frequent consumption of water throughout the shift.
4. Place water containers as close as possible to the workers, not away from them.

5. When drinking water levels within a container drop below 50%, the water shall be replenished immediately; or water levels should not fall below the point that will allow for adequate water during the time necessary to effect replenishment.
6. Disposable/single use drinking cups will be provided to employees, or provisions will be made to issue employees their own cups each day.
7. Noise making devices, such as air horns, may be used to remind employee's to take their water break.

To ensure access to sufficient quantities of potable drinking water Supervisors must either provide clean iced coolers or iced bottled water **one quart per employee per hour.**

To encourage frequent drinking of potable water Supervisors must give adequate work breaks and ensure employees are drinking water on regular intervals.

IX. ACCESS TO SHADE

Access to rest and shade or other cooling measures are important preventive steps to minimize the risk of heat related illnesses. 3395 (d) Employees suffering from heat illness or believing a preventative recovery period is needed, shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling for a period of no less than five minutes. Such access to shade shall be permitted at all times.

Procedures for providing Shade:

- Supervisor will set-up an adequate number of; umbrellas, canopies or other portable devices, at the start of the shift and will relocate them to be closer to the crew, as needed. Equipment should be placed in close proximity (i.e., no more than 50-100 yards) to the work activity.
- Employees have access to office or construction trailer, or other building with air conditioning.
- Every morning there will be short tailgate meetings (in the employees' language) to remind workers about the importance of rest breaks and the location of shade.
- Non-agricultural employers can use other cooling measures if they demonstrate that these methods are as effective as shade.

To ensure access to shade at all time Supervisors shall provide easy ups when ambient temperature exceeds 75 degrees F. To ensure that employees have access to a preventative recovery period Supervisors shall ensure employees take regular breaks in increasing amounts based on temperature.

X. HIGH HEAT PROCEDURES

When the temperature equals or exceeds 95 degree Fahrenheit, the Site Supervisors shall implement the high-heat preventive procedures by:

1. Ensuring that effective communication by voice, observation, or electronic means is maintained so that employees at the work site can contact a supervisor when needed. An electronic device, such as a cell phone or text messaging device, may be used for this purpose only if reception in the area is reliable.

This preventive measure is particularly important in circumstances where the supervisor is not present at the site and needs to be immediately alerted of a problem, such as when the outdoor temperature has suddenly spiked or the water used for replenishing containers have run out.

2. Observing employees for alertness and signs or symptoms of heat illness.

Recognition of signs or symptoms of heat illness by a supervisor is crucial for assuring that sick workers be provided immediate access to shade and medical treatment. Delay of prompt medical response is likely to occur if employees working individually or in small groups suffer heat syncope, disorientation or loss of consciousness or any other symptoms of heat illness without the supervisor's knowledge.

In instances where employees work in small groups without a supervisor present throughout the shift, the supervisor must designate an employee with sufficient experience and training to look for signs and symptoms of heat illness. Such a designated observer must know what steps to take if heat illness occurs.

3. Reminding employees throughout the shift to drink plenty of water.

During period of high temperatures workers may be more likely to skip drinking water and or take rest breaks because they are in a rush to finish their work, and do not realize this can increase their risk of heat illness.

4. Close supervision of a new employee's for the first 14 days of employment. Exceptions to the close supervision requirements are if the employee indicates at the time of hire that he or she has been doing similar outdoor work for at least 10 of the past 30 days for 4 or more hours per day.

It is important to supervising new employees to ensure that necessary preventive measures such as frequent drinking of water and taking cool down breaks are followed.

XI. EMERGENCY PROCEDURES

Written emergency procedures help reduce the risk of heat related illnesses, and ensure that assistance is provided without delay. 3395 (e) (3) The Company's procedures required by subsections (e) (1) (B), (G), (H), and (I) shall be in writing and shall be made available to employees and to representatives of the Division upon request. These include:

- Procedures for complying with the requirements of this standard,
- Procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary,
- Procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider;

- Procedures for ensuring that, in the event of emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders.

Procedures for complying with the Heat Illness Standard:

- All employees will be trained prior to working outdoors.
- Working hours will be modified to work during the cooler hours of the day, when possible.
- When a modified or shorter work-shift is not possible, more water and rest breaks will be provided.
- Supervisors will continuously check all employees, and stay alert to the presence of heat related symptoms.
- Supervisors will carry cell phones or other means of communication, to ensure that emergency services can be called, and check that these are functional at the worksite prior to each shift.
- Every morning, workers will be reminded about address and directions to the worksite and emergency procedures.

To reduce the risk of heat-related illness (HI) and respond to possible symptoms of HI Supervisors shall monitor employees for heat related illnesses during hot days. In the event of an emergency Supervisors shall keep emergency medical numbers to the nearest location readily available.

XII. TRAINING

Training is critical to help reduce the risk of heat related illnesses and to assist with obtaining emergency assistance without delay. 3395 (e) (1) Employee training: Training in the following topics shall be provided to all supervisory and non-supervisory employees:

- The environmental and personal risk factors for heat illness;
- The employer's procedures for complying with the requirements of this standard;
- The importance of frequent consumption of small quantities of water, up to 4 cups per hour, when the work environment is hot and employees are likely to be sweating more than usual in the performance of their duties;
- The importance of acclimatization;
- The different types of heat illness and the common signs and symptoms of heat illness;

- The importance to employees of immediately reporting to the employer, directly or through the employee's supervisor, symptoms or signs of heat illness in themselves, or in co-workers;
- The employer's procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary;
- The employer's procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider;
- The employer's procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders. Communication for employees shall be in a form readily understandable by all affected employees.

Supervisor training: Prior to assignment to supervision of employees working in the heat, training on the following topics shall be provided:

- The information required to be provided by section (e) (1) above.
- The procedures the supervisor is to follow to implement the applicable provisions in this section.
- The procedures the supervisor is to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.

Procedures for complying with the heat illness training provision:

- All employees will receive heat illness prevention training prior to working outdoors. Especially all newly hired employees.
- On hot days, and during a heat wave, supervisors will hold short tailgate meetings to review this important information with all workers.
- All newly hired workers will be assigned a buddy or experienced coworker to ensure that they understood the training and follow the company procedures.
- Supervisors will be trained prior to being assigned to supervise outdoor workers.

Appendix A - Guidelines for Heat Exposure Limits

Always monitor signs and symptoms of heat-stressed workers. Discontinue any activity for a person when:

- Sustained heart rate greater than 160 beats per minute for those under 35 and 140 for those 35 and over.
- There are complaints of sudden and severe fatigue, nausea, dizziness, lightheadedness, or fainting.
- There are periods of inexplicable irritability, malaise or flu-like symptoms.
- Sweating stops and the skin becomes hot and dry.

Relative Humidity %	Environmental Temperature °F									
	70	75	80	85	90	95	100	105	110	115
0%	64	69	73	78	83	87	91	95	99	103
10%	65	70	75	80	85	90	95	100	105	111
20%	66	72	77	82	87	93	99	105	112	120
30%	67	73	78	84	90	96	104	113	123	135
40%	68	74	79	86	93	101	110	123	137	151
50%	69	75	81	88	96	107	120	135	150	
60%	70	76	82	90	100	114	132	149		
70%	70	77	85	93	106	124	144			
80%	71	78	86	97	113	136	Extreme Danger			
90%	71	79	88	102	122					
100%	72	80	91	108						

Category	Apparent temperature (°F) Dangers	
Extreme danger	Greater than 120	Heat stroke imminent
Danger	105-120	Heat exhaustion likely
Extreme caution	90-105	Heat cramps, exhaustion possible
Caution	80-90	Exercise more fatiguing than normal

Apparent temperature, Heat Stress Index (HSI): A measure of how hot it really feels in degrees Fahrenheit when relative humidity is factored with the actual air temperature. This chart has been adapted from the National Weather Service's "heat index" and an adjustment has been made with the apparent temperature categories to match more closely working in full sunshine. This guideline should be followed for employees not wearing protective clothing.

HIRING PROCEDURE

- Review employment applications and check all references.
- Schedule and conduct employment interviews with all perspective employees.
- Give perspective employee the Company Safety Handbook. Perspective employee must study the Code of Safe Practices, Injury and Illness Prevention Program, and Hazardous Communication Section in the Safety Handbook. They will be tested on these programs and must score 75% or higher to be hired.
- Contact perspective employees' to schedule a time for the Pre Employment Training.
- Schedule a pre-employment drug test and physical for perspective employee. After approximately three days, the M.R.O will contact you with the results of the drug test and physical. If drug test is negative and there are no restrictions on physical abilities then proceed with hiring.
- Upon acceptable completion of the Pre-Employment and Hazardous Communication Training, go through New Employee Checklist (Form 4061) at the end of this section. Thoroughly review all documentation upon completion, supervisor and new hire shall initial the checklist. Be sure that the employee understands the company commitment to safety and what is expected.
- Turn the New Employee Checklist, acknowledgements, and testing information into the main office for review and record keeping.
- Notify new employee that they are under a 30-day trial period. Notify the foreman that he is responsible for ensuring that the new employee receives On-The-Job Training.

NEW EMPLOYEE CHECK LIST

New or Reassigned Employee Safety, Health and Environmental Orientation

Prospective employee must initial the box(s) as the following Company policies are discussed.

GENERAL	
	Employment application
	I-9 and W-4
	Pre-placement physical
	Pre-employment Drug/Alcohol screen
	Safety Manual issued and explained
	Required attendance and participation in safety meetings explained
	Required reporting to Supervisor of every injury, property loss, unsafe condition and every unsafe practice
	Lockout/Tagout Standard discussed
	Confined Space/Safe Work Permit/Hot Work Standard discussed
	Fire protection equipment and extinguishing agents discussed
	Electrical safety training, as needed
	Respiratory protection training, if applicable
	Enforcement policy (<i>verbal, written, terminated</i>)
	Employee responsibility for preventing accidents
	Discuss the safety suggestion box
	HAZCOM overview training received, as needed
	Accident Reporting and Investigation Procedures received and discussed
	Review Drug and Alcohol Policy
	Company Vehicle Policy reviewed
	Vehicle safety inspection form reviewed
	Hard hat issued
	Safety glasses issued
	Uniform and steeled toed boot policy reviewed
	Policy for, PPE reviewed (<i>hard hat, ANSI Z87.1 safety glasses, steel toed boots</i>).
SAFETY INCENTIVE PROGRAM	
	Company Safety Incentive Program explained.
	Employee agrees to fully cooperate with the safety efforts of the employer and use good judgment, concerning safe behavior.

All of the above has been diligently and completely explained to me. I have read and understand the safety expectations of the Company and understand what is expected of me as an employee.

Employee Signature

Date

Completed copies of this form must be kept in the safety files for a minimum of three years.

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APPENDIX A

SAMPLE – TAGOUT DEVICE

APPENDIX B

PERIODIC (Lockout/Tagout) INSPECTION FORM

I. PURPOSE

This policy establishes procedures for the safety of personnel working on equipment that must be locked out to prevent the unexpected energization, start-up or release of stored energy. They shall be followed by all employees whose duties require them to service, repair, adjust, lubricate, or perform work activities in which the unexpected energization, start-up or release of stored energy could cause injury. Hazardous energy includes, but is not limited to, electrical, hydraulic, pneumatic, mechanical, chemical, thermal, stored and momentum/gravity. These forms of energy must be eliminated, isolated or controlled prior to servicing, repairing or maintaining equipment and machines.

II. SCOPE

These procedures are generic to provide direction to all operations. However, the OSHA regulation requires specific procedures for different types of machines and equipment. Therefore, each operating entity shall develop written procedures for the different types of equipment in their operation. Similar machines and/or equipment (those using the same type and magnitude energy), which have the same or similar types of controls, can be covered with a single procedure.

This procedure does not apply to cord and plug connected electrical equipment if the equipment is unplugged and the plug is in the exclusive control of the employee who is performing the servicing or maintenance of that equipment. The cord and plug is considered to be within the employee's control if it is in sight or is otherwise under their physical control. If the cord and plug is not within the employee's sight or physical control, a lockout device shall be attached to the plug in such a way that it shall not permit the plug to be inserted into the outlet.

III. REFERENCES

Title 8 CCR 3203 Injury and Illness Prevention Program;
Title 8 CCR 3314 Cleaning, repairing, servicing and adjusting of prime movers;
29 CFR 1910.147 Control of hazardous energy (lockout/tagout)

IV. RESPONSIBILITIES

Safety Officer

- The Safety Officer will administer the Lockout/Tagout Program.
- Conduct or contract for employee training and notification.
- Ensure that an audit of the Lockout/Tagout program is conducted at least annually. Those conducting the audit may Company employees but they may not audit their own systems.

Site Supervisors/Foremen shall be responsible for ensuring the following:

- Verifying the use of energy control procedures where the procedures are required.
- Assuring the availability of lock out devices.
- Assuring new process equipment is designed to accept a lock out device.

Employees / Contractors are responsible for ensuring the following:

- Using energy control devices and following the Energy Control Procedures.
- Verifying that process equipment is disengaged or de-energized before working on the equipment.
- Helping develop Energy Control Procedures for equipment that currently does not have procedures.
- Safely returning equipment to service.

V. DEFINITIONS

Affected Employee – An employee who operates equipment or machines on which service or maintenance is being performed under lockout/tagout procedures, or whose job requires him to work in an area in which such servicing or maintenance is being performed.

Authorized Employee – An employee who is authorized to initiate the lockout/tagout procedure on machines or equipment to perform servicing or maintenance, provided they have received the proper training.

Blockout – A blockout may be necessary when potential energy does not a means for lock and/or tag placement. Examples of this are when safety blocks, or stands, are placed under raised equipment so that parts that may fall are braced. Another example is when blinds are placed in piping systems so that substances cannot pass through. Blocks and blinds do not de-energize equipment. Use them only after the machinery has been isolated from its main energy sources.

Energized – Connected to an energy source or containing stored or residual energy.

Energy Isolating Device – A mechanical device that physically prevents the transmission or release of energy including, but not limited to, the following: manually operated electrical circuit breaker, disconnect switch, slip blind, blind flange, line valve, a block or similar device, etc. This does not include a push button or selector type switch.

Energy Source – Any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, pressurized piping, compressed air or other energy which, if unexpectedly released, could cause injury to employees.

Lockout – The placement of a lockout device or energy isolating device, in accordance with an established procedure, to ensure that the energy isolating device and equipment being controlled cannot be operated until the lockout device is removed.

Lockout Device – A device that uses a positive means such as a keyed lock or combination lock to hold any energy isolating device in a safe position and prevent the energizing of a machine or equipment. Examples include lockout hasps, valve lockouts, chain with a lock and circuit breaker lockout.

Shall – Mandatory, must be done.

Should – Advisory, may be done.

Standard Operating Procedure (SOP) – A set of instructions written in such detail that the desired operation can be performed repeatedly with a consistently desirable end result.

Tagout – The placement of a tagout device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout Device – A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and equipment being controlled may not be operated until the tagout device is removed. See Appendix A.

VI. GENERAL REQUIREMENTS

1. This program addresses potential energy from any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy. Other energy may include potential exposure to steam, tension, gravity, ect..
2. Lockout Tagout devices shall indicate the identity (name) of the employee applying the device.
3. Periodic inspections of the company Lockout/Tagout procedures are required to be conducted and documented at least annually to ensure procedures & requirements are being followed.

The Lockout/Tagout inspection shall be performed by someone other than those actually using the procedure. A certified review of the inspection including date, equipment, employees and the inspector should be documented on the form shown in Appendix B.

4. Before an authorized or affected employee turns off a machine or equipment, the authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the methods or means to control the energy.
5. The machine or equipment shall be turned off or shutdown using the procedures established for the machine or equipment. Refer to equipment shut down procedures (if available). An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.
6. All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source.
7. Stored energy and the possibility of re-accumulation:
 - 1) Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained and otherwise rendered safe.
 - 2) If there is a possibility of re-accumulation of stored energy level, verification of isolation shall be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists.
8. Prior to starting work on machines or equipment that have been locked or tagged out; the authorized employee shall verify that isolation and deenergization of the machine or equipment have been accomplished.
9. This program addresses specific procedures for handling multiple groups of workers involved in a lockout. The procedure must afford the group of employees a level of protection equal to that provided by a personal lockout or tagout device. Refer to "Procedure Involving More Than One Person - GROUP LOCKOUT" within this document.
10. The authorized employee should ascertain the exposure status of individual group members. Each employee shall attach a personal lockout or tagout device to the group's device while he/she is working and then remove it when finished. During shift change or personnel changes, there should be specific procedures to ensure the continuity of lockout or tagout procedures. Refer to "Procedure Involving More Than One Person - GROUP LOCKOUT" within this document.

Appendix A: Sample Tagout Device

DANGER		
DO NOT OPERATE This Tag & Lock To Be Removed Only By Person(s) Shown Below		
_____	_____	_____
Name	Date	Time

_____	_____	_____
Name	Date	Time

Appendix B: Periodic Inspection Form

LOCKOUT/TAGOUT PROCEDURE INSPECTION

Machine or Equipment Reviewed: _____ Location: _____

Employees Included in the Inspection		
Last Name	First Name	MI

Was the Lockout/Tagout Procedure performed correctly?

☐ YES

☐ NO

Do all employees understand their responsibilities in the procedure?

☐ YES

☐ NO

If tags were used, do the employees understand their limitations?

☐ YES

☐ NO

Employees Requiring Additional Training		
Last Name	First Name	MI

Comments _____

Signature of Inspector/Supervisor

Date

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VACUUM TRUCK OPERATIONS

Purpose

This policy has been created to reduce, if not eliminate, the number of work related incidents related to vacuum truck operations.

Scope

This program applies to company operated vacuum trucks, which is defined company owned, leased, rented, or otherwise designated for Company use.

Introduction

During vacuum truck operations, workers are at risk of being exposed to many hazards. The potential for releasing toxic gases exists whenever vacuum trucks suck up liquid waste to be transported to disposal sites. Low levels of exposure to hydrogen sulfide (H₂S) can result in symptoms such as eye irritation, sore throat, nausea, and vomiting. At high levels of exposure, workers not wearing the appropriate protective equipment will pass out. Too much of the gas can kill a worker in seconds.

The tank on a vacuum truck is a **confined space**. An operator may be handling toxic chemicals. If he enters the tank for any reason, he might be overcome by fumes. There is only one way in and one way out of the tank, so it is a confined space in the truest sense. **Never enter a vacuum truck tank unless following comprehensive confined space entry procedures.**

Safe work procedures for vacuum truck operators

Safe work procedures for vacuum truck operators address the potential for chemical reactions and the potential release of toxic gas or fumes. They also take into account the variety of fluids or substances that vacuum trucks typically carry. Before starting any vacuum truck operations make sure that workers understand the following:

- The hazards associated with the liquids or substances to be vacuumed or transferred.
- The evacuation and rescue procedures in the event of a toxic gas leak.
- Ensure that air quality monitoring at the work site is continuous at such locations as the discharge area of the vacuum truck venting hose.
- Ensure that first aid is readily available on site in the event of exposure to toxic gas.
- Consult the manufacturer's instructions to confirm that the vacuum equipment is designed for the particular transfer operation.
- Ensure that all equipment, i.e. (tank, vacuum truck, and pumping equipment) is in safe working condition.

- Ensure back-up alarms are working properly.
- Use signal man while backing vacuum truck.
- Ensure hose ends are hobbled prior to work.
- Ensure all personnel are aware vaults and cellars are not to be entered. If it becomes necessary to enter, update JSA and adhere to confined space entry procedures.

Preventing exposure to toxic gases during transfer operations:

- Never transfer fluids from one truck to another unless it has been established that no chemical reaction will occur.
- Position trucks to minimize exposure to any discharged gases and fumes.
- Ensure that discharge lines are long enough and large enough for safe operation.
- Position vent lines away from workers and workstations, including control panels, valve handles, gauges, shut-offs, and hose attachment points. If possible, use a vertical exhaust stack to divert exhaust gases away from workers and ignition sources.
- Check air monitoring equipment during operations to confirm that venting is proceeding safely.

Operator Responsibilities

Operator Responsibilities include monitoring the following:

- 1) Tank level indicators to avoid overfilling
- 2) Tank pressure gauges to avoid over pressurizing receiving tanks or creating excessive vacuum in supply tanks
- 3) Tank temperature gauges to help identify possible chemical reactions
- 4) Minimize the air introduced into the system when pressure loading or unloading. Submerge the suction line in liquid, or reduce the vacuum pump speed when skimming or nearing the end of a load.
- 5) Maintain a log of transported fluids and any potential residue.
- 6) Use gravity loading and unloading whenever possible.
- 7) Use a vapor recovery system when available to avoid venting tanks directly to the atmosphere.
- 8) Double valve and cap all connections prior to driving vehicle.
- 9) Always ground hose connections prior to transfer.
- 10) Never leave the truck unattended while running.
- 11) Splash caps on the bleeder valve.
- 12) Splash caps on all hoses.
- 13) Bypass filter installed.

Supervisor Responsibilities

Before starting any vacuum truck operations, supervisors should:

- 1) Make sure that workers understand hazards associated with the substances to be vacuumed and the evacuation procedures in the event of a toxic gas leak.
- 2) Ensure that air quality monitoring at the work site is continuous and first aid is readily available on site.
- 3) Consult the manufacturer's instructions to confirm that the vacuum equipment is designed for the particular transfer operation.
- 4) Ensure that all equipment including tank and vacuum trucks, and pumping equipment, is in safe working condition.

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VEHICLE POLICY

Purpose

According to the Bureau of Labor Statistics (BLS); more than 2,000 deaths a year are caused by occupational motor vehicle incidents. This figure represents greater than 30 percent of the annual number of fatalities from occupational injuries. Vehicle Accidents is the #1 cause of job related injuries and deaths. Therefore this policy has been created to reduce, if not eliminate, the number of work related vehicle incidents in our Company.

Scope

This program applies to motor vehicle safety while driving Company vehicles, which is defined as the use of vehicles that are Company owned, leased, rented, or otherwise designated for Company use, including personal vehicles used for Company business.

Reference

Best Practices - Vehicle Safety Training is not mandated by law.

Responsibilities

Supervisors shall be responsible for ensuring the following:

- Incident free driving on Company business.
- Verifying that drivers under their control have a valid and appropriately designated driver's license.
- Ensuring daily pre-trip inspections of the vehicle and its emergency equipment are performed.
- Ensuring employee and passenger safety, including requiring the use of safety belts.
- Reporting defects so that corrective action can be taken.
-

Employees / Contractors are responsible for ensuring the following:

- The safety of you and all passengers.
- Incident free driving on Company business.
- Driving with appropriate and valid driver's license.
- Informing your supervisor in the event your driver's license becomes suspended for any reason.
- Completing daily pre-trip inspections and walk around of the vehicle and its emergency equipment.
- Safely returning vehicles and equipment to service.

Defensive Driving

Incident free driving is the key responsibility of all Company personnel. To obtain this goal requires the attitude of a professional defensive driver. A defensive driver is one who drives to prevent incidents despite weather conditions, the actions of others, road conditions, etc.

Defensive driving includes the following behaviors:

- Conducting pre-trip inspections of the vehicle and its emergency equipment.
- Walking around your vehicle prior to leaving.
- Ensuring passenger safety, including the use of safety belts.
- Reporting defects so that corrective action can be taken.
- Journey planning and anticipating delays.
- Eliminating distractions, such as cell phone/radio use, eating, or drinking.
- Obeying traffic laws.
- Ensuring that vehicle cab housekeeping is maintained.
- Utilizing defensive driving techniques at all times.

The Defensive Driving Principles of Space Cushion driving shall be observed. Allowing adequate space for the vehicle and adequate visibility provides time to predict the actions of others. It also allows the driver to avoid potentially dangerous situations and to communicate their presence and/or intentions to other drivers.

The keys to Space Cushion driving are summarized as follows:

- ✓ Aim High in Steering
- ✓ Get the Big Picture
- ✓ Keep Your Eyes Moving
- ✓ Leave Yourself An Out
- ✓ Make Sure They See You

Commentary Driving Techniques

Commentary driving is a valuable training tool, it forms part of the process of becoming an advanced driver. The ability to give a driving commentary will help you (amongst other things) to improve your concentration level and to drive systematically. These are two of the key areas that need development when learning to drive at the advanced standard required by the advanced driving tests.

Quite a lot of drivers find it difficult to talk and drive at the same time. The reasons for this range from the variation in the ways that our brains (as individuals) process information, through to the simple fact that some people are embarrassed about talking out loud as they drive.

When trying commentary driving for the first time some drivers slow down as they struggle for words to describe the ever changing scene ahead. In extreme cases the commentary can cause problems if one aspect of the driving scene is dwelt on for too long.

The ability to give a running commentary, like any other aspect of driving, improves with constant practice. Consider the following aspects of commentary driving:

- Keeping it relevant
- Keeping it simple
- The benefits for your training

A good commentary includes information about:

- The driver's actions
- Weather conditions
- The actions of other road users
- Time and location
- Physical features of the road
- The characteristics of the road surface
- Traffic signs and road markings

While talking about all the factors listed above the driver will be anticipating the likely outcome of any developing situation and the action that will be taken to negotiate that situation safely.

By talking out loud you will start to 'prioritize' areas which require a specific course of action – in turn this will help to raise your awareness of the importance of planning ahead.

Your commentary will help you to structure the way you think while driving.

General Vehicle Safety Rules

1. You shall have a valid driver's license to drive any vehicle on company premises. All drivers of company vehicles must have the appropriate driver's license i.e. (Class A, B, or C).
2. Each company vehicle must be inspected by the employee prior to driving. All trash must be removed before you leave your vehicle at the end of day.
3. It is company policy for all drivers and passengers to wear seat belts.
4. Company vehicles are not to be used for non-Company business.

5. Use drive-through parking whenever possible to reduce backing accidents. When parking your vehicle leave enough room ahead to allow exiting in forward gear. Never leave a running vehicle unattended. Wheel chocks are required on vehicles in excess of 1 ton capacity.
6. Perform the circle of safety, i.e. circle your vehicle prior to leaving to avoid hitting low level objects. Do not back up any vehicle or equipment when you do not have a clear view. Have an observer signal you if the rear view is blocked.
7. The maximum speed limit on any job site is 25 MPH, unless posted otherwise.
8. Never drive over unprotected flow lines or other barriers. Do not park in areas that contain weeds or other combustible barriers.
9. Passengers may not ride outside the cad of any truck, i.e. they must not ride in beds, on truck bumpers, running boards, or tailgates.
10. Pipe carrying racks must never be overloaded. All fittings, tools, supplies, equipment and loose objects hauled on trucks must be firmly secured or restrained to prevent them from falling off into the path of other vehicles.
11. All loads hauled on vehicles must be securely tied down with approved rope, straps or chains. Under no circumstances shall a load be hauled without proper tie downs. Before hauling a load make a quick walk around the vehicle to assure all tool boxes are closed and that the load is secure. Use red flags on any load that exceeds 4 feet overhang beyond truck, trailer or dolly.
12. When hauling a load check to be sure the load stays secure while under way. It's a good idea to pull over and re-tighten your load periodically.
13. DO NOT stand near trucks when unbinding or unloading pipe.
14. NEVER attempt to perform work or drive a vehicle when you are impaired by alcohol, medication or drugs.
15. Vehicles shall not be parked behind other vehicles or in such a position that places the vehicle in another vehicle's blind spot.

Training

All drivers of Company or rental vehicles must complete an initial defensive driving course, participate in the commentary drive program, and participate in BBS observations. Drivers shall also attend periodic refresher defensive driving course as required.

VEHICLE INSPECTION REPORT

WEEK ENDING DATE: _____

DRIVER: _____

CHECK ITEMS WHICH ARE DEFECTIVE (X) AND SUPPLY DETAILS ABOUT THE DEFECT IN THE "REMARKS" SECTION BELOW. USE (✓) IF INSPECTION WAS SATISFACTORY. MARK N/A FOR NOT APPLICABLE.

VEHICLE NO.:		M	T	W	T	F	S	S	TRAILER NO.:		M	T	W	T	F	S	S
BRAKES (SERVICE)									BRAKES								
BRAKES (PARKING)									BRAKE CONNECTIONS								
BODY									BUMPER								
CLUTCH									COUPLING DEVICE								
COOLING SYSTEM									DOORS								
DEFROSTER									HITCH								
DRIVE LINE									KINGPIN								
ENGINE									LANDING GEAR								
EXHAUST SYSTEM									LIGHTS								
FRAME									REFLECTORS								
FUEL TANKS									SECUREMENT SYSTEMS								
HEATERS									SUSPENSION SYSTEM								
HORN									TIRES								
LEAKS									WHEELS & RIMS								
LIGHTS									OTHER								
OIL PRESSURE									SAFETY/EMERGENCY EQUIPMENT								
REAR VISION MIRRORS									FIRE EXTINGUISHER								
REFLECTORS									FLAGS								
SPEEDOMETER									FUSES & FLARES								
STEERING SYSTEM									REFLECTIVE TAPE								
SUSPENSION SYSTEM									FIRST AID KIT								
TIRES									SEATBELTS								
WHEELS & RIMS									OTHER:								
WINDOWS																	
WINDSHIELD WIPERS																	
OTHER:									REMARKS:								

☐ **CONDITION OF VEHICLE IS SATISFACTORY**
 I CERTIFY THAT I AM SATISFIED THAT THIS VEHICLE IS IN SAFE OPERATING CONDITION AND I HAVE REVIEWED THE LAST VEHICLE INSPECTION REPORT AND VERIFIED THAT REQUIRED REPAIRS HAVE BEEN COMPLETED.

 DRIVER'S SIGNATURE

 DATE

☐ **ABOVE DEFECTS CORRECTED**
☐ **ABOVE DEFECTS NEED NOT BE CORRECTED FOR SAFE OPERATION OF VEHICLES**

 MECHANIC'S SIGNATURE

 DATE

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ASBESTOS AWARENESS

I. Recognition of Industry Asbestos Hazards

The first step in recognition of industrial asbestos hazards is to develop knowledge of the types of construction materials that historically have contained asbestos. Common materials that may contain asbestos include:

- sprayed-on insulation on ceilings or walls
- sprayed-on insulation on beams
- insulation around or in duct work
- boiler insulation
- pipe coverings
- ceiling, floor or wall tiles or panels
- fire walls and doors
- sprayed-on decorative surfaces
- gaskets in piping or other systems
- automotive braking systems (covered under general industry standard even when found in a construction environment)

The second step is positive identification of asbestos in the material. This is done by taking a bulk sample of the material and submitting it to a laboratory for analysis. Only a small amount of the material is needed for analysis. The samples should be shipped to the laboratory in 20-milliliter scintillation vials, 35-millimeter film canisters, or small prescription bottles from pharmacies. Do not send samples in plastic bags or envelopes, as these may break or leak and contaminate other samples in the same shipment and/or the laboratory environment and personnel. The recommended analytical technique is polarized light microscopy.

To obtain samples from some materials it may be necessary to use a scraping or cutting tool, such as a penknife, putty knife or sheetrock knife. In some cases it may be necessary to patch-up places where a sample has been taken. For example, duct tape may be applied over a hole in pipe lagging.

In all cases, be careful not to overexpose yourself when taking a sample. Use of an appropriate respirator and other protective equipment may be required.

NOTE: OSHA does not recommend the use of commercially available kits for screening for the presence of asbestos in construction materials because of the following problems:

II. General Requirements

1. Asbestos awareness training is required for employees whose work activities may contact asbestos containing material (ACM) or presumed asbestos containing material (PACM) but do not disturb the ACM or PACM during their work activities. The training must be documented.
2. Possible locations where employees may be exposed to asbestos during their job functions include: asbestos materials are used in the manufacture of heat-resistant clothing, automotive brake and clutch linings, and a variety of building materials including insulation, soundproofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet, and fire-resistant drywall. Asbestos is also present in pipe and boiler insulation materials, pipeline wrap and in sprayed-on materials located on beams, in crawlspaces, and between walls.
3. Health effects of asbestos include respiratory disease and various types of cancer. Exposure to asbestos has been shown to cause lung cancer, asbestosis, mesothelioma, and cancer of the stomach and colon.
4. Employees will abide by warning signs and labels and will not disturb the asbestos containing material. Signs and labels shall identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that asbestos containing material (ACM) and/or presumed asbestos containing material (PACM) will not be disturbed.
5. When working on multi-contractor worksites, employees shall be protected from exposure. If employees working immediately adjacent to a Class I asbestos jobs are exposed to asbestos due to the inadequate containment of such job, the company shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

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BLOODBORNE PATHOGEN POLICY

I PURPOSE

An infection control plan must be prepared for all persons who handle, store, use, process, or dispose of infectious medical wastes, or may foreseeably be exposed to blood or body fluids in the conduct of their job. This infection control plan was written to comply with OSHA requirement, 29 CFR 1910.1030, Blood Borne Pathogens. The plan includes requirements for personal protective equipment, housekeeping, training, and a procedure for reporting exposures. **Employees who provide 1st aid response as part of their job task must be included in the program.** Ordinarily, custodial workers do not need to be included in the program, however, their jobs should be evaluated to determine the risk of exposure for their particular worksite.

The purpose of the Bloodborne Pathogens Standard is to "reduce occupational exposure to Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV), the virus that causes AIDS, and other Bloodborne pathogens" that employees may encounter in their workplace.

II APPLICABILITY

The Bloodborne Pathogen program applies to all company personnel that can reasonably anticipate exposure to blood or other infectious material. Exposure determinations shall be made without regard to use of personal protective equipment, i.e. employees protected with appropriate PPE are considered exposed in the determination. Exposure shall be assumed for all personnel expected to provide emergency care and/or trained in First Aid procedures.

III DEFINITIONS

Biological Hazard - The term biological hazard or biohazard is taken to mean any viable infectious agent that presents a risk, or a potential risk, to the well being of humans.

Medical Wastes/Infectious Wastes - All waste emanating from human or animal tissues, blood or blood products or fluids. This includes used first aid bandages, syringes, needles, sharps, material used in spill cleanup and contaminated PPE or clothing.

Universal Precautions - Refers to a system of infectious disease control that assumes that every direct contact with body fluids is infectious and requires every employee exposed to be protected as though such body fluids were infected with blood-borne pathogens. All infectious/medical material must be handled according to Universal Precautions (OSHA Instruction CPL 2-2.44A)

Hazards - Unprotected exposure to body fluids presents the possible risk of infection from a number of bloodborne pathogens notably Hepatitis and HIV.

Engineering Controls - Refers to prevention of exposure to bloodborne pathogens via controls that include proper storage facilities and containers, autoclaves, and disinfectant equipment.

Administrative Controls - Administrative controls include universal precautions, assignment of PPE, employee training, use of spill kits specifically designed for blood and body fluids, restricted access to waste collection points and waste disposal procedures.

IV **GENERAL REQUIREMENTS**

1. Training shall be provided at the time of initial assignment and within 1 year of their previous training.
2. Occupational exposure to blood or other potentially infectious materials requires that all employers that can "reasonably anticipate exposure" of employees to infectious material to prepare and implement a written exposure control plan. Site specific exposure control plans shall be developed.
3. Universal precautions must be observed. Under circumstances in which differential between body fluids is difficult or impossible, all body fluids will be considered potentially infectious.
4. Employees will have access to a copy of the exposure control plan. Access to a copy of the exposure control plan shall be provided in a reasonable time, place, and manner.
5. Hand washing facilities must be readily available at all work locations or ensure antiseptic solutions/ towelettes will be available for use. If provision of hand washing facilities are not feasible, then an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes must be provided.
6. When the possibility of occupational exposure is present, PPE is to be provided at no cost to the employee such as gloves, gowns, etc. PPE shall be used unless employees temporarily declined to use under rare circumstances. PPE shall be repaired and replaced as needed to maintain its effectiveness
7. All equipment or environmental surfaces shall be cleaned and decontaminated after contact with blood or other infectious materials.
8. The Hepatitis B vaccine shall be available to all employees that have occupational exposure at no cost to the employee(s).

9. Accurate records for each employee with occupational exposure must be maintained for at least the duration of employment plus 30 years.
10. Training records shall be maintained for 3 years from the date of training.

V GENERAL PROGRAM MANAGEMENT

There are a number of general principles that should be followed when an employee has occupational exposure to blood or other potentially infectious materials. Under all circumstances it shall be assumed universal procedures apply, i.e. all body fluids shall be considered potentially infectious.

1. It is prudent to minimize all exposure to bloodborne pathogens.
2. Risk of exposure to bloodborne pathogens shall never be underestimated.
3. Engineering and work practice controls shall be structured to eliminate or minimize employee exposure to bloodborne pathogens.

Other Potential Infectious Materials (OPIM)

All occupational exposure to blood or **other potentially infectious materials (OPIM)** place workers at risk for infection with bloodborne pathogens. OSHA defines blood to mean human blood, human blood components, and products made from human blood. **Other potentially infectious materials (OPIM) means:** (1) The following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids; (2) Any unfixed tissue or organ (other than intact skin) from a human (living or dead); and (3) HIV-containing cell or tissue cultures, organ cultures, and HIV- or HBV-containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.

VI EXPOSURE DETERMINATION

Tasks and procedures in which occupational exposure to blood or other potentially infectious materials can occur are as follows:

1. Care of Lacerations and Similar Wounds
2. Administering First Aid or CPR
3. Caring for Burned Skin

VII METHODS OF COMPLIANCE

Employee Access to Exposure Plan

Employees shall receive a copy of the exposure control plan upon hire. Additional copies are available from the company Safety Representative upon request.

Communication of Hazards

Bloodborne Pathogen hazards shall be communicated to employees via information within this policy, information booklets, training and warning labels/signs.

Universal Precautions

Universal Precautions will be used to prevent contact with blood and other potentially infectious material. Unless it is known otherwise, all human blood, or bodily fluids will be treated as if they are infected with HBV, HIV or other bloodborne pathogens.

Engineering Controls

The Safety Representative or his designee will work with department managers and supervisors to review tasks and procedures performed at the work sites in situations where engineering controls can be implemented and/or updated. Engineering controls shall be examined and maintained or replaced on a regular schedule to ensure their effectiveness.

The following engineering controls are used throughout each location:

- Hand washing facilities, which are readily accessible to all employees who have the potential for exposure.
- If hand-washing facilities are not feasible, an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes shall be provided.

Work Practice Control

All appropriate work practice controls shall be in place as follows:

- Specimens of blood or potentially infectious materials must be put in leak proof bags for handling.
- Hands are to be washed immediately or as soon as feasible, after removal of gloves or other personal protective equipment.
- Following any contact of body areas with blood or any other potentially infectious materials, wash hands and any other exposed skin with soap and water as soon as possible. Flush exposed eyes, nose and/or mouth if any of these areas are affected.
- In all procedures involving blood or other potentially infectious material, employees should minimize splashing, spraying or other actions generating droplets of these materials.

- Equipment or environmental surfaces shall be thoroughly cleaned & decontaminated after contact with blood or other infectious material.

VIII **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

Personal Protective Equipment is provided to Company employees for protection against occupational exposure to blood and other potentially infectious material. It shall be used when rendering aid and provided at no cost to employees. PPE shall be appropriately sized for responders and readily available. PPE shall be cleaned/launched and properly disposed. The specific PPE available at Company Facilities includes, but is not limited to, the following:

Type Available	Locations
Disposable gloves	<u>In all first aid boxes</u>
Safety glasses with solid side shields	<u>In all first aid boxes</u>
Disposable pocket masks with one way valves	<u>In all first aid boxes</u>

IX **RESPONSE PROCEDURES**

Incidents involving exposure to blood or other potentially infectious material are to be dealt with as follows:

1. The employee is to report the incident to his/her direct supervisor before the end of the work shift during which the incident occurred. The employee's supervisor will notify the Safety Representative when the employee reports the incident.
2. Employees who render first aid assistance in any situation involving the presence of blood, or other potentially infectious material, regardless of whether or not a specific exposure incident occurs **will be offered a series of Hepatitis B (HBV) immunizations at no cost to employee** as soon as possible, but no later than 24 hours following initial exposure. The employee's direct supervisor is to inform the employee of this when the exposure is reported.
3. The Safety Representative or his designee will contact the locally approved Medical Facility to arrange for the exposed employee to receive the HBV immunization series.
4. Exposed employees that decline the HBV vaccination series should read and sign the OSHA Declination Form.

X **INFORMATION AND TRAINING**

Information will be provided to all employees during Company provided CPR/ Medic First Aid / Bloodborne pathogens training program. The written policy may be obtained from any Safety Representative, or within the Company Safety Manual.

All personnel assigned duties as deemed at risk of exposure will receive initial and annual training by a qualified instructor on the Bloodborne Pathogen Policy. Additionally, personnel trained in First Aid shall be offered this annual training. All new and current affected Employees will be trained initially and annually thereafter.

The content of the training program will include:

- Facility Policy
- Types and transmission of Blood-Borne Pathogens
- General Safety Rules
- Universal Precautions
- Use of Personal Protective Equipment
- Waste Disposal Procedures
- Post Exposure Treatment and Procedures
- HBV Vaccinations

XI **LABELING**

Warning labels must be affixed to containers of infectious waste. Labels must include the BIOHAZARD legend and symbol. Labels must be fluorescent orange or orange-red, or predominantly so, with lettering or symbols in contrasting color.

- Labels should be affixed as close as possible to the container by string, wire, adhesive, or another method that prevents loss or unintentional removal.
- Labels for contaminated equipment must meet the specifications above, and must state the portions of the equipment which remain contaminated.



**LABELS SHOULD DISPLAY THIS
UNIVERSAL BIOHAZARD SYMBOL**

The area Safety Representative must be contacted to determine appropriate disposal of biohazard waste.

XII POST-EXPOSURE EVALUATION AND FOLLOW-UP

Accident Investigation

If an employee is involved in an incident where exposure to blood or other potentially infectious materials occurs:

- The exposed employee's supervisor will investigate the circumstances surrounding the exposure incident.
- Make sure that medical consultation and treatment (if required) is provided as quickly as possible.

XIII MAINTENANCE OF RECORDS

Documents related to the Company Bloodborne Pathogen Policy are maintained in the main office. Accurate records for each employee with occupational exposure must be maintained for at least the duration of employment plus 30 years.

Records include:

- Individual exposure and/or medical documents.
- Applicable training records, to include: date and content of training, name and job title of personnel attending.

All records required by this section shall be made available upon request of employees, Assistant Secretary and the Director for examination. and copying. Medical records must have written consent of employee before released. The employer shall comply with the requirements involving transfer of records set forth in 29 CFR 1910.1020(h). The company Safety Representative is responsible for maintaining medical and/or training records and has the overall responsibility for the effectiveness of this policy.

Appendix A

Record of Hepatitis "B" Vaccine Declination

I understand that due to my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to me. However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future, I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee's Name (Print)

Date

Employee's Signature

Date

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I. PURPOSE

The Company Inc. will provide employees with CPR/First Aid training so that personnel will be available for initial first aid treatment of injuries should an accident occur. Any employee who feels they are not capable of administering CPR/First Aid should seek immediate help by calling 9-1-1 for the victim of an accident and stay with the victim until help arrives, or seek out another employee that can administer this service.

II. SCOPE

Each remote work site shall have a person certified in first aid and CPR available to render emergency care. Although the Company does not have designated First aid/CPR responders we do provide First Aid/CPR training for all of its employees every two years. Employees are not required to respond to first aid or CPR events, but if they feel they have adequate knowledge, training and capability, they may respond as "Good Samaritans".

III. REFERENCE

29 CFR 1910.151(b), *Medical Services and First Aid*

29 CFR 1910.1030(d), *Bloodborne Pathogens*

29 CFR 1926.23, *First Aid and Medical Attention*

CCR Title 8, Sections 1512 and 3400, *Emergency Medical Services and First Aid*

IV. RESPONSIBILITIES

- Site supervisors shall ensure first aid kits are inspected before being sent to each job and weekly to ensure expendable items are replaced as necessary.
- Site supervisors shall keep a list of appropriate emergency phone numbers, for hospitals, physicians, ambulance and other emergency services necessary in the event an injured person must be transported.
- Site supervisors shall ensure appropriate fresh water, drinking cups, washing facilities are available at each site.
- Site supervisors shall ensure appropriate eye wash facilities are available when employees are exposed to corrosive materials.

V. GENERAL REQUIREMENTS

1. In the absence of an infirmary, clinic, hospital, or physician, that is reasonably accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first aid shall be available at the worksite to render first aid.
2. A valid certificate in first aid training must be obtained from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence.
3. First aid supplies must be readily available and easily accessible when required
4. First aid kits shall consist of appropriate items which will be adequate for the environment in which they are used (refer to inventory list shown above). For construction operations, items shall be stored in a weather proof container with individual sealed packages of each type of item.
5. Site Supervisors shall ensure the availability of adequate first aid supplies, and periodically reassess the demand for supplies and adjust their inventories. For construction operations, first aid kits shall be checked before being sent out to each job and at least weekly.
6. Proper site specific equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service shall be provided.
7. Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities shall be provided within the work area.

VI. ABC EVALUATION

The initial evaluation of a victim should follow the procedure developed by the American Red Cross for basic life support, called the “ABC Evaluation” (Airway, Breathing, Circulation).

A review of the procedure for performing ABC evaluation is provided in the table below.

Step	Action	Explanation
1	Check for responsiveness	<ul style="list-style-type: none">• If the victim responds, monitor condition and consider obtaining medical attention for the victim.• No additional action is required by the rescuer.• If the victim does not respond, call for help and proceed to Step 2.
2	Position the victim	<ul style="list-style-type: none">• If necessary, move the victim so he/she is lying on their back.
3	Clear the victim's airway	<ul style="list-style-type: none">• Open the airway by using the head-tilt/chin-lift method.• Look into the victim's mouth and remove anything that is blocking or could block the airway.
4	Determine whether or not the victim has stopped breathing	<ul style="list-style-type: none">• Place your cheek next to the victim's nose and mouth to feel an exchange of air for 3 to 5 seconds.• At the same time, watch for any chest movement.• <i>If the victim is breathing, proceed to Step 5.</i>• <i>If breathing has stopped, begin rescue breathing.</i>
5	Locate the carotid artery to feel if the heart is circulating blood	<ul style="list-style-type: none">• Initially place the tips of two fingers on the larynx (voice box).• Gently slide your fingers into the groove between the voice box and the large muscle of the neck.• Feel for the victim's pulse <p><i>If circulation has stopped, begin CPR.</i></p>

VII. SEVERE BLEEDING

Severe bleeding is the result of a wound to large vessels of the body and MUST be controlled quickly.

Prior to performing any first aid on a bleeding victim, you should:

- Call for medical help or have someone else call while first aid is being initiated.
- Use personal protective clothing such as surgical gloves, mask, and other protective items from the first aid kit.

Control severe bleeding by referring to the table below to identify and initiate the correct procedure.

If the bleeding...	Then...
Can be controlled with a: <ul style="list-style-type: none">• clean pad• handkerchief, or• cloth	<ol style="list-style-type: none">1. Place a clean pad, handkerchief, or cloth over the wound and press firmly with your hands <p><i>Note: If you do not have a pad or bandage, close the wound with your hand or fingers.</i></p> <ol style="list-style-type: none">2. Apply pressure directly over the wound.3. Hold the pad firmly in place with a bandage, necktie, or cloth strip, etc.
If the bleeding... is the result of an injury such as amputation, mangled, or crushed arms or legs and CANNOT be controlled with the procedure described above	Then... Apply pressure at a point and then if not controlled apply a tourniquet to the wound by: <ol style="list-style-type: none">1. finding a strong, wide piece of cloth;2. placing it immediately above the wound, making sure that it is just tight enough to stop the bleeding, and;3. notify medical responders that a tourniquet is in place.

VIII. FIRST AID KIT INVENTORIES

First aid kits will be provided by the company. The size of the kit will be determined by the number of employees it will serve. The contents of the first aid kits shall be stored in a weatherproof container with individually sealed packages and inspected regularly (at least weekly) to ensure that the expended items are replaced. The contents of first aid kits shall be arranged to be quickly found and remain sanitary. Each kit has been approved by our company physician and should include at a minimum:

Truck Kits (up to 10 people)	
32 Sheer Bandages, 3/4X3"	4 NON-STICK pads medium
2 KLING Gauze Bandages, 2"	2 Oval Eye Pads
1 Triangle Bandages	1 First Aid Tape, 1/2x180"
10 Antiseptic Wipes	1 First Aid Guide
2 Disposable Gloves	2 Burn Cream, 1/8 oz. packs
2 CPR Barriers	

JOB SITE KITS (up to 25 people)	
32 Sheer Bandages, 3/4x3"	2 KLING Gauze Bandages, 2"
4 NON-STICK pads medium	2 Oval Eye Pads
1 Triangle Bandages	1 First Aid Tape, 1/2x180"
10 Antiseptic Wipes	2 Burn Cream, 1/8 oz. packs
2 Disposable Gloves	20 Flex. Fabric Bandages, 1x3
2 CPR Barriers	4 NON-STICK Pads Small
1 First Aid Guide	1 Elastic Bandage, 2"
1 Scissors & Tweezers	1 Instant Cold Pack, Small

JOB SITE KITS (up to 100 people)	
4 Disposable Gloves	12 Burn Cream, 1/8 oz. packs
30 Antiseptic Wipes	2 First Aid Tape, 1/2x180"
2 Triangle Bandages	4 KLING Gauze Bandages, 2"
4 NON-STICK pads medium	4 Oval Eye Pads
1 First Aid Guide	100 Sheer Bandages, 3/4x3"
4 CPR Barriers	40 Flex. Fabric Bandages, 1x3
2 NON-STICK Pads Small	1 Elastic Bandage, 2"
2 Instant Cold Pack, 4 1/2x6"	1 Scissors & Tweezers
10 Plastic Bandages , Ex. Lg.	10 Flex. Fabric Knuckle Band.
10 Flex. Fabric Finger Band.	2 NON-STICK Pads, Medium
2 NON-STICK Pads, Large	2 NU-Gauze Sterile Sponges
2 KLING Rolled Bandages, 4"	2 Combined Dressings, 5x9"
1 Tourniquet, 3/4x36"	1 Elastic Bandage 2"
1 First Aid Cream, 8oz.	2 Ophthalmic Irrigating Fld.
1 Rescue Blanket, 56"x 84"	

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FIRE PREVENTION AND PROTECTION

I. PURPOSE

OSHA's Fire Prevention Plan regulation, requires the company, to have a written fire prevention plan (FPP). This plan applies to all operations in our company where employees may encounter a fire.

This FPP is in place at this company to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire. This plan addresses the following issues:

- Major workplace fire hazards and their proper handling and storage procedures.
- Potential ignition sources for fires and their control procedures.
- The type of fire protection equipment or systems which can control a fire involving them.
- Regular job titles of personnel responsible for maintenance of equipment and systems installed to prevent or control ignition of fires and for control of fuel source hazards.

II. REFERENCE

TITLE 8 CCR, subsection 3221, Fire Prevention Plan
29 CFR 1910.38, Emergency Action Plans

III. GENERAL REQUIREMENTS

The plan is closely tied to our emergency action plan where procedures are described for emergency escape and route assignments, procedures to account for all employees after emergency evacuation has been completed, rescue and medical duties for those employees who perform them. Please see the emergency action plan for this information.

1. Fire equipment training (an educational program) shall be provided to employees whose duties require the use of fire protective equipment. The goal is to familiarize employees with the general principles of fire extinguisher use and the hazards involved in incipient stage fire fighting.
2. Training will be provided before initial assignment and annually thereafter.
3. Portable fire extinguishers are subjected to monthly visual inspections and an annual maintenance check.

IV. SAFETY REPRESENTATIVE RESPONSIBILITIES:

The assigned Safety Representative is responsible for the following activities. He must:

1. Develop a written fire prevention plan for day and evening work conditions.
2. Immediately notify the Long Beach fire or police departments, and the building owner/superintendent in the event of a fire affecting the office.
3. Integrate the fire prevention plan with the existing general emergency plan covering the building occupied.
4. Distribute procedures for reporting a fire, the location of fire exits, and evacuation routes to each employee.
5. Conduct drills to acquaint the employees with fire procedures, and to judge their effectiveness.
6. Satisfy all local fire codes and regulations as specified.
7. Train designated employees in the use of fire extinguishers and the application of medical first-aid techniques.
8. Keep key management personnel home telephone numbers in a safe place in the office for immediate use in the event of a fire. Distribute a copy of the list to key persons to be retained in their homes for use in communicating a fire occurring during non-work hours.
9. Decide to remain in or evacuate the workplace in the event of a fire.
10. If evacuation is deemed necessary, the Operations Manager ensures that:
 - All employees are notified and a head count is taken to confirm total evacuation of all employees.
 - When practical, equipment is placed and locked in storage rooms or desks for protection.
 - The building owner/superintendent is contacted, informed of the action taken, and asked to assist in coordinating security protection.
 - In locations where the building owner/superintendent is not available, security measures to protect employee records and property are arranged as necessary.

V. WORKPLACE FIRE HAZARDS

It is the intent of this company to assure that accumulation of combustible waste materials are controlled so that a fast developing fire, rapid spread of toxic smoke, or an explosion will not occur. Employees are to be made aware of the hazardous properties of materials in their workplaces, and the degree of hazard each poses.

Fire hazards at our facilities include, but are not limited to, oily waste, such as oily rags, compressed gases contained in cylinders, and petroleum fuel materials.

Fire prevention measures must be developed for all fire hazards found. Once employees are made aware of the fire hazards in their work areas, they must be trained in the fire prevention measures developed and use them in the course of their work. For example, oil soaked rags must be treated differently than general paper trash in office areas. In addition, large accumulations of waste paper or corrugated boxes, etc., can pose a significant fire hazard. Accumulations of materials which can cause large fires or generate dense smoke that are easily ignited or may start from spontaneous combustion, are the types of materials with which this fire prevention plan is concerned. Such combustible materials may be easily ignited by matches, welder's sparks, cigarettes and similar low level energy ignition sources. It is the intent of this company to prevent such accumulation of materials.

Certain equipment is often installed in workplaces to control heat sources or to detect fuel leaks. An example is a temperature limit switch often found on deep-fat food fryers found in restaurants. There may be similar switches for high temperature dip tanks, or flame failure and flashback arrester devices on furnaces and similar heat producing equipment. If these devices are not properly maintained or if they become inoperative, a definite fire hazard exists. Again employees and supervisors should be aware of the specific type of control devices on equipment involved with combustible materials in the workplace and should make sure, through periodic inspection or testing, that these controls are operable. Manufacturer's recommendations should be followed to assure proper maintenance procedures.

VI. POTENTIAL IGNITION SOURCES

Flammable or combustible materials may not ignite on their own without an external source of ignition.

The following procedures are used to control known ignition sources at this company: no accumulation of oily rags; cylinders are inspected and maintained in proper working condition; fuel materials are not exposed to external ignition sources

VII. FIRE PROTECTION EQUIPMENT

Fire protection equipment, selected and purchased by the Operations Manager, in use at this company includes the following extinguishers to protect from the various types of fire hazards.

Type of Fire: B, flammable liquids, gases and greases. Type of Extinguisher: B or ABC, foam, carbon dioxide, dry chemicals

In addition, Fire hoses are also present to control fires. They are located at various places throughout the plants.

VIII. MAINTENANCE OF FIRE PROTECTION EQUIPMENT

Once hazards are evaluated and equipment is installed to control them, the equipment must be monitored on a regular basis to make sure it continues to function properly.

Housekeeping Procedures

Our company controls accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire. We have identified the following potential hazards in our facility:

- ☐ Accumulation of oily rags
- ☐ Open fuel oil containers
- ☐ Stockpiled Paper products

The following procedures have been developed to eliminate or minimize the risk of fire due to improperly stored or disposed of materials.

- ☐ Keep floor free of paper and dust.
- ☐ Store oily rags in specially designed containers.
- ☐ Store all flammables in fire cabinets when not in use.

IX. FIRE EXTINGUISHER INSPECTION AND MAINTENANCE

All Company vehicles (except personal vehicles) should be equipped with an approved fire extinguisher. The size of the extinguisher should be determined by the anticipated need:

VEHICLE TYPE	MINIMUM REQUIREMENT
Pickups and Cars	2-1/2 pound fire extinguisher
Heavy equipment, hydro-cranes ect...	20-pound fire extinguisher

- Fire extinguishers are an important segment of any fire protection program. Fire extinguishers should be:
 - a. Accessible
 - b. Properly maintained
 - c. Inspected monthly by trained personnel and documented
 - d. Inspected annually by qualified personnel and documented
- The supervisor is responsible for ensuring that all extinguishers are properly maintained and inspected. Each employee should know how to identify and report extinguishers needing recharging and/or maintained.
- Portable fire extinguishers shall be inspected visually monthly and re-certified on an annual basis. Appropriate records of annual certifications shall be kept with each individual fire extinguisher.

X. TRAINING

At the time of a fire, employees should know what type of evacuation is necessary and what their role is in carrying out the plan. In cases where the fire is large, total and immediate evacuation of all employees is necessary. In smaller fires, a partial evacuation of nonessential employees with a delayed evacuation of others may be necessary for continued plant operation. We must be sure that employees know what is expected of them during a fire to assure their safety.

This document is not one for which casual reading is intended or will suffice in getting the message across.

If passed out as a statement to be read to oneself, some employees will choose not to read it, or will not understand the plan's importance. In addition, training on the plan's content is required by OSHA.

A better method of communicating the fire prevention plan is to give all employees a thorough briefing and demonstration.

Training, conducted on initial assignment, includes:

- ☐ What to do if employee discovers a fire
- ☐ Demonstration of alarm, if more than one type exists
- ☐ How to recognize fire exits
- ☐ Evacuation routes
- ☐ Assisting employees with disabilities
- ☐ Measures to contain fire (e.g., closing office doors, windows, etc. in immediate vicinity)
- ☐ Head count procedures (see EAP for details)
- ☐ Return to building after the "all-clear" signal

If the Operation Manager has reason to believe an employee does not have the understanding required, the employee must be retrained.

The Environmental Compliance Consultant certifies in writing that the employee has received and understands the fire prevention plan training.

Because failure to comply with company policy concerning fire prevention can result in OSHA citations and fines as well as employee injury, an employee who does not comply with this program will be disciplined.

The Environmental Compliance Consultant provides training for each employee who is required to use fire prevention equipment. Employees shall not use fire prevention equipment without appropriate training. Training, before an individual is assigned responsibility to fight a fire, includes:

- ☐ Types of fires
- ☐ Types of fire prevention equipment
- ☐ Location of fire prevention equipment
- ☐ How to use fire prevention equipment
- ☐ Limitations of fire prevention equipment
- ☐ Proper care and maintenance of assigned fire prevention equipment and
- ☐ Extinguishing a small oil fire

Employees must demonstrate an understanding of the training and the ability to use the equipment properly before they are allowed to perform work requiring the use of the equipment.

If the Operation Manager has reason to believe an employee does not have the understanding or skill required, the employee must be retrained.

The Environmental Compliance Consultant certifies in writing that the employee has received and understands the fire prevention equipment training.

XI. RESPONSIBLE PROCEDURES

In case of fire the following procedure should be used:

1. **Summon help by whatever means available.** Do not fight a fire before alerting someone else.
2. Analyze the situation, considering:
 - a. Threat to life?
 - b. Damage to public property?
 - c. Evacuate or is extinguishing the fire possible?
 - d. Notification and assistance from outside authorities appropriate?
 - e. Hazardous or toxic chemicals present?
3. Isolate all fuel sources and/or threatened facilities.
4. Fighting a fire in the initial stages is considered incipient fire fighting. **DO NOT FIGHT FIRES BEYOND THE INCIPIENT STAGE UNLESS YOU ARE TRAINED AND EQUIPPED TO DO SO AS A PART OF A FIRE BRIGADE OR EMERGENCY RESPONSE TEAM.** Such fire fighting should be limited to trained personnel using fire extinguisher and water streams at long range.
5. Locate the fire fighting equipment and approach the fire **FROM THE UPWIND SIDE.** In the case of a gas fire, extinguish the fire by shutting off the fuel source.
6. **NEVER OPERATE AN EXTINGUISHER IN SUCH A MANNER THAT ANY PART OF THE BODY IS LOCATED DIRECTLY IN FRONT OF THE FILL CAP.**
7. After the fire is extinguished, stand by to ensure that there are no flashbacks.

XII. FIRE PREVENTION GUIDELINES

1. Class A fire materials should not be stored in or used as construction material in process areas.
2. Keep all buildings in which solvents or chemicals are being handled well ventilated at all times.
3. Report and repair all hydrocarbon liquid or gas leaks immediately. If immediate repairs are not possible, post an adequate warning sign, isolate the area and take extra precautions against fire.
4. In the event of a hydrocarbon liquid or gas leak, extinguish all fires and remove other sources of ignition immediately. Shut down engines and other potential sources of ignition, such as pilot lights. Report the leak promptly to the supervisor in charge. Shut off fuel supply or process if possible.
5. Use soap suds when testing for gas leaks on connections. Never use an open flame.
6. Use gasoline as a motor fuel only. Using gasoline as a cleaning agent on Company property is strictly forbidden. Use a high flash point (140 +F) safety solvent to clean tools, machinery and other similar equipment. Wear gloves made of hydrocarbon-resistant rubber to protect hands.
7. Transport gasoline only in approved, clearly marked containers. Never place gasoline containers inside car or truck passenger compartments.
8. Follow proper procedures when lighting direct-fired heater. Lighting procedure stickers are available from your Compliance director.
9. Flame arresters should be properly maintained and inspection port covers keep in place.
10. When transferring hydrocarbon (especially "flashing" liquids) from a line or vessel to another container, the source container and the receiving container should be electrically bonded to prevent ignition due to static electricity.

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I. PURPOSE

This written Hazard Communication Plan covers the requirements of OSHA's Hazard Communication Standard. Our Company is committed to administering legally and morally correct actions to protect its employees, contractors, the surrounding communities and the environment from exposure to chemical and/or hazardous substances.

II. SCOPE

To ensure that information about the dangers of hazardous chemicals used at our locations is known by all affected employees, the following hazard information program has been established. Under this program, you will be informed of the contents of OSHA's hazard communication standard, the hazardous properties of chemicals with which you work, safe handling procedures, and measures to take to protect yourself from these chemicals.

III. APPLICABILITY

This program applies to all work operations in our company where you may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. All work units of this company will participate in the hazard communication program. Copies of the program are available in the main office for review by any interested employee.

Our Safety Representative is the program coordinator who has overall responsibility for the program. He will review and update the program, as necessary. Copies of the written program may be obtained from him at the main office.

IV. REFERENCE

29 CFR 1910.1200, *Hazard Communication*
CCR Title 8, Section 5194, *Control of Hazardous Substances*

V. DEFINITIONS

Hazardous Chemical: means any chemical which is classified as a physical hazard or a health hazard, a simple asphyxiant, combustible dust, pyrophoric gas, or hazard not otherwise classified.

Health Hazard: means a chemical which is classified as posing one of the following hazardous effects: acute toxicity (any route of exposure); skin corrosion or irritation; serious eye damage or eye irritation; respiratory or skin sensitization; germ cell mutagenicity; carcinogenicity; reproductive toxicity; specific target organ toxicity (single or repeated exposure); or aspiration hazard.

Globally Harmonized System (GHS): is an internationally agreed-upon system for labeling, created by the United Nations. It is designed to replace the various classification and labeling standards used in different countries by using consistent criteria for classification and labeling on a global level.

Label: means an appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the immediate container of a hazardous chemical, or to the outside packaging.

Physical Hazard: means a chemical that is classified as posing one of the following hazardous effects: explosive; flammable (gases, aerosols, liquids, or solids); oxidizer (liquid, solid or gas); self-reactive; pyrophoric (liquid or solid); self-heating; organic peroxide; corrosive to metal; gas under pressure; or in contact with water emits flammable gas.

Safety Data Sheet (SDS): Formally known as Material Safety Data Sheet (MSDS); means written or printed material concerning a hazardous chemical that is prepared in accordance with the regulation.

VI. RESPONSIBILITIES

Management is responsible to ensure adequate resources are dedicated to provide for compliance with the standard.

Employees must review this written hazard communication plan and:

- Follow all safety instructions provided by this plan and by your supervisor
- Complete hazard communication training and pass the test
- Obtain an SDS for any new chemical to be tested or purchased
- Forward new SDSs to the Safety Representative to facilitate updating SDS binders.
- Label containers that are used for the transfer of chemicals (secondary or portable containers)
- Read Safe Use Guide information and chemical labels prior to working with a chemical
- Always wear personnel protective equipment specific to each chemical

VII. EMPLOYEE RIGHTS

Under the law, the hazard communication program also establishes rights for employees:

1. You have the right to personally receive information regarding hazardous substances to which you may be exposed.
2. You have the right for your physician or collective bargaining agent to receive information regarding hazardous substances to which you may be exposed.

3. You may exercise your rights under the provisions of the Occupational Safety and Health Act (OSHA) without concern for any discharge or discrimination.
4. This written hazard communication program is available for you to read at any time mutually acceptable between employer and employee.
5. You have the right to refuse to work with a toxic substance if you have not been provided with SDS information within the prescribed time limits.
6. You may petition OSHA to have any chemical or substance added, removed or modified on the OSHA toxic substance list.
7. You may request a copy of an SDS for a material to which you may be exposed.

VIII. GENERAL REQUIREMENTS

1. Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training shall be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.
2. A written hazard communication program (this program) shall be developed, implemented, and maintained at each workplace that describes how labels and other forms of warning, safety data sheets, and employee information will be met.
3. A list of the hazardous chemicals known to be present at each location must be maintained, using an identity that is referenced on the appropriate SDS.
4. When you are required to perform hazardous non-routine tasks (e.g., cleaning tanks, entering confined spaces, etc.), special training will be provided in order to inform you regarding the hazardous chemicals to which you might be exposed and the proper precautions to take to reduce or avoid exposure.
5. Site specific programs shall have specific methods for providing information concerning hazardous chemicals at job sites, methods of providing SDS sheets, methods of precautionary measures to be taken and methods of providing information on labeling systems. Where employees must travel between work places during a work shift (multi job sites), the written program may be kept at a primary job site. If there is no primary, then the program should be sent with employees.
6. Container labels shall contain the following information: Identity of hazardous chemicals, appropriate hazard warnings and name and address of the chemical manufacturer, importer or other responsible party.
7. Chemical manufacturers are responsible for developing SDSs. The Company shall have a SDS for each chemical used.

8. SDSs shall be maintained and readily accessible in each work area. SDSs can be maintained at the primary work site. However, they must be available in case of an emergency. SDS must be made available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director.

IX. LIST OF HAZARDOUS CHEMICALS

Our Safety Representative will make a list of all hazardous chemicals used at each location, and will update the list as necessary. Our list of chemicals identifies all of the chemicals used in our work areas. It identifies the corresponding SDS for each chemical by using the *same* name as that used on the corresponding SDS. For example, if the label says "DYCOTE 8" on the container, any time you want to know more about it, go to the SDS listed under the name "DYCOTE 8". The labels of all containers shipped to us from outside will also contain the name and address of the chemical manufacturer who can be contacted if additional information is desired.

X. PROPOSITION 65 LISTED CHEMICALS

The Safe Drinking Water and Toxic Enforcement Act of 1986 requires that the Governor revise and republish at least once per year the list of chemicals known to the State to cause cancer or reproductive toxicity. The following chemicals are known to be on the proposition 65 list and may be present at any job site.

Location	Chemical	Prop65
Field	Diesel #2 (diesel exhaust is prop 65 listed)	Cancer
Field	Gasoline Unleaded (vapors are prop 65 listed)	Cancer
Field	Paints	Cancer
Field	Solvents	Cancer
Field	Thinners	Cancer
Field	Select Process Chemicals	Cancer

GENERAL SAFETY POLICIES**Section: 5.05 Hazard Communication Program GHS****Revision Number: 1****Revision Date: 8/28/2015****File Name: P505****XI. HAZARDOUS CHEMICAL COMMONLY FOUND ON SITE**

ACETONE	CUTTING OIL
ACETYLENE GAS	DE-EMULSIFIER FOR OIL
ADHESIVES	DIESEL GAS, DIESEL OIL
AGGREGATE	DRYWALL
ALUMINUM ETCHING AGENT	ENAMEL
AMMONIA	ETHYL ALCOHOL
ANTI-FREEZE	EXPLOSIVES
ARSENIC COMPOUNDS	ETCHING AGENTS
ASBESTOS	FIBERGLASS
ASPHALT (PETROLEUM)	FOAM INSULATION
BENZENE (and derivatives)	FORM OILS
BLEACHING AGENTS	FREON 20, R20 (AND OTHERS)
CARBON BLACK	GALVANIZING MATERIALS
CARBON MONOXIDE (IN CYLINDERS)	OUTLETS, SWITCHES
CAULKING, SEALANT AGENTS	GASOLINE (PETROL, ETHYL)
CAUSTIC SODA (SODIUM HYDROXIDE)	GLUES
CEMENT	GRAPHITES
CHROMATE SALTS	GREASES
CHROMIUM	GROUTS
CLEANERS	GYPSUM (CALCIUM SULFATE)
COAL TAR PITCH	HELIUM (IN CYLINDERS)
COATINGS (BRUSH OR SPRAY)	HYDRAULIC BRAKE FLUID
COBALT	HYDAULIC ACID
CONCRETE CURING COMPOUNDS	INKS
CREOSOL	INSULATION
KEROSENE	IRON
LEAD	PHOTOGRAVURE INK (COPY
LIME	MACHINES)
LIMESTONE	PIPE COATINGS
LUBRICATING OILS	PIPE THREADING OIL
LYE (SODIUM HYDROXIDE)	PLASTICS
SODIUM HYDROXIDE)	POLISHES
MAGNESIUM	PROPANOL
MASONRY MATERIALS	PUTTY
METAL CONDUIT	PVC-PIPE CEMENT
METALS	ROOFING FELTS
METHANOL (METHYL ALCOHOL)	SEALERS
METHYL ETHYL KETONE	SOLDER, FLUX
(2-BUTANONE)	SOLVENTS
MORTAR	SOLDER, SOFT (LEAD, TIN)
MOTOR OIL ADDITIVES	SULFURIC ACID
MURIATIC ACID	THINNER, PAINT/LACQUER
NAPHTHA (COAL TAR)	TIN
NITROGLYCERIN DIOXIDE (IN	TRANSITE
CYLINDERS)	TURPENTINE, GUM SPIRIT
OXYGEN (IN CYLINDERS)	VARNISHES
PAINT REMOVER	WAXES
PAINT STRIPPER	WOOD ALCOHOL (METHANOL)
PAINTS	WOOD DUST

XII. SAFETY DATA SHEETS

SDS's provide specific information on the chemicals in use. Our Safety Representative will maintain a binder in his office with an SDS on every hazardous chemical on our premises. Each SDS will be a fully completed OSHA Form 174 or the equivalent and maintained as appropriate.

The Safety Representative will also make sure that each work site maintains an SDS for the hazardous chemicals in that area at a place where it is readily available to employees while they are at work. If you do not know where they are located, ask your supervisor.

Our Safety Representative is responsible for acquiring and updating SDS's. He will contact the chemical manufacturer or vendor if additional information is necessary or if an SDS has not been supplied with an initial shipment. All new procurements for the company must be cleared by the Safety Representative.

These Safety Data Sheets contain the following information about the chemicals in your workplace and will be IN compliance with the GHS requirements.

- Section 1. Identification
- Section 2. Hazard(s) identification
- Section 3. Composition/information on ingredients
- Section 4. First-Aid measures
- Section 5. Fire-fighting measures
- Section 6. Accidental release measures
- Section 7. Handling and storage
- Section 8. Exposure controls/personal protection
- Section 9. Physical and chemical properties
- Section 10. Stability and reactivity
- Section 11. Toxicological information
- Section 12. Ecological information
- Section 13. Disposal considerations
- Section 14. Transport information
- Section 15. Regulatory information
- Section 16. Other information, including date of preparation or last revision

XIII. LABELS AND OTHER FORMS OF WARNING

Our Safety Representative will also ensure that all hazardous chemicals on work sites are properly labeled and updated, as necessary. The labels list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party.

Container labels must contain the following information: Identity of hazardous chemicals, appropriate hazard warnings and name and address of the chemical manufacturer, importer or other responsible party. Company and/or employees shall not remove or deface labels on incoming containers of hazardous chemicals.

Containers of products that include any hazardous chemical that is shipped *from* our location will be checked by the Safety Representative or a person assigned to that responsibility, in order to make sure all containers are properly labeled.

If there are a number of stationary containers within a work area that have similar contents and hazards, each of them need not be labeled. However, signs will be posted to convey the needed hazard information.

On our stationary process equipment, we may sometimes substitute regular process sheets, batch tickets, blend tickets, and similar written materials for container labels—but they will contain the same information as labels. If used, those written materials will be readily available to you during your work shift.

If you transfer chemicals from a labeled container to a portable container that is intended only for your immediate use, no labels are required on the portable container.










Pipes or piping systems do not have to be labeled but their contents will be described in the training sessions. If you ever have any questions about pipes or their contents, ask your supervisor.

XIV. PICTOGRAMS AND HAZARDS

Workplace chemical containers are labeled by the chemical manufacturer when received. Under OSHA's HAZCOM GHS standard, labels need to include the following:

- ✓ **Pictogram:** a symbol plus other graphic elements, such as a border, background pattern, or color that is intended to convey specific information about the hazards of a chemical. Each pictogram consists of a different symbol on a white background within a red square frame set on a point (i.e. a red diamond). There are nine pictograms under the GHS.
- ✓ **Signal words:** a single word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for less severe hazards.
- ✓ **Hazard Statement:** a statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- ✓ **Precautionary Statement:** a phrase that describes recommended measures to be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical or improper storage or handling of a hazardous chemical.

Pictograms and Hazards

Health Hazard 	Flame 	Exclamation Mark 
<ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	<ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	<ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non Mandatory)
Gas Cylinder 	Corrosion 	Exploding Bomb 
<ul style="list-style-type: none"> • Gases under Pressure 	<ul style="list-style-type: none"> • Skin Corrosion/ burns • Eye Damage • Corrosive to Metals 	<ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
Flame over Circle 	Environment (Non Mandatory) 	Skull and Crossbones 
<ul style="list-style-type: none"> • Oxidizers 	<ul style="list-style-type: none"> • Aquatic Toxicity 	<ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

XV. NON-ROUTINE TASKS

When you are required to perform hazardous non-routine tasks (e.g., cleaning tanks, entering confined spaces, etc.), special training will be provided in order to inform you regarding the hazardous chemicals to which you might be exposed and the proper precautions to take to reduce or avoid exposure.

XVI. TRAINING

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training from the Safety Representative (or his designee) on the hazard communication standard and the safe use of those hazardous chemicals to which you may be exposed.

A program that uses both audiovisual materials, classroom-type training, and/or on-the-job training has been prepared for this purpose. The training program may vary among workers but every worker will be trained in the OSHA hazard communication standard and all chemicals to which he or she may be exposed while at work.

Whenever a new hazard is introduced, additional training will be provided as appropriate. Regular safety meetings may also be used to review the information presented in the initial training. Site supervisors will be extensively trained regarding hazards and appropriate protective measures so they will be available to answer questions from employees and provide daily monitoring of safe work practices. If you

are ever unsure about what you should do or uncertain about the consequences of any action you plan to take, *DON'T ACT. Ask your supervisor beforehand!*

The training plan will emphasize these items:

- Summary of the standard and this written program.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., personal protective equipment required, proper use, and maintenance; work practices or methods to assure proper use and handling of chemicals; and procedures for emergency response).
- Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.
- Where SDS's are located, how to read and interpret the information on both labels and SDS's, and how employees may obtain additional hazard information.

The Safety Representative or designee will regularly review our employee training program and advise management on training or retraining needs. As part of the assessment of the training program, he or she may want to obtain input from employees regarding the training they have received, and their suggestions for improving it. If you have any suggestions, give them to your supervisor. He or she will see to it that they are provided to the appropriate party.

Retraining is required when the hazard changes or when a new hazard is introduced into the workplace. It is also company policy to provide training whenever it is needed to whoever needs it. If you do not think you are fully or properly trained, or if you ever feel you need additional training in any aspect of your job or your work environment, report that to your supervisor *immediately!*

XVII. SUBCONTRACTORS AND MULTI-EMPLOYER SITES

Upon notification by the responsible supervisor, our Safety Representative or a person specifically designated for the purpose will provide outside contractors with notice of any chemical hazards that may be encountered in the normal course of their work on the

premises, the labeling system in use, the protective measures to be taken, the safe handling procedures to be used, and the location and availability of SDS's. Each contractor bringing chemicals on-site must provide us with the appropriate hazard information on those substances, including the labels used and the precautionary measures to be taken in working with those chemicals.

XVIII. ADDITIONAL INFORMATION

All employees, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS's, chemical information lists and any other safety or health matter that may interest or concern them at our main office.

Non-English speaking employees' information shall be presented in their native language. Labels shall be legible and in English.

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RESTRICTED DUTY/ LIGHT DUTY POLICY

I. Purpose

The purpose of this policy is to provide a mechanism for the Company to assist injured employees to return to work as soon as possible after an accident, injury, or illness.

II. Policy

Return-to-work policies include light and alternate duty assignments whereby employees with work related injuries or illnesses are encouraged to return to work as soon as possible, in accordance with the operational needs of the Company and the medical restrictions established by the treating physician. The safety representative will help facilitate early return-to-work activities, as required to ensure a quick return to work of the employee.

III. Definitions

Light Duty (also known as modified duty): A situation where an employee returns from a workrelated injury to modified or restricted duties in the previously held position.

Alternate Duty: A situation where temporary medical restrictions preclude return to duty in the employee's previous position, and a temporary assignment to an alternate position is offered within the home department or a hosting department.

Department: The department to which the employee is assigned during her/his normal employment.

Safety Representative - The person that provides, or assists in providing alternate duty to an injured employee.

IV. Intent

Where practical, Company employees on temporary disability due to a workers' compensation covered injury will be afforded the opportunity to return to work in light or alternate duty status.

In either of these instances, the duty being offered will meet the physician's recommendations and be subject to the provisions of the Family and Medical Leave act, on Leaves of Absence, and this policy.

Light duty policies should be used in all departments to keep an employee working and productive. In situations where Light duty is not practical, the department should initiate and continue communications with the employee and the employee's physician to expedite the employee's return to regular duty.

Employees on temporary disability leave suffering any permanent disability as defined by the Americans with Disabilities Act (ADA) should be provided reasonable

accommodations and considered for other positions in the Company for which they are qualified.

V. Responsibilities and Procedures

Granting alternate/light duty is optional to the Company. The offer of alternate/light duty may be terminated at any time in accordance with its operational needs. The offer or termination of alternate/light duty must be communicated to the employee in writing using the Bona Fide Offer of Employment. Under this scenario the Company is not obligated to create alternate/light duty positions.

Each department should implement procedures that encourage employees who are away from work due to a work-related injury or illness to return to work in such a capacity as the employee is able. A safety representative and/or management representative can facilitate this by identifying light duty assignments that conform to the employee's particular limitations as prescribed by the treating physician.

This may consist of either modifying the employee's current job requirements (light duty) or assigning the employee other responsibilities in another position (alternate duty).

Light duty may consist of any tasks, full or part-time, in an employee's position that they are qualified to perform when unable to perform regularly assigned duties. This procedure does not require elimination or reassignment of a substantial number of essential functions related to the position.

Employees on light or alternate duty shall maintain their salary and status except in such circumstances approved by the appropriate management representative. The duration of light duty or alternate duty should be the lesser of the duration of the medical restriction or three months. At the end of three months, the case shall be reviewed for determination of status.

VI. Release from Light Duty Assignments

Following the employee's release for restricted duty by a physician, the department should review the medical limitations relevant to the essential functions of the employee's job description. The Company should offer the employee light duty if such duty is compatible with the employee's medical restrictions and is available. The offer must be in writing using a Bona Fide Offer of Employment.

If alternate duty is required, the Company should prepare an Alternate Duty Job Description demonstrating that such duty is in accordance with the employee's medical restrictions. The claimant's treating physician must sign the Alternate Duty Job Description sheet. The Safety representative will assist departments in writing these assignments, as needed. The management representative must approve any offer of alternate duty prior to forwarding such an offer to the employee.

The Bona Fide Offer of Employment should clearly state the following:

- (1) The position offered;
- (2) The hours of duty;
- (3) The wages;
- (4) Job description, including duty hours, and maximum physical requirements of the position (lifting and approximate lbs., approximate time stooping, pushing, standing, sitting, etc.);
- (5) The address, location, and approximate distance in miles from the employee's residence; and
- (6) The beginning and ending date of the position.

The employee's physician must review and certify that the employee can perform the tasks defined. If the physician modifies the Alternate Duty Job Description, the physician should recertify the job description. The Company maintains the right to withdraw the offer of alternate duty if the job description, as modified by the physician, is unacceptable to meet operational needs.

The employee who does not agree to or accept a bona fide offer of employment that has been approved by her/his physician may be subject to disciplinary action (e.g., termination) and/or a reduction in income benefits as allowed by the Workers' Compensation law.

The employee shall be required to provide the Company a medical report form the attending physician following each physician's visit, but not less than every 30 days, throughout the duration of relevant medical restriction. At the end of alternate duty, the employee must return to regular duty, seek reassignment to a position that meets that employee's capabilities, or be placed on disability leave in accordance with Company policy.

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RESPIRATORY PROTECTION PROGRAM

I. PURPOSE

This respiratory protective equipment program initiates standard operating procedures to ensure the protection of all employees from respiratory hazards through proper selection and use of respirators. Respiratory protective equipment is to be used only where engineering control of respiratory hazards is not feasible, while engineering controls are being installed, or in emergencies. This program is in accordance with the requirements of OSHA 29 CFR 1910.134.

II. ADMINISTRATIVE DUTIES

The designated Respiratory Protection Program Administrator is the Compliance director. This person is solely responsible for all facets of the program and has full authority to make necessary decisions to ensure success of this program. The Program Administrator will develop written detailed instructions covering each of the basic elements in this program, and is the sole person authorized to amend these instructions.

He is also qualified by appropriate training and experience that is commensurate with the complexity of the program to administer or oversee our Respiratory Protection Program and conduct the required evaluations of program effectiveness.

Employees may review a copy of our Respiratory Protection Program in the Safety Manual. The Program Administrator reviews this program periodically to ensure its effectiveness. The Program Administrator may also amend the written program.

III. GENERAL REQUIREMENTS

1. Respiratory protection training must be completed initially and annually thereafter. The training program must address employee knowledge of respirators, fit, use, limitations, emergency situations, wearing, fit checks, maintenance and storage, medical signs and symptoms of effective use, and general requirements of the OSHA standard. The training must be provided before requiring the employee to use the respirator.
2. Respiratory equipment will be provided to all employees that may be exposed to harmful vapors and oxygen deficient atmospheres. Respirators are to be used when engineering control measures are not feasible or during emergency situations with high exposure. Respirators shall be provided that are applicable and suitable for purpose intended.
3. The respiratory program administrator is the Safety Manager. This person is the individual who is knowledgeable of the complexity of the program, able to conduct evaluations and has the proper training.

4. Respiratory protection equipment is provided by the company to all affected employees at no cost.
5. Respiratory Hazards must be identified and NIOSH certified respirators must be selected and provided based on those hazards and factors affecting performance.
6. Medical evaluations shall be completed prior to fit-testing and be confidential, held during normal working hours, convenient, understandable, and the employee given a chance to discuss the results with the physician or other licensed health care professional (PLHCP).
7. Fit-testing of tight-fitting face pieces must be done by either qualitative or quantitative methods. Employees are required to pass qualitative fit test (QLFT) or quantitative fit test (QNFT) before initial use, if a different respirator is used, and annually.
8. If an employee cannot wear tight-fitting face pieces, if the seal is broken. Anything that can affect the seal is prohibited. This includes facial hair, glasses, etc. Respirators with tight-fitting facepieces shall not be worn by employees who have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function.
9. Employees must leave the area to wash, change cartridges, or if they detect break-through or resistance. The program administrator must address appropriate surveillance, and ensure employees leave the area to wash, change cartridges, or if they detect break-through or resistance.
10. If employees need to work in IDLH environments work will commence following the IDLH selection criteria shown on page 5. Additionally, outside standby persons must be provided, maintaining communication, proper training and equipment, notification procedures, and necessary action to take in an emergency. Mandatory equipment must include SCBA or SAR with auxiliary air supply and appropriate retrieval equipment or equivalent rescue means.
11. Respirators must be maintained and cared for to ensure they are clean and sanitary. Respirators are required to be provided in a clean and sanitary manner using procedures in Appendix B of the regulation or equally effective manufacturer's procedures. Our Safety Representative is responsible for ensuring employees are maintaining and caring for respirators.
12. Respiratory protective equipment must be properly stored and inspected. They must be protected from damage, contamination, etc. For emergency use respirators must be stored accessible, clearly marked. Respirators must be inspected on a routine basis - before use and during cleaning; emergency -

monthly, and before and after each use; escape-only - before being carried into workplace.

IV. RESPIRATOR SELECTION

Respirators are selected on the basis of respiratory hazards to which the worker is exposed and workplace and user factors that affect respirator performance and reliability. All selections are made by the Foreman, Compliance director, or designee. Respirators, training and medical evaluations are provided at no cost to employees. The Program Administrator will develop detailed written standard operating procedures governing the selection of respirators using the NIOSH Respirator Decision Logic and/or OSHA standards. Outside consultation, manufacturer's assistance, and other recognized authorities will be consulted if there is any doubt regarding proper selection.

Selection Procedure Checklist

When selecting any respirator in general:

Select and provide respirators based on respiratory hazard(s) to which a worker is exposed and workplace and user factors that affect respirator performance and reliability.

Select a National Institute for Occupational Safety and Health (NIOSH) certified respirator.

Identify and evaluate the respiratory hazard(s) in the workplace, including a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form. Consider the atmosphere to be immediately dangerous to life or health (IDLH) if you cannot identify or reasonably estimate employee exposure.

Select respirators that provide protection to the employee, and correctly fits, the user. When selecting respirators for IDLH atmospheres

Provide these respirators:

A full face piece pressure demand Self-contained, positive pressure, breathing apparatus (SCBA) certified by NIOSH for a minimum service life of thirty minutes, or

- A combination full-face piece pressure demand supplied-air respirator Self-contained breathing apparatus (SAR) with auxiliary self-contained air supply.
- Provide a NIOSH-certified 5-minute escape bottle to be used in conjunction with the above respiratory protective equipment in IDLH conditions, or when using a atmosphere-supplying respirator.
- Consider all oxygen-deficient atmospheres to be IDLH. Exception: If the program administrator, or designee, can demonstrate that, under all foreseeable conditions,

the oxygen concentration can be maintained within the ranges specified in Table II of 29 CFR 1910.134 (i.e., for the altitudes set out in the table), then atmosphere-purifying respirators may be used.

When selecting respirators for atmospheres that is not IDLH

- Provide a respirator that is adequate to protect the health of the employee and ensure compliance with all other OSHA statutory and regulatory requirements, under routine and reasonably foreseeable emergency situations.
- Select respirators appropriate for the chemical state and physical form of the contaminant.
- For protection against gases and vapors, provide:
 - An atmosphere-supplying respirator, or
 - An air-purifying respirator, provided that: (1) The respirator is equipped with an end-of-service-life indicator (ESLI) certified by NIOSH for the contaminant; or (2) If there is no ESLI appropriate for conditions in our workplace, implement a change schedule for canisters and cartridges that is based on objective information or data that will ensure that canisters and cartridges are changed before the end of their service life.
- For protection against particulates, provide:
 - An atmosphere-supplying respirator; or
 - An air-purifying respirator equipped with a filter certified by NIOSH as a high efficiency particulate air (HEPA) filter, or an air-purifying respirator equipped with a filter certified for particulates by NIOSH; or
 - For contaminants consisting primarily of particles with mass median aerodynamic diameters (MMAD) of at least 2 micrometers, an air-purifying respirator equipped with any filter certified for particulates by NIOSH.

Respirator Types and Uses

The following types of respirators are in use in this facility:

Types:	Situation used:
30 Minute SCBA	Emergency escape and Confined Space Entry
15 Minute SCBA	Confined Space Entry (Escape Only)
Supplied Air Respirator (SAR), or airline	Confined Space Entry
Air Purifying Respirator (APR)	Blasting/Painting/and some Chemical Loading

Only NIOSH-certified respirators are selected and used. Where practicable, the respirators will be assigned to individual workers for their exclusive use.

V. MEDICAL EVALUATIONS

A medical evaluation to determine whether an employee is able to use respiratory protective equipment is an important element of an effective Respiratory Protection Program and is necessary to prevent injuries, illnesses, and even, in rare cases, death from the physiological burden imposed by respiratory protection equipment use.

Persons will not be assigned to tasks requiring the use of respirators nor fit tested unless it has been determined that they are physically able to perform the work and use the respirator.

An approved physician, licensed health care professional (PLHCP) and/or designee will perform medical evaluations using a medical questionnaire found in Sections 1 and 2, Part A of Appendix C of 29 CFR 1910.134.

All medical questionnaires and examinations are confidential and handled during the employee's normal working hours or at a time and place convenient to the employee. The medical questionnaire is administered so that the employee understands its content. All employees are provided an opportunity to discuss the questionnaire and examination results with their physician or other licensed health care professional (PLHCP).

Before any initial examination or questionnaire is given, we supply the PLHCP with the following information so that he/she can make the best recommendation concerning an employee's ability to use a respirator:

- Type and weight of the respiratory protection equipment to be used by the employee;
- Duration and frequency of respirator use (including use for rescue and escape);
- Expected physical work effort;
- Additional protective clothing and equipment to be worn;
- Temperature and humidity extremes that may be encountered.

Once the PLHCP determines whether the employee has the ability to use or not use respiratory Protective equipment, he/she sends the a written recommendation containing only the following information:

- Limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

Follow-up medical examination

A follow-up medical examination will be provided if a positive response is given to any

question among questions 1 through 8 in Section 2, Part A of Appendix C of 29 CFR 1910.134 or if an employee's initial medical examination demonstrates the need for a follow-up medical examination. Our follow-up medical examination includes tests, consultations, or diagnostic procedures that the PLHCP deems necessary to make a final determination.

If the respirator is a negative pressure respirator and the PLHCP finds a medical condition that may place the employee's health at increased risk if the respirator is used, our company shall provide a powered air-purifying respirator (PAPR), if the PLHCP's medical evaluation finds that the employee can use such a respirator. In the above case the company may choose to transfer an employee to a position that does not require a respirator. If a subsequent medical evaluation finds that the employee is medically able to use a negative pressure respirator, then the company is no longer required to provide a PAPR.

Additional medical examinations

Our company provides additional medical evaluations if:

- An employee reports medical signs or symptoms that are related to ability to use a respirator;
- A PLHCP, supervisor, or the respirator program administrator informs the employer that an employee needs to be re-evaluated;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, and temperature) that may result in a substantial increase in the physiological burden placed on an employee. Contact the approved physician/licensed health care professional (PLHCP) for a copy of your confidential medical evaluation or questionnaire.

VI. FIT TESTING PROCEDURES

Respiratory protective equipment must fit properly to provide protection to users. If a tight seal is not maintained between the facepiece and the employee's face, contaminated air can be drawn into the facepiece and be breathed by the employee. Fit testing seeks to protect the employee against breathing contaminated ambient air and is one of the core provisions of our respirator program.

In general, fit testing may be either qualitative or quantitative. Qualitative fit testing (QLFT) involves the introduction of a gas, vapor, or aerosol test agent into an area around the head of the respirator user. If that user can detect the presence of the test agent through subjective means, such as odor, taste, or irritation, the respirator fit is inadequate.

In a quantitative respirator fit test (QNFT), the adequacy of respirator fit is assessed by

measuring the amount of leakage into the respirator. Appropriate instrumentation is required to quantify respirator fit in QNFT.

The Program Administer makes sure those employees are fit tested at the following times with the same make, model, style, and size of respirator that will be used:

- Before any of our employees are required to use any respirator with a negative or positive pressure tight-fitting facepiece;
- Whenever a different respirator facepiece (size, style, model, or make) is used;
- At least annually;
- Whenever the employee reports, or our company, PLHCP, supervisor, or Program Administrator makes visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight; and
- When the employee, subsequently after passing a QLFT or QNFT, notifies the company, Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable. That employee will be re-tested with a different respirator facepiece.

Employees must pass one of the following fit test types that follow the protocols and procedures contained in 29 CFR 1910.134 Appendix A:

- QLFT (May be used to test tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators if tested in the negative pressure mode); or
- QNFT (May be used to fit test a tight-fitting half facepiece respirator that must achieve a fit factor of 100 or greater OR a tight-fitting full facepiece respirator that must achieve a fit factor of 500 or greater OR tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators if tested in the negative pressure mode).

VII. PROPER USE PROCEDURES

Once the respirator has been properly selected and fitted, its protection efficiency must be maintained by proper use in accordance with 29 CFR 1910.134(g). Our company ensures with written procedures that respirators are used properly in the workplace.

Our company has used the following checklist to ensure that proper use procedures include coverage of OSHA requirements:

Facepiece Seal Protection

- Do not permit respirators with tight-fitting facepieces to be worn by employees who have:
 - Facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function; or

- Any condition that interferes with the face-to-facepiece seal or valve function.
- If an employee wears corrective glasses or goggles or other personal protective equipment, ensure that such equipment is worn in a manner that does not interfere with the seal of the facepiece to the face of the user.
- For all tight-fitting respirators, ensure that employees perform a user seal check each time they put on the respirator using the procedures in 29 CFR 1910.134 Appendix B-1 (User Seal Check Procedures) or procedures recommended by the respirator manufacturer that you can demonstrate are as effective as those in Appendix B-1.

Continuing Respirator Effectiveness

- Appropriate surveillance must be maintained of work area conditions and degree of employee exposure or stress. When there is a change in work area conditions or degree of employee exposure or stress that may affect respirator effectiveness, reevaluate the continued effectiveness of the respirator.
- Ensure that employees leave the respirator use area:
 - To wash their faces and respirator facepieces as necessary to prevent eye or skin irritation associated with respirator use; or
 - If they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the facepiece; or
 - To replace the respirator or the filter, cartridge, or canister elements.
 - If the employee detects vapor or gas breakthrough, changes in breathing resistance, or leakage of the facepiece, replace or repair the respirator before allowing the employee to return to the work area.

Procedures for IDLH Atmospheres

Ensure that:

- One employee or, when needed, more than one employee is located outside the IDLH atmosphere;
- Visual, voice, or signal line communication is maintained between the employee(s) in the IDLH atmosphere and the employee(s) located outside the IDLH atmosphere;
- The employee(s) located outside the IDLH atmosphere are trained and equipped to provide effective emergency rescue;
- The employer or designee is notified before the employee(s) located outside the IDLH atmosphere enter the IDLH atmosphere to provide emergency rescue;
- The employer or designee authorized to do so by the company, once notified, provides necessary assistance appropriate to the situation;

- Employee(s) located outside the IDLH atmospheres are equipped with:
 - Pressure demand or other positive pressure SCBAs, or a pressure demand or other positive pressure supplied-air respirator with auxiliary SCBA; and either:
 - Appropriate retrieval equipment for removing the employee(s) who enter(s) these hazardous atmospheres where retrieval equipment would contribute to the rescue of the employee(s) and would not increase the overall risk resulting from entry; or
 - Equivalent means for rescue where retrieval equipment is not required under the bullet item above this one.

VIII. MAINTENANCE AND CARE PROCEDURES

In order to ensure continuing protection from respiratory protective devices, it is necessary to establish and implement proper maintenance and care procedures and schedules. A lax attitude toward maintenance and care will negate successful selection and fit because the devices will not deliver the assumed protection unless they are kept in good working order.

Cleaning & disinfecting

Our company provides each respirator user with a respirator that is clean, sanitary, and in good working order. We ensure that respirators are cleaned and disinfected using the procedures below:

In Appendix B-2 of 29 CFR 1910.134 (refer to appendix B).

- Recommended by the respirator manufacturer. These procedures are of equivalent effectiveness as Appendix B-2 of 29 CFR 1910.134.

The respirators are cleaned and disinfected at the following intervals:

Respirator type:	Are cleaned and disinfected at the following interval:
Issued for the exclusive use of an employee	As often as necessary to be maintained in a sanitary condition
Issued to more than one employee	Before being worn by different individuals
Maintained for emergency use	After each use
Used in fit testing and training	After each use

Storage

Storage of respirators must be done properly to ensure that the equipment is protected and not subject to environmental conditions that may cause deterioration. We ensure that respirators are stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they are packed or stored in a clean dry place to prevent deformation of the facepiece and exhalation valve. In addition, emergency respirators are kept accessible to the work area; stored in compartments that are clearly marked as containing emergency respirators; and stored in accordance with any applicable manufacturer instructions.

Inspection

In order to assure the continued reliability of respirator equipment, it must be inspected on a regular basis. The frequency of inspection is related to the frequency of use. Here are our frequencies for inspection:

Respirator type:	Inspected at the following frequencies:
All types used in routine situations	Before each use and during cleaning
Maintained for use in emergency situations	At least monthly and in accordance with the manufacturer's recommendations, and checked for proper function before and after each use
Emergency escape-only respirators	Before being carried into the workplace for use

Any one of our respirator inspections includes a check:

- For respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the facepiece, head straps, valves, connecting tube, and cartridges, canisters or filters; and
- Of elastomeric parts for pliability and signs of deterioration.
- For self-contained breathing apparatus, in addition to the above, monthly, we maintain air and oxygen cylinders in a fully charged state and recharge when the pressure falls to 90% of the manufacturer's recommended pressure level and determine that the regulator and warning devices function properly.

Also for respirators maintained for emergency use, we certify the respirator by documenting the date the inspection was performed, the name (or signature) of the person who made the inspection, the findings, required remedial action, and a serial number or other means of identifying the inspected respirator. This information shall be maintained until replaced following a subsequent certification.

See the attached respirator inspection records.

Repairs

Respirators that fail an inspection or are otherwise found to be defective are removed from service, and are discarded or repaired or adjusted in accordance with the following

procedures:

- Repairs or adjustments to respirators are to be made only by persons appropriately trained to perform such operations and only with the respirator manufacturer's NIOSH-approved parts designed for the respirator;
- Repairs must be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed; and
- Reducing and admission valves, regulators, and alarms must be adjusted or repaired only by the manufacturer or a technician who is certified by the manufacturer.

Discarding of respirators

Respirators that fail an inspection or are otherwise not fit for use and cannot be repaired must be discarded in a manner to ensure they are not used again.

IX. AIR QUALITY PROCEDURES

When atmosphere-supplying respirators are being used to protect employees it is essential to ensure that the air being breathed is of sufficiently high quality. Our company's procedures to ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators include coverage of the following OSHA requirements:

Compressed Air, Compressed Oxygen, Liquid Air, and Liquid Oxygen Used for Respirators

- Compressed and liquid oxygen must meet the United States Pharmacopoeia requirements for medical or breathing oxygen.
- Compressed breathing air must meet at least the requirements for Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:
 - Oxygen content (v/v) of 19.5-23.5%;
 - Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;
 - Carbon monoxide (CO) content of 10 ppm or less;
 - Carbon dioxide content of 1,000 ppm or less; and
 - Lack of noticeable odor.
- Documentation for the quality of compressed breathing air must be kept with each bottle and/or available at the location of intended use.
- Ensure that compressed oxygen is not used in atmosphere-supplying respirators that have previously used compressed air.
- Ensure that oxygen concentrations greater than 23.5% are used only in equipment designed for oxygen service or distribution.

Cylinders Used to Supply Breathing Air to Respirators

- Cylinders must be tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR 173 and 178), or acceptable manufacturer standards.
- Cylinders of purchased breathing air must have a certificate of analysis from the supplier that the breathing air meets the requirements for Grade D breathing air.
- The moisture content in the cylinder must not exceed a dew point of -50 deg. F (-45.6 deg. C) at 1 atmosphere pressure.

Compressors

- Ensure that compressors used to supply breathing air to respirators are constructed and situated so as to:
 - Prevent entry of contaminated air into the air-supply system;
 - Minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (5.56 deg. C) below the ambient temperature;
 - Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters must be maintained and replaced or refurbished periodically following the manufacturer's instructions; and
 - Have a tag containing the most recent change date and the signature of the person certified to perform the change. The tag must be maintained at the compressor.
- For compressors that are not oil-lubricated, ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.
- For oil-lubricated compressors, use a high-temperature and carbon monoxide alarm, to monitor levels.

Breathing Air Couplings

- Ensure that breathing air couplings are incompatible with outlets for non-respirable worksite air or other gas systems. No asphyxiating substance must be introduced into breathing air lines.

Breathing Gas Containers

- Use breathing gas containers marked in accordance with the NIOSH respirator certification standard, 42 CFR part 84, or other acceptable standard.

Filters, Cartridges, and Canisters

- Ensure that all filters, cartridges and canisters used in the workplace are labeled properly with the NIOSH approval label and that the label is not removed and remains legible.

X. TRAINING

The most thorough respiratory protection program will not be effective if employees do not wear and maintain respiratory protective equipment properly. Simply put, employee training is an important part of the respiratory protection program and is essential for correct respirator use.

Our training program covers both the:

1. Respiratory hazards to which our employees are potentially exposed during routine and emergency situations, and
2. Proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance.

Both training parts are provided prior to requiring an employee to use a respirator in our workplace. However, if an employee has received training within 12 months addressing the seven basic elements of respiratory protection (see "Seven basic elements" below) and the Company and the employee can demonstrate that he/she has knowledge of those elements, then that employee is not required to repeat such training initially.

We require all employees that will be wearing respiratory protective equipment to be retrained annually and when the following situations occur:

- Any change in the workplace that requires a different type of respiratory protective equipment to be worn;
- Inadequacies in the employee's knowledge or use of the respiratory protective equipment indicate the employee has not retained the proper understanding or skill; or
- Any other situation arises in which retraining appears necessary to ensure safe respirator use.

Seven basic elements

Our employees are trained sufficiently to be able to demonstrate knowledge of at least these seven elements:

1. Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator.
2. What the limitations and capabilities of the respirator are.
3. How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions.
4. How to inspect, put on, remove, use, and check the seals of the respirator.
5. What the procedures are for maintenance and storage of the respirator.

6. How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.
7. The general requirements of 29 CFR 1910.134.

The basic advisory information on respirators, as presented below is provided by our Program Administrator and /or designee in any written or oral format, to employees who wear respirators when such use is not required by the regulations or by our company:

Voluntary use of respirators

If in the event an employee feels like it is necessary to wear a respirator in an environment where hazardous substances are below OSHA limits they must contact their Compliance director and be entered into the respiratory protection program. Exception: Employees whose only use of respirators involves the voluntary use of filtering (non-sealing) facepieces (dust masks).

XI. PROGRAM EVALUATION

It is inherent in respirator use that problems with protection, irritation, breathing resistance, comfort, and other respirator-related factors occasionally arise in most respirator protection programs. Although it is not possible to eliminate all problems associated with respirator use, we try to eliminate as many problems as possible to improve respiratory protection and encourage employee acceptance and safe use of respirators. By having our program administrator thoroughly evaluate and, as necessary, revise our Respiratory Protection Program, we can eliminate problems effectively.

Program evaluation, performed by your Program Administrator, involves the following:

- Conducting evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.
- Regularly consulting employees required to use respirators to assess their views on program effectiveness and to identify any problems. Any problems that are identified during this assessment must be corrected. Factors to assess include, but are not limited to:
 - Respirator fit (including the ability to use the respirator)
 - Appropriate respirator selection for the hazards to which the employee is exposed
 - Proper respirator use under the workplace conditions the employee encounters
 - Proper respirator maintenance

APPENDIX A USER SEAL CHECK PROCEDURES

RE-PRINT OF: APPENDIX B-1 TO §1910.134:
USER SEAL CHECK PROCEDURES (Mandatory)

The individual who uses a tight-fitting respirator must perform a user seal check to ensure that an adequate seal is achieved each time the respirator is put on. Either the positive and negative pressure checks listed in this appendix, or the respirator manufacturer's recommended user seal check method shall be used. User seal checks are not substitutes for qualitative or quantitative fit tests.

I. Facepiece Positive and/or Negative Pressure Checks:

- A Positive pressure check. Close off the exhalation valve and exhale gently into the facepiece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the facepiece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve and then carefully replacing it after the test.
- B. Negative pressure check. Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the facepiece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the facepiece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

II. Manufacturer's Recommended User Seal Check Procedures:

The respirator manufacturer's recommended procedures for performing a user seal check may be used instead of the positive and/or negative pressure check procedures provided that the employer demonstrates that the manufacturer's procedures are equally effective.

APPENDIX B RESPIRATORY CLEANING PROCEDURES

RE-PRINT OF: APPENDIX B-2 TO §1910.134:
RESPIRATOR CLEANING PROCEDURES (Mandatory)

These procedures are provided for employer use when cleaning respirators. They are general in nature, and the employer as an alternative may use the cleaning recommendations provided by the manufacturer of the respirators used by their employees, provided such procedures are as effective as those listed here in Appendix B-2. Equivalent effectiveness simply means that the procedures used must accomplish the objectives set forth in Appendix B-2, i.e., must ensure that the respirator is properly cleaned and disinfected in a manner that prevents damage to the respirator and does not cause harm to the user.

I. Procedures for Cleaning Respirators:

- A. Remove filters, cartridges, or canisters. Disassemble facepieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.
- B. Wash components in warm (43° C [110° F] maximum) water with a mild detergent or with a cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.
- C. Rinse components thoroughly in clean, warm (43° C [110° F] maximum), preferably running water. Drain.
- D. When the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in one of the following:
 - 1. Hypochlorite solution (50 ppm of chlorine) made by adding approximately one milliliter of laundry bleach to one liter of water at 43° C (110° F); or,
 - 2. Aqueous solution of iodine (50 ppm iodine) made by adding approximately 0.8 milliliters of tincture of iodine (6-8 grams ammonium and/or potassium iodide/100 cc of 45% alcohol) to one liter of water at 43° C (110° F); or,
 - 3. Other commercially available cleansers of equivalent disinfectant quality when used as directed, if their use is recommended or approved by the respirator manufacturer.

- E. Rinse components thoroughly in clean, warm (43° C [110° F] maximum), preferably running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on facepieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.
- F. Components should be hand-dried with a clean lint-free cloth or air-dried.
- G. Reassemble facepiece, replacing filters, cartridges, and canisters where necessary.
- H. Test the respirator to ensure that all components work properly.

APPENDIX C REFERENCES

American National Standards Institute
Respiratory Protection, ANSI Z88.2

Barclays Official California, Code of Regulations (CCR)
Respiratory Protective Equipment, Cal/OSHA Title 8 CCR §1531

Department of Labor
Respiratory Protection, and Appendices, OSHA 29 CFR 1910.134
Approval of Respiratory Protective Devices, 42 CFR 84

Government Institutes, Inc., Rockville, Maryland
OSHA's Respiratory Protection Standard 1996, Mark McGuire Moran

National Institute Occupational Health (NIOSH)
Guide to Industrial Respiratory Protection-1987,
Guide to the Selection and Use of Particulate Respirators Certified Under 42 CFR 84 (4/23/96).

RESPIRATOR FIT TEST RECORD

A. Employee: _____ Date: _____

Employee No: _____

Employee Job Title/Description: _____

B. Respirator: _____ Self-Contained _____ Supplied Air _____ Chemical Cartridge _____ Dust/Fume/Mist Filter
_____ Powered Air _____ Chemical Cartridge _____ Dust/Mist Filter _____ HEPA Filter

Respirator Selected: _____

Manufacturer: _____

NIOSH Approval Number: _____

Model Number: _____

C. Conditions which could affect respirator fit:

_____ Beard _____ Dentures _____ Glasses

_____ Facial Scar _____ Moustache _____ None

Comments: _____

D. Fit Check:

Negative Pressure: _____ Pass _____ Fail _____ Not Done

Positive Pressure: _____ Pass _____ Fail _____ Not Done

Isoamyl Acetate: _____ Pass _____ Fail _____ Not Done

Sweetner Test: _____ Pass _____ Fail _____ Not Done

Irritant Smoke: _____ Pass _____ Fail _____ Not Done

Comment: _____

E. Maintenance: Cleaning: _____ Daily _____ Weekly Other _____ _____ Individual _____ None
Disposal: _____ Daily _____ Weekly Other _____ _____ Plant

F. Employee acknowledgement of test results:

Employee Signature: _____ Date: _____

Test conducted by: _____ Date: _____

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SUBCONTRACTOR MANAGEMENT PROGRAM

I. Purpose

This Subcontractor Management Program establishes and implements safe work practices designed to minimize the risks associated with subcontract operations.

This Subcontractor Management Program also requires a detailed contractor selection criteria. When selecting a contractor, site supervisors must obtain and evaluate information regarding the contractor's safety and environmental performance.

Management must also ensure that contractors have their own written safe work practices. Agreement must be documented on appropriate contractor safety and environmental policies and practices before the contractor begins work at any company run facilities (refer to the company Master Service Agreement (MSA) required of all field contractors).

Contracted employees must be knowledgeable and experienced in the work practices necessary to perform their job in a safe and environmentally sound manner. Documentation of each contracted employee's expertise to perform his/her job and a copy of the contractor's safety policies, procedures and training records must be made evaluated prior to awarding any contract.

II. Contractor Selection Criteria

A major step in achieving acceptable subcontractor performance is selecting a safe and environmentally responsible contractor. Therefore, it is appropriate for management to request that contractors submit specific performance information in their contract response proposals.

Management must:

1. Perform periodic evaluations of the performance of contract employees that verifies they are fulfilling their obligations, i.e. (site evaluation, incident tracking and/or BBS observation), and
2. maintain a subcontractor employee injury and illness log for all applicable subcontract work.

Site supervisors must inform subcontractors of any known hazards at the facility they are working on including, but not limited to potential for fires, explosions, slips, trips, falls, other injuries, and hazards associated with lifting operations.

Site supervisors must also develop and implement safe work practices to control the presence, entrance, and exit of subcontract employees in operation areas.

III. General Requirements

Safe work practices should meet the most current provisions of any applicable federal, state, or local regulations. Company safety manuals clearly illustrate applicable safe work practices required at each location. The company safety manual (or equivalent) must be kept up to date and made readily available at each work site.

1. Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents, and safety statistics prior to issuing a Master Service Agreement (MSA).
2. A series of safety metrics such as, Total Recordable Incident Rate (TRIR), Experience Modifier Rating (EMR), Lost Time Incident Rate (LTIR), and Fatality Rate shall be used as a criteria for selecting subcontractors.

Any subcontractor failing to meet the following minimum safety metric criteria shall not be considered for work:

- Failing to maintain proper insurance coverage, MSA documentation, and/or applicable contractor license.
- Being cited by OSHA or other agency for a significant violation within the last three (3) years.
- Experience modification rating (EMR) in excess of 1.0 for the previous three (3) year average.
- Total Recordable Incident Rate (TRIR) or Lost Time Incident Rate (LTIR) for a contractor is in excess of 4.0.

The contractor safety questionnaire attached to the appendix of this document shall be utilized for this purpose.

3. Subcontractors shall be included in pre-job meetings or kick-off meetings, and safety orientations. Subcontractors must check in with the Company site supervisor daily to ensure all applicable personnel are included in pre-job safety orientations and pre-job meetings.
4. Subcontractors will be included in tailgate safety meetings, job safety analysis or hazard assessments, and on the job safety inspections. Subcontractors must check in with the Company site supervisor daily to ensure all applicable personnel are included in regular job safety inspections and participate in job hazard analysis.

5. Post-job safety performance reviews are required of all subcontractors. At a minimum a rehash of the subcontractors performance with regard to the safety metrics stated above shall be completed by site supervisors upon completion of job.

MASTER SERVICES AGREEMENT

This **MASTER SERVICES AGREEMENT** (the "Agreement") is entered into this ____ day of _____, 20__, by, between and among: **(1) Fence Factory.**, a California corporation (the "Company"); and **(2)** _____, a _____ (the "Contractor"). The Company and the Contractor may be referred to herein individually as a "Party" and collectively as the "Parties."

RECITALS:

WHEREAS, the Company is engaged in oil, gas and hydrocarbon drilling, operating and production operations in the United States.

WHEREAS, the Contractor renders services and provides materials that are related and incident to certain portions and various phases of the oil and gas drilling, operating and production business.

WHEREAS, the Company and the Contractor are desirous of entering into this Agreement for purposes of agreeing upon the manner, type, quantity and quality of Services (as defined below) the Contractor agrees to provide for and on behalf of the Company, including the Contractor's compensation for the same, as well as otherwise providing for and establishing the terms, conditions and provisions governing the independent contractor relationship provided for herein.

NOW THEREFORE, in consideration of the covenants, agreements and undertakings contained in this Agreement and in accordance with the terms, conditions and provisions set forth herein, the Parties agree as follows:

SECTION I

"Purpose and Scope of Agreement"

This Agreement is a master contract and agreement between the Company and the Contractor, and shall control and govern all services performed and materials supplied by the Contractor and Contractor's employees and other persons provided by the Contractor to render and provide services under this Agreement (collectively the "Contractor Personnel") to, for and on behalf of the Company. The Contractor is in the business of performing, rendering, supplying and providing the kinds and types of labor, services, work, products, materials, goods and supplies that are related to the oil, gas and hydrocarbon business, including, but not limited to those kinds and types of services and materials set forth in the national, state or local price sheets and discount schedules, bid and quote sheets and forms, lists and schedules, materials, products, supplies and goods, and descriptions of techniques, technology and technological expertise attached hereto as **EXHIBIT "A"** and incorporated herein for all purposes by this specific reference (collectively, the "Service(s)"). This Agreement shall be effective for all purposes as of the earlier of the date the Services commence, or the date both Parties execute this Agreement (the "Effective Date"). Unless the Parties agree otherwise in writing, this Agreement shall govern

and control solely with respect to the Services performed by the Contractor for the Company within the United States and any and all states therein, as well as any federal and state territorial waters, if applicable. The Services to be performed by the Contractor and any liabilities assumed by the Contractor hereunder shall be governed and controlled solely by the terms of this Agreement, and the Contractor may not transfer or assign any of its responsibilities or liabilities under this Agreement to a third party.

SECTION II

“Independent Contractor Status”

The Contractor and Contractor Personnel shall be and hereby are independent contractors with respect to all Services, and shall act as independent contractors at all times during the term of this Agreement. Neither the Contractor nor the Contractor Personnel shall be deemed, for any purpose whatsoever, to be an agent, servant, employee or representative of the Company. The Contractor shall retain and exercise the authority and right to direct and control the manner in which all Services are performed for the Company; however, the Company retains the right to provide general instructions to and observe the Contractor in the performance of all Services performed hereunder. The Contractor shall have no right or authority to supervise, instruct or give orders to any of the Company’s employees, agents, representatives, consultants or subcontractors, and all such persons shall be and remain under the Company’s direct and sole supervision and control at all times. The Contractor and Contractor Personnel shall serve in an advisory capacity only and shall have no right or power to bind the Company to any contracts or agreements with third parties or otherwise without specific written authority from the Company. The Contractor understands that, as an independent contractor, the Company does not provide to the Contractor or Contractor Personnel any benefits such as medical insurance, dental insurance, vacation plans, savings or retirement plans or any other similar benefit.

SECTION III

“Services”

The Services shall be the subject of a purchase order, work order, work ticket, change order, field ticket, letter, memorandum, verbal acknowledgment or receipt order, verbal or written instruction, or any other similar instrument, document or direction for Services issued by the Company to the Contractor (collectively, the “Service Order(s)”). Service Orders may be either oral or written and will provide or contain, where applicable, a description of the Services to be performed and the consideration to be paid for same, as well as the specific personnel to be provided and the particular job location where the Services will be performed. If the Service Order is in writing, it may be in a form similar to **EXHIBIT “B”** attached hereto, or in any other form agreed to by the Parties. All Service Orders shall be controlled and governed by this Agreement, and shall not modify or change the terms contained herein. This Agreement shall define and govern the rights and obligations of the Company and the Contractor during the term hereof. Any other agreements, stipulations or provisions contained in any Service Order that are contrary to or do not conform to the terms, conditions and provisions of this Agreement shall be null and void, unless the same are in writing and have been executed by an authorized

representative of both the Company and the Contractor; and any such written instrument shall contain and specifically state that a particular provision therein constitutes an amendment to or otherwise controls a provision in this Agreement. However, in the event the Parties enter into a separate contract or agreement concerning a specific project, service or product that is limited solely to the subject matter thereof, then this Agreement shall not apply to such contract, unless otherwise provided for therein.

SECTION IV

“Term and Termination”

This Agreement shall be effective as of the Effective Date and shall continue in full force and effect until the earlier of: (A) _____ (____) months after the Effective Date; (B) sixty (60) days following the Company’s receipt of written notice of termination from the Contractor; (C) at any time or immediately, in the sole discretion of the Company, by delivering written notice of termination to the Contractor; or (D) upon a Party’s failure to cure an Event of Default (as hereafter defined) within ninety (90) days following receipt of written notice of the Event of Default by the other Party. An “Event of Default” means: (A) a breach of any warranty or other material provision hereof; (B) failure to comply with any obligation required hereby; or (C) the Contractor becomes subject to any bankruptcy, insolvency or receivership proceeding. Upon termination of this Agreement, the Company may deduct unearned cash advances or other payments due to the Company from any amounts owed to the Contractor. In no event shall the Contractor be entitled to be paid for services that have not been performed by reason of such termination, and the Contractor shall not be entitled to any compensation or damages for any loss of future compensation or anticipated profits by reason of such termination. If the Contractor terminates this Agreement, the Contractor shall complete any Services that have been commenced prior to such termination. If the Company terminates this Agreement, the Company shall have no further obligation to the Contractor, other than payment for Services properly performed prior to such termination. Within ten (10) days after this Agreement terminates, the Contractor shall remove any and all equipment and Contractor Personnel from the premises or work site where the Services were being performed.

SECTION V

“Compensation”

A. The Company agrees to pay the Contractor, as full compensation for Services actually performed, the amount provided for in the applicable Service Order or as may be agreed upon prior to commencement of the Services; which amount shall be inclusive of all applicable federal, state, county, city, municipal and local taxes, of any kind or type.

B. The Contractor shall be solely responsible for all of its general, administrative and overhead costs, including but not limited to insurance and taxes. The Contractor shall be solely responsible for and shall fully comply with all applicable laws, statutes, rules and regulations concerning workers’ compensation insurance, Social Security, Medicare and Medicaid taxes, unemployment insurance, federal, state and local income, sales, use, excise and gross receipts

taxes, hours of labor, wages, working conditions and all other employer/employee related matters, including the proper filing and payment of all taxes which may apply to the Contractor. The Company will timely prepare, issue and forward to the Contractor, in the year following the calendar year in which Services are rendered, a federal Form 1099 reflecting all compensation paid for such Services during the prior calendar year.

C. The Contractor shall assume full, exclusive and complete liability for, and agrees to pay and discharge all valid taxes, lienable claims, license and permit fees, levies, charges, contributions or other items imposed or to be imposed, assessed or levied by any governmental authority, regulatory agency or law on, with respect to, measured by or associated with the Contractor, the Services or any Contractor Personnel, including but not limited to value added, capital gains, corporation or individual income taxes relating to or assessed upon the actual or assumed income, profits or gains of the Contractor or Contractor Personnel, as well as unemployment insurance, pensions, contribution plans and social security payments arising directly or indirectly out of the performance of the Services.

SECTION VI

“Invoices and Payments”

A. The Contractor shall submit an invoice to the Company at least once each calendar month for the Services performed during the preceding calendar month. Invoices shall set forth in detail: **(i)** a description of the Services performed; **(ii)** the date(s) the Services were performed; **(iii)** the rate charged for and total amount due for the Services; **(iv)** the location of or area where the Services were performed; **(v)** any applicable well, project or location number or description; **(vi)** any applicable purchase order, authority for expenditure, accounting or other identifying number(s); and **(vii)** any other information reasonably requested by the Company. All invoices shall be accompanied and supported by the applicable signed Service Order(s) and all original delivery tickets, field tickets, work orders and other documentation reasonably requested by the Company. Any obligation of the Company to reimburse expenses of any kind shall be set forth in the applicable Service Order; provided, however, that no expenses other than necessary, reasonable and verifiable expenses shall be reimbursed. The Contractor shall provide original receipts or vouchers for such expenses with any request for expense reimbursement.

B. The Company shall pay all undisputed portions of any applicable invoice within thirty (30) days after receipt of the invoice. In the event the Company disputes one or more items in an invoice, the Company shall, within thirty (30) days after receipt of such invoice, notify the Contractor of the item or items being disputed and the reasons therefor. The Company may withhold payment for such disputed items until settlement of the dispute. Payments made hereunder shall not in any event prejudice the right of the Company under Section XII of this Agreement to question the propriety, reasonableness, necessity or accuracy of any costs, charges or expenses.

SECTION VII

“Contractor’s Responsibilities and Warranties”

A. Unless otherwise provided in a Service Order, the Contractor shall furnish, at its sole cost, expense and risk, any and all machinery, equipment, tools, repairs, spare parts, automobile(s), transportation, supplies, goods, materials and any other items necessary for the performance and timely completion of the Services. The Contractor represents that all products, tools, supplies, materials and other items necessary for the performance of the Services shall conform to the highest applicable quality and specification standards required by or applicable to the Services then being performed. The Contractor warrants that all such products shall be free of defects in material and workmanship for a period of twelve (12) months from and after the date of installation. The Contractor shall furnish the Contractor Personnel who are skilled in their trades, trained in safety and have the ability to properly perform and timely complete the Services.

B. The Contractor and Contractor Personnel shall perform the Services in accordance with the specifications in the Service Order and the terms of this Agreement. The Contractor and Contractor Personnel shall act in accordance with the best professional practices at all times, and shall perform the Services in a competent, prudent and workmanlike manner. “Workmanlike manner” means that the Services are performed in a manner considered skillful by those with the special knowledge, training and experience to evaluate and judge such Services. In the event the Company, in its sole discretion, determines that the Services have not been performed in accordance with this Section, the Contractor shall: **(1)** promptly re-perform any nonconforming Services at the Contractor’s sole cost and expense and to the reasonable satisfaction of the Company; or **(2)** at the Company’s option, refund to the Company that portion of the consideration that is attributable to the nonconforming Service(s).

C. The Contractor agrees, represents and warrants that any actions undertaken in connection with Services shall be in compliance with all applicable federal, state, county, city and local statutes, laws, rules, regulations, standards and codes adopted or enacted by governmental agencies or authorities, or industry groups or organizations. The Contractor agrees to and shall obtain and maintain in full force and effect all applicable and necessary permits, licenses and approvals for the performance of Services under this Agreement; and agrees to forward photocopies of any and all such licenses to the Company. The Contractor represents and warrants that all Services shall be performed by the Contractor in accordance with any and all applicable federal, state, county, city and local safety rules, regulations and requirements.

D. The Contractor agrees to and shall furnish originals or photocopies of work tickets, delivery tickets, field tickets, work orders, reports or any other relevant documentation to the Company on a daily or regular basis during the time Services are being performed under this Agreement. In addition, the Contractor shall verbally inform the Company, as soon as practical, of any and all accidents, occurrences or injuries arising out of or occurring during the period of time Services are being performed hereunder that result in death or injuries to the Contractor or the Contractor Personnel, or result in physical damage to personal or real property of the Company, the Contractor, the Contractor Personnel or third parties. As soon as possible

following any such incident, the Contractor agrees to furnish the Company with a written report of such incident, along with a copy of all non-privileged reports provided by the Contractor to the Contractor's insurance company or governmental authorities.

E. The Contractor represents and warrants that each member of the Contractor Personnel is an employee of the Contractor, and that the Contractor will withhold applicable federal, state and local income taxes, and Medicare, Medicaid and Social Security taxes with respect to such Contractor Personnel. The Contractor will pay all applicable taxes and will file a federal W-2 form with the appropriate federal, state and local tax authorities for each member of the Contractor Personnel.

SECTION VIII

"Patents, Copyrights, Intellectual Property and Confidential Information"

A. As used in this Agreement, the term "Intellectual Property" means any material or subject matter that: **(1)** is potentially patentable, is embodied in a patent application or is, as of the date hereof, patented or covered by a patent; **(2)** is potentially copyrightable, is embodied in a copyright registration application, or constitutes a copyright, regardless of whether registered or not; **(3)** is potentially usable as a trademark or service mark, is embodied in a trademark or service mark application, or constitutes a trademark or service mark, regardless of whether registered or not; **(4)** constitutes or potentially constitutes a trade secret or is in fact currently a trade secret; or **(5)** constitutes or potentially constitutes a protectable intellectual property right in any applicable state, federal or foreign jurisdiction. Intellectual Property also includes any existing trade secrets and proprietary information owned, claimed or to be claimed or owned in the future by the Company.

B. The Contractor specifically acknowledges and agrees that any business, technical, proprietary, financial or other information, including Intellectual Property, acquired, discussed, used or developed in connection with activities or Services under this Agreement, regardless of the manner in which or by whom the same are developed, shall be deemed confidential in nature, and shall not be disclosed by the Contractor or Contractor Personnel without the express written consent of the Company.

C. The Contractor specifically acknowledges and agrees that any Intellectual Property owned or claimed by the Company and existing on or prior to the date of this Agreement is and shall be the sole property of the Company, and the Contractor acquires no rights of any kind or type in any such Intellectual Property. The Contractor also agrees that all existing and future improvements, modifications or alterations to the Company's existing Intellectual Property and any Intellectual Property that is developed, modified, altered or improved during the term of this Agreement shall be and remain the sole property of the Company, regardless of whether the Company or the Contractor conceived, developed or improved the same. In that regard, the Contractor agrees to cooperate with the Company in connection with and sign any applications or registrations for any existing or new patents, trademarks, service marks and copyrights covering any and all such new or improved Intellectual Property; as well as execute any transfers, assignments or conveyances to and in favor of the

Company which effectively transfer and convey all of the Contractor's right, title and interest in any and all improvements to the Company's Intellectual Property, even if developed or conceived by the Contractor.

D. The Contractor agrees to and shall defend, indemnify and hold the Company harmless from and against any and all claims, demands, and causes of action for any patent, copyright, trademark or service mark infringement, or misappropriation of any trade secrets and Intellectual Property resulting from the Contractor's performance of Services under this Agreement.

SECTION IX

"Release and Indemnity"

A. Notwithstanding anything to the contrary in the other provisions of this Agreement, the **CONTRACTOR AGREES TO BE RESPONSIBLE AND ASSUME ALL LIABILITY FOR, AND HEREBY AGREES TO DEFEND, RELEASE, INDEMNIFY AND HOLD HARMLESS THE COMPANY**, and its affiliate companies and their officers, directors, agents, representatives, employees and insurers, as well as its subcontractors (other than the Contractor and Contractor Personnel) and their employees (collectively, the "Company Indemnitees"), from all losses, costs (including attorneys' fees, court costs, costs of investigation and any costs incurred in enforcing this indemnity obligation), expenses, damages, claims, lawsuits and causes of action (including but not limited to loss of parental or spousal consortium or wrongful death) whether arising from or under any theory of tort, contract, breach of contract, negligence, gross negligence or otherwise (including claims which arise by reason of indemnification or assumption of liability contained in other contracts entered into by the Company Indemnitees) arising out of, incident to, or in connection with any and all Services and the Contractor's activities, operations and materials under this Agreement (collectively the "Claims") arising in connection with the loss of or damage to the property of the Contractor, Contractor Personnel or either of their invitees (collectively the "Contractor Group"), and/or the injury or death of any member of the Contractor Group. Furthermore, the Contractor agrees to be responsible and assume all liability for and hereby agrees to defend, release, indemnify and hold harmless the Company Indemnitees from and against any and all Claims of any person or entity directly or indirectly arising out of or related to the negligent acts or omissions of the Contractor Group.

B. Notwithstanding anything to the contrary in the other provisions of this Agreement, the **COMPANY AGREES TO BE RESPONSIBLE AND ASSUME ALL LIABILITY FOR, AND HEREBY AGREES TO DEFEND, RELEASE, INDEMNIFY AND HOLD HARMLESS THE CONTRACTOR**, and its affiliate companies and their officers, directors, agents, representatives, employees and insurers, as well as its subcontractors and their employees (collectively the "Contractor Indemnitees"), from all losses, costs (including attorneys' fees, court costs, costs of investigation and any costs incurred in enforcing this indemnity obligation), expenses and causes of action (including but not limited to loss of parental or spousal consortium or wrongful death) whether arising from or under any theory of tort, contract, breach of contract or otherwise arising out of, incident to, or in connection with

any and all of the Company's activities or operations under this Agreement (collectively, the "Claims") arising in connection with the loss of or damage to the property of the Company or its invitees (collectively, the "Company Group"), and/or the injury or death of any member the Company Group. Furthermore, the Company agrees to be responsible and assume all liability for and hereby agrees to defend, release, indemnify and hold harmless the Contractor Indemnitees from and against any and all Claims of any person or entity directly or indirectly arising out of or related to the negligent acts or omissions of the Company Group.

C. Notwithstanding any provision in this Agreement to the contrary, this Agreement does not authorize one Party to sue for or collect from the other Party its own consequential, special or indirect damages, and each Party hereby waives any and all Claims it may have against the other Party for its own such damages, including but not limited to lost profits or business interruption, however the same may be caused or arise.

D. In the event a Party fails to provide a defense and perform the indemnity obligations provided for herein, the other Party shall be entitled to receive from such Party, in addition to its attorneys' fees, costs, expenses and any amounts paid in judgment or settlement, all costs, expenses, and attorneys' fees incurred in the enforcement of this Agreement. Furthermore, the prevailing Party in any litigation relating to this Agreement, other than that involving defense and indemnity which is addressed above, shall be entitled to recover its reasonable and necessary attorneys' fees and costs of litigation from the other Party.

SECTION X

"Pollution, Contamination and Environmental Matters"

A. The Contractor agrees to and shall comply with any and all applicable laws, rules, regulations, statutes and ordinances which now exist or may hereafter be enacted during the time Services are being performed under this Agreement relating to environmental matters and the control, regulation or prevention of pollution and contamination. The Contractor also warrants that it will comply with and cause others to comply with the highest prevailing and approved standards of care and business judgment in order to control and dispose of all waste, oil, water and other waste materials that may accumulate or be caused by or arise in connection with the performance of Services by the Contractor in order to prevent pollution and contamination of any nature, kind or type resulting from or associated with the Services.

B. The Contractor agrees to and shall assume all responsibility for (including the control and removal of hazardous materials) and shall defend, indemnify and hold the Company Indemnitees and the Company Group harmless from and against all claims, demands, liabilities, causes of action, damages and losses of every kind, character and nature, including death, injury, illness, loss or damage to persons and property, arising from or associated with pollution, contamination, environmental negligence, hazardous materials, discharges or other activities associated with the Services and materials provided by the Contractor and the Contractor Personnel hereunder. The Contractor's obligation provided for above includes, but is not limited to, fines, penalties, cleanup actions, remedial actions, repair or restoration of property and any other legal or equitable liabilities that may be ordered, assessed or required by any applicable state, federal, county, city or local governmental agency or authority.

SECTION XI

"Insurance"

As additional security for the indemnity obligations provided above, the Contractor agrees to provide coverage and amounts of liability insurance, which in no event shall be less than the minimum types and amounts set forth in **EXHIBIT "C"** attached hereto; PROVIDED, HOWEVER, AND NOTWITHSTANDING THE ABOVE, in the event an injury or accident causing loss or liability occurs that is subject to a jurisdiction where there is a prohibition or limitation of the Contractor's ability to indemnify the Company Indemnitees, then, if such law must be applied, the Contractor's liability shall exist to the full extent allowed by the law of such jurisdiction.

SECTION XII

"Verification and Audit Rights"

A. The Contractor agrees that all invoices, financial settlements, billings and reports rendered to the Company in connection with this Agreement and/or the Services will properly reflect the facts concerning all Services, activities and transactions performed and handled for the account of the Company, and such data may be relied upon as being complete and accurate in any reporting and recording made by the Company for any purpose. The Contractor agrees to notify the Company promptly upon discovery of any event or instance where the Contractor fails or may fail to comply with this provision.

B. The Company and its authorized representatives shall have reasonable and sufficient access to time, quantity, rate and other information in order to satisfy themselves that no costs or expenses that are required to or should be included in the rates of the Contractor are directly invoiced as reimbursable costs, and that all expenses that are required to or should be provided for either in the rates of the Contractor or as a reimbursable cost are properly accounted for. If any costs or expenses are disputed and the Contractor refuses to provide access to the relevant information, then such costs and expenses shall be deemed to be included in the rates of the Contractor and shall not be allowable or payable as reimbursable costs.

C. The Contractor and each of its subcontractors shall maintain a true and correct set of books and records concerning the amounts invoiced for the Services, including auditable records of labor, materials, invoices and other supporting documents relating to the Services for a period of not less than three (3) years after the date of the applicable invoice. The Company may, upon request and for a period of up to one (1) year after the date of each invoice, audit any and all books and records of the Contractor, the Contractor Personnel and any of their subcontractors relating to the invoiced Services; provided, however, that the Contractor, the Contractor Personnel and any subcontractor shall have the right to exclude any proprietary trade secrets, formulas or processes from such audit and inspection. Within sixty (60) days after receipt of the audit report from the Company, the Contractor, the Contractor Personnel and/or any subcontractor shall respond in writing to all issues identified in an audit by the Company or

representatives of the Company. The Contractor, the Contractor Personnel and/or any subcontractor and the Company shall work to expeditiously resolve all audit issues.

SECTION XIII

“Force Majeure”

Neither Party shall be liable for failure to perform the terms of this Agreement when such performance is prevented, delayed or rendered impossible by a condition of Force Majeure. “Force Majeure” shall include, but not be limited to, acts of God, action of the elements, war, strikes, acts of the public enemy, quarantine, epidemic, blockade, civil disturbance, riots, insurrection, fire, rules or regulations of any governmental authority having or claiming jurisdiction or control in the premises (the compliance with which makes continuance of performance impossible), or any other cause beyond the reasonable control of such Party, whether or not similar to the causes specified above. A condition of Force Majeure shall not relieve the Company from an obligation to make payment hereunder when due for Services already performed. Except when the Services are suspended due to a labor dispute by the Contractor or its subcontractors with its or their employees, no payment shall be due the Contractor for the period during which the Services are suspended.

SECTION XIV

“Assignment and Subcontracting”

The Contractor shall not, without the prior written consent of the Company, engage any subcontractor (including other contractors) for performance of the Services or assign any rights, duties or obligations arising under this Agreement, either in whole or in part, including but not limited to the assignment of monies payable under this Agreement. In the event the Company consents to the assignment of this Agreement or the Contractor's use of a subcontractor, the Contractor shall continue to be responsible for the due observance of all requirements of this Agreement, and any breach thereof by any assignee or subcontractor shall be deemed to be a breach by the Contractor.

SECTION XV

“Notices”

All notices required or permitted to be given hereunder shall be given in writing and shall be effective: **(A)** upon receipt when hand-delivered, telefaxed or delivered by courier; or **(B)** three (3) days after deposit in the U.S. Mail when mailed to the addresses set forth below with postage thereon prepaid. The Parties may designate a different or other address from time to time in the same manner.

Company:

Fence Factory
2419 Palma Drive
Ventura, CA 93003

Contractor:

Telephone: _____

Telefax: _____

SECTION XVI

“Standards of Business Conduct”

The Company requires the highest possible standards of ethical and business conduct and safety from the Contractor in the performance of the Services and its responsibilities under this Agreement. For purposes of this Section, “Contractor” shall include Contractor Personnel. The Contractor shall adhere to and comply with the following:

A. United States Department of Transportation (“DOT”) Regulations. If the Contractor is subject to the rules and regulations of the DOT, the Contractor agrees to implement and comply with all such rules and regulations applicable to drug testing, education and training of the Contractor’s employees. The Contractor further agrees, upon request by the Company, to provide to the Company a copy of the Contractor’s drug testing program, evidence of compliance therewith and any additional information requested pursuant to applicable DOT rules and regulations.

B. Safety Matters. The Contractor agrees to and shall take all steps and perform all actions that are necessary, required or advisable in order to maintain adequate protection of persons and property during the Contractor’s performance of Services hereunder, and shall perform all Services in a safe manner that minimizes interference with the Company’s operations. The Contractor will maintain in full force and effect and will enforce, throughout the term hereof, a safety manual, including safety and loss prevention standards and provisions, which comply with all applicable federal, state, county, city, local and municipal safety laws, statutes, rules, regulations and ordinances. Prior to commencement of any Services, the Contractor shall inspect the location, land, premises and facilities on, in or around which the Services will be performed in order to assess and determine any and all risks and conditions incident or related thereto. Upon completion of the Services, the Contractor shall remove all trash, rubbish and waste materials associated with or caused by the performance of the Services, and shall leave the Company’s land, premises, location and facilities in a clean, neat and orderly condition.

C. Non-Discrimination. The Contractor shall not discriminate against any employee or any applicant for employment based on or because of race, creed, color, sexual

orientation, religion or national origin; and shall take any and all affirmative actions and steps as are or may be necessary, required or advisable in order to insure that employees and applicants for employment are treated by the Contractor during their employment relationship fairly, equally and without regard to their race, creed, color, sexual orientation, religion or national origin. Any and all such affirmative actions and steps shall apply to all applicable employment, promotion, demotion, transfer, recruitment, advertising, layoff, termination, pay rates, forms of compensation, training and advancement activities, and any other policies and procedures of the Contractor. If or to the extent necessary or required while occupying the lands, premises or facilities owned by the Company, the Contractor agrees to and shall post in conspicuous places and make available to employees and applicants for employment any and all applicable notices containing the provisions of this paragraph. In addition and while occupying the lands, premises or facilities owned by the Company, the Contractor shall, in all solicitations or advertisements for employment or positions with the Contractor, state that all qualified persons will receive equal consideration for employment without regard to race, creed, color, sexual orientation, religion or national origin. If or to the extent necessary, required or applicable, the Contractor shall comply with any and all applicable portions, titles and parts of the Code of Federal Regulations, including, but not limited to: Affirmative Action Programs, Small Business and Small Disadvantaged Business Subcontracting Plans, Labor Surplus Area Concerns Subcontracting Program, Contractor Work Hours and Safety Standards, Affirmative Action for Handicapped Workers, Clean Air and Water, Hazardous Materials Identification and Material Safety Data, and Immigration Reform and Control Act, including all rules and regulations promulgated thereunder and all amendments thereto.

D. Governmental Regulations. In addition to the specific regulations referred to above, the Contractor agrees to and shall comply with all other applicable federal, state, county, city, local and municipal statutes, rules, laws, regulations and ordinances pertaining to equal opportunity employment, affirmative action programs, disabled and handicapped workers, non-segregated facilities, rehabilitation programs, utilization of minority business enterprises, age discrimination, non-discrimination, Vietnam and other war era veterans, small businesses and disadvantaged businesses, labor laws, employment laws and any and all other applicable laws, rules and regulations pertaining to rendering Services under this Agreement.

E. Policies on Drugs, Alcohol & Firearms. The Contractor shall not perform any Services for the Company when the Contractor is impaired by alcohol or any controlled substance. While on the Company's premises or performing the Services, the Contractor shall not: **(1)** use, possess, distribute or sell firearms, explosives, weapons, alcoholic beverages, illicit or non-prescribed controlled drugs, or drug paraphernalia; or **(2)** misuse legitimate prescription or over-the-counter drugs. Any person who violates these provisions shall be immediately and permanently removed from the premises. When Services are being performed by the Contractor on premises owned or controlled by, or at work sites of, the Company, the Company has the right to: **(1)** request the Contractor to submit to alcohol or drug testing at an authorized facility designated by the Company; and **(2)** without prior notice, search the person, possessions and vehicles of the Contractor for contraband or prohibited items. The Company has the right to request the Contractor to immediately discontinue using a particular individual in the performance of Services for the Company any time: **(1)** reasonable cause exists to suspect

alcohol or drug use by such individual; and/or (2) such individual either refuses to take, or tests positive in, any alcohol or drug test.

F. Background Searches and Checks. The Company shall have the right to conduct background searches and checks on the Contractor or any personnel of the Contractor who will be performing Services for the Company. The Contractor shall take all actions, execute all documents and cause the Contractor's personnel to take all actions and execute all documents as are or may be necessary or required to assist the Company in this process.

G. Gifts and Gratuities. The Contractor acknowledges and agrees that the Company has a policy with respect to gifts and gratuities, and it is a conflict of interest for any of the Company's employees or immediate family members to accept gifts, payments, gratuities, extravagant entertainment, services or loans in any form (not including items of nominal value that are customary and proper under the applicable circumstances) from anyone soliciting business from or that has an existing business relationship with the Company. The Contractor agrees to notify the Company in the event any employee of the Company solicits a gift or gratuity from the Contractor, and the Company agrees to maintain confidentiality of such communication and notification.

H. Insider Trading. The Contractor must not buy or sell securities of the Company, directly or indirectly, on the basis of nonpublic information (or communicate such information to others for that purpose) learned, obtained or gathered by the Contractor while performing the Services.

I. Computer and Communication Facilities. The Contractor may be provided or given access to telephones and computer work stations, including the Company's internal network access and computing facilities such as the Internet and electronic mail. In such case, the Contractor shall be responsible and liable for any inappropriate use of such facilities.

Notwithstanding anything to the contrary in the other provisions of this Agreement, the Company has the right to request the Contractor to immediately discontinue using a particular individual in the performance of the Services for the Company any time without notice and without liability if the Contractor fails to comply with this Section.

SECTION XVII

"Arbitration"

A. In the event a dispute arises under this Agreement, the Parties agree to and shall use their best efforts to mutually resolve such dispute within sixty (60) days after one Party notifies the other Party that a dispute or disagreement exists. The Parties shall use their best efforts, through private discussions between representatives of each Party or through an agreed upon mediation procedure, to resolve any such dispute.

B. If the Parties are unable to resolve any claim, dispute or controversy, as provided above, then the same shall be settled and determined by the arbitration procedures set forth

below. Any dispute, controversy, or claim (a "Dispute") arising from, out of or in connection with this Agreement shall be settled and determined by binding arbitration, as the sole and exclusive remedy of the Parties. The arbitration shall be conducted by the American Arbitration Association ("AAA") in accordance with its Commercial Arbitration Rules (the "Rules"), as now in effect or amended hereafter; which are deemed to be incorporated herein by reference. In the event a conflict arises between the Rules and the arbitration provisions set forth below, then the provisions set forth below shall govern and control. The Dispute shall be determined and resolved by a panel composed of three arbitrators (the "Panel"). Each Party shall appoint one arbitrator, and the two arbitrators previously appointed shall appoint the third arbitrator, who shall act as chairman of the Panel. Each arbitrator shall be knowledgeable of and have at least ten (10) years of experience dealing with or involving the particular kind and type of Dispute to be determined by the Panel. In the event any arbitrator is not appointed, as provided above, then such arbitrator shall be appointed by the AAA in accordance with the Rules. The arbitration shall be held in Los Angeles County, California, and the proceedings shall be conducted and concluded as soon as reasonably practical based on the schedule established by the Panel. However, the Panel shall use its best efforts to render its decision within one hundred eighty (180) days after the selection of the chairman of the Panel. The decision of the Panel shall be final and binding on the Parties. Judgment upon the decision and award rendered by the Panel may be entered in, and enforced by, any court of competent jurisdiction. Each Party shall bear the fees and expenses of the arbitrator selected by it, and both Parties shall equally share and pay the fees and expenses of the chairman of the Panel, provided; however, the Panel may award to the prevailing Party its costs, expenses and attorneys' fees incurred in connection with such proceedings.

SECTION XVIII

"General Provisions"

A. Incorporation by Reference. The Exhibits attached to this Agreement and any additional Service Orders are incorporated into this Agreement by this specific reference. However, in the event of a conflict between the provisions of this Agreement and those contained in the Exhibits and/or Service Orders, the provisions in this Agreement shall prevail.

B. Applicable Laws and Venue. This Agreement shall be governed by and interpreted in accordance with the laws of **THE STATE OF CALIFORNIA (EXCLUSIVE OF ANY PRINCIPLES OF CONFLICTS OF LAWS WHICH WOULD DIRECT OR REQUIRE THE APPLICATION OF THE SUBSTANTIVE LAWS OF ANOTHER JURISDICTION)**. In the event of a dispute concerning the meaning or application of this Agreement, then this Agreement shall be construed fairly and reasonably and neither more strongly for nor against either Party. The Parties agree that in the event any arbitration or litigation arises in connection with this Agreement, any action must be brought in Los Angeles County, California.

C. Entire Agreement. This Agreement constitutes the entire agreement of the Parties and supersedes and replaces any and all prior oral or written agreements or any other

communications relating to the Services. Any and all prior contracts and agreements between the Parties are hereby cancelled and terminated, and shall be of no further force or effect.

D. Survival of Terms. Notwithstanding the suspension or termination of this Agreement or any Force Majeure event, the Parties shall continue to be bound by the provisions of this Agreement that require some action or forbearance after such termination, including but not limited to those related to confidentiality, indemnity, warranty and insurance.

E. Modifications, Amendments and Waivers. This Agreement may be amended, modified or otherwise altered, or its provisions waived, only by an amendment in writing signed by an authorized representative of each Party. The waiver of any requirement or provision in this Agreement on any particular occasion or at any particular time shall not be deemed a waiver of such requirement or provision, or serve as a precedent, on other occasions or at other times.

F. Enforceability of the Agreement. If any part or provision of this Agreement is judicially or by arbitration declared invalid, such declaration shall not have the effect of invalidating or voiding the remainder of this Agreement. The Parties agree that the part or provision of this Agreement held to be invalid, void or unenforceable shall be modified to the extent necessary or required in order to make this Agreement enforceable; or if necessary, this Agreement shall be deemed to be amended to delete the unenforceable part or provision, and the remainder shall have the same force and effect as if such part or provision had never been included.

G. Headings. Headings, captions or other subdivisions of this Agreement have been inserted for convenience or reference only and shall not limit or affect the legal construction of any provision hereof.

H. Binding Authority. Each of the persons executing this Agreement represents and warrants that he or she has the full right and authority to execute this Agreement on behalf of the Company and the Contractor, respectively, and to bind the applicable Party to the fulfillment of all of the terms, conditions and provisions hereof.

I. Successors and Assignees. This Agreement shall be binding upon and inure to the benefit of the Parties and their respective heirs, devisees, personal representatives, successors in interest and assignees.

J. Further Assurances. The Parties agree to and shall take any and all actions and steps, and prepare, execute and acknowledge any and all applicable instruments, documents and agreements, in order to fully effectuate the intent of the Parties and this Agreement and otherwise comply with the terms, conditions and provisions contained herein.

K. Solicitation of Employees. The Parties shall not directly, indirectly or through any third parties solicit, recruit, entice or induce any employee, consultant or representative of the other Party to terminate his, her or its employment, association or relationship with such Party in order to become an employee, consultant or representative of the other Party.

L. Counterparts. This Agreement may be executed in one or more or multiple counterparts; each of which shall be considered an original instrument, and all of which shall be considered one and the same original instrument and agreement. The Company is hereby authorized to assemble all separate counterparts into one original document.

IN WITNESS WHEREOF, the Parties have caused this Agreement to be duly executed on the date first set forth above.

Company

Contractor

Fence Factory

By: _____
(Signature)

By: _____
(Signature)

(Printed Name)

(Printed Name)

(Title)

(Title)

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I. WASTE STORAGE AND HANDLING

Field personnel must be familiar with and implement the following health and safety procedures during waste management activities, especially during packaging, sampling, handling or similar activities where it is likely to be exposed.

- Review SDS for chemicals suspected to be in the waste.
- Refer to typical health and safety requirements specific to field operations and wear the proper personal protective equipment.
- Drums containing waste should never be lifted by hand; use proper waste handling equipment.
- Follow confined space entry standard in enclosed areas.
- If there are any unsafe conditions or items needing repair, contact immediate supervisor and take corrective action immediately.
- Review first aid and fire fighting protocols prior to initial exposure to material.
- Be sure to contact the EH&S contact if uncertainties exist.

II. WASTE STORAGE

Storage procedures begin when waste is generated and ends at removal and transportation of the waste for recycling, disposal or treatment. All wastes should be stored and handled in a manner that prevents the creation of nuisances (odor, spills, dust, etc.).

III. CONTAINERS

Containers used to store waste should be nonabsorbent, durable, watertight, and designed for safe handling. Containers should also be of sufficient size to prevent overflow (22 CCR 66262.30). Waste storage and handling may include the following list of storage containers:

- Bulk liquid storage tanks (Baker tanks)
- Roll-off bins/boxes [California Highway Patrol (CHP) or Department of Transportation (DOT) approved]
- DOT Drums

IV. TIME LIMIT FOR STORAGE

Per 22 CCR 66262.34, the time limit for hazardous waste storage is 90 days and requires the following:

- Appropriate containers.
- Proper storage area.

- Properly filled-out hazardous waste label affixed to all hazardous waste containers immediately.
- The date which each period of accumulation begins must be clearly marked on the storage container or entered on the label.
- Storage of hazardous waste for more than 90 days requires a special permit from the appropriate regulatory agencies.
- Weekly inspections and records must be completed by the Site Supervisor, or designee, weekly while waste is in storage. Copies should be forwarded to the Company environmental contact.

V. STORAGE CONTAINER LABELS

A properly completed label must be placed on all waste containers. Labels are available at the field office. Depending upon the hazardous characteristics of the waste stored in the container, the following types of labels should be used. All labels must be filled out completely using a waterproof pen:

- Waste Pending Analysis Labels—For wastes that are suspected to be hazardous but are awaiting laboratory analysis to determine the hazardous classification, a waste label indicating the laboratory analysis is pending must be affixed to the storage container.
- Hazardous Waste Labels—For wastes that are known to be hazardous or determined to be hazardous through laboratory analysis. A special label must be used, “hazardous waste”.
- Non-hazardous Waste Labels—This type of label should be used for wastes that are known to be non-hazardous or determined to be non-hazardous through laboratory analysis, “non-hazardous waste”.
- Non-regulated Waste Labels—This label should be used for wastes that are accumulated pending disposal that are not regulated as hazardous or universal wastes.
- Drained Used Oil Filter Labels—Used oil filters should be drained and placed in a closed drum exhibiting a “drained used oil filter” label.
- Empty Labels—Drums that are onsite and planned to be utilized for containing wastes may be marked with the “Empty” label. Additionally, drums that held a hazardous waste or hazardous material and are now empty may be marked as such.

Alternative methods of identification (such as temporary type signs) may be acceptable when storing waste in rented bins or tanks. Additional labels may be required for DOT, or other regulatory agency.

VI. WASTE PROFILING AND DISPOSAL

Each waste material must be identified as either hazardous or non-hazardous so it is properly disposed of. Once a waste stream has been identified as hazardous or non-hazardous, an application must be submitted to an approved disposal or recycling facility for acceptance of the waste. Most disposal and recycling facilities require a properly completed waste profile sheet, appropriate laboratory report and may also request a sample. The Company will coordinate the profiling function on a case by case basis. Please refer to the flow chart in Figure 1 for assistance in determining whether or not a material is hazardous and how to dispose of it. Please take note:

- EPA “Listed” waste can be found at <http://www.epa.gov/osw/hazard/wastetypes/listed.htm>
- “Universal Waste” consists of: electronic devices, batteries, mercury-containing equipment, cathode ray tubes and non-empty aerosol cans.

VII. TRANSPORTATION OF WASTE

All shipments of both hazardous and non-hazardous waste require documentation to track the material from the generating facility to the disposal or recycling facility (Title 22 CCR 66262.20). The type of documentation approved as shipping papers include:

- Uniform Hazardous Waste Manifest—The Company will coordinate the preparation of the hazardous waste shipping paperwork with help from field personnel on a case by case basis. Uniform hazardous waste manifests are obtained from EPA approved vendors. Every container of 119 gallons or less must be marked with the following words and information (See Figure 2 for sample label):

HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____.
Generator's EPA Identification Number _____.
Manifest Tracking Number _____.

- Non-hazardous Waste Manifest—For non-hazardous wastes, these forms are available from the transportation vendor at the time of shipment pickup.
- Bill of Lading—Used for ***non-hazardous wastes only***.

VIII. DOCUMENTATION AND RECORD KEEPING

Regulatory agencies require record retention from three up to five years. Documentation requests from the regulating agencies are routine, therefore, complete records are important. Duplicate files should be kept at the particular facility as backup copies.

IX. CONTINGENCY SPILL RESPONSE AND REPORTING

The Business Plan contains specific information regarding hazardous waste spills. Please follow the appropriate spill response and reporting procedure when required.

FIGURE 1 – Waste Classification and Disposal Flow Chart

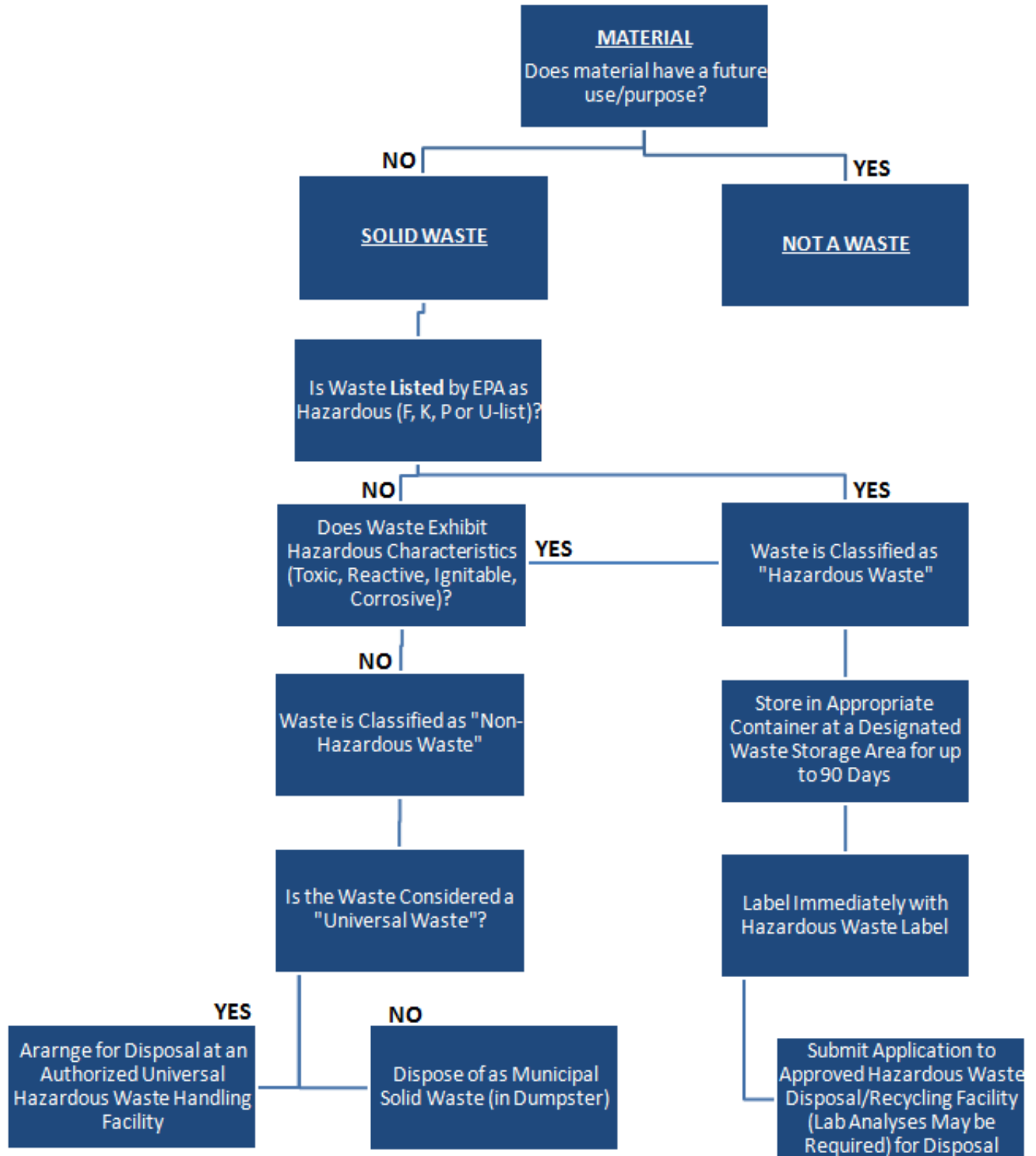


FIGURE 2 – Hazardous Waste Label



The image shows a yellow rectangular label with a red border featuring diagonal stripes. The text is in red and black. At the top, 'HAZARDOUS WASTE' is written in large, bold, red capital letters. Below this, in smaller black capital letters, is 'FEDERAL LAW PROHIBITS IMPROPER DISPOSAL'. Further down, in black capital letters, is 'IF FOUND, CONTACT THE NEAREST POLICE, PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY'. Below this is a section for 'GENERATOR INFORMATION:' with several lines for text entry. The lines are labeled: NAME, ADDRESS, CITY, STATE, ZIP, EPA ID NO., EPA WASTE NO., ACCUMULATION MANIFEST, and START DATE DOCUMENT NO. Below this is a large rectangular box with a red border, containing the text 'D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX'. At the bottom, in large, bold, red capital letters, is 'HANDLE WITH CARE!'.

**HAZARDOUS
WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE,
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

EPA ID NO. _____ EPA WASTE NO. _____

ACCUMULATION MANIFEST

START DATE _____ DOCUMENT NO. _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!