

# BROS MECHANICAL SOLUTIONS INC SAFETY MANUAL

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## Corporate Safety Policy

The Occupational Safety and Health Act of 1970 clearly states our common goal of safe and healthful working conditions. The safety and health of our employees continues to be the first consideration in the operation of our business.

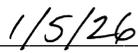
Safety and health in our business must be a part of every operation. Without question it is every employee's responsibility at all levels.

It is the intent of BROS MECHANICAL SOLUTIONS INC to comply with all laws. To do this we must constantly be aware of conditions in all work areas that can produce injuries. No employee is required to work at a job he or she knows is not safe or healthful. Your cooperation in detecting hazards and, in turn, controlling them is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.

The personal safety and health of each employee of BROS MECHANICAL SOLUTIONS INC is of primary importance. The prevention of injuries and illnesses is of such consequence that it will be given precedence over operating productivity whenever necessary. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health in keeping with the highest standards.

Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum. Our goal is always zero accidents and injuries.

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Name and Title

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## Company Policies and Procedures

### 1. PROGRAM REQUIREMENTS.

BROS MECHANICAL SOLUTIONS INC will ensure that the hazards at our jobsites are evaluated and communicated to its employees and that proper protective measures are provided. Safety is also the responsibility of every employee of this company. The Safety Officer is the sole person authorized to amend these instructions. This program will be maintained in accordance with OSHA Regulations 29 CFR 1910 and 29 CFR 1926. In addition, BROS MECHANICAL SOLUTIONS INC will review and evaluate this program on an annual basis or when operational changes occur that require a revision of this document.

### 2. WRITTEN INDIVIDUAL PROGRAMS.

BROS MECHANICAL SOLUTIONS INC will maintain written individual procedures for the types of hazards/issues that our employees will or could potentially be exposed to. Each program will be reviewed/revised on an annual basis or as required by the respective governing OSHA Standard. Each written program will be communicated to all personnel that are affected by it. Each will encompass the total workplace, regardless of number of workers employed or the number of work shifts. They will be designed to establish clear goals and objectives.

### 3. HEALTH AND SAFETY PROGRAM RESPONSIBILITY.

3.1. **Company Owner Responsibilities.** The Owner of BROS MECHANICAL SOLUTIONS INC recognizes the importance of safety and has committed to creating a place of employment which is free from recognized hazards. The Owner is ultimately responsible for the safety of all employees of BROS MECHANICAL SOLUTIONS INC

The Owner will ensure that all levels of management in the company are delegated the necessary authority to cultivate a safe environment and to take the appropriate actions to correct any deviations or deficiencies relating to safety on the job. The Owner will also be responsible for making available the funds necessary to ensure that employees are provided with effective safety equipment to perform their work.

3.2. **Safety Officer Responsibilities.** The company Safety Officer will be responsible for the day to day management of the company safety program. The Safety Officer will assist the company in remaining in compliance with all applicable health and safety regulations. The Safety Officer will identify and coordinate training sessions to ensure that all employees are equipped with the needed safety skills and knowledge. The Safety Officer will perform inspections of jobsites and facilities and take the appropriate actions to correct any deviations or deficiencies relating to safety on the job. Eleazar Ortiz and Edilmar Ortiz has been designated as the Safety Officers for

3.3. **Project Manager Responsibilities.** Project Managers will be responsible for safety on their respective projects. They will be expected to involve the Safety Officer at the beginning of every project even before work has started. Project Managers will take

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recommendations from and work with the Safety Officer to ensure the safety of employees on the job. All Employees on jobs are subject to random drug testing.

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- 3.4. Supervisor Responsibilities. Company Supervisors are responsible for the daily enforcement of the policies and procedures in the BROS MECHANICAL SOLUTIONS INC safety program. They will be responsible for all aspects of employee safety in their respective areas. They will conduct periodic safety meetings for their employees. Supervisors will monitor the safety of employees on a daily basis and take the appropriate actions to correct any deviations or deficiencies relating to safety on the job. Supervisors will be attentive to employee safety concerns and report them to the Safety Officer. They will keep in communication with the Safety Officer to ensure all employees receive training, refresher training, or retraining as needed.
- 3.5. Employee Responsibilities. Employees are the first lines of defense as it pertains to safety at all BROS MECHANICAL SOLUTIONS INC jobsites. Employees are expected to abide by all of the safety policies and procedures in the company safety program. They will be held responsible for their own safety and are expected to report unsafe conditions to their Supervisors immediately. If the Supervisor is unavailable, they will report safety violations or concerns to the Company Owner or Safety Officer. Employees, if feasible, are also expected to correct safety violations within their immediate areas. They will ensure they report to work in a state of readiness, with the appropriate clothing, and with all issued personal protective equipment. Employees will only operate equipment on which they have been trained and authorized to use. They will report accidents, injuries, and near misses immediately to their Supervisor.

## 4. JOB SAFETY PLANNING AND ANALYSIS.

- 4.1. Pre-Construction. BROS MECHANICAL SOLUTIONS INC is dedicated to ensuring the safety of all employees. For this reason, safety is considered even before contracts are awarded. The Safety Officer will be involved throughout the bid process to ensure that special tasks or procedures requiring additional safety precautions are identified as soon as practicable. In addition, once the contract has been awarded and before the project begins, a pre- construction safety meeting should be held with the Prime or General Contractor, Subcontractors, and other applicable parties to discuss the following:
  - 4.1.1. Safety Management specifics and controls.
  - 4.1.2. Subcontractor requirements.
  - 4.1.3. Job hazard analysis.
  - 4.1.4. Special safety equipment, tools, hazards, or methods that will help in completing the job efficiently and safely.
  - 4.1.5. Safety Training and Orientation.
  - 4.1.6. Job-site safety inspections.
- 4.2. Job Safety (Hazard) Analysis. Job hazard analysis is to be used to make a habit of safe work practices. It is also beneficial as a guideline to follow during new employee training efforts and for quickly identifying the cause of an accident should one occur. Each analysis should be periodically reviewed for possible improvements. All

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supervisors will be familiar with the proper completion of a Job Safety (Hazard) Analysis. The following basic steps should be followed in preparation of a job hazard analysis:

- 4.2.1. Select the jobs or specific tasks for hazard analysis.
- 4.2.2. Consider the task to be performed and inspect the area(s) to identify potential hazards.
- 4.2.3. Break the job or task into individual components or activities.
- 4.2.4. Identify the hazards associated with each component activity (ex. Falls, electric shock, chemical exposure, cuts, etc.).
- 4.2.5. Identify what procedures or equipment are needed to perform each component activity safely (ex. Ladders, scissor lifts, personal protective equipment, etc.).
- 4.2.6. Apply the analysis to the job.

## 5. ROUTINE SAFETY AND HEALTH INSPECTIONS.

Routine safety and health inspections of all job sites will be conducted as necessary by the Safety Officer or designated individual. The inspection will be conducted to discover conditions and work practices that may lead to job accidents and industrial illnesses, through specific, methodical auditing, checking, or inspection procedures.

5.1. Inspection elements. The following inspection elements will be checked during safety inspections.

- |                         |   |
|-------------------------|---|
| 5.1.1. Floors           | Condition, slip, trip, falls            |
| 5.1.2. Aisles           | Marking, obstructions                   |
| 5.1.3. Stairs           | Condition, railings, obstructions       |
| 5.1.4. Ladders          | Condition, Metal in electrical areas    |
| 5.1.5. Exits            | Obstructions, locked?, lighted?         |
| 5.1.6. Ventilation      | Adequate, fans guarded?, maintained     |
| 5.1.7. Hand tools       | Grounded, guarded, pressure switches    |
| 5.1.8. Chemicals        | MSDS's, labels, storage, separated      |
| 5.1.9. Compressed gas   | Storage, heat sources, labels, training |
| 5.1.10. Guarding        | Installed, over, under, around, between |
| 5.1.11. Lockout Tagout  | Procedures, training, devices, tags     |
| 5.1.12. Eye protection  | Used, training, Z-87 rated protectors   |
| 5.1.13. Fire protection | Extinguishers, training, locations      |
| 5.1.14. First Aid       | Kits, OSHA logs, training               |

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5.1.15. Confined Spaces                      Marked, training, ventilation, equipment

5.1.16. Work practices                      Unsafe work practices observed? (list)

5.2. Inspection report.    The Safety Officer will provide a safety report based on the inspection items noted during the inspection to the appropriate supervisor.

## 6. SAFETY MEETINGS.

A well-ordered flow of information is essential to a good safety program. The company, through a program of safety meetings at all levels, intends to accomplish the goals of safety awareness, education, and participation.

6.1. We are committed to efficient and quality training that increases safety awareness amongst all employees.

6.2. Safety meetings for employees will be held on a regular basis to demonstrate management's commitment to accident prevention. Possible agenda items include but are not limited to the review of accidents, safety education, safety inspections, elimination of workplace hazards, new methods of improving job performance, employee training, personal protective equipment, safety incentives, hazard communication, lockout/tagout, respiratory protection, fall protection, and other safety policies.

6.3. It is vital to this Workplace Safety Program that all safety training and meetings be carefully documented. Written records of all safety meetings are the responsibility of the Supervisor(s). Training activities are the responsibility of the Safety Officer.

## 7. HAZARD REPORTING.

All employees are required to report potential or known hazards immediately upon identification. If possible, the hazard should be eliminated immediately when found. Otherwise, the immediate supervisor must be notified and all work where employees are exposed to the hazard must be discontinued until the hazard has been removed.

## 8. FIRST AID PROCEDURES.

8.1. Serious Injuries. Supervisors will be responsible to ensure all employees report serious accidents or injuries immediately to the Safety Officer. Where employees require professional medical attention, the Supervisor will accompany the employee to the hospital or clinic and observe the employees' condition and status. The supervisor will report directly to the Safety Officer the condition of the employee and ensure that proper accident investigation procedures are followed.

8.2. Minor injuries. Minor injuries, such as cuts, scratches, bruises, and burns that do not require a doctor's treatment, may be handled by the employee at the jobsite. Recurring first aid injuries will be reported to the Safety Officer to ensure they do not become serious.

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8.3. First Aid Kits. First aid kits will be maintained at each jobsite by the Supervisor. All employees will be made aware of the location and availability of the first aid kit. The type of first aid kit to be maintained will be for minor emergencies such as cuts and skin abrasions.

## 9. ACCIDENT INVESTIGATION.

Accident investigation is primarily a fact-finding procedure; the facts revealed are used to prevent recurrences of similar accidents. The focus of accident investigation will be to prevent future accidents and injuries to increase the safety and health of all our employees.

### 9.1. Immediate concerns.

9.1.1. Ensure any injured person receives proper care.

9.1.2. Ensure co-workers and personnel working with similar equipment or in similar jobs are aware of the situation. This is to ensure that procedural problems or defects in certain models of equipment do not exist.

9.1.3. Start the investigation promptly.

9.2. Accident Investigation Form. An investigation form which details specific company requirements for investigation will be used to gather data to determine causes and corrective actions. As a minimum the form will contain the following areas of concern.

#### 9.2.1. Accident investigation form data.

- Injured employee's name
- Date and time of injury
- Occupation or task being performed when injured
- Employee's address
- Sex/age/DOB
- Social security number
- Length of service
- Length of time at specific job
- Time shift started
- Overtime length when injury occurred
- Physician's and hospital name (if transported)
- Type of injury
- Resulting fatalities
- Description and analysis of accident
- Action taken to prevent recurrence and person
- Employee's statement
- Witnesses' statement
- Person completing form and date
- Person reviewing form and date

9.3. Supervisors are responsible for ensuring that employees follow safe work practices and receive appropriate training to enable them to do this. Supervisors will be responsible

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to fill out accident reporting/investigation requirement forms and to reinforce the BROS MECHANICAL SOLUTIONS INC safety program.

## 10. GENERAL SAFETY RULES FOR ALL EMPLOYEES.

The following safety rules are established by this company as general safety rules for all Employees.

- 10.1. Never operate any machine or equipment unless you are authorized and trained to do so.
- 10.2. Do not operate defective equipment. Do not use broken hand tools. Report them to your supervisor immediately.
- 10.3. Never start on any hazardous job without being completely familiar with the safety techniques which apply to it. Check with your supervisor if in doubt.
- 10.4. Make sure all safety attachments are in place and properly adjusted before operating any machine. BROS MECHANICAL SOLUTIONS INC practices the 6' mandatory tie off policy.
- 10.5. Do not operate any machine or equipment at unsafe speeds. Shut off equipment which is not in use.
- 10.6. Wear all protective garments and equipment necessary to be safe on the job. Wear proper shoes. Sandals or other open-toed or thin-soled shoes should not be worn.
- 10.7. Do not wear loose, flowing clothing or long hair while operating moving machinery.
- 10.8. Never repair or adjust any machine or equipment unless you are specifically authorized to do so by your foreman.
- 10.9. Never oil, clean, repair, or adjust any machine while it is in motion.
- 10.10. Never repair or adjust any electrically driven machine without opening and properly tagging the main switch.
- 10.11. Put tools and equipment away when they are not in use.
- 10.12. Do not lift items which are too bulky or too heavy to be handled by one person. Ask for assistance.
- 10.13. Keep all aisles, stairways, and exits clear of skids, boxes, air hoses, equipment, and spillage.
- 10.14. Do not place equipment and materials to block emergency exit routes, fire boxes, sprinkler shutoffs, machine or electrical control panels, or fire extinguishers.
- 10.15. Stack all materials neatly and make sure piles are stable.
- 10.16. Keep your work area, machinery and all company facilities which you use clean and neat.
- 10.17. Do not participate in horseplay, or tease or otherwise distract fellow workers.

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- 10.18. Power-truck operators must always safeguard other workers; workers must show courtesy to power-truck operators.
- 10.19. Floor mounted extension cords should be placed so that they are always flush to the ground.
- 10.20. Frayed or damaged electrical cords should be replaced.
- 10.21. Never take chances. If you're unsure, you're unsafe!
- 10.22. Ask for help, if needed.

## 11. FIRE PREVENTION AND PROTECTION.

Fire and explosion pose a serious risk to our employees during operations involving open flames or high heat sources such as the use of propane or electric torches. Flames can be produced which could quickly become uncontrollable under certain situations. For this reason, all employees will be trained in these procedures:

- 11.1. Basic safety precautions. Heat, open flame, or any operations where sparks may be produced will be permitted only in areas that are or have been made fire safe. When work cannot be moved practically, as in most construction work, the area will be made safe by removing combustibles or protecting combustibles from ignition sources.
- 11.2. Fire extinguishers. Suitable fire extinguishing equipment will be maintained in a state of readiness for instant use. Such equipment may consist of hose or portable extinguishers depending upon the nature and quantity of the combustible material exposed. Employees will not use portable fire extinguishers unless they have been trained.
- 11.3. Housekeeping. All employees will be familiar with the Housekeeping Program and will follow all applicable requirements as stated therein to ensure that flammable or combustible materials do not accumulate in the work area.
- 11.4. Chemical Storage. BROS MECHANICAL SOLUTIONS INC will ensure that proper storage locations are provided to employees using chemicals. Flammable chemicals will be stored in approved locations or flammable liquids cabinets designed in accordance with 29 CFR 1910.106. Toxic and corrosive chemicals will be stored apart from flammable chemicals and will be further segregated according to acidity and/or alkalinity. All chemical storage location will be approved by the Safety Officer before use.
- 11.5. Authorization. Employees performing heat or open flame operations must obtain authorization from their Supervisor. Where required, employees will fill out a Hot Work permit.

## 12. EVACUATION PROCEDURES.

All employees upon receipt of an evacuation order will exit the work area via the Nearest Unaffected Exit. They will proceed to the designated evacuation muster point for the area they were in at the time of the evacuation order, quickly and quietly. They will also upon request, aid their supervisor in taking role or by being a runner.

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- 12.1. Egress Routes. All employees will become familiar with the location of all posted egress routes of the facility areas that they frequent and will know the primary and secondary egress routes of their work area.
- 12.2. Evacuation Muster Points. All employees will become familiar with the marked evacuation muster points and will know the primary evacuation muster point of the facility areas that they frequent and for their work area. NO ONE WILL LEAVE AN EVACUATION MUSTER POINT WITHOUT THE EXPRESS PERMISSION OF THE SENIOR EMPLOYEE PRESENT.
- 12.3. Severe Weather Safe Spots. All employees will become familiar with posted Severe Weather Safe Spots and will know the location of the nearest Severe Weather Safe Spot for the areas that they frequent and their work area. Upon the announcement of severe weather, proceed to the designated safe spot.
- 12.4. Arrival Actions. Upon arrival at an evacuation muster point, each employee will seek out the senior employee present to assure that they have been accounted for. They will also, upon request, aid area supervisors or managers in taking a role or by being a runner.
- 12.5. Visitor Escorts. Each visitor at the facility must always be escorted throughout the facility or jobsite by a company employee. The escort will ensure their visitor is escorted to an evacuation muster point or safe spot as required. Upon arrival at an evacuation muster point, the visitor's name will be forwarded to the employee in charge at the evacuation muster point.

## 13. RECORDKEEPING REQUIREMENTS.

BROS MECHANICAL SOLUTIONS INC fully understands that companies with eleven (11) or more employees at any time during the calendar year immediately preceding the current calendar year must comply with the provisions of 29 CFR 1904. Records will be established on a calendar year basis.

- 13.1. BROS MECHANICAL SOLUTIONS INC will report to OSHA, as required by 29 CFR 1904.39, all fatalities, hospitalizations, amputations, and losses of an eye as a result of work-related incidents. Incidents that will be reported to the nearest OSHA Area Office include:
  - 13.1.1. Fatalities within eight hours after the occurrence to one or more employees, and
  - 13.1.2. Within 24 hours of learning of any incident which results in hospitalization, amputation, or loss of an eye of an employee.
- 13.2. Log and summary of occupational injuries and illnesses. This employer will:
  - 13.2.1. Maintain a log and summary of all recordable occupational injuries and illnesses by calendar year.
  - 13.2.2. Enter each recordable injury and illness on the log and summary as early as practicable but no later than 7 working days after receiving information that a

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recordable injury or illness has occurred. For this purpose, form OSHA No. 300

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or an equivalent which is as readable and comprehensible to a person not familiar with it will be used. The log and summary will be completed in the detail provided in the form and instructions on form OSHA No. 300.

- 13.3. Supplementary record. In addition to the log of occupational injuries and illnesses (OSHA 300) BROS MECHANICAL SOLUTIONS INC will have available for inspection at each of our facilities within 7 working days after receiving information that a recordable case has occurred, a supplementary record for each occupational injury or illness for that establishment. The record will be completed in the detail prescribed in the instructions accompanying Occupational Safety and Health Administration Form OSHA No. 301. Workmen's compensation, insurance, or other reports are acceptable alternative records if they contain the information required by Form OSHA No. 301 (according to OSHA). If no acceptable alternative record is maintained for other purposes, Form OSHA No. 301 will be used, or the necessary information will be otherwise maintained.
- 13.4. Annual summary. BROS MECHANICAL SOLUTIONS INC will post an annual summary of occupational injuries and illnesses for each facility under our control. This summary will consist of a copy of the year's totals from the form OSHA No. 300A and the following information from that form:
  - 13.4.1. Calendar year covered.
  - 13.4.2. BROS MECHANICAL SOLUTIONS INC and establishment address.
  - 13.4.3. Certification signature, title, and date.
  - 13.4.4. A form OSHA No. 300A will be used in presenting the summary. If no injuries or illnesses occurred in the year, zeros will be entered on the totals line, and the form posted.
  - 13.4.5. The summary will be completed by February 1 of each calendar year. This company, or the officer or employee of BROS MECHANICAL SOLUTIONS INC who supervises the preparation of the log and summary of occupational injuries and illnesses, will certify that the annual summary of occupational injuries and illnesses is true and complete. The certification will be accomplished by affixing the signature of the employer, or the officer or employer who supervises the preparation of the annual summary of occupational injuries and illnesses, at the bottom of the last page of the summary.
  - 13.4.6. BROS MECHANICAL SOLUTIONS INC will post a copy of the establishment's summary in each facility. The summary covering the previous calendar year will be posted no later than February 1 and will remain in place until April 30. For employees who do not primarily report or work at a fixed site belonging to this company, or who do not report to any fixed site on a regular basis, we will satisfy this posting requirement by presenting or mailing a copy of the summary during the month of February of the following year to each such employee who receives pay during that month. (NOTE: For multi-establishment

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employers where

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operations have closed in some establishments during the calendar year, it will not be necessary to post summaries for those establishments).

13.5. Records retention. Records will be retained for 5 years following the end of the year to which they relate.

## 14. DISCIPLINARY ACTIONS FOR WILLFUL UNSAFE ACTS.

Employee safety is paramount at BROS MECHANICAL SOLUTIONS INC. The willful commitment of an unsafe act cannot be condoned. Employees who willfully jeopardize their own or coworkers' safety will be disciplined. The type of discipline can range from a verbal warning to dismissal. The Safety Officer, and supervisory personnel in the administrative chain of any employee may give employees a verbal warning for a known unsafe act or procedural, or operational infraction. Disciplinary action other than a release from shift without pay must be reviewed by the company Owner.

### 14.1. Forms of discipline.

- 14.1.1. Verbal warning. The company Safety Officer, and supervisory personnel in the administrative chain of any employee may give employees a verbal warning for a known unsafe act or procedural, or operational infraction. A second verbal warning in the same shift will be grounds for release from the current work shift without pay. The immediate supervisor will be consulted in all cases and will make the determination for release.
- 14.1.2. Written warning. A written warning will be issued automatically for a second verbal warning for an unsafe act. The written warning will become part of the employee's permanent personnel record.
- 14.1.3. Retraining. It must be considered that the possibility exists that lack of proper training may be a cause of any unsafe act. Supervisors will review the need for employee remedial training in their job skill to enable them to better accomplish their jobs.
- 14.1.4. Dismissal hearing. The employee concerned will be notified of his or her rights in advance of termination. The option of dismissal will be reviewed by the company Owner before termination. The immediate supervisor will be consulted to determine if a lesser form of discipline is warranted. The employees' rebuttal (if provided) will be considered along with the severity of the act, the supervisor's recommendation and any other supporting information provided at the time of the hearing.

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## Hazard Communication Program

### 1. PROGRAM REQUIREMENTS.

BROS MECHANICAL SOLUTIONS INC will ensure that the hazards of all chemicals used at our job sites are evaluated and that information concerning their hazards is transmitted to all employees. The purpose of this program is to address the issues of evaluating the potential hazards of chemicals, communicating information concerning these hazards, and establishing appropriate protective measures for employees. This program will be maintained in accordance with 29 CFR 1910.1200 and updated annually or as required.

BROS MECHANICAL SOLUTIONS INC will make the written hazard communication program available to all employees, during each work shift. BROS MECHANICAL SOLUTIONS INC acknowledges that the Hazard Communication requirements have been aligned with the Globally Harmonized System of Classification (GHS) and Labeling of Chemicals.

### 2. RESPONSIBILITY.

The Safety Officer is the program coordinator, acting as the representative of the company owners, who have the ultimate responsibility for all facets of this program. The Safety Officer has full authority to make necessary decisions to ensure success of the program.

BROS MECHANICAL SOLUTIONS INC will submit a copy of this program to any Prime or General Contractor upon request. Supervisors are required to be familiar with the contents of this program, will ensure the program is followed by their subordinates on a daily basis, and will maintain a copy of the program and SDS's available for their subordinates.

### 3. TRAINING REQUIREMENTS.

BROS MECHANICAL SOLUTIONS INC will provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment, annually, and whenever a new chemical is introduced into their work area that could present a potential hazard.

#### 3.1. Information. BROS MECHANICAL SOLUTIONS INC employees will be informed of:

3.1.1. The OSHA standard 29 CFR 1910.1200.

3.1.2. Any operations in the jobsite where hazardous chemicals are present.

3.1.3. The location and availability of the written hazard communication program, including a list(s) of hazardous chemicals used at the jobsite, and the associated safety data sheet (SDS).

#### 3.2. Training. Employee hazard communication training at BROS MECHANICAL SOLUTIONS INC will be conducted annually by the Safety Officer or an approved training provider. Newly hired personnel will be briefed on the general requirements of the OSHA hazard communication standard, as well as duty specific hazards before they begin any duties at a new jobsite. This training will include at least the following:

3.2.1. Methods that may be used to detect the presence or release of a hazardous chemical in the work area. This will include any monitoring conducted by

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BROS MECHANICAL SOLUTIONS INC , continuous monitoring devices, visual appearance, or odor of hazardous

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chemicals when being released, etc. Safety Data Sheets (SDS) will be used to augment this requirement where ever possible.

- 3.2.2. The physical and health hazards of the chemicals present in the work area (e.g., flash point, reactivity, toxicity).
  - 3.2.3. The measures employees can take to protect themselves from these hazards. Specific procedures BROS MECHANICAL SOLUTIONS INC has implemented to protect employees from exposure to hazardous chemicals, to include; appropriate work practices, programs, emergency procedures, and personal protective equipment.
  - 3.2.4. An explanation of the labeling system used at BROS MECHANICAL SOLUTIONS INC , the safety data sheet, and how employees can obtain and use the appropriate hazard information.
  - 3.2.5. The chemical (formal) and common name(s) of products used, and all ingredients which have been determined to be health hazards.
  - 3.2.6. The primary route(s) of entry; inhalation, absorption, ingestion, injection, and target organs.
  - 3.2.7. The OSHA permissible exposure limit, ACGIH Threshold Limit Value, including any other exposure limit used or recommended by the chemical manufacturer.
  - 3.2.8. Whether the hazardous chemical has been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC).
  - 3.2.9. Any generally applicable precautions for safe handling and use which are known including appropriate hygienic practices, protective measures during repair and maintenance of contaminated equipment, and procedures for clean-up of spills and leaks.
  - 3.2.10. Emergency and first aid procedures.
- 3.3. Documentation. All training will be documented using an attendance roster. Certificates of completion will be issued to attendees by the Safety Officer and a copy of the completed certificate filed.

## 4. LABELING REQUIREMENTS.

Labeling requirements of containers of chemicals used at BROS MECHANICAL SOLUTIONS INC , as well as of containers of chemicals and hazardous materials being shipped off site. The following procedures apply:

- 4.1. Unmarked Containers. Employees of BROS MECHANICAL SOLUTIONS INC will not use unmarked containers containing chemicals.
- 4.2. Container Labeling. BROS MECHANICAL SOLUTIONS INC will ensure all containers are properly labeled. Employees will ensure that labels on containers of hazardous chemicals are not removed or defaced. Once they are emptied, chemical containers

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can never be used in the place of any other container (for example, trash receptacles).

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4.3. Minimum labeling requirements. All container labels will list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer, or other responsible party.

## 5. SAFETY DATA SHEETS AND HAZARDOUS MATERIALS INVENTORY LIST.

The Safety Officer is responsible for obtaining SDS's for every chemical used by BROS MECHANICAL SOLUTIONS INC. The Safety Officer will maintain a master copy in the main office. In addition, the Safety Officer will review the SDS's for all chemicals used to determine if additional precautions or special personal protective equipment will be required in order to ensure employee safety.

5.1. Supervisors will be responsible to maintain readily accessible copies of the SDS's at the job sites and to ensure that all employees are aware of the location.

5.2. SDS requests. A request letter will be forwarded to any vendor who does not provide an SDS with a product received by this company.

5.3. Hazardous Substances Inventory. The Company maintains an inventory of all known hazardous substances in use on the job site. A chemical inventory list is available from the Safety Officer.

5.4. Hazardous substances brought onto the job site by the company will be included on the hazardous chemical inventory list in the SDS Book or in a separate SDS log for specific job information.

## 6. NON-COMPANY EMPLOYEES PROGRAM.

Visitors, Contract Employees, and Contractor Personnel. The Safety Officer and/or Supervisor will advise visitors, contract employees, and contractor personnel of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, the safe handling procedures to be used, and availability of SDS's. Any contractor bringing chemicals on-site must provide BROS MECHANICAL SOLUTIONS INC with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

## 7. TRADE SECRETS.

To protect trade secrets, the chemical manufacturer, importer, or employer may withhold the specific chemical identity, including the chemical name, and other specific identification of a hazardous chemical, from the safety data sheet. To ensure the safety of our employees, BROS MECHANICAL SOLUTIONS INC will obtain any information not shown on a SDS from a supplier, when such information is needed to determine the hazardous constituents of chemicals used within our facility or by our employees. BROS MECHANICAL SOLUTIONS INC employees will not use a specific chemical, if they cannot determine from the SDS (or other approved source) proper protective measures to be used.

## 8. NON-ROUTINE TASKS.

# **BROS MECHANICAL SOLUTIONS INC SAFETY MANUAL**

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No employee will be allowed to perform tasks that they are not fully trained to accomplish. Non-routine tasks will be evaluated prior to beginning work and the related hazard assessed to develop protective measures.

## 9. CHEMICAL STORAGE.

9.1. BROS MECHANICAL SOLUTIONS INC will ensure that proper storage locations are provided to employees using chemicals. Flammable chemicals will be stored in approved locations or flammable liquids cabinets designed in accordance with 29 CFR 1910.106. Toxic and corrosive chemicals will be stored apart from flammable chemicals and will be further segregated according to acidity and/or alkalinity. All chemical storage location will be approved by the Safety Officer before use.

EMPLOYEE NAME \_\_\_\_\_

EMPLOYEE SIGNATURE \_\_\_\_\_

DATE \_\_\_\_\_