

CORPORATE SAFETY MANUAL



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Safety Program Endorsement and Policy Statement

Garret Shields has always put safety as our first priority before all other business objectives. We take great pride in our culture and workplace here and at the foundation is our commitment and investment in the safety of our employees, our clients and our business partners.

We believe that no job or task is more important than protecting our worker's health and safety. If a job represents a potential health or safety threat, every effort will be made to plan a safe way to do the task. Shortcuts will not be tolerated.

If a worker observes any task that may pose a potential threat to their health or safety, he or she must inform their supervisor who is expected to take appropriate precautions.

IF A JOB CANNOT BE DONE SAFELY, IT WILL NOT BE DONE!

All items in this Safety Manual not only apply to our employees but to all subcontractors or vendors working on our projects and job-sites. It is our responsibility to make sure they are following proper Safety protocols as they are an extension of our company and have the same responsibility we do when it comes to providing a safe workplace for their employees.

Garret Shields wants every employee to end their workday as healthy as they started it. At every level in our organization, you will find a dedicated commitment and effort to safety and it starts at the top. If you ever are witness to any employee, manager or business partner of our company not taking safety as our #1 priority, I would ask that you contact me directly and I will make sure we correct the situation through positive training and corrective counseling.



(Signed)

Rick Sulzer, P.E.

President & CEO

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Safety and Health Objectives

Garret Shields plans to achieve worker safety and health through the following:

- A. Training every employee how to recognize unsafe conditions and implement safe work practices in their trade.
- B. Following safety procedures and rules as listed in the safety program and as instructed by tool box talks and your Foreman.
- C. Provide appropriate equipment to ensure safe working conditions for our employees and protection of the general public.
- D. Using a qualified safety person to provide guidance for conditions not specifically covered by our safety program or safety regulations.
- E. Making regular job site safety inspections to identify unsafe conditions.
- F. Enforcing safety rules and using disciplinary action when appropriate.
- G. Promote a positive attitude toward the observance of safe work practices.
- H. Search out innovative ideas from the industry and our employees and implement into our daily safety operations.
- I. Reach our goal of Zero Injuries – Zero Accidents – Zero Damages

Safety Committee: Organization and Responsibilities

Safety Committee Chairperson: Rick Sulzer – CEO / Principal

Our safety committee chairperson, will help coordinate an effective plan to reduce work place injuries and illnesses.

The primary function of our safety committee is to create and maintain injury prevention as a primary goal in our company. Our safety committee will be made up of at least one senior management representative with the remaining members a combination of supervisors and hourly employees, with representative from each department. Membership will be periodically rotated to provide opportunities for maximum participation. It is our objective to have monthly meetings; more if the committee deems it necessary, established on a calendar basis, with the agenda distributed to all members at least one week prior to the meeting. Notice of meetings will also be sent to all senior management and posted on the bulletin board.

Principle activities and responsibilities include:

- Conduct quarterly hazard inspection tours of the office, fabrication, maintenance and yard to identify hazardous conditions, unsafe work practices and recommend corrective action. This also includes an evaluation of observed safe work behaviors to improve safe work performance. The committee will choose as many members as are prudent for these inspections, rotating so that all members will have an opportunity to participate.
- Act as a clearinghouse for all safety ideas and activities.
- Review incident investigation reports and near misses that have occurred in the past month. Determine that corrective actions recommended are appropriate and prudent. Recommend changes to the safety program as necessary.
- Assist in the development of base line safe work performance expectations and work practices.
- Recommend content for training programs to maintain employee knowledge and skill in safety.
- Individually promote safety activities and set good examples in the areas where they work, as well as forward to the committee their fellow employee's concerns and complaints in the area of safety and health.
- Keep records of committee meetings so that progress can be evaluated and management kept informed.

Director of Safety Responsibilities

Director of Safety: Derrick Glawson – Vice President

Our Director of Safety has the responsibility and authority to administer our safety program. The primary duties and responsibilities include, but are not limited to:

1. Formulate, administer, evaluate and prepare appropriate adjustments to our safety/health and property protection program.
2. Make monthly reports to management on safety program progress, including strategic plans for reducing injury and incident frequency and severity.
3. Maintain current incident record system. Track incident reports for common elements and trends. Follow-up with site supervision to ensure that corrective action was taken. Benchmark achievements. Management must be regularly informed of progress on corrections.
4. Assist in training employees in safety and health matters. Coordinator will maintain records of new employee safety orientation and all ongoing training activities. Training program elements and schedule will be based both on regulatory compliance and company goals for reduction in incidents.
5. Supervise safety inspections and surveys made by the company safety committee. Perform periodic unannounced site hazard inspections to confirm site safety activities and conditions.
6. Ensure our program meets or exceeds federal (i.e., OSHA, EPA, DOT, etc.), state and local safety regulations.
7. Initiate and maintain safety-related communications in meetings and correspondence, and conduct activities that will stimulate the interest and maintain the accountability of employee safety.
8. Work with all levels of management to help them understand their role and responsibilities.
9. Coordinate Risk Control consulting activity and support provided by the insurance carrier's Risk Control Services and Claims departments.
10. Coordinate prompt claims reporting and return-to-work activities with our insurance carrier and our preferred medical providers. We will utilize our disability management plan for return to work and transitional duty task design to help manage our injuries.
11. Work with job Superintendents to support their efforts. Job Superintendents are responsible for job site safety including compliance with this program, employee safety training and coaching, and prompt incident reporting. The Superintendent shall remain responsible even if tasks or duties are delegated to others.

Superintendent Safety Responsibilities

Our **Field Superintendents** are responsible for completing assigned projects, including job site compliance with this safety program, employee safety training and incident reporting. The Superintendent shall remain responsible even if tasks or duties are delegated to others.

A Field Superintendent has the authority and responsibility to carry out our safety program. Safety results will be factored into a superintendent's salary increase. The primary duties and responsibilities include, but are not limited to:

1. Formulate, evaluate, administer and prepare appropriate adjustments to our safety and health program to handle situations not covered.
2. Make monthly reports to management on safety program activities.
3. File claim reports and investigate all incidents in a timely fashion. Maintain a file of all incident reports. Follow-up on incident report corrective action to verify its implementation.
4. Provide topics for employees' safety and health training. Maintain records of all training, showing the topic, date, instructor and attendees. The Safety Coordinator can assist by providing training topics. Action recommended from incident investigations, lessons learned from accidents on other jobs and inspection deficiencies are all appropriate topics for weekly tool box talks.
5. Conduct regular safety inspections to identify unsafe conditions or unsafe acts.
6. Ensure the site meets or exceeds federal, state and local safety regulations.
7. Establish a job site safety committee consisting of hourly and supervisory personnel with the superintendent as chairman.
8. Work with foremen, engineers and other supervisors to help them understand their safety role and responsibilities.
9. Enforce safety rules by coaching foremen and hourly personnel when unsafe behavior and conditions are observed. Institute disciplinary action as warranted.
10. Provide safety training to Foremen so they can carry out their responsibilities.

Foreman/ Crew Leader Safety Responsibilities

Foremen / Crew Leaders are responsible for the safety of their crew, employee safety coaching and prompt incident reporting. The Foreman shall remain responsible even if tasks or duties are delegated to others.

Safety results will be factored into all salary increases. The primary duties and responsibilities include, but are not limited to:

1. Discuss appropriate adjustments to our safety and health program with the Superintendent to handle situations not covered by our program.
2. Report incidents immediately upon discovery to the Superintendent. Implement corrective action as directed by the superintendent.
3. Present employee safety and health training using tool box talks and other methods as appropriate. Document records of all training, showing the topic, date, instructor and attendees. Provide records to the Superintendent.
4. Conduct regular safety inspections of the work area, correcting and reporting unsafe conditions.
5. Participate as a member of the job site safety committee.
6. Discuss job tasks with the members of your crew and the applicable safety rules that must be observed.
7. Enforce company safety rules. Coach employees on the appropriate safe work methods when you observe them working in an unsafe manner. Employ disciplinary action when an employee repeatedly disregards the company's safety program.

Hiring and Training

Our work force is our most valuable and important asset. We want to select qualified employees. Once hired, thorough training and education is paramount to understand our objectives and acquire the skills to safely perform the job.

Prospective Employees

- Each prospective employee will fill out an employment application.
- Each prospective employee will receive a personal interview either by our human resources department or a supervisor.
- A phone call reference check may be made of the prospective employee's previous employers.
- If the employee is expected to drive a company vehicle or drive their own vehicle on company business, even occasionally, they must fill out the auto section of the employment application. State motor vehicle reports will be required and reviewed. Note our selection criteria for drivers and our base-line expectations for new and existing drivers.
- Physical exams may be required for all positions pending an offer of employment, consistent with ADA regulations and the physical demands of the job. Actual commencement of the job is based on successfully passing this exam including a negative drug screen. Physical exam criteria are based on job descriptions that have identified critical physical demands to fulfill the specific job requirements.
- Garret Shields, LLC currently use the services of an outside care provider to perform drug screening and physical exams. All detail of the exams will remain within files of our human resources department.
- Job descriptions will be updated every three years with input from a superintendent and the safety coordinator. They must reflect the actual critical job demands, as well as cognitive skills employees must have to hold a given position. Our treating occupational physician must also be consulted to provide essential detail into the final description. These will then be used to base future physical exams and work re-entry criteria from work place injuries for modified duty adjustments.

New Employee Safety Orientation and Training

A key element in our safety program is the initial training of employees. They need to know the company safety program, policy and rules in order to develop the proper safety attitude and safe work procedures.

The following areas are to be covered in the new employee's orientation:

- Safety program endorsement and commitment of Garret Shields Infrastructure including the role employees play, their responsibility and how these are enforced.
- Company safety expectations of the work force, supervisors and management; and how employees are held accountable for safe work performance.
- Incident reporting procedures, including the need for prompt reporting to their supervisor.
- Injury management and transitional duty plan for employees recovering from work place incidents.
- Safety organization and functions.
- Specific personal protective equipment (PPE) requirements.
- First-aid procedures: use of first-aid responders as a primary contact and bloodborne pathogen protection.
- Review of the company emergency disaster preparedness plan.
- Disciplinary action for not following company safety policies and rules.
- The employee safety orientation checklist should be completed by the supervisor and placed in the employee's file.

Job Specific Training by Supervisors

Each Supervisor, Crew Leader or Foreman must acquaint a new employee with the nature of their work, general safe work expectations for their trade and task specific work rules.

Safety Disciplinary Action

Safety policies and work rules are developed for everyone's protection. Knowing these policies and rules is a condition of employment as is compliance with them. Failure to do so will result in disciplinary action as detailed below.

1. **First violation:** Verbal warning; entry in Crew Leader/Foreman log.
2. **Second violation:** Written warning; copy for file or Personnel Office.
3. **Third violation:** Written warning; one day suspension without pay.
4. **Fourth violation:** Written warning and one-week suspension, or termination if warranted.

DRUG AND ALCOHOL POLICY

GARRET SHIELDS is dedicated to the health and safety of our employees. Drugs, alcohol, and other prohibited items pose a serious threat to our employee's health and safety. The Firm has the responsibility to its employees to provide a safe and productive workplace. It is our responsibility to our clients and to the public to ensure their safety and trust in the Firm. Therefore, it is the policy of GARRET SHIELDS to ensure that's it workforce is productive, its facilities are safe and the success of its business is not hindered by drug and alcohol abuse.

It is the policy of GARRET SHIELDS that the use, sale, purchase, transfer, possession, or presence in one's system of any controlled substance (except medically prescribed drugs) by any employee while on the company premises, engaged in company business, operating company equipment, or while under authority of GARRET SHIELDS is strictly prohibited. Disciplinary action shall take place as necessary to protect the company's assets and our employees.

Neither this policy nor any of its terms are intended to create a contract of employment or contain the terms of any contract for employment. GARRET SHIELDS reserves the sole right to change, amend, or modify and terms or provision of this policy without notice.

Garret Shields recognizes substance abuse dependency as an illness and major health problem. Employees needing help in dealing with such problems are encouraged to use our health insurance plan, as appropriate. Conscientious efforts to seek help will not jeopardize any employee's job, and will not be noted in any personnel record.

Drug and alcohol testing may be conducted for the following:

- Pre-employment
- Post Accident
- Probable Cause
- Per DOT Requirements

If the employee refuses to participate in a drug test or unduly delays the test, the employee shall be subject to disciplinary action, up to and including termination.

Testing applicants for employment and employees for controlled substance can be an effective means to identify those in need of counseling, treatment or disciplinary action and/or detect individuals who do not meet GARRET SHIELDS's hiring criteria. The testing program is intended to supplement, not replace, other methods by which the use of controlled substances may be detected. GARRET SHIELDS has selected a Substance Abuse and Mental Health Services Approved Laboratory (SAMSHAL) to perform drug testing in accordance with this policy.

Chain of Custody procedures will be observed at all times.

All Drivers who operate commercial motor vehicles that require a commercial drivers license under 49 CFR Part 383 are subject to the FMCSA's drug and alcohol regulations, 49 CFR Part 382.

FOR FURTHER POLICY INFORMATION, REFER TO THE DRUG AND ALCOHOL POLICY IN THE EMPLOYEES ADMINSTRATIVE HANDBOOK.

General Safe Work Rules

Employee Responsibilities

All employees are expected to perform their jobs to the best of their ability as well as perform them in a safe manner. It is critical that employees do not circumvent safety features and employ unsafe work behaviors that can cause them or others to be at risk. OSHA requires that we furnish employees a place of employment “free from recognized hazards that are causing or are likely to cause death or serious physical harm to employees.” Our employees play a significant role in the success or failure of our overall safety program. All accidents are preventable and we must each carry out our safety responsibility.

Primary Expectations

Employee responsibilities for safety include the following:

- Practice safe work habits and follow your supervisor’s instructions, company safety rules and regulations.
- Report unsafe conditions to your supervisor.
- Wear and maintain appropriate safety equipment as required by your supervisor.
- Maintain equipment in good condition with all safety features in place when in operation. Notify your supervisor if problems develop. Do not try to fix or jury rig equipment in the field.
- Report all incidents to your supervisor immediately, whether or not there is an injury.
- Participate in safety by attending tool box talks and other meetings as required by your supervisor. Your suggestions for improvement will assist in making our program more effective.

Personal Protective Equipment (PPE)

- Eye and head protection will be worn on all job sites. Special safety glasses will be provided when working with and adjacent to lasers.
- A welding hood will be worn when stick (electric arc), MIG or TIG welding. Safety glasses will be worn under the welding hood when stick welding.
- Welding goggles with the appropriate shade lens will be used for oxy-acetylene cutting, heating or brazing.
- Protective footwear shall be worn to protect from falling objects and sharp objects. Athletic or canvas-type shoes are not allowed on the job site.

General Safety Expectations

- Perform only those jobs to which you have been assigned and properly instructed. If you have any doubts or questions, ask your supervisor.
- Report damaged equipment immediately for replacement or repair.
- First aid will be administered only by trained authorized first responders. Their names will be posted at each job.
- No employee shall attempt to remove foreign objects from someone's eyes, ears or face. Our treating medical provider must be contacted immediately for the removal of any foreign object. Contact will be made via the first-aid responder to the clinic that will assist with the incident investigation.
- Never move an injured person unless it is absolutely necessary or as directed by the first responder. Further injury may result. Keep the injured as comfortable as possible until an ambulance arrives.
- If any part of your body comes in contact with an acid or caustic substance, rush to the nearest water available and flush the affected part. Secure medical aid immediately.
- Keep your mind on your work at all times. Horseplay is not permitted on the job. Injury, termination or both can be the result.
- Do not distract the attention of fellow workers. Do not engage in any act that would endanger another employee.
- Watch where you are walking. Do not run.
- The use of illegal drugs or alcohol or being under the influence of the same on the project is cause for termination. Inform your supervisor if you are taking strong prescription drugs that warn against driving or using machinery.
- We provide sanitation facilities for your use. Damaging or defacing these facilities is forbidden.
- Serious injury can result when compressed air is used for personal cleaning or cooling. Use compressed air for equipment operation only.
- Keep all fire protection equipment and exits clear of obstructions to allow ready access.
- Riding on any material handling equipment not equipped with a seat and seat belt for each rider is prohibited and will be grounds for disciplinary action.
- If you must work around power shovels, trucks and dozers, make sure operators can always see you. Barricades are required for cranes
- Do not enter any barricaded area unless you are authorized to do so.
- Never throw anything "overboard." Someone passing below may be seriously injured.

Hand and Portable Electric Tools

- Keep tools clean, free of grease and dirt. Clean tools work better and last longer. Poorly maintained tools are less efficient and may cause damage or injuries.
- Turn in defective tools for repair.
- Do not use power tools and equipment until you have been properly instructed in the safe work methods and are given authority to use them.

Heavy Equipment and Rigging

- You may not act as a rigger until you are trained in determining the capacity of a sling or bull line, inspecting the device for damage and rigging the load to prevent movement during handling.
- The rigger must know the effects of the horizontal sling angle to prevent exceeding the sling's strength.
- A rigger must know ANSI B30 hand signals or agree with the equipment operator on hand signals to be used.
- Lifting personnel with a crane shall not be performed without prior approval of the VP Operations / General Superintendent. Lifting personnel with a loader, fork truck or tele-handler is prohibited.
- Do not operate equipment without the necessary safety features in place and ensuring they are in working order.

Lifting and Carrying

- Lift correctly - with legs, not the back. **Get help** if the load is too heavy.
- Inspect the object to be moved for sharp corners, nails and other projections that may cause an injury. Check out the container or object to make an intelligent decision as to your capabilities and limitations for making a lift. Look for a label or stamp indicating the weight to determine how much you will be lifting.
- Size up the load. Clear away anything on the floor that might cause you to lose your footing.
- Avoid reaching as you lift or lower. If something is in your way, move it. Set feet firmly, placing one foot alongside the load and the other slightly behind the load. When lifting, keep the object close to your body. Choose the lifting position that feels most comfortable, with or without a straight back. Set muscles of legs, hips and back ready to take the strain.
- When grasping an object to lift, get a firm grip with fingers under the load if there are no handholds. Lift steadily, avoiding jerky motions. Never twist while lifting or lowering. Lift first, then turn your body by repositioning your feet.
- Do not lift awkward or heavy materials alone. If in doubt, contact your foreman to get someone to help you or utilize a mechanical lifting device.

- When two or more workers are “team lifting,” decide how the object will be handled and what route to use. Keep in step and agree on signals for changing directions, stopping, placing object, etc.
- When using material handling equipment, be sure you fully understand how to operate the lifting or hoisting equipment before you start.

Material Storage

- Select a stable base with a solid, level surface free of holes and imperfections. Pipes and other materials that may roll or slide should be chocked at the base for stability or tied to vertical structural supports. When stacking loose materials, rotate every other row ninety degrees to interlock the layers. Masonry should be stepped back when above four feet high to assure stability.
- Maintain adequate aisle space. Leave enough room for hand truck, powered truck, portable fire equipment and workers to get to the material. Materials should not protrude beyond the face of the stack.
- Pile material to a safe height so that the stack will remain steady and not exceed the floor load capacity. Maintain at least 18 inches between any materials and activated sprinkler heads. Be certain to maintain a minimum three-foot clearance around electrical panels.

Machine Operations

- Avoid leaving an unattended machine running unless it is fully guarded and intended to operate continuously in a safe mode.
- Do not operate equipment for which you have not been trained and authorized. If you have questions about the safe operation of a machine, contact your supervisor immediately.
- Under no circumstances should machines be used in an unsafe manner or with safety devices missing, malfunctioning or circumvented.
- Keep all mechanical safeguards in position during operation. Refer to our company policy on lockout/tagout procedures when maintenance or setup is underway.
- Do not wear jewelry or loose clothing when operating machinery. If gloves are required for protection, ask your supervisor to suggest alternatives. Machines can sometimes pull in gloves and cause severe injuries.
- Do not work with any defective equipment, especially with malfunctioning safeguards. This is a very dangerous situation and must be reported to your supervisor immediately.
- All machines will have guards in place before the machine is put into operation. Guards will be adjusted according to the operation required. Guards will only be removed when required for setup or repair.
- All belt-driven equipment must have guards around pulleys, gears, spindles, belts, shafts, sprockets and other moving parts that expose employees to an unsafe condition.

Tele-Handler and Powered Industrial Lift Truck Operation

- Operate this equipment at a safe speed at all times, factoring in the surface and other trades working in the area.
- Lifting personnel is prohibited. Use an aerial lift.
- This equipment shall not be used to transport personnel, only the operator may be aboard.
- Never transport loads which are unstable or above the rated capacity of the equipment. Refer to the rated load on the placard of the equipment. Adding counterweights to alter the lift truck's lifting capacity is strictly prohibited.
- Operators must sound the horn or bell when approaching pedestrians. However, sounding a warning does not give operators the right-of-way. Proceed slowly until pedestrians are clear.
- Avoid traveling with fork tines up. Use the tilt control to bring load over drive wheels, to stabilize the load. Always back down an incline in low gear when fully loaded.
- Only licensed and certified operators are authorized to operate a telehandler or powered industrial material handling device.

Excavations and Trenches

- Only enter a trench if you are authorized to do so by your supervisor or designated competent person.
- Enter trenches or excavations using a stairway, ladder or ramp. Do not use pallets or concrete forms as a makeshift ladder.
- Do not store tools or materials closer than two feet from the top edge of the excavation.

Ladders

- For any overhead work near electrical sources, use an appropriate ladder for the task (fiberglass, plastic or wood). Metal ladders must not be used when working on or near electrical circuits.
- Straight or extension ladders should have non-skid feet or be cleated. Secure ladders by lashing at the top and blocking at the bottom.
- Set up straight or extension ladders at 75.5 degrees using the label on the side rail, or measuring one foot out for every four feet of length (the 4:1 rule).
- Only use ladders on a stable base, not on lumber, masonry block or other insecure materials. Never set up a ladder on a scaffold.
- Do not climb on the two highest rungs of a step, straight or extension ladder.
- When straight ladders are used to access a work platform, extend at least 3 feet above the landing, deck or roof area.

- Remove defective ladders from service and tag “*Dangerous, Do Not Use.*”
- Inspect the ladder for defects (missing cleats, cracked rungs, broken spreaders, etc.) before use.
- Position ladders away from doors unless door is blocked, locked or guarded to prevent it from striking the ladder.
- Stepladders will be used only when fully open with both spreader bars locked and on a level surface. Do not use a stepladder in the closed or semi-closed position.
- Climb the front steps (not rear braces) of a stepladder.
- Keep metal ladders at least three feet away from overhead electric power conductors.

Housekeeping

- Dispose of oily rags, old paint cans and other containers that have held flammable liquids in the appropriate receptacle.
- Throw debris and scrap in properly labeled waste containers. Do not place combustibles or flammables in open containers. Use self-closing lid containers (FM and UL listed) to avoid potential fires from spontaneous combustion. Dispose of infectious waste and materials that have been used to clean up blood or other potentially infectious materials in the appropriate red containers marked with the biohazard label. This is consistent with the bloodborne protection plan of our company. Refer to the Bloodborne Pathogens section for more information.
- Pick up tripping hazards such as fasteners, lumber, wire, waste materials, etc., and dispose of them promptly.
- Practice good housekeeping around your work area. Everyone must look after their own area and report other areas in need of attention to the supervisor or a member of the safety committee.

Fire

- Open fires are prohibited.
- Report a fire per the company policy. Call 911 or the local response team for help, being sure to give the operator specific information including the location of the fire. Notify your supervisor to initiate the fire evacuation and response plan.
- Follow the fire prevention program throughout all phases of work to assure that effective firefighting equipment is immediately available and designed to effectively meet all fire hazards.
- Store materials so they do not obstruct exits. Materials shall be stored with due regard to their fire characteristics; oxygen and acetylene cylinders shall never be stored at an exit or in emergency egress routes. Clearance of at least 36 inches shall be maintained for lights, heating units and electrical boxes.

- When practical, objects to be welded, cut or heated should be moved to a designated safe location. If the object cannot be moved, positive means shall be taken to confine the heat, sparks and slag and protect adjacent combustible materials.
- Discuss hot work with your supervisor to determine if a permit and fire watch is warranted.
- All extinguishers must be prominently placed, labeled for use and kept clear of obstructions at all times.
- If a fire extinguisher is used or is found discharged, report it to the supervisor immediately and bring it to the trailer so it can be serviced. A replacement extinguisher should be mounted immediately.
- Fire extinguishers shall be inspected on a monthly basis. The date and inspector's initials on the tag document the inspection.
- When the fire signal (alarm) sounds, exit the building and gather at the designated assembly point. Do not try to take tools or personal belongings with you, exit immediately.
- No smoking will be strictly enforced in all areas where "No Smoking" signs are posted.

Flammable and Combustible Liquids

- Only approved containers will be used for the storage and handling of flammable and combustible liquids. Flammables, including gasoline, will be stored in approved safety cans. Under no circumstances will gasoline or other high flash-point flammables be utilized as a cleaning solvent.
- When not in use and at the end of the work day, all flammable liquid containers will be placed in the flammable liquids storage cabinets.
- Flammable or combustible liquids that have leaked or spilled shall be cleaned up immediately and disposed of per the supervisor's instructions.
- There shall be no smoking, open flame or use of flammable or combustible liquids in the area of storage. All employees must observe company restrictions on where and when smoking is acceptable. Failing to practice these rules will result in disciplinary action.
- Isolate all combustible and flammable materials and solvents from possible ignition sources such as open flames, heated surfaces, electric arcs and sparks, mechanical sparks, static electricity and self-heating materials. In short, all energy sources (mechanical, electrical, chemical, thermal, radiation) should be considered as potential ignition sources.

Electrical Safety

- Treat all electrical circuits and equipment as energized. Do not attempt to adjust or repair any electrical device unless it is part of your regular job assignment. Bring observed hazards and maintenance needs to the attention of your supervisor as soon as possible.

- Follow all company lockout/tagout procedures when repairs are necessary. Be sure to keep machines and powered equipment in a “zero energy state” when performing service or setup.
- Keep covers to all electrical fixtures and wiring in place at all times, unless temporarily removed for servicing by qualified persons. We consider only Electricians to be qualified persons for electrical exposures.
- Only qualified persons may reset breakers in an open panel box or enter an electric room with open panels.
- Do not attach flexible cords to a wall, ceiling, door or other building surface.
- Extension cords must be a three wire flexible cord. The grounding (third) prong must be present.
- Do not use metal ladders within reach of overhead power lines.
- Stationary and portable electric power tools shall be double-insulated or electrically grounded via a third wire. A double-insulated tool will be identified on the tool's label.
- Ground fault circuit interrupters (GFCI) will be used on all job sites. A breaker or outlet type GFCI will be used for all new work. If a portable GFCI is used, it will be plugged directly into an outlet that is part of the permanent wiring. Never use an extension cord between the permanent wiring and the portable GFCI.
- Never use electrical equipment in wet or damp areas unless the equipment is approved for use in these areas and suitable PPE is utilized.

Scaffolds and Aerial Lifts

- Do use a scaffold unless you are authorized to do so.
- A scaffold must be fully decked from the front edge to the rear guardrail. Report missing planks or guardrails immediately and stop work until they are replaced.
- Access the scaffold from the structure, ladder or stair tower. Never climb the diagonal bracing. Check with your supervisor to determine if the scaffold frame is an appropriate substitute for an independent ladder.
- Never climb on an object or guard rails to gain extra height.
- A personal fall arrest system shall be used when operating an aerial lift. Use the shortest lanyard practical, tied to the anchorage point marked by the manufacturer.
- Do not use an aerial lift that you have not been trained to operate.

Working at Heights

- Do not remove guardrails or perimeter cables without authorization from your supervisor.
- Fall arrest equipment is required whenever you could fall more than six feet. Training on how to inspect, wear and attach fall arrest equipment must be completed before you are expected to use it.
- Discuss anchorage points to be used with your supervisor or qualified person before starting the task

Restricted Work

- Get the approval of your supervisor before doing the following types of work (unless authorized):
- Never enter a manhole, well, shaft, tunnel or other confined space which could possibly have a non-respirable atmosphere due to lack of oxygen, the presence of toxic or flammable gas or a possibility of engulfment by solids or liquids. Observe our company confined space entry procedure before undertaking this type of task.
- Welding or other “hot work” that requires a special permit. Notify your Superintendent to obtain a hot work permit, complying with the list of precautions on the permit to assure potential fires are eliminated.
- Opening pressurized gas, chemical, air or steam lines/valves. Observe the lockout/tagout procedure and utilize appropriate blanks and isolation devices before proceeding with your work.
- Repairing or cleaning drums and tanks which have held volatile or toxic substances.
- Disposing of flammable or toxic materials.
- Changing the operation or removal of any safety device. Under no circumstances is anyone to circumvent safety features without equal protection. Only trained and authorized persons are to attempt such activities and must undertake the same protocol as others to assure optimum safety.

Confined Space Entry Work

No employee shall enter the areas defined below until a competent person evaluates the area and authorizes entry.

1. A space that is **not designed for continuous** employee occupancy
2. Has **limited** or **restricted** means for entry or exit
3. Any space that may expose employees to the risk of death, incapacitation or impairment of ability to self rescue. This includes potential **hazardous atmospheres** such as:
 - a. Oxygen concentration below 19.5% or above 23.5%
 - b. Flammable gas
 - c. A toxic atmosphere or substance
 - d. Airborne combustible dust
 - e. Danger of engulfment

General Confined Space Entry Procedure

- There shall be no unauthorized entry into a confined space by any person until the Confined Space Entry Permit has been reviewed and approved by a competent person or has been determined to be a Non-Permit Required Space.
- An authorized person shall examine, test and evaluate the space before entry to determine that the appropriate precautions and PPE are available and will be used.
- A rescue plan shall be developed and known by everyone involved in the entry.
- An attendant knowledgeable about the rescue plan shall be stationed outside the space. They will have a means of alerting first responders should the rescue plan be initiated.
- The attendant will **never** enter the confined space.
- Periodic testing or continuous monitoring shall be used to verify that conditions do not deteriorate beyond the capabilities of the control methods being used (ventilation or respiratory protection).
- Combustible compressed gas cylinders are not allowed in the confined space. Remove the torch from the space during breaks and at the end of the day. Changing torch heads or tips shall only be done outside the confined space.
- A portable dry chemical fire extinguisher shall be available whenever hot work is being done in a confined space. Carbon monoxide extinguishers are not allowed.

- Retrieval equipment shall be worn by all entrants so that rescue can be initiated without anyone having to enter the space.
- The permit shall be closed out at the end of the work day by physically observing the space, ensuring that work is complete and all employees have left the space
- If work is necessary for more than one day, a new confined space permit must be completed and submitted.

Elements of a Respiratory Protection Program

*NOTE: This section is intended to highlight the key elements for establishing and maintaining a respiratory protection program. It does not purport to be all inclusive in content or scope. A successful respiratory protection program must contain the major elements of the program as outlined in this section, however this section **does not** contain the operational information necessary to be a working program. Contact your occupational health consultant, industrial hygienist and equipment distributor for assistance with adding and expanding the elements listed here. For complete information on regulatory provisions, refer to OSHA 29CFR 1910.134.*

Administration

Responsibility and authority for administration of a respiratory protection program is assigned to the Project Manager. He may delegate the authority for this assignment to the general superintendent. However, it remains his responsibility to assure full compliance with all sections of this program.

Hazard Assessment

Proper assessment of the hazard is the first important step to protection. The Project Manager will apply their knowledge of the process, equipment, raw materials, end products and by-products to identify possible hazards. Request an evaluation of the identified hazards to determine the level(s) of exposure and the need for controls. The sampling device and the type of frequency of sampling will be dictated by the hazard and operating conditions.

Hazard Control

Anticipating hazards with the use of pre-planning is preferred, but if a hazard is identified during construction, the primary activity is to protect all employees. Cease work until the hazard is evaluated and the appropriate level of control established. Elimination should be the primary goal. When not practical, local or general exhaust ventilation or appropriate NIOSH-approved respirator will be selected.

Respirator Selection

NIOSH-approved respirators will be selected based on the hazard assessment performed by the Project Manager. Employees are prohibited from bringing their own respirators onto the worksite

Voluntary use of filtering face-piece respirators (dust masks) for protection against dusts/mists, even though exposures are found to be below applicable exposure limits, is allowed as long as the employee has a medical evaluation, is trained and is aware that these are one-time-use respirators.

Medical Evaluation

Employees required to wear a respirator must be cleared by [Health Care Provider] before being issued the equipment. Additional periodic evaluations, if deemed necessary due to respirator type, frequency of use or employee health, will be determined by [Health Care Provider] recommendation.

Testing

A qualitative or quantitative fit test will be performed on employees who wear negative-pressure respirators. This testing process will also allow the employee to become accustomed to the respirator prior to entering a hazardous atmosphere.

Training

Each employee will receive training that covers:

- The hazardous nature of the air contaminant.
- Other hazard controls in effect and the reasons respirators are needed.
- The function, limitations and capabilities of the respirator.
- For filter type respirators, how to determine when the filter element needs to be changed.
- The potential consequences of overexposure caused by improper respirator use.
- How to check proper respirator fit before entering the area of exposure and why it is important to eliminate factors that can interfere with proper fit (beards, long sideburns, etc.).
- How and why to perform positive- or negative-pressure tests each time the respirator is donned.
- Procedures for proper cleaning, maintenance and storage of the respirator.

Maintenance

Any employee using a respirator will clean and disinfect it at the end of each day it is used. During cleaning, inspect all parts for fit and deterioration. If deficiencies are found, the parts will be replaced or a replacement respirator will be obtained. Respirators will be assigned to individual employees as needed and will not be shared with anyone else.

Storage

The employee shall store the respirator in a clean, plastic, re-sealable bag or container after it has been cleaned and disinfected. The respirator will be stored in a temperate location 40 to 90 degrees F and not subjected to freezing conditions. It must be protected from physical damage from being struck or crushed by other tools or equipment.

Audits

This program will be evaluated annually for effectiveness. Incident records, including first aid logs, will be reviewed to identify any illness or injury associated with respiratory protection. A representative sample of supervisors and employees who have used respirators will be surveyed for their view on the program.

Incident Investigation

Response and Sample Form

An incident investigation should be completed following every incident that could have caused physical damage or personal injury to an employee, subcontractor or the general public.

The purpose of investigating an incident is to determine the cause and identify steps that can be taken to prevent a reoccurrence.

It is the responsibility of the supervisor to make an immediate report of every incident and "near miss." The supervisor usually knows more about the incident than anyone else, and in most cases, it is up to the supervisor to put into effect whatever measures may be adopted to prevent similar incidents.

Each investigation should be completed as soon after the incident as possible. A delay of only a few hours may allow important physical evidence to be destroyed or removed.

It is the purpose of incident investigation to obtain factual information so that the cause can be determined and incident recurrence prevented, not to fix blame.

Managing the Incident Scene

An incident scene is a chaotic place, particularly when injuries are involved. The supervisor will take charge of the site and direct any response activities.

It is important to remember that two concerns take priority at any scene:

- Care and treatment of the injured.
- Elimination or control of remaining hazards.

Four-Part Approach Incident Investigation

Step I - Care for the Injured Person

1. Take necessary precautions to ensure that injured people are safe from additional injury and that no one else is in jeopardy
2. Arrange for first aid or any necessary emergency treatment
3. Make the injured person as comfortable as possible

Step II - Secure the Names of Witnesses

1. Gather the names, addresses, telephone numbers and an account of the incident from others in vicinity. Please remember that a person may witness an incident with any of their five senses
2. Secure injured person's description of incident after they have been treated

Step III – Gather Physical Facts

1. Analyze and evaluate the premises where the incident occurred for the following:

- Hazards in immediate area, including the walking surface and equipment
 - General housekeeping
 - Presence of water, snow or ice
 - Any objects near the injured person or out of place
 - If the person was injured by flying or falling object, determine where the object came from and how it was stored
 - If equipment is involved in the injury, determine whether equipment was operating properly
2. Preserve pre-incident cleaning/maintenance/repair records for the area or equipment involved
 3. **Take photos of area**

Step IV – Write Report and Evaluate the Facts

1. Analyze the descriptions and physical facts
 - Look for verification
 - Note inconsistencies
2. Draw conclusions
3. Develop plan of action to prevent reoccurrence
4. Write up investigation and conclusions
 - Distribute report to Safety Coordinator and management

REPORT (*Incident Report*) can be found in the Form Section

Incidents Involving Non-Employees

Use the same four-part approach for gathering facts thru interviews and observation of the physical evidence. Remember, you will be dealing with someone else's employees (subcontractor) or with the general public.

Key Points to Remember

DO>>>>>>

- Go to the scene of the accident at once
- Show your concern for the injured party's health and safety
- Secure the scene so that others are not in jeopardy
- Act courteously
- Act professionally
- Inspect scene closely
- Get all essential details

Report the accident to the main office immediately, no matter how slight the injury.

DO NOT>>>>

- Apologize for the accident
- Argue with the injured party about the cause of the accident
- Reprimand an employee at the scene of an accident
- Offer to pay all medical expenses
- Admit responsibility (responsibility is often a legal conclusion that parties at the scene are not competent to make)
- Mention insurance
- Discuss the accident with anyone other than parties within your organization that need the information. Only discuss the accident with outside parties upon the recommendation of your legal counsel.
- Permit investigators to take pictures at the scene without supervision and management approval.

RETURN TO WORK PROGRAM

The Return-to-Work Program is a key part of workers' compensation disability management and offers significant savings in workers compensation claim cost along with human resource benefits. Preventing injuries and illnesses is our primary objective. From time to time, it may become necessary to help injured employees return to their regular duties as soon as medically possible. The return-to-work program will accomplish this goal.

GARRET SHIELDS will seek to work cooperatively with medical professionals to make informed individualized assessments about the ability of our employees to work and/or be at work. We do not make medical decisions and we do not allow doctors to make employment decisions. The aim of this program is to return all employees, if possible, to their original employment positions within the timeframe of the program.

The return-to-work program is available to all employees who have sustained a **work-related** injury or illness. Each case shall be treated independently. The program will be implemented in a manner consistent with the company obligation under state and federal leave and disability laws.

While there is no exact definition of "reasonable accommodation," one should consider it to include any change to a job; the work environment or the way things normally are done that enables an injured or ill employee to productively return to his/her regular work assignment. Reasonable accommodations might include:

- Modified preinjury job
- Working fewer hours
- Taking more frequent breaks
- Obtaining limited assistance from a co-worker for more difficult tasks (if co-worker is available)
- Some job/responsibility sharing
- Physical changes to the work environment
- Assistive devices
- Assignment to another job if capable of performing
- Special project work

Management shall work with the Corporate Safety Director to ensure (1) identify the precise job-related limitations posed by the employee's injury (for example, what specific parts of the job is the employee not able to perform); (2) identify all possible accommodations that might enable the employee to perform the job-related limitations; (3) assess the reasonableness of any accommodations identified; and (4) choose an appropriate accommodation.

Transferring Employees to Light Duty Assignments

In cases where employees cannot be returned to their existing positions, GARRET SHIELDS will attempt to keep them at work or return them to work as soon as possible. Light duty is a temporary work assignment that bridges employees back to full employment and avoids lost work time. It normally involves matching functional abilities of the injured employees to job tasks that are less physically demanding than their regular work assignments.

To be eligible for light duty, injured employees must be unable to perform the essential functions of their existing positions or any vacant positions that may be available. Because transitional duty is used to keep employees working following an injury, it is usually **less than 90 calendar days**. Light duty assignments will be terminated in 90 days or less.

Any extensions must be approved by the Corporate Safety Director and shall be based on an assessment of the injured employee's functional status and if light duty can be continuously available without disruption of daily activities.

Returning injured and ill employees back to work promptly, with minimal risk of re-injury, requires a total team effort. The employee, manager, and supervisor all must cooperate and work hard to develop a plan that works. The following lists the more important responsibilities.

Employee Responsibilities

- Understand how to report an injury. Injuries shall be reported immediately to the Supervisor regardless of the severity of the injury.
- Tell the physician that light duty is available
- It is the injured employee's responsibility to obtain the provider's signature on this letter and return it to his/her supervisor who will submit a copy of the letter to the Corporate Safety Director.
- Return the Physician's Return to Work Authorization Form from the treating physician and fax immediately to the Corporate Safety Director.
- Maintain regular contact with the Company and keep them advised of any changes in medical condition prior to returning to work.
- Actively participate in the light duty program. Communicate any difficulties or concerns regarding the duties provided to the immediate supervisor and the Corporate Safety Director.
- Maintain regular contact with your Supervisor while working under the light duty program.

Managers / Supervisor Responsibilities

The Supervisor must take responsibility for ensuring that the employee and GARRET SHIELDS meet the commitments they have made to return the employee back to work.

- Make sure that all employees know how to report an injury or illness.
- Investigate the injury / complaint for work related injuries or illness.
- Ensure immediate completion of the Supervisor's Accident/Incident Report within 8 hours and forward to the Corporate Safety Director.
- Ensure any and all necessary forms are completed and delivered to the Corporate Director of Safety.
- Assist employee in obtaining forms necessary to apply for leave under The Family and Medical leave Act of 1993, if applicable.
- Contact the injured employee on a weekly basis and express concern for the employee's recovery and reassure him/her that we want him/her back.
- Assist in creation of light duty work assignments.
- Meet with the returning employee at the start and end of the first day to review and discuss any concerns the employee may have.
- Meet with the employee on a weekly basis to discuss any amendments to the injured workers progress.
- Maintain contact with the Corporate Director of Safety in order to review any emerging concerns.

Job Site Inspections

Job site inspections shall be performed regularly to identify and correct unsafe site conditions. The superintendent is responsible to see that inspections are done by designated qualified persons.

In addition, hazard surveillance tours shall be conducted periodically by the job site safety committee no more than a day before a scheduled meeting.

Identifying unsafe conditions or revealing unsafe practices is one of the best ways we can demonstrate to our employees our interest and sincerity in safety. Regular inspections encourage employees to analyze their own work areas and implement corrective action.

Do not limit inspections to searching for unsafe physical conditions, but also note unsafe work methods and practices, no matter the trade or contractor. Consider the following:

1. **Site** - Holes, ponding, vegetation overgrowth, traffic flow, etc.
2. **Delivery, storage and laydown** - Heights, floor loads, projection of materials, material-handling devices, storage methods, space around materials, congestion that makes it difficult to retrieve materials, stacking, housekeeping, etc.
3. **Structure** - Walking surface, congestion in work areas, unguarded fall hazards, water or snow, etc.
4. **Housekeeping** - Waste and scrap removal, tools, part/equipment placement, clear paths to exits, material leakage, flammable and toxic, etc.
5. **Electricity** - Equipment condition, service panels, GFCI breakers, portable GFCIs, gang boxes, cord integrity, insulation, grounding, tools, etc.
6. **Fire Safety** - Protection, smoking rules, hot work permit, fire watch, housekeeping, etc.
7. **Hand and Power Tools** - Condition, grounding, proper use, etc.
8. **Hazardous Chemicals** - Storage, MSDS information, safe handling and use, spill containment provisions, labeling, amount used, toxicity, PPE use, etc.
9. **Heating and Ventilation** - Type, effectiveness, hazardous vapor removal, clearance around heater, protection of fuel lines, venting products of combustion, etc.
10. **Lighting** - Coverage, intensity, bulb protection, etc.
11. **Machinery** - Safeguarding points of operation. For exposed moving parts, maintenance, leaks, lockout, illumination, etc.

The designated person will observe and document potential safety/health hazards, including the potential hazards of confined spaces and develop a plan for safeguarding his employees. Report observed unsafe acts of other trades to the appropriate supervisor. When a hazard is identified, the following hierarchy will be implemented:

1. Eliminate or remove the hazard
2. Institute engineering changes to reduce the severity of the exposure
3. Make engineering changes to protect against the hazard.
4. Provide personal protective equipment and enforce its use.
5. Use administrative means to reduce the exposure (i.e., using two-person lift teams for lifting/moving heavy objects or limiting the amount of time exposed to noise and chemicals.)

A record of all safety inspections and correctional steps will be kept.

REPORT (*Job Site Inspection*) can be found in the Form Section

Job Hazard Analysis

Safety pre-planning of critical operations eliminates surprises that may result in stopping work, work-around solutions or other methods employed on the fly to get the work done – many times without any regard to safety. By using a Job Hazard Analysis, the job can be broken down into its various steps and placed in logical sequence. Each step looks at a single task. Each task may consist of a set of movements or operations. Be sure to list all the steps in a job. Some steps might not be done each time; checking the wheels on a dolly, for example, however, these tasks are part of the job as a whole and should be listed and analyzed.

Potential Hazards

Identify the hazards associated with each step. Examine each step to find and identify hazards. It is important to list all hazards.

Be sure to distinguish between a hazard, an accident and an injury. A hazard is a potential danger, an accident is an unintended happening that may result and an injury is the result of an accident.

Recommended Safe Job Procedures

Using the first two columns as a guide (see following page), decide what procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury or occupational illness. Actions that can be taken are:

- Selecting another method to eliminate manual acts
- Engineering the hazard out
- Engineering to reduce size, weight, hand distances
- Providing personal protective equipment
- Improve housekeeping
- Job instruction training

List recommended safe operating procedures on the form and also list required or recommended personal protective equipment for each step. Be specific. Say exactly what needs to be done to correct each hazard. Give a recommended action or procedure for every hazard.

A sample guide follows to help you understand how to complete this exercise for each of your tasks.

SEE REPORT IN FORMS SECTION

Hazard Communication Program

GENERAL

The **Superintendent** is responsible for the provisions of this policy, even if duties are delegated to others on the job site.

[Note: You may want to change the responsibilities, which are underlined for easy identification]

I. **Hazard Determination**

The responsible **Superintendent** will ensure that Material Safety Data Sheets (MSDS) for all chemicals are provided by the vendor, so that any hazard posed by the chemical can be identified. If the MSDS does not accompany the delivery, the responsible **Superintendent** shall request a hard copy, a fax copy or an internet address (URL) where the information can be viewed and downloaded.

II. **Labeling**

- A. The Superintendent will be responsible for seeing that all chemical containers coming onto the job are properly labeled.
- B. All labels shall be checked for:
 - 1. Chemical identity
 - 2. Hazard
 - 3. Name and address of responsible party
- C. Each Foreman/Crew Leader shall be responsible for seeing that all portable containers used in their work areas are labeled with identity and hazard warning.

III. **Material Safety Data Sheets (MSDS)**

- A. The Superintendent will be responsible for compiling the master MSDS file. It will be kept in the office.
- B. Copies of MSDSs for all hazardous chemicals to which employees may be exposed will be kept in a file at the local office or job-site trailer.
- C. MSDSs will be available for review to all employees during working hours. Copies will be available upon request to the Superintendent.

IV. **Employee Information Training**

- A. The Superintendent shall coordinate and maintain records of training conducted for chemicals that will be used in upcoming tasks/operations.
- B. Before starting work, or as soon as possible thereafter, each new employee will attend a safety class. In that class, each employee will be given information on:
 - 1. Chemicals and their hazards in the workplace.

2. How to lessen or prevent exposure to these chemicals.
 3. What the company has done to lessen or prevent workers' exposure to these chemicals.
 4. Procedures to follow if employee is exposed.
 5. How to read and interpret labels and MSDSs.
 6. Where to locate MSDSs and from whom they may obtain copies.
- C. The employee will be informed that:
1. The employer is prohibited from discharging or discriminating against an employee who exercises his rights regarding information about hazardous chemicals in the workplace.
 2. As an alternative to requesting an MSDS from the employer, the employee may obtain a copy from the Department of Public Health.
- D. Attendance will be taken at training sessions. These records will be kept by the Superintendent.
- E. Before any new hazardous chemical is introduced into the workplace, each employee will be given information in the same manner as during the safety class.
- V. Hazardous Non-Routine Tasks (Delete Entire Section If Not Applicable)**
- A. On occasion, employees are required to do work in hazardous areas (e.g. confined spaces). Prior to starting work in such areas, each employee will be given information about the hazards involved in these areas. This information will include:
1. Specific chemical hazards.
 2. Protection/safety measures the employee is required to take to lessen risks.
 3. Measures the company has taken to lessen the hazards, including ventilation, respirators, the presence of another employee and emergency procedures.
- VI. Informing Contractors**
- A. It is the responsibility of the Superintendent to provide other contractors with employees exposed to our chemicals with the following information:
1. Hazardous chemicals with which they may come in contact.
 2. Measures the employees should take to lessen the risks.
 3. Where to get MSDSs for all hazardous chemicals.
- B. It is the responsibility of the Superintendent to obtain chemical information from contractors when they will expose our employees to hazardous chemicals that they may bring into our work area.

Bloodborne Pathogens

It is not expected that our employees will come in contact with blood during the course of their work, but if they do, here is what we expect.

1. Do not touch or clean up any substance you suspect to be blood. Notify your supervisor of your discovery.
2. What do if an exposure occurs?
 - a. Wash exposed area with soap and water
 - b. Flush splashes to nose, mouth or skin with water
 - c. Irrigate eyes with water or saline
 - d. Report the exposure
 - e. Direct the worker to a healthcare professional
3. Decontamination of blood from equipment, tools or materials will only be done by personnel trained in the hazards of bloodborne pathogens, including hepatitis B and who are equipped with the appropriate personal protective equipment.
4. Should you suffer a bleeding injury, try to control the bleeding until medical attention is rendered.
 - a. Cover the bleeding area with an absorbent material; apply medium pressure to the wound to control bleeding.
 - b. Dispose of contaminated clothing and materials in an approved, labeled, biohazard container.
5. Training shall be provided to all employees on the hazards of bloodborne pathogens, including hepatitis B and the precautions they need to take to avoid contact. If a biohazard container is maintained by an on-site first aider, all employees should be shown the label and other identifying features so they know to leave it alone.
6. Renovation work in hospitals, clinics or other medical facilities where infectious materials may be present will be decontaminated by qualified personnel before work begins.

Vehicle and Drive Safety Policy

This policy applies to all employees who drive or operate vehicles or equipment. It is the responsibility of each employee to operate all vehicles and equipment in a safe manner and to drive defensively to prevent injuries and property damage. Garret Shields endorses all applicable state motor vehicle regulations relating to driver behavior and responsibility. Our company expects each driver to operate the vehicle in a safe and courteous manner pursuant to all applicable safety rules and state laws.

DRIVER ELIGIBILITY AND RESPONSIBILITY

- Drivers must have a valid driver's license for the type of vehicle to be operated, and keep the license(s) with them at all times while driving. All CDL drivers must comply with all applicable DOT regulations, including successful completion of medical, drug, and alcohol evaluations.
- ***Any employee who has a driver's license revoked or suspended shall immediately notify their Supervisor or President of the Company and discontinue operation of the company vehicle. Failure to do so may result in severe disciplinary action including termination.***
- Company vehicles are to be driven by authorized employees ONLY. Other employees and family members are not authorized to drive the company vehicles.
- All accidents involving company vehicles must be reported to the police and to the Director of Safety, as well as the employee's immediate Supervisor. Failure to stop after an accident and/or failure to report an accident may result in disciplinary action, including termination.
- All damages to the company vehicle not involved in an accident must be reported to the employee's direct supervisor immediately and an Incident Report completed. Failure to do so may result in disciplinary action, including termination.
- Any driver of a company vehicle involved in an accident MUST go to the nearest Medical Clinic (as directed by the company) to complete a post-accident drug screen. The clinic will contact the Company for authorization.
- The use of a company vehicle while under the influence of intoxicants and other drugs is strictly prohibited and is sufficient cause for disciplinary action, including termination.
- All drivers and passengers operating or riding in company vehicles must wear seatbelts and follow applicable motor vehicle laws.
- Any mechanical issues with the company vehicle shall be reported to the employee's direct supervisor immediately and if the issue is severe, the vehicle should not be driven and red tagged immediately.
- Drivers are responsible for the security of the company vehicles being used by them and all company assets (tools, materials, etc.) located within. All vehicles should be turned off when not moving. Vehicles SHOULD NOT be left running while on a job-site and no occupants are located inside the vehicle. The DRIVER is responsible for removing the key from the ignition and kept in a safe location. In the event the DRIVER loses the key, the employee may be responsible for all costs associated with towing and replacing the key. Doors should be locked and all company assets secured in the vehicle or locked in a secured location when all employees leave the vehicle location.

Your personal driving record reflects your overall driving habits and directly impacts our insurance costs. Your personal driving is your responsibility and a concern by the company. Motor Vehicle Records may be ordered annually for all company drivers and the driving records of randomly selected groups of company drivers may be assessed periodically throughout the year. An unfavorable record may result in the loss of company vehicle driving privileges and/or your employment with the company.

Lockout

Shut down equipment

Place locks on the energy-isolating device(s)

Release stored energy

Verify isolation of equipment

Lockout will not be complete until the locks are removed in accordance with an established procedure.

This lockout program involves establishing procedures for isolating machines and equipment from energy sources and affixing locks to the energy-isolating devices. The purpose of lockout is to prevent personal injuries and fatalities caused by unexpected start-up or release of stored energy during repairs, maintenance, cleaning and operation of machinery.

Shut Down

Before setup, clearing a jam, maintenance or repair work is performed on equipment, it shall be shut down in such a way as to prevent accidental start up and the release of stored energy. Lockout shall also be used if safety devices must be bypassed for adjustment or lubrication, and anytime part of the employees' body is within the danger zone during a machine cycle. Simple activities such as changing a circular saw blade or drill bits in a hand-held pneumatic drill require the application of these procedures, starting with pulling the plug.

1. Shut off the power and release energy
 - a. Electrical; use the main disconnect or breaker. Pull the plug on portable equipment.
 - b. Pneumatic; turn out the pressure regulator and bleed all compressed air from the supply line. Disconnect the air line on portable equipment.
 - c. Hydraulic; turn the isolation valve or shut off electric power to the hydraulic pump, relieve pressure in the supply line. Disconnect the supply line on portable equipment.
 - d. Steam or water; close the valve, relieve pressure in the supply line. In some cases it may be prudent to break the line and blank off the supply line.
2. Lock the disconnect, breaker, pressure regulator or isolation valve in the off position using your lock or by adding your lock to a gang lock device if more than one person is working on the equipment.
3. Verify that there is no stored energy from gravity-operated components, springs, accumulators, surge tanks, etc. If energy cannot be released, block the component to prevent movement.
4. Only the employee placing the lock is allowed to remove it. Should repairs not be completed in one workday, the supervisor will discuss the maintenance or repairs needed, and instruct the employee to remove their lock and replace it with their own.

5. Before starting work on the equipment, try to energize it using normal operator starting controls. Return the control to the off or neutral position after this test.
6. When work is complete, reverse steps 2 and 1 to restore power.
7. Standing clear, test the equipment for proper operation.

Locking Out

Powered, portable hand tools will conform to this policy by unplugging the tool from the power source before changing bits or blades, adjusting or lubricating the tool. The operator will visually confirm the tool is unplugged and then test the tool by activating the trigger before proceeding with the setup, adjustment or lubrication.

For other types of equipment, a key-operated padlock will be issued to each person involved together with all keys. No two locks will have a common key or a master key. Each lock will be identified to the employee by Company name, badge number and department. When more than one employee is working on the same equipment, a gang lock device will be used so every employee can place their lock on the switch or valve. Tags may be used to supplement protection, but using tags without locks is insufficient and could result in serious injuries or fatalities. Here are a few guidelines to remember:

- Do not rely on pulling fuses as a substitute for placing a lock on the energy-isolating device. A pulled fuse does not guarantee that the circuit is dead, nor does it prevent someone from replacing the fuse.
- Do not rely on locking out operating controls instead of the power sources.
- An employee will never leave equipment locked out at the end of the day without discussing the work with their supervisor.
- Do not assume the job is too small or too short to require lockout.
- These rules apply to both major and minor repairs.

Training

All employees will receive initial and ongoing training about the lockout program's objectives and procedures, and their own responsibilities. Retraining will be given when there is a change in machines, equipment, processes or the energy control procedures. All training will be documented to indicate who received the training, who conducted the training and the training date.

Subcontractor Management

Subcontractor performance affects our ability to complete the job on schedule and within budget. Every supervisor must know the contract terms and conditions for each subcontractor so they take immediate action should problems arise. Start by discussing the matter with the subcontractor's foreman/superintendent. The Project Manager will handle prequalification and contract conditions.

The foreman/superintendent will conduct a pre-job meeting with the subcontractor's supervisor and/or top management representative to review the contract, safety expectations, dispute resolution, disciplinary procedures and other issues as appropriate, including but not limited to:

- Accident reporting and investigation procedures
- Correction of unsafe behavior or conditions
- Emergency procedures
- Hazardous materials handling and spill procedures
- Identity of competent persons
- Materials delivery and storage
- OSHA visits
- Penalty/ backcharge to correct safety conditions caused by subcontractor
- Required documentation
- Review certificate(s) of insurance
 - Subcontractor is not allowed to marshal any materials or equipment until their certificate(s) of insurance have been received and verified as per contract provisions.
- Safety pre-planning of operations
- Site security
- Site inspections and reports
- Safety meeting requirements
- Waste disposal

Audit

Observe the subcontractor's work for quality and safety. Verbally report unsafe behaviors and conditions to their supervisor for immediate action, followed by a written memo. Follow up on all items within 24 hours, unless another time period is agreed upon. Add a handwritten notation to the memo noting the date and time of your

follow up and the result you observed. Especially important is documentation of additional actions should the unsafe behavior or conditions still exist.

OSHA Visit

An OSHA Compliance Officer may stop the first person they see and request to enter the job site. If the request is not made to a supervisor, **call your supervisor immediately** and ask the compliance officer to wait until that person arrives. If they are not on site, inform the compliance officer how long it will take for them to return. **Do not engage in small talk about the job while waiting.**

The supervisor or company representative must request the Compliance Officer's credentials. When they are satisfied, ask for the nature of his/her inspection: complaint, focused, target industry, drive-by, etc.

Comply with the officer's requests to look at our safety program, accident reports and inspection surveys. Do not provide any contract documents without approval from our corporate office. No material, other than the OSHA form 300, *Log of Work-Related Injuries and Illnesses*, is to be given to OSHA without permission from the corporate office.

Approve members of the inspection party. Each employer has the right to representation; the Compliance Office has the right to choose the representative. Disruptive conduct by the employer/employee representatives is cause for dismissal from the inspection party.

Ensure that the Compliance Officer has the appropriate PPE before being allowed on the job site.

During the Inspection

- Allow the Compliance Officer to lead; he/she will not generally look in every nook and cranny.
- Do not permit unnecessary employees to linger near the inspection party.
- Do not harass, threaten or otherwise intimidate the Compliance Officer.
- We have the right to protect trade secrets and may deny inspection where such are in use.
- Keep a chronological record of where the Compliance Officer goes, how long he/she talks to employees and whether he/she returns to a location previously inspected.
- When photographs are taken, ask the nature of the suspected violation and record in your journal/log. Take a picture of the same subject.
- If videotaping is done, be cautious of the audio portion and verbally request you not be recorded. Take your own video. Make certain the video camera used by OSHA is turned off to prevent audio recording without permission.