

North Western Steel

# Health and Safety Manual

Lovelock, Nevada

Prepared for: Northwestern Steel Contractors, Employees, and Subcontractors

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# Table of Contents

1.0 Introduction

2.0 Company Safety Vision and Mission

3.0 Responsibilities and Safety Leadership

4.0 Compressed Gas Cylinders

5.0 Welding Safety Procedures

6.0 Working at Heights Use the Working at Heights Checklist (NWS-CI-006) before elevated tasks.

7.0 Ladder Safety Protocols

8.0 Crane Safety and Rigging Refer to the Crane Inspection Checklist (NWS-CI-001). Inspect gear using the Rigging Gear Inspection Form (NWS-CI-014).

9.0 Equipment and Tool Safety

10.0 PPE Requirements Verify gear with the PPE Inspection Checklist (NWS-CI-012).

11.0 Hearing Protection

11.0 Emergency Procedures and Reporting

12.0 Incident Response and Investigation Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

13.0 Training and Competency

14.0 Site-Specific Safety Guidelines

15.0 Drug and Alcohol Policy

16.0 Safety Audits and Continuous Improvement

17.0 Life Saving Rules

18.0 Referenced Safety Forms

# 1.0 Introduction

The Health and Safety Manual is a comprehensive guide designed to ensure the well-being of all employees, contractors, and subcontractors working at North Western Steel. This document outlines the expectations, responsibilities, and protocols that must be followed to maintain a safe and healthy working environment. The manual serves as a reference for all safety-related procedures and is essential for preventing accidents and injuries on the job. It emphasizes the importance of adhering to safety standards and encourages a proactive approach to identifying and mitigating potential hazards. By following the guidelines set forth in this manual, North Western Steel aims to create a culture of safety that prioritizes the health and well-being of everyone on site.

# 2.0 Company Safety Vision and Mission

North Western Steel is dedicated to achieving a zero-incident workplace. Our vision is to foster a culture of safety excellence through strong leadership, continuous improvement, and proactive prevention. We believe that every incident is preventable, and our mission is to deliver high-quality welding and fabrication services while ensuring the health and safety of our team, clients, and the community. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

This unwavering commitment to safety is evident in the standards we uphold and the resources we invest to safeguard our workforce. We have developed comprehensive safety policies and procedures that are regularly reviewed and updated to reflect industry best practices and new regulatory requirements. Training and competency development are pillars of our safety culture, ensuring that every employee, contractor, and subcontractor is equipped not only with the technical skills necessary for their role, but also with the knowledge to identify, assess, and mitigate hazards in real time. Verify gear with the PPE Inspection Checklist (NWS-CI-012).

Leadership at every level of North Western Steel actively participates in safety initiatives, from routine site inspections to involvement in safety committee meetings. By modeling safe behaviors, recognizing proactive efforts, and addressing issues promptly, our leaders set the tone for a workplace where safety is an integral part of every operation.

Continuous improvement is embedded in our approach. We encourage the reporting of near misses, incidents, and suggestions for safety enhancements, viewing each as an opportunity to strengthen our safety systems. Lessons learned are shared across the organization, fostering a collective responsibility for safety and driving innovation in hazard prevention. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

Above all, we empower every member of our team to prioritize safety, giving each individual the authority and support to halt work when unsafe conditions are present without fear of reprisal. We believe that cultivating an open, inclusive atmosphere where feedback is welcomed enables us to identify risks early and implement effective solutions.

By embedding these values into our daily work, North Western Steel strives not only to comply with safety regulations, but to exceed them—creating an environment where every person is valued, protected, and encouraged to contribute to our shared goal of safety excellence.

# 3.0 Responsibilities and Safety Leadership

At North Western Steel, safety is everyone’s responsibility, and our leadership is unwavering in its commitment to creating a culture of safety that energizes the entire organization. Senior leaders visibly demonstrate this commitment in a multitude of ways that set the standard for safety excellence:

* Establishing Clear Roles and Accountabilities: Senior leaders define health and safety roles, responsibilities, and accountabilities for individuals and teams at all organizational levels. Leadership ensures everyone understands expectations and their part in maintaining a safe workplace.
* Leading by Example: Leaders serve as role models, consistently demonstrating personal compliance with all health and safety standards, and communicating the importance of these values throughout the organization. Supervisors model safe behavior, enforce protocols, and address hazards promptly.
* Creating an Open and Empowering Environment: Leaders foster a workplace where employees are encouraged to speak freely, share suggestions, and provide new ideas. Transparent reporting channels enable everyone to contribute to safety improvements without fear of reprisal.
* Active and Visible Engagement: Senior leaders are active in the field, engaging positively with personnel, coaching and encouraging good safety behaviors, and offering personal feedback on concerns. Participation in “Management in the Field” activities and conducting health and safety tours demonstrate their hands-on approach.
* Proactive Prevention and Improvement: Leadership takes proactive measures by regularly reviewing and updating safety policies, conducting routine safety audits, and implementing initiatives that reinforce the zero-harm safety vision. Lessons learned from incidents and near misses are shared to drive continuous improvement.
* Resource Support and Training: Leaders ensure the provision of necessary resources, including up-to-date training, adequate equipment, and support systems, so all employees are equipped to work safely and confidently address hazards as they arise.
* Recognition and Positive Reinforcement: Award and recognition programs highlight exemplary safety performance at the individual, project, and site levels. Leadership acknowledges their impact on the safety, health, and well-being of both employees and their families, celebrating proactive efforts and team successes.
* Effective Communication: Health and safety communications are issued and promoted regularly. Leaders discuss safety topics at all meetings, ensuring every employee remains informed and engaged with evolving best practices and standards.

Supervisors supplement this leadership by conducting toolbox talks, providing feedback during shift meetings, and ensuring compliance with procedures. Employees are encouraged to report near misses, participate in safety drills, and help identify opportunities for further improvement. Safety meetings are documented using the Toolbox Talk Record (NWS-CI-010).

By embedding these values and practices, North Western Steel’s leadership inspires a collaborative spirit where every individual feels empowered, valued, and responsible for sustaining a safe and healthy workplace. This collective commitment is the foundation of our safety excellence.

# 4.0 Compressed Gas Cylinders

**1. Scope & Purpose**

This section addresses the safe handling, storage, transportation, and use of compressed gas cylinders—such as oxygen and acetylene—within welding and fabrication operations in mining environments. It integrates federal regulations to help mitigate risks of fire, explosion, toxic exposure, and mechanical hazards.

**2. MSHA Requirements**

* **Securing and Storage**  
  MSHA mandates that compressed and liquid gas cylinders must be properly secured—typically in designated racks or upright positions—to prevent tipping or movement. In underground coal mines, they must also be clearly labeled, protected from falling debris, electrical hazards, heat from welding, and flammable substances. When not in use, valves must be closed and hoses removed ([Mine Health and Safety Administration](https://arlweb.msha.gov/stats/top20viols/tips/16005.htm?utm_source=chatgpt.com)).
* **Valve Protection**  
  Cylinder valves must be shielded by protective covers during storage and transport, and positioned safely during use ([Mine Health and Safety Administration](https://arlweb.msha.gov/stats/top20viols/tips/16006.htm?utm_source=chatgpt.com)).
* **Specific Underground Coal Mine Protocols**  
  For underground operations:
  + Cylinders must be upright, chained or rack-secured, and stored at least 10 feet from work sites.
  + Work areas must be free from oil, grease, and coal dust, and ventilated separately if welding is regular ([GovInfo](https://www.govinfo.gov/content/pkg/CFR-2012-title30-vol1/pdf/CFR-2012-title30-vol1-sec75-1106-4.pdf?utm_source=chatgpt.com" \o "Mine Safety and Health Admin., Labor § 75.1106–4), [Oregon OSHA](https://osha.oregon.gov/oshapubs/factsheets/fs09.pdf?utm_source=chatgpt.com)).

**3. OSHA Standards**

* **General Industry (29 CFR 1910.101)**  
  In welding shops or support facilities, all compressed gas cylinders, portable tanks, and cargo tanks must have appropriate pressure relief devices and comply with Compressed Gas Association (CGA) standards (e.g., P‑1‑1965, S‑1.1‑1963) for safe handling and inspection ([OSHA](https://www.osha.gov/compressed-gas-equipment/standards?utm_source=chatgpt.com), [OSHA](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.101?utm_source=chatgpt.com)).
* **Construction (29 CFR 1926.350)**  
  During welding or cutting in construction-like settings:
  + Cylinders must remain upright or be placed “valve end up” while in use, transport, or storage ([OSHA](https://www.osha.gov/laws-regs/standardinterpretations/2021-11-18?utm_source=chatgpt.com), [OSHA](https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.350?utm_source=chatgpt.com)).
  + In-building storage must be well-protected, ventilated, and at least 20 feet from flammables, or separated by a 5-foot, half-hour fire-rated barrier ([OSHA](https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.350?utm_source=chatgpt.com)).
  + Cylinders must be placed far enough away from the welding operation to avoid exposure to sparks or heat; if not feasible, fire-resistant shields are required ([OSHA](https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.350?utm_source=chatgpt.com)).

**4. Best Practices—Welding & Fabrication Context**

| **Hazard / Task** | **Recommended Practice** |
| --- | --- |
| **Transport & Handling** | Use cylinder carts or carriers, secure upright, protective caps on, never roll or drop, tighten caps by hand ([Mine Health and Safety Administration](https://arlweb.msha.gov/epd/efsms/toolbox/week49.pdf?utm_source=chatgpt.com)). |
| **Storage & Identification** | Store upright, chained at upper third; clearly label contents; separate full from empty cylinders; protect from moisture and corrosives ([Mine Health and Safety Administration](https://arlweb.msha.gov/epd/efsms/toolbox/week49.pdf?utm_source=chatgpt.com), [Oregon OSHA](https://osha.oregon.gov/oshapubs/factsheets/fs09.pdf?utm_source=chatgpt.com)). |
| **Valve & Regulator Safety** | Keep valves closed when not in use, remove hoses, protect valves with caps, keep regulators clean and dedicated to specific gases ([GovInfo](https://www.govinfo.gov/content/pkg/CFR-2008-title30-vol1/pdf/CFR-2008-title30-vol1-sec56-4603.pdf?utm_source=chatgpt.com" \o "Mine Safety and Health Admin., Labor § 56.4603), [Mine Health and Safety Administration](https://arlweb.msha.gov/epd/efsms/toolbox/week49.pdf?utm_source=chatgpt.com)). |
| **Site-Specific Fireplace Controls** | For welding near cylinders, ensure distance or barriers to protect against heat and sparks. Use ventilation in enclosed spaces and avoid combustible accumulations (oil, grease, coal dust) within 10 ft ([GovInfo](https://www.govinfo.gov/content/pkg/CFR-2012-title30-vol1/pdf/CFR-2012-title30-vol1-sec75-1106-4.pdf?utm_source=chatgpt.com" \o "Mine Safety and Health Admin., Labor § 75.1106–4), [OSHA](https://www.osha.gov/laws-regs/regulations/standardnumber/1926/1926.350?utm_source=chatgpt.com)). |

**5. Summary**

* **MSHA** emphasizes secure storage, valve protection, and rigorous control in underground mining.
* **OSHA** provides broad general- and construction-industry standards for cylinders: addressing relief devices, safe placement, storage distances, and handling procedures.
* **Implementation** of these standards, along with thoughtful operational planning, is essential to maintain safety in welding and fabrication zones within mining operations.

# 5.0 Welding Safety Procedures

**Welding, Cutting and Burning**

Hot work is defined as tasks that can create or become a source of ignition, such as grinding, welding, thermal or oxygen cutting, burning, and similar activities. All sites have designated hot work permit-required areas, and it is the Contractor’s responsibility to become familiar with these locations.

A Hot Work Permit is required before working near or over oxidizers, flammable gases, liquids, oils, rubber belting or linings, plastics, easily combustible materials, coal, or other materials susceptible to fire. Often, a separate Burn Permit from site Environmental departments is also required and may need additional regulatory notification and approval.

References to Forms:

* Use the Hot Work Permit and Inspection Form (NWS-CI-003) before operations in non-designated areas.
* Inspect fire extinguishers monthly with the Fire Extinguisher Inspection Log (NWS-CI-013). At least one appropriately sized extinguisher must be at the site in addition to normally placed extinguishers.
* Check compressed gas cylinders and PPE using the PPE Inspection Checklist (NWS-CI-012).
* Use the Welding Machine Inspection Checklist (NWS-CI-016) prior to operation.
* Record respirator testing and fit checks on the Respirator Fit Test Record (NWS-CI-015).
* Complete the Confined Space Entry Checklist (NWS-CI-004) before welding in confined spaces.
* Report all incidents and near misses using the Incident/Near Miss Report Form (NWS-CI-011) immediately.

Areas that may require a Hot Work Permit include, but are not limited to:

* Within 100 ft. of powder magazine or explosive/blasting storage area
* Dust collectors, ductwork, and areas with rubber linings or combustible dust
* Above/adjacent to cable trays or electrical cables
* Inside vessels or confined spaces
* Vehicle fuel systems or fuel tanks
* Fuel storage/distribution areas
* Battery storage/charging areas
* Reagent and oxygen storage areas
* Sewer and septic systems
* Conveyor belting
* Tire storage areas
* Mobile fuel and lubrication trucks
* Combustible/flammable materials storage or handling areas
* Controlled burns of vegetation or waste materials

Key Principles for Hot Work Activities:

* Identify all hazards, including those from surroundings and weather. Conduct initial and continuous atmospheric monitoring; oxygen must remain between 19.5% and 23%.
* Train personnel in Hot Work procedures and correct PPE usage.
* Provide knowledgeable, competent supervision.
* Obtain and display all required permits.
* Coordinate with Lock-out/Tag-out/Try-out and Confined Space procedures as needed.
* Ensure all safety forms and checklists are completed and current.

Hot Work Permit Process and Responsibilities:

* Begin the Hot Work Permit process (NWS-CI-003) before starting work. All precautionary measures must be verified, and all involved must sign the permit. An Authorized Person gives final approval.
* Permits are valid for one shift and one task. Delays or changes may invalidate the permit.

Preparation and Fire Prevention:

* Remove or protect flammable materials within 35 ft. of hot work, including combustible flooring and debris. Cover openings or cracks that could allow the passage of sparks or heat.
* A fire watch may be required during and after hot work, especially in high-risk areas.
* No smoking or use of lighters is allowed within 50 feet of hot work operations.

Equipment Inspection, Maintenance, and Safe Practices:

* Inspect welding and cutting equipment, cables, torches, and electrode holders before each use. Remove defective equipment from service.
* Use only approved sparking strikers for igniting flammable gas tools and inspect all hoses for leaks and wear. Protect or elevate hoses as needed.
* Store compressed gas cylinders upright, secure them, and keep away from heat sources. Valves must be closed and checked for leaks before use. Move cylinders using appropriate carts.
* Bleed gas hoses after use to remove residual pressure.
* Always support items being welded or cut—never hold in hand.
* Shield arc welding operations with flame-proof screens, and use hearing protection for air arc gouging.

Personal Protective Equipment (PPE) and Clothing:

* Hard hats and welding shields are required; no soft caps are allowed.
* Safety glasses or goggles must be worn under welding hoods; face shields are required for grinding.
* Wear long-sleeve shirts (100% cotton recommended), buttoned collars and cuffs, pants outside boots, and protective gloves with leather sleeves or welder’s jackets. Prevent slag from entering boots.
* Clothing must be clean and free from flammable materials.
* Helpers must also wear long sleeves and gloves. Welders and helpers must use proper filter lenses, and inspect all face shields and helmets before use.

Ventilation, Fume Control, and Respiratory Protection:

* Ensure proper ventilation whenever welding, cutting, or heating in confined spaces. Use respirators when required and record fit tests.
* Welders and cutters should avoid the fume plume and use appropriate cartridges for respirators when working with hazardous materials.

Confined Space and Electrical Safety:

* Follow confined space entry procedures, including atmospheric testing and continuous monitoring. Verify proper equipment grounding and use dry, insulated PPE.

Special Considerations and Emergency Preparedness:

* Only certified welders may perform hot work on fall protection equipment, man lifts, and similar items.
* Personnel must know the locations of first aid kits, eyewash stations, and emergency showers. Report all incidents, near misses, or injuries immediately.

Communication and Documentation:

* Ensure safety communications are clear and all required forms are completed and maintained according to company and regulatory requirements.

By eliminating redundancy and following these requirements, an effective hot work program is maintained—minimizing risks, ensuring compliance, and fostering a strong safety culture in all welding, cutting, and burning operations.

# 6.0 Working at Heights

Use the Working at Heights Checklist (NWS-CI-006) before elevated tasks.

Working at heights presents significant risks, especially in industries regulated by the Mine Safety and Health Administration (MSHA). To ensure full compliance, all personnel exposed to fall hazards must utilize MSHA-approved fall protection systems, including body harnesses, shock-absorbing lanyards, lifelines, and secure anchorage points rated for the loads they may bear. Prior to use, such equipment must be inspected for defects in accordance with MSHA 30 CFR Part 56/57 Subpart M. Use the Working at Heights Checklist (NWS-CI-006) before elevated tasks.

When using ladders, employees are required to maintain three points of contact at all times. Ladders must be constructed and maintained per MSHA standards, and portable ladders must be secured against accidental displacement. Scaffolds and elevated platforms must be designed, erected, and dismantled under the supervision of a competent person, and inspected before each shift, as required by MSHA 30 CFR §56.15005. All scaffolding must feature guardrails at the proper heights, mid-rails, and toe boards to prevent tools or materials from falling.

For any work performed near open edges or platforms above 30 inches, physical barriers such as guardrails must be installed, and personnel must be prevented from accessing unprotected edges. Fall arrest devices must be used when working in situations where guardrails are not feasible, and fall arrest plans must be documented and reviewed.

All employees must complete site-specific MSHA Part 46 or Part 48 training, which includes modules on fall protection, ladder safety, and working at heights. Refresher training and regular safety meetings are required to address any changes in regulations or site-specific hazards. Use the Working at Heights Checklist (NWS-CI-006) before elevated tasks.

To ensure accountability, all incidents, near misses, and equipment failures must be reported immediately, and the incident scene should not be disturbed until MSHA has authorized further action. Recordkeeping, incident investigation, and corrective action follow-up are mandatory as per MSHA regulations. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

By aligning North Western Steel’s protocols with current MSHA requirements, the company upholds the highest standards of safety for employees working at heights, preventing falls and ensuring regulatory compliance on every project site. Use the Working at Heights Checklist (NWS-CI-006) before elevated tasks.

# 7.0 Ladder Safety Protocols

All ladders in use at North Western Steel must comply with established safety standards, including OSHA 29 CFR 1926 Subpart X (Ladders) and MSHA 30 CFR Part 56/57, Subpart M (Ladders and Escalators). These regulations ensure that all ladders are designed, maintained, and used safely in accordance with federal requirements.

Damaged or defective ladders are strictly prohibited. Any ladder exhibiting visible signs of damage must be marked and immediately removed from service as outlined in OSHA 1926.1053(b)(16) and MSHA 56/57.11003.

Portable ladders must feature slip-resistant feet and be set up on stable, level surfaces (OSHA 1926.1053(b)(6)). Entry and exit points around ladders should be kept clear to prevent tripping hazards.

When working at heights above six feet, adhere to all applicable fall protection requirements under OSHA 1926.501 and MSHA 56/57.15005.

Secure ladders at the top with ropes or other effective means (OSHA 1926.1053(b)(8)). If securing is impossible, a coworker must stabilize the ladder while in use, in line with best practices recommended by both OSHA and MSHA.

Keep all ladders free of materials such as cords, hoses, wires, oil, grease, or other debris. Do not leave objects or tools on top of ladders as required by OSHA 1926.1053(b)(13).

Always fully open and lock step ladders or A-frame ladders before climbing as specified in OSHA 1926.1053(b)(9).

Maintain three points of contact at all times while climbing, working from, or descending a ladder (OSHA 1926.1053(b)(21)).

The following actions are expressly prohibited by OSHA and MSHA standards:

* Standing on the top two steps or the very top platform (OSHA 1926.1053(b)(13))
* Sitting on the top platform
* Climbing or working from the back side of a ladder
* More than one person on a ladder at any time (OSHA 1926.1053(b)(14))
* Working backwards from a ladder
* Ascending or descending a ladder while facing away from it (OSHA 1926.1053(b)(20))

Visually inspect all ladders before each use, and re-inspect after any event that could impact their integrity (e.g., after being dropped or exposed to harsh conditions), as required by OSHA 1926.1053(b)(15) and MSHA 56/57.11003.

Ensure ladders are rated for the expected workload—such as a Type 1A (300-pound-rated) fiberglass ladder for heavy-duty operations. This aligns with OSHA 1926.1053(a)(1).

Contractors must provide a comprehensive ladder safety training program, enabling employees to recognize hazards and apply proper accident prevention measures (OSHA 1926.1060 and MSHA 46.5, 48.27).

By following these protocols and referencing OSHA and MSHA regulations, North Western Steel upholds its commitment to safety and ensures a secure workplace for all. Consistent ladder safety practices and ongoing inspections help prevent injuries and support our shared pursuit of safety excellence.

# 8.0 Crane Safety and Rigging

Refer to the Crane Inspection Checklist (NWS-CI-001). Inspect gear using the Rigging Gear Inspection Form (NWS-CI-014).

Only certified operators are authorized to operate cranes at North Western Steel, in strict compliance with MSHA regulations. Prior to each use, all rigging equipment, including slings, chains, and hooks, must be inspected for wear, deformation, or defects, following the inspection protocols outlined in MSHA 30 CFR Part 56/57 Subpart N. Each piece of equipment must be clearly labeled with its load rating, ensuring that it is suitable for the intended task and does not exceed its maximum capacity as mandated by MSHA. Refer to the Crane Inspection Checklist (NWS-CI-001). Inspect gear using the Rigging Gear Inspection Form (NWS-CI-014).

When lifting loads, it is imperative that no personnel stand or pass beneath suspended loads, as per MSHA safety standards. Tag lines must be used to guide loads safely, preventing uncontrolled movement and minimizing the risk of accidents. All rigging and crane operations must be supervised by a competent person who has received MSHA Part 46 or Part 48 training, and only trained personnel may participate in these activities. Refer to the Crane Inspection Checklist (NWS-CI-001). Inspect gear using the Rigging Gear Inspection Form (NWS-CI-014).

Detailed inspection records must be maintained and made available for review during audits or MSHA inspections. Any rigging equipment found to be defective must be immediately removed from service and reported according to North Western Steel’s incident protocols and MSHA requirements. Regular refresher training, as well as safety meetings focused on crane and rigging hazards, are conducted to reinforce regulatory compliance and address any updates to MSHA standards. Refer to the Crane Inspection Checklist (NWS-CI-001). Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately. Inspect gear using the Rigging Gear Inspection Form (NWS-CI-014).

These comprehensive measures ensure that every aspect of crane operation and rigging at North Western Steel aligns with current MSHA regulations, thereby safeguarding personnel, maintaining legal compliance, and promoting a culture of continuous safety improvement on all project sites. Refer to the Crane Inspection Checklist (NWS-CI-001). Inspect gear using the Rigging Gear Inspection Form (NWS-CI-014).

# 9.0 Equipment and Tool Safety

All tools and equipment at North Western Steel must undergo a thorough inspection prior to each use, ensuring they are maintained in optimal working condition and free from defects that could pose safety risks. Any tools or equipment identified as damaged, malfunctioning, or otherwise unsafe must be immediately tagged out of service and reported to a supervisor for proper handling, in accordance with company policy and regulatory requirements.

Power tools are to be equipped with all necessary guards, and operators are required to use the appropriate personal protective equipment (PPE) at all times during operation. Extension cords must be of heavy-duty industrial grade, fitted with ground-fault circuit interrupter (GFCI) protection, and clearly labeled for job site use. In addition, every extension cord in service must be subjected to a documented ground check at least once per month. This monthly inspection should include verification of the cord's insulation, plug integrity, grounding pin, and overall electrical safety. Any cord found to be damaged, frayed, or failing the ground check must be removed from service until properly repaired or replaced. Verify gear with the PPE Inspection Checklist (NWS-CI-012).

The use of homemade, modified, or improvised tools is strictly prohibited on all North Western Steel project sites. Only commercially manufactured, properly rated tools and equipment, which meet recognized safety standards, are permitted for use. This policy eliminates the risks associated with non-standardized tools, reducing the likelihood of failure or unexpected hazards arising from subpar or unpredictable materials and construction.

Operators of heavy equipment must complete all required training and be officially authorized prior to use. When equipment is not in operation, attachments must be fully lowered, and parking brakes must be properly set to prevent unintended movement. All equipment and tool inspections, ground check records, and training documentation must be meticulously maintained and readily accessible for review during internal audits or regulatory inspections.

Collectively, these rigorous equipment and tool safety protocols are foundational to preventing workplace injuries and incidents related to equipment malfunction or misuse. By enforcing monthly ground checks of electrical cords, banning homemade tools, and maintaining strict inspection and documentation standards, North Western Steel demonstrates its unwavering commitment to safety, compliance, and a culture of vigilance on every project site. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

# 10.0 PPE Requirements

Verify gear with the PPE Inspection Checklist (NWS-CI-012).

Proper personal protective equipment (PPE) must be worn at all times at North Western Steel. The minimum PPE includes hard hats, safety glasses, high-visibility clothing, gloves, and steel-toe boots. Among these, hard hats are an essential safety requirement, especially when employees are present around or beneath overhead work. This includes, but is not limited to, situations involving crane operations, rigging, steel erection, scaffolding, or any work where there is a possibility of tools, materials, or debris falling from above. Hard hats are engineered to absorb the impact of falling objects and protect against penetrating injuries, significantly reducing the risk of serious head trauma in the workplace. Refer to the Crane Inspection Checklist (NWS-CI-001). Verify gear with the PPE Inspection Checklist (NWS-CI-012). Inspect gear using the Rigging Gear Inspection Form (NWS-CI-014).

The policy mandates that all individuals—regardless of their role—must wear hard hats in areas with overhead hazards. This requirement is not restricted to those directly performing the overhead task; it extends to all personnel, visitors, and subcontractors who may be in the vicinity of such work. By doing so, North Western Steel establishes a blanket of protection, ensuring that everyone on site benefits from the highest standard of head injury prevention.

Supervisors are tasked with monitoring strict adherence to this policy and are empowered to stop work if individuals are found without proper head protection in designated zones. Regular inspections of hard hats must also be conducted to ensure they are free from cracks, dents, or other damage that could compromise their effectiveness. Damaged or expired hard hats must be immediately replaced, and workers should be trained to recognize when their PPE needs to be inspected or exchanged. Verify gear with the PPE Inspection Checklist (NWS-CI-012).

Additional PPE—such as hearing protection, respirators, and face shields—must be worn when conditions require. Supervisors are responsible for enforcing compliance with all PPE requirements, ensuring a safe work environment for every employee. Wearing the appropriate PPE, especially hard hats in overhead work zones, is not only a regulatory obligation but a vital element of workplace safety, providing a critical barrier against injury and reinforcing North Western Steel’s commitment to employee wellbeing and a culture of vigilance. Verify gear with the PPE Inspection Checklist (NWS-CI-012). Record results on the Respirator Fit Test Record (NWS-CI-015).

# 11.0 Hearing Protection

At North Western Steel, your hearing safety is our top priority. To ensure your hearing is protected while performing welding and fabrication tasks in mining operations, we require strict adherence to the following guidelines, in line with MSHA and OSHA regulations.

## 1. Objectives & Scope

Our goal is to prevent occupational noise-induced hearing loss. The following requirements apply to all employees exposed to hazardous noise:

* Noise monitoring
* Use of hearing protection devices (HPDs)
* Audiometric testing
* Employee training
* Strict recordkeeping

## 2. MSHA Requirements (30 CFR Part 62)

Hearing Conservation Programs:

If your noise exposure exceeds an 8-hour time-weighted average (TWA) of 85 dBA, you will be enrolled in our hearing conservation program. We will monitor noise, notify affected employees, and provide you with access to HPDs.

Exposure & Dual Protection Levels:

You must use hearing protection if exposed to 90 dBA TWA or higher. When noise levels reach or exceed 105 dBA TWA, you are required to wear dual protection—both earplugs and earmuffs. Exposure above 115 dBA is not permitted under any circumstances.

## 3. OSHA Standards (29 CFR 1910.95)

Program Triggers & HPD Provision:

If you are exposed to noise at or above 85 dBA 8-hour TWA, you will be included in the hearing conservation program. We will provide hearing protectors at no cost and replace them as needed.

Fitting, Attenuation, & Selection:

We offer a selection of suitable protectors, ensure proper fitting, and supervise your initial use. Your HPDs must reduce noise exposure to at least 90 dBA TWA—and to 85 dBA TWA if you experience a Standard Threshold Shift (STS). We use established methods to estimate HPD effectiveness.

Training & Audiometric Testing:

You will receive annual training on noise hazards, proper use of protectors, and testing procedures. If you are exposed at or above 85 dBA TWA, you will participate in our audiometric testing program, which includes baseline hearing tests and regular follow-ups.

## 4. Integration & Best Practices for Mining Welding/Fabrication

|  |  |
| --- | --- |
| <b>Aspect</b> | <b>Best Practice</b> |
| Dual HPD use | Required for noise exposure of 105 dBA or above. |
| Fit testing | You may participate in fit-testing programs to ensure your HPDs are effective. |
| Noise controls hierarchy | We prioritize engineering and administrative controls before relying on HPDs. |
| Recordkeeping | We maintain detailed records of your noise exposure and audiometric results, and you may observe the monitoring process. |

## 5. Summary

North Western Steel is committed to your hearing health. We implement hearing conservation programs starting at 85 dBA, require HPDs at 90 dBA, enforce dual protection at 105 dBA, and strictly prohibit exposure above 115 dBA. By following OSHA and MSHA standards, providing fit-testing, prioritizing noise controls, and maintaining comprehensive records, we ensure you are fully protected in welding and fabrication environments. Your participation and vigilance are essential to maintaining a safe and healthy workplace for all.

Let me know if you’d like assistance drafting audit checklists, training modules, or noise control plans specifically for welding areas!

# 12.0 Emergency Procedures and Reporting

In the event of an emergency, all workers at North Western Steel must promptly adhere to the established site evacuation plan. Upon activation of an alarm or notification of an emergency situation—such as fire, chemical spill, severe weather, or medical crisis—employees must cease all work activities immediately and proceed in an orderly fashion to the designated assembly points. These locations are clearly marked on site maps posted throughout the facility and reviewed during orientation. Supervisors and designated fire wardens are responsible for conducting headcounts to ensure that all personnel, including visitors and subcontractors, are accounted for.

Emergency contact numbers, including local fire, medical, and security services, must be prominently displayed at key locations on every job site. In the case of injury or illness, employees are required to report the incident to their supervisor without delay, ensuring that first aid or emergency medical attention can be provided as swiftly as possible. Adequately stocked first aid kits and functional fire extinguishers must be maintained at accessible locations, with regular inspections documented to guarantee readiness. Defibrillators and other emergency equipment, where present, must be checked in line with regulatory requirements and manufacturer recommendations. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately. Inspect monthly using the Fire Extinguisher Inspection Log (NWS-CI-013).

Additionally, employees must never tamper with or misuse emergency equipment. Any observed deficiencies or missing items must be immediately reported to site management for correction. The integrity of incident scenes must be maintained until safety personnel authorize further action, preserving evidence for potential investigations and ensuring hazards are properly assessed and mitigated. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

Regular emergency drills are conducted to familiarize all employees with proper procedures and to reinforce a calm, coordinated response. These drills cover evacuation routes, alarm signals, communication protocols, and the roles and responsibilities of designated emergency responders. By practicing these scenarios, North Western Steel prepares its workforce to respond effectively and efficiently, minimizing confusion and reducing the risk of injury or property damage during real emergencies.

Collectively, these emergency procedures form a crucial component of North Western Steel’s comprehensive safety program, ensuring that every individual on site understands their role in safeguarding themselves and others during critical situations. The company’s commitment to preparedness helps foster a culture of vigilance, accountability, and rapid response in the face of unforeseen events.

# 13.0 Incident Response and Investigation

Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

At North Western Steel, the prompt reporting of all incidents—ranging from minor injuries and property damage to near-misses and unsafe conditions—is fundamental to maintaining a safe workplace. Immediately after an incident occurs, affected employees must notify their supervisor, who will take initial steps to secure the area, provide necessary first aid, and ensure no further hazards exist. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

Supervisors are responsible for initiating a thorough investigation using root cause analysis methodologies such as the “Five Whys” or fishbone diagrams to uncover not only the direct cause but also any underlying systemic issues that may have contributed. This process involves interviewing witnesses, collecting evidence, reviewing safety procedures, and analyzing equipment or environmental factors involved in the incident. The goal is not to assign blame, but to understand what happened and why, so that meaningful corrective actions can be put in place. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately. Verify gear with the PPE Inspection Checklist (NWS-CI-012).

Once the investigation is complete, supervisors, in collaboration with safety officers and, when appropriate, management representatives, will develop and document corrective and preventive actions. These may include revising procedures, retraining employees, upgrading equipment, or making physical changes to the work environment. All actions taken are tracked to completion, and their effectiveness is reviewed regularly to ensure continuous improvement.

Importantly, incident findings and lessons learned are communicated to all personnel, often through toolbox talks, safety briefings, or posted summaries, to raise awareness and prevent similar events. Employees are also encouraged to participate in the process by suggesting improvements or reporting hazards without fear of reprisal. Document safety meetings using the Toolbox Talk Record (NWS-CI-010). Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

Failure to report incidents is taken seriously at North Western Steel, as unreported hazards or events undermine the collective effort to enhance safety. Employees who neglect to report may face disciplinary action, underscoring the shared responsibility to protect oneself and others. By treating every incident as an opportunity to learn and improve, North Western Steel strengthens its culture of safety, transparency, and accountability, ensuring that everyone benefits from a safer workplace. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

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# 14.0 Training and Competency

At North Western Steel, comprehensive safety training is the cornerstone of a competent and protected workforce. Before beginning any assignment, all employees must participate in a thorough orientation that introduces them to the company’s safety philosophy, core policies, and general hazard awareness. This initial training ensures that everyone understands the foundational expectations for safe conduct on-site.

Once orientation is complete, employees undergo job-specific training tailored to the unique hazards and operational demands of their assigned roles. For example, individuals working with heavy machinery receive instruction on safe operating procedures, equipment limitations, and emergency shutdown processes. Those involved in specialized tasks—such as confined space entry, lockout/tagout, or rigging—must complete additional targeted training sessions designed to address the complex risks associated with these activities. These specialized modules not only teach technical procedures but also emphasize hazard recognition, proper use of personal protective equipment (PPE), and situational awareness. Complete the Confined Space Entry Checklist (NWS-CI-004) before entry. Use the Lockout/Tagout Checklist (NWS-CI-005) to verify isolation procedures. Verify gear with the PPE Inspection Checklist (NWS-CI-012). Inspect gear using the Rigging Gear Inspection Form (NWS-CI-014).

Learning at North Western Steel is a continuous process. Annual refresher courses are mandatory for all staff to reinforce critical safety principles, update personnel on regulatory changes, and introduce improvements in safety practices. These sessions often incorporate practical exercises, interactive discussions, and scenario-based drills to keep employees engaged and responsive. Employees who transition to new roles or face changes in work processes receive supplementary training as needed, ensuring their competencies remain current and relevant.

To monitor and maintain high standards, training records are meticulously documented and reviewed regularly by supervisors and safety officers. These records provide a comprehensive overview of each employee’s qualifications and highlight any additional training requirements. Audits of training effectiveness are also conducted, involving feedback surveys and hands-on assessments, to identify areas for improvement and to celebrate successes in skill development.

By investing in ongoing education, North Western Steel cultivates a well-trained workforce that can identify hazards, implement safe work practices, and respond confidently in emergency situations. This proactive approach not only minimizes accidents and injuries but also empowers employees to take ownership of their safety and that of their colleagues, ensuring a productive and resilient work environment for all.

# 15.0 Site-Specific Safety Guidelines

Each job site at North Western Steel presents its own unique set of hazards and operational challenges, making site-specific safety guidelines an indispensable component of the company’s overall safety management system. Before any work begins, all personnel are required to participate in a detailed review of the site-specific safety plan. This plan outlines the particular risks present on that job site—whether related to heavy machinery, confined spaces, hazardous substances, or environmental conditions—and describes the control measures that must be followed. Complete the Confined Space Entry Checklist (NWS-CI-004) before entry.

Daily hazard assessments and toolbox talks are mandatory. These briefings allow teams to discuss the tasks ahead, identify any immediate or emerging hazards, and review strategies for mitigating risk. Employees are encouraged to raise any concerns or observations during these discussions, fostering a culture of shared vigilance and proactive problem-solving. Document safety meetings using the Toolbox Talk Record (NWS-CI-010).

Access to certain areas of the job site is strictly controlled. Only individuals with proper authorization and training may enter restricted or high-risk zones, such as those involving high-voltage equipment, crane operations, or chemical storage. Clearly marked signage, barricades, and physical barriers are installed wherever necessary, and all personnel must follow posted instructions without exception. Refer to the Crane Inspection Checklist (NWS-CI-001).

Furthermore, site-specific safety guidelines emphasize the importance of emergency preparedness. Employees must familiarize themselves with the location of emergency exits, muster points, fire extinguishers, and first aid kits. Regular emergency drills are conducted to ensure that everyone knows how to respond swiftly and effectively in case of incidents such as fires, chemical spills, or medical emergencies. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately. Inspect monthly using the Fire Extinguisher Inspection Log (NWS-CI-013).

By adhering to these tailored guidelines, North Western Steel ensures that every worker is equipped with the knowledge and tools required to manage the unique hazards of each site. This thorough, site-focused approach not only safeguards individual wellbeing but also reinforces the collective commitment to safety that underpins the company’s operations. Verify gear with the PPE Inspection Checklist (NWS-CI-012).

# 16.0 Drug and Alcohol Policy

North Western Steel upholds a strict zero-tolerance policy regarding drugs and alcohol, which includes testing for both illegal substances and legalized marijuana. Random and for-cause testing may be conducted at any time to ensure compliance with this policy. The use or presence of any impairing substance—including legalized marijuana—is strictly prohibited during work hours and on company property. Any employee found in violation will face disciplinary action, up to and including termination. Employees taking prescription medications, including medical marijuana that may impair function, must notify their supervisor prior to performing job duties. This comprehensive approach is essential to maintaining fitness for duty and preventing accidents or injuries related to impairment.

# 17.0 Safety Audits and Continuous Improvement

Regular safety audits and inspections form a cornerstone of North Western Steel’s commitment to workplace safety and continuous improvement. These audits are conducted systematically across all job sites to proactively identify potential hazards, evaluate the effectiveness of existing safety measures, and verify adherence to company protocols and regulatory requirements. Auditors may include internal safety officers as well as external specialists, ensuring assessments are thorough and objective.

Each audit involves detailed observation of work practices, examination of equipment, and review of documentation such as training records and incident reports. Employees are encouraged to actively participate by reporting hazards, voicing safety concerns, and proposing actionable solutions. This open communication fosters a sense of shared responsibility and ensures that even minor risks are promptly addressed before they can escalate. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

All findings from these inspections are carefully documented, and areas for improvement are clearly outlined. Corrective actions are assigned to responsible parties with specific deadlines to guarantee timely resolution, and follow-up inspections are scheduled to confirm the effectiveness of implemented changes. Identified best practices are also shared across the organization to elevate overall safety standards.

Safety performance metrics—including near-miss reports, incident rates, and audit outcomes—are regularly tracked and analyzed. Results are communicated transparently during monthly safety meetings, where teams can discuss trends, celebrate achievements, and strategize ways to overcome persistent challenges. This ongoing review process not only reinforces accountability but also cultivates a culture of learning, adaptability, and excellence. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

Through this rigorous and inclusive approach, North Western Steel not only maintains compliance with safety regulations but continually strives to exceed them, ensuring every worker returns home safely at the end of each day.

# 18.0 Life Saving Rules

Zero Tolerance Policy: North Western Steel strictly enforces a zero-tolerance policy regarding violations of life-saving safety procedures and substance use. Any non-compliance, including a failed drug or alcohol test, will result in immediate disciplinary action, up to and including termination of employment. Zero Tolerance rules are covered in the New Employee Orientation Form (NWS-CI-017).

Fall protection must be used at all times when working at heights. Use the Working at Heights Checklist (NWS-CI-006) before elevated tasks.

Only individuals who are properly trained and authorized may operate equipment.

All energy sources must be locked out and tagged out prior to any servicing or maintenance activities.

Required personal protective equipment (PPE) must be worn at all times while on site. Verify gear with the PPE Inspection Checklist (NWS-CI-012).

The workplace must remain free of drugs and alcohol at all times. Any employee who fails a drug or alcohol test will be subject to immediate disciplinary action.

All incidents, near-misses, and hazards must be reported to supervision immediately. Submit an Incident/Near Miss Report Form (NWS-CI-011) immediately.

Work must cease immediately if conditions are unsafe; concerns should be reported without hesitation.

Strict adherence to these life-saving rules is essential to prevent serious injuries and to ensure the safety and well-being of all personnel on site.

# 19.0: Referenced Safety Forms

|  |  |
| --- | --- |
| Form Title | Document No. |
| Crane Inspection Checklist | NWS-CI-001 |
| Workplace Inspection Form | NWS-CI-002 |
| Hot Work Permit and Inspection | NWS-CI-003 |
| Confined Space Entry Checklist | NWS-CI-004 |
| Lockout/Tagout Checklist | NWS-CI-005 |
| Working at Heights Checklist | NWS-CI-006 |
| Vehicle Inspection Checklist | NWS-CI-007 |
| Forklift Inspection Checklist | NWS-CI-008 |
| Job Hazard Analysis (JHA) Form | NWS-CI-009 |
| Toolbox Talk Record | NWS-CI-010 |
| Incident/Near Miss Report Form | NWS-CI-011 |
| PPE Inspection Checklist | NWS-CI-012 |
| Fire Extinguisher Inspection Log | NWS-CI-013 |
| Rigging Gear Inspection Form | NWS-CI-014 |
| Respirator Fit Test Record | NWS-CI-015 |
| Welding Machine Inspection Checklist | NWS-CI-016 |
| New Employee Orientation (incl. Zero Tolerance) | NWS-CI-017 |

**Owner/Operator Signature:**

**Date:**

**Safety Manager Signature:**

**Date:**

**Employee Signature:**

**Date:**