HEALTH AND SAFETY PLAN

IN ACCORDANCE WITH

29 CFR 1910 (OSHA)
29 CFR 1926 (COSHA)

FOR

MJ VanDamme Trucking, Inc.

INDEX
HEALTH AND SAFETY PLAN

MJ VanDamme Trucking, Inc.

Health and Safety Policy Statement
In accordance with 29 CFR 1910, 29 CFR 1926

Scope:

We are committed to providing a safe, injury-free, and healthy work environment for everyone. Safe and healthy conditions do not occur by chance. They are the result of diligent work and careful attention to all company policies by everyone.

Purpose:

Safety requires cooperation on everyone's part. It is important that communication be kept open at all times between management and employees. Employees who notice hazards or other safety problems, or feel that they need additional training, should notify their supervisor. Supervisors and management will address these concerns and take corrective action when warranted.

Everyone will know the safety standards for their area or job and abide by them. Supervisors will instill a positive safety attitude and awareness in their workers through personal adherence, personal contact, training, and regularly scheduled safety meetings. It is the duty of all employees to perform their work with regard for the safety of themselves and co-workers.

Any employee has the right and duty to stop work activities if unsafe conditions are observed at any job location.

Our safety policies are based on past experience and current standards, and are also an integral part of the company's personnel policies. This means that compliance with the policies is a condition of employment and must be taken seriously. Failure to comply is sufficient grounds for disciplinary action or for termination of employment.

Our safety and health is a top priority in this organization and is an integral part of productivity and quality. The best reason for you to observe these policies is because it's in your own self-interest to do so and the best interest of company. Following these policies will help you stay safe, healthy, and able to work, play, and enjoy life.

Management Team
MJ VanDamme Trucking, Inc.
Date - 01/01/2017

ACKNOWLEDGMENT

By my signature I establish that I have read the Corporate Health and Safety Program, am familiar with its provisions, understand its provisions, and agree to comply with all health and safety requirements. In addition, my signature below indicates that I understand that failure to comply with these health and safety requirements is sufficient grounds for disciplinary action or for termination of employment.

Name (Print)	Signature/Date
_____	_____
Witness (Print)	Witness Signature/Date
_____	_____

1.0 PURPOSE AND POLICY:

A. The purpose of this Corporate Health and Safety Program (CHSP) is to establish corporate personnel protective standards, and mandatory safety practices, procedures and management to be used by MJ VanDamme Trucking, Inc. ("the Company") during work activities at project sites.

B. Company policy is to maintain the most protective environment possible for Company employees. Company personnel will follow all applicable Federal and State regulations.

(1) In particular, the Company will follow those regulations as outlined in Occupational Safety and Health Administration (OSHA) Standards for General Industry (29 CFR Part 1910), and OSHA Standards for Construction (29 CFR Part 1926).

C. All Company personnel and contract employees will respect confidentiality of Company work activities and our clients' trade secrets.

(1) Company personnel will also follow all applicable health and safety requirements provided by our clients when working on sites under the client's control.

(2) Personnel safety is the primary goal of all Company employees including the Company owners, project managers, supervisors, technical staff, and office staff. Company takes pride in our safety record.

2.0 APPLICABILITY:

A. The provisions of this CHSP are mandatory for all Company activities at project sites.

(1) All Company personnel shall abide by the CHSP.

(2) This plan will be revised as necessary pending unforeseen site conditions or activities, and such approved revisions will be provided as appropriate to all recipients of this CHSP.

B. Any supplemental site specific Health and Safety Plans (HSP) shall conform to the CHSP as a minimum standard.

C. All Company personnel and contract employees who engage in on site project activities must be familiar with the CHSP, comply with its requirements, follow the site specific HSP, and will provide a signature confirming review and understanding.

3.0 SCOPE OF WORK:

A. The project scope of work will drive the requirements of the HSP.

(1) Appropriate H&S measures will be developed for the type of work being performed and the type of hazards of concern that are present or potentially present.

B. The Project Manager in conjunction with the Corporate H&S Administrator will be responsible for developing the HSP that meets the minimum requirements of the CHSP and the scope of work for specific projects.

4.0 Safety Program and Disciplinary Program

A. Company is committed to a safe and lawful working environment.

B. Violation of the CHSP will result in disciplinary action, up to and including termination of employment, at the discretion of Company.

C. The CHSP includes work within the office, field activities, and use of vehicles.

D. Supervisors, Project Managers, Corporate H&S Administrator and Project site safety officers will be responsible for enforcement of all safety activities and issues.

E. Company employees are responsible for reading and understanding the CHSP.

F. Any safety procedures not followed in the CHSP will result in disciplinary action.

(1) The employee will be informed immediately of the safety violation. The cause and/or reason for the safety violation will be discussed.

(2) Disciplinary action will depend on the severity of the safety infraction. The incident will be documented and placed in the project safety file.

(3) Periodic inspections by the Corporate H&S Administrator and/or Project Manager will be conducted to verify safety procedures are being followed by site supervisor(s) and personnel.

(4) If the supervisor(s) are not following safety procedures, the supervisor(s) will be informed of the safety violations and disciplined depending on the severity of the safety infraction.

5.0 Health and Safety Program Responsibilities

A. Our goal is to protect employees from injury while working for the Company.

(1) This goal will receive top priority from everyone.

(2) Duties and responsibilities of personnel under our CHSP are as follows:

B. Corporate Health and Safety Director:

(1) Administers the corporate H&S program.

(2) Supports the Project Managers in the development of site specific HSP's.

(3) Assists management and supervisors in the health and safety training of employees.

(4) Recommends processes and activities that will develop and maintain incentives for and motivation of employees in health and safety.

(5) Recommends disciplinary action for violators of H&S rules.

(6) Maintains the state H&S poster, emergency telephone numbers, OSHA Form 300, and other required notices.
   (a) Ensures this information is posted in places where employees can see them.

(7) Develops and maintains accident and incident investigation and reporting procedures and systems.
   (a) Investigates serious or reportable injuries and takes action to eliminate injury causes.
   (b) Reportable incidents consist of fatalities, lost workday cases, and incidents without lost workdays requiring medical treatment.
   (c) Keeps management informed of findings.
   (d) Reports injuries that result in an occupational fatality or three or more hospitalized workers to appropriate OSHA personnel within eight (8) hours of occurrence.
   (e) Maintains all records and reports of accidents and near misses that have taken place during Company operations.
      (I) Forms and reports may include, the OSHA Form 301 Injury/Illness Log, and/or the OSHA Form 101 Supplementary Record of Occupational Injury and Illnesses.
      (II) Data shall be kept for five (5) years.
   (f) Ensures that a Report of Occupational Injury or Disease report is filed with the Workers' Compensation office within ten days of employee's notification of an occupational injury or disease.

(8) Processes all paperwork associated with accidents, onsite inspections and in-house audits.

(9) Maintains permanent record for Company files maintaining all HIPAA privacy rules.

(10) Maintains all medical records, evaluations and exposure monitoring records for a period of 30 years.

(11) Maintains all training records for a minimum of three (3) years.

(12) Credentials medical providers in person or by proxy explaining MJVD needs and abilities to provide modified work when physician directed.

C. Supervisors

(1) Familiarizes him/her-self with H & S regulations related to his/her area of responsibility.

(2) Directs, implements, and coordinates H & S program elements and activities within area of responsibility.

(3) Ensures that all employees in area of responsibility use appropriate personal protective equipment and safety devices.

(4) Ensures that safety equipment is available, maintained, used, and stored correctly.

(5) Ensures that all persons within area of responsibility receive job H & S training as required.

(6) Conducts periodic H & S inspections of work area.

(7) Ensures correction of unsafe conditions.

(8) Ensures that project managers are aware of and comply with requirements of CHSP.

(9) Investigates all injuries within area of responsibility.
- (a) Reviews all injuries/incidents with supervisors and workers involved.
- (b) Ensures reports and Workers' Compensation forms are completed and submitted as appropriate.
- (c) Insures that corrective action is taken immediately to eliminate the cause of the injury/incident.

(10) Requires all subcontractors and subcontractor personnel working on Company projects comply with H & S regulations.

(11) Maintains copies or access to applicable programs and Workers' Safety forms, in accordance with Company practice and policy.

D. Project Managers (PM)

(1) Understand, explain, and enforce safety responsibilities that apply to Company operations associated with the specific project.

(2) Overall responsibility for the implementation of the site specific HSP and ensures compliance by workers with the H & S regulations and Company rules.

(3) Ensures that persons under his/her supervision use safety devices and personal protective equipment.

(4) Conducts frequent and regular H & S inspections of his/her work projects.

(5) Conducts or designates Site Safety Officer to conduct site specific safety briefings with all workers under his/her supervision.

(6) Ensures that injuries are treated promptly and reported properly.

(7) Investigates all injuries/incidents, obtains all pertinent data, and initiates/takes corrective action.

(8) Acts on reports of hazards or hazardous conditions reported to him/her by employees.

E. Field Engineer/Field Team Leaders

(1) The Field Engineer/Field Team Leader has the authority to direct Company and site activities.
- (a) The Field Engineer/Field Team Leader may also be the Project Manager and the Site Safety Officer.

(2) Manages Company operations.

(3) Implements site specific HSP.

(4) Coordinates with the Site Safety Officer in determining personnel protection levels.

(5) Coordinates with other on site personnel, including subcontractors to Company.

(6) Documents all field activities.

F. Project Site Safety Officer (SSO)

(1) The Project Site Safety Officer shall have a minimum of 1 year of experience in the safety and construction industry or related fields, a sound working knowledge of Federal and State occupational H & S regulations, and experience in monitoring and administration of a respiratory protection program.

(2) Periodically inspects protective clothing and equipment.

(3) Ensures that protective clothing and equipment are properly stored and maintained.

(4) Ensures control of entry and exit at the Control Access Points (project specific).

(5) Confirms each member's suitability for work based on each member's Company physical results.

(6) Monitors the personnel for signs of stress, such as cold exposure, heat stress, and fatigue.

(7) Conducts periodic inspections to determine if the site HSP is being followed.

(8) Enforces the "buddy" system.

(9) Implements a contingency plan, if necessary.

(10) Ensures that all required H & S equipment is available.

(11) Advises medical personnel of potential exposures and consequences.

G. All Employees:

(1) Will be familiar with and comply with proper H & S practices.

(2) Will use the required safety devices and proper personal protective safety equipment.

(3) Will notify supervisor/SSO/PM immediately of unsafe conditions/acts, incidents, near misses and injuries after ensuring that no one will be injured while notifying the supervisor.

(4) Will inform his/her supervisor if they are uncertain how to conduct a task in a safe manner.

(5) Will assist supervisors/management in all efforts to provide and maintain a safe workplace.

6.0 Workers' Compensation Claims Management:

A. The following actions will be taken/followed on all accidents/injuries being submitted as a Workers' Compensation claim.

(1) Injured employees must report their injury to their supervisor immediately (within one working day - 24 hours for one employee, and within eight hours if more than two employees injured), who in turn will notify other appropriate Company officials, such as the Health and Safety Director or Human Resources Manager.

(2) All injuries/incidents will be investigated by the Corporate H&S Director or supervisor to determine the facts and take corrective actions to prevent future recurrences.

B. Employees, within ten (10) days after notification to the employer, will complete the necessary portions of Company workers compensation carrier Injury Report Form.

C. The supervisor or Human Resources Manager will complete the Employer's Information section of the same report within ten days of the notification and will file the claim with the Division of Workers Compensation.

D. The Human Resources Manager will ensure that the Workers' Safety and Compensation Division is notified as appropriate by filing the above report within ten days of the notification.

E. The accident investigation must confirm that the injury was job related for the resultant claim to be valid.

F. Injured employees will be entered into a modified job program, when such is recommended by the attending physician and MJVD can accommodate the particular restrictions. The injured employee's supervisor will be informed of said restrictions and ensure they are maintained until the employee is released to full duty by the physician.

7.0 OSHA Form 300 Injury/illness Log:

A. The OSHA Form 300 injury/illness log of all recordable occupational injuries and illnesses is maintained in the main office by the Corporate H&S Director.

B. The summary section of the OSHA Form 300 must be posted at each work office by February 1st of the following year and remain in place until April 30th.

8.0 General Corporation Safety Guidelines:

A. The general safety rules and procedures listed below are for <u>your protection</u> and are provided so that you can work without injury because you will <u>know</u> how to work safely.

(1) Employees shall use tools that are suitable for the task and are in good repair.
- (a) Tools should only be used for the task they were intended to perform.
- (b) Any broken or damaged tool shall not be used until it is repaired or replaced.
  - (I) For example, don't use hammers with broken handles or chisels with mushroomed heads.
- (c) Proper handles will be fitted to tools where required.

(2) Hand cleaner and paper towels or rags shall be made available.
- (a) Wash hands or other affected areas as soon as possible, should they come in contact with any hazardous substance.
- (b) Insure that hands are clean before eating, drinking or smoking.
- (c) Avoid making unnecessary facial contact with your hands face while handling hazardous materials.

(3) Getting on or off any equipment while it is in motion is prohibited.

(4) Under no circumstances shall any person be permitted to ride with arms or legs outside of a truck body, in a standing position on the body, on running boards, or seated on side fenders, cab shield, on in the rear of the truck.

(5) Horseplay, scuffling, or dangerous practical jokes are forbidden on the job.

(6) The practice of throwing tools from one location to another, from one employee to another, or dropping them to lower levels shall not be permitted.

(7) Sharp edged or pointed tools shall not be carried in employee's pockets.

(8) There is no job that requires running - WALK - DON'T RUN

(9) Any employee found intoxicated or under the influence of drugs, with alcoholic beverage or illegal chemical substances in their possession while on duty will be subject to dismissal.

(10) Gambling is prohibited while on the job

9.0 Code of Safe Practices - For posting on all jobsites

Code of Safe Practices

1. All persons shall follow these safe practice rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the foreman or superintendent.
2. Foremen shall insist on employees observing and obeying every rule, regulation, and order as is necessary to the safe conduct of the work, and shall take such action as is necessary to obtain observance.
3. All employees shall be given frequent accident prevention instructions. Instructions shall be given at least every 10 working days.
4. Anyone known to be under the influence of drugs or intoxicating substances that impair the employee's ability to safely perform the assigned duties shall not be allowed on the job while in that condition.
5. Horseplay, scuffling, and other acts that tend to have an adverse influence on the safety or well-being of the employees shall be prohibited.
6. Work shall be well planned and supervised to prevent injuries in the handling of materials and in working together with equipment.
7. No one shall knowingly be permitted or required to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might unnecessarily expose the employee or others to injury.
8. Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined that is safe to enter.
9. Employees shall be instructed to ensure that all guards and other protective devices are in proper places and adjusted, and shall report deficiencies promptly to the foreman or superintendent.
10. Crowding or pushing when boarding or leaving any vehicle or other conveyance shall be prohibited.
11. Workers shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties, unless they have received instructions from their foreman.

12. All injuries shall be reported promptly to the foreman or superintendent so that arrangements can be made for medical or first aid treatment.

13. When lifting heavy objects, the large muscles of the leg instead of the smaller muscles of the back shall be used.

14. Inappropriate footwear or shoes with thin or badly worn soles shall not be worn.

15. Materials, tools, or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects.

10.0 Safety Committee

It is a requirement that all employees participate in the Company safety committee.

Participation is defined as:

- Perform worksite inspections at least daily.
- Document worksite inspection results in daily reports.
- Photograph and correct safety concerns.
- Utilize email to disseminate safety inspection information to superintendents, project managers and the H&S Director.
- Participate in safety inspections conducted by the Company.
- Attend quarterly safety committee meetings to discuss results of periodic inspections.

Quarterly safety committee meetings will require the attendance of one representative from each Company office. It is the individual employees responsibility to ensure that they make themselves available to attend the scheduled meetings.

Results of safety committee meetings will be made available via email to those employees that are unable to attend the scheduled meetings.

The H&S Director will solicit results from committee members at regular intervals for presentation during safety committee meetings.

Safety Committee Duties & Responsibilities

- Review results of worksite inspections
- Review accident investigation and submit suggestions for accident prevention measures
- If hazardous conditions are presented, investigate and suggest remedial solutions
- Maintain written records of all safety & health issues that the committee discusses
- Be available to process all employee safety suggestions

11.0 Hazard Correction

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based upon the severity of the hazards. Hazards shall be corrected according to the following procedures:

1. When observed or discovered;

2. When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
3. All such actions taken and dates they are completed shall be documented on the appropriate hazard assessment form and/or JSA.

12.0 Training and Instruction

All employees shall receive training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows;

- Upon hiring – Short Service Employee
- Workers assigned to new duties within the company
- Whenever new substances, processes, procedures, or equipment are introduced to the workplace
- Whenever a new hazard is discovered
- All workers with respect to the hazards relative to their job assignment

13.0 Short Service Employee

- An employee is generally considered a "short service employee" if he/she has less than 90 days experience with MJVD, or in his/her present role.
- A "short service employee" may not work alone. A work crew of less than 5 employees may NOT have more than one "short service employee".
- Prior to starting a project it is the responsibility of MJVD's Site Foreman to notify the client's site coordinator for the project that there is a "short service employee" working on the site.
- "Short service employees" will be visibly identifiable by the use of an "orange" vest with a badge indicating "training". MJVD's Site Foreman will make the client aware as to how they are able to identify these employees.
- Per the previous procedures under "training" the "short service employee" will be monitored and mentored. When they have attained the correct knowledge of not only the equipment but also the HASP and general operating procedures/safety measures the hi-visibility identifiers will be removed, the client will be notified and documentation will be sent to the office for files.
- A person mentoring may only have one Short-Service employee assigned to their crew at a time and they must remain on site with them at all times.
- Subcontractors must manage their "short service employees" in accordance with the requirements of the MJVD's "short service employee" procedures.
- A short service employee who is involved in an incident within the first 30 days of employment may be terminated. The "supervisor" of a short service employee requiring termination may have a "reprimand" submitted to their personnel file and may serve one day off from their current project. While on the day off the employee will spend the time taking refresher courses for any/all activities that were involved in the incident.
- A "supervisor" who has received a "reprimand" may not serve as a supervisor to a short service employee for at least 30 days after an incident.

1.0 Policy:

A. The following document is to provide guidance in investigating all accidents and/or incidents occurring on our job sites.

B. It will pertain to employee related accidents, injuries to third parties, property damage and vehicle related accidents.

C. This document also serves as a guide in training personnel in the duties and responsibilities required to perform incident investigation as well as the necessary techniques required to complete.

2.0 Purpose:

A. Accident and incident investigations help control accidents and related costs by documenting exactly what occurred and identifying what can be done to prevent a reoccurrence.

(1) A good investigation documents the circumstances at the time of the accident and can help the persons involved accurately recall the situation several years after the occurrence.

(2) This can be extremely helpful in defending a lawsuit or fraudulent claim.

B. A good investigation identifies the causes and allows the supervisor to take steps to prevent the same accident from happening again.

(1) Accident reduction helps improve efficiency and profitability by reducing lost time, work interruption, equipment repairs and the other indirect costs associated with employee accidents.

C. Accident investigations should be conducted for employee accidents as well as those injuries involving subcontractors or the public.

(1) All incidents of a serious nature should also be investigated.

D. Accidents are usually the result of conditions or actions that the superintendent, foreman, and employees are often in the best position to control.

(1) An accident is an unplanned event that interrupts operations and can result in lost time, property damage, or bodily injury.

(2) Accidents usually arise from problems in at least one of four areas:
* EQUIPMENT - Tools, Machinery, Vehicles, Cords, Ladders
* MATERIAL - Solvents, Adhesives, Compressed gases, Lubricants
* PEOPLE - Our Employees, Subcontractors, Anyone who may contribute or cause the accident
* ENVIRONMENT - Temperature, Ventilation, Noise, Rain, Snow, Dust, etc.

3.0 Definitions:

Incidents - are unsafe practices or conditions that have not yet resulted in an accident or loss but could unless corrective steps are taken. Investigations are conducted before the fact and/or before an injury occurs to identify and correct any unsafe practices that could lead to an accident.

Accidents - are persons, objects or energy out of control. Investigations are conducted after the fact and/or after the injury/loss have occurred. The purpose is to identify the causes so similar accidents can be prevented**.**

4.0 Procedures:

A. Accident and incident investigations follow basically the same procedures.

(1) An investigation is a report of the facts, causes and contributing factors that lead to the accident/incident and an action plan for correcting the problem.

B. Situations that should be investigated are those that have resulted in a serious or disabling injury, minor injuries, property damage and near miss incidents.

(1) These investigations could involve employee injuries (Workers Compensation), injuries to subcontractor employees, to general public or customers (Liability), or damage to vehicle and equipment (Property).

C. The investigation should include several key steps:

(1) Notice of the event -
- (a) The injured person or fellow workers usually notify the superintendent or foreman. The superintendent or foreman must insist that all accidents be reported immediately.
- (b) There may be some reluctance to report accidents due to fear of discipline, paper work or concern that they will spoil their record.
- (c) Superintendents and foreman must keep the process simple as possible and explain the importance of accident reporting, investigation and prevention.

(2) Go to the Scene Immediately -
- (a) Failure to respond right away prevents proper management of the accident scene and could result in a poor and inaccurate investigation.
- (b) Always, the first task is to attend to the injured and provide first aid/medical attention.
- (c) If possible, the Employees Report of Injury should be filed while the situation is still fresh.
- (d) Witness statements are to be obtained as soon as possible and the supervisor needs to emphasize fact-finding rather than fault finding.
- (e) Gather facts from all available sources avoiding hasty conclusions until all facts are considered.

(3) Photographs-
- (a) For accidents involving serious injury or substantial property loss, physical conditions may be photographed from different angles to further confirm what was found.
- (b) Several photos should be taken of a general view showing the relationship of the accident to surrounding equipment or articles.
- (c) Articles that have a direct relationship to the accident should be photographed with a ruler or some other reference alongside to show size of the object.

(d) Basic information should be included on the back of each photo as follows:
  (I) Data identifying the particular accident
  (II) Data identifying who took the photo, the date and time
  (III) Data to orient the camera position with the accident scene
(e) Posed photographs can also be used to illustrate or refute the statement of a witness or accident victim.
(f) A person with the same general, physical characteristics of the injury party can be placed in the same spot and position as directed by the witness.
(g) Mark important aspects on the photo.

(4) Interview Witnesses -
(a) Witnesses should be interviewed separately and as soon as possible to get an unbiased version of what happened.
(b) Superintendents/foreman should conduct the interview in private and try to put the witness at ease.
(c) Basic questions to be asked include:
  (I) What was the injured doing?
  (II) What unsafe actions (by injured or others) were observed?
  (III) Were there any unsafe conditions?
  (IV) How could the accident have been prevented?
(d) The superintendent/foreman should ask the witness to verbally and visually walk him through the accident.
(e) The story should be told back to the witness to ensure the accuracy of the statement and all facts should be recorded so they are not lost or forgotten.
(f) Thank the witness for their help.
(g) Remember to get the facts not conclusions.

(5) Review the Facts -
(a) Examine all the accident elements:
  (I) Equipment - Maintained, proper for the job, properly used
  (II) Material - Correct for the job, stored and handled properly
  (III) People - How many, enough to do job, properly trained
  (VI) Environment - Did work area contribute or cause accident
  (V) Records should be checked to see if this has occurred before, including any maintenance records if equipment was involved.

(6) Determine Accident Causes -
(a) Be thorough and systematic to ensure accuracy.
(b) System or procedure flaws are commonly the cause of accidents.
(c) The investigation should identify causes or factors that lead to the system failure:

5.0 IMMEDIATE ACCIDENT CAUSES

A. Unsafe Acts -

(1) Are involved in about 90% of all accidents and may be committed by the injured, management or others.

(2) Unsafe acts may be committed deliberately, unknowingly or may result from uncontrollable means.

(3) Unsafe acts are usually short in duration, don't happen continually and have reasons that vary from employee to employee, job to job.

(4) People commit unsafe acts for several reasons including incentives (get it done with a short cut), poor work habits, lack of knowledge and physical or mental impairments (fatigue, medication).

(5) Common unsafe acts include removing safety devices, using unsafe equipment, working at an unsafe speed and horseplay.

B. Unsafe Conditions -

(1) Are involved in about 10% of all accidents and can be associated with hazards caused by people, equipment or processes either directly or indirectly.

(2) Common causes of unsafe conditions include unsafe acts where people create an unsafe situation, normal wear and tear, poor product or equipment design, and by-products such as steam, smoke, vapors or lights.

(3) Unsafe conditions tend to remain until they cause a problem or an accident and, unless corrected, remain that way.

(4) Common unsafe conditions include missing or broken guards, unexpected movement of equipment or materials, poor housekeeping, defective tools and hazardous attire - loose clothing, jewelry, long hair, and improper footwear.

C. Other Accident Causes

(1) Job Factors -
- (a) Involve poor indoctrination,
- (b) Inadequate training,
- (c) No training follow-up,
- (d) Failure to follow safety rules,
- (e) Communication breakdown,
- (f) Lack of material handling equipment.

(2) Personal Factors -
- (a) Involve poor morale caused by job change,
- (b) Drinking,
- (c) Drugs,
- (d) Fatigue or stress

6.0 Corrective Action -

A. Once the immediate and basic accident causes are identified, determine what corrective measures will be taken to prevent a recurrence.

B. Corrective actions generally fall into three categories:

(1) Physical Change -
- (a) The most effective type of corrective measure when it can be used.
- (b) Generally, it is easier to replace or repair the broken equipment than to train all employees to avoid the hazard.

(2) Procedural Change -

(a) How certain jobs or tasks are done followed by employee training and enforcement.

(3) Retrain the Injured Employee -
(a) All employees who may be exposed to the same hazard condition or situation.

7.0 Reports to Management -

A. All appropriate investigation and report forms must be filled out completely and accurately by the superintendent/foreman.

(1) These reports will include facts, the conclusions as a result of the investigation and what corrective action will be taken.

(2) Reports should be written so that someone unfamiliar with the situation can understand it. Readers may include claims adjusters, consultants, OSHA and attorneys.

(3) The superintendent/foreman may be called upon to recall the details of the accident several years after it occurred.

(4) Therefore, it is best to develop as accurate and detailed a report as possible.

B. Be sure to cover the four basic parts:

(1) Identification of the accident - WHO, WHEN, WHERE

(2) Description of the accident - WHAT, HOW

(3) Cause of the accident - WHY

(4) Corrective action measures/remedy

C. All reports should be completed within 24 hours of the occurrence and any additional information added as soon as possible.

8.0 Follow-up and Prevention -

A. The final step in the accident investigation process involves using the information collected and preventing additional accidents.

B. In an ongoing effort the supervisor should:

(1) Communicate the action taken so other employees learn

(2) Ask for support from employees and others who may be able to help.

(3) Review past reports to see if corrective measures were implemented

(4) Conduct inspections and safety talks to implement corrective measures, raise safety awareness and help prevent accident recurrence.

(5) Correct unsafe acts and unsafe conditions as soon as they are noted.
(a) The supervisor sets the example.
(b) The less hazards are tolerated by the supervisor, the fewer hazards and claims he will have to deal with in the future.

(c) Employees will understand that unsafe acts or conditions violate company policy and that compliance with safe work rules and practices is mandatory.(6)Monitor work procedures and employees to be sure the corrective action is effective and if not, what is.

C. Control human error by stopping incorrect methods or procedures, find alternative ways of getting the job done, and provide necessary training to correct the problem, train all employees doing the same job and enforce procedures to ensure compliance.

D. Eliminate hazardous conditions by removing, guarding or warning about them or recommend policies and procedures to help eliminate them.

(1) Follow-up is essential to ensure that hazardous conditions do not reoccur.

9.0 General Liability Accidents:

A. General liability accidents require special handling.

B. Unless they are handled properly, they may result in a lawsuit.

(1) The potential financial loss is much greater than employee accidents.

(2) Injured parties will tend to rely on the legal system to resolve a claim, particularly when you or the claims adjuster fail, or appear to fail, to respond in what they consider a prompt and fair manner.

(3) In addition to supervisors who are aware of a liability claim situation should adhere to the following general procedures:
- (a) Never admit to guilt or company wrong-doing.
  - (I) A sympathetic or reassuring statement made at an accident scene could cause serious damage in court.
  - (II) Let the court determine who is at fault.
- (b) Prompt notification of the accident is essential.
  - (I) This should be a joint effort by all employees and supervisors.
  - (II) An expensive claim and lawsuit can best be avoided by prompt investigation, claims handling and settlement.
  - (III) This does not mean every liability situation will result in a claim, but prompt investigation confirming or refuting company responsibility is critical and will determine what approach will be taken to handle the situation.
- (c) Statements should be obtained from the injured parties as soon as possible.
  - (I) These should be detailed and provide a full description of the apparent injuries or damage.
  - (II) If possible, these statements should be taken in the presence of another, third person who could be used to corroborate what was said.

(4) Witness statements should be obtained from both employees and the public, if available.
- (a) The full name, address and telephone number of each witness should be obtained.

(5) Photographs should be taken of accident scene elements, particularly those that reflect favorably on the company.
- (a) This might include shots of the scene that clearly show there was no hazard.

C. Follow-up activities should include contact with the injured parties to show concern and interest in their recovery.

(1) This must be handled carefully, sometime at the direction of legal counsel.

(2) The purpose of the contact is to reassure the injured party that you are not ignoring their situation and, by so doing, help diffuse any anger that might prompt them to retain an attorney.

D. Prompt communication is essential and the supervisor should keep management up-to-date on any new developments.

10.0 Accident Reporting:

A. Forms needed by the office

(1) Supervisors report of injury

(2) Employees report of injury

(3) Release for return to work

(4) Light duty status report

(5) All medical bills and reports

B. Procedures

(1) Instruct all employees to notify their supervisor immediately when an accident or incident occurs.

(2) Get the necessary First Aid or Medical attention for the injured employee.

(3) Assemble the necessary tools and equipment needed to perform a thorough inspection.

(4) Go to the accident scene and fill out the Supervisors Report of Injury or Illness neatly and completely.
(a) Be specific about the accident or incident.
(b) We need to know **WHO, WHAT, WHERE, WHAT HAPPENED, HOW IT HAPPENED AND WHY IT HAPPENED.**
(c) Reports need to be made within 24 hours of the accident.

(5) Inform the office the same day of the accident

(6) Have the injured employee fill out the Employees Report of Injury the same day or as soon as possible.
(a) Be specific and give full detail of what happened and what the apparent injury is.

C. Determine what hazard in the work area caused the accident and be sure to correct it as soon as possible.

(1) Have workers out of the area until the hazard is eliminated.

D. Report to the office any site related incident that would involve the company.

E. No employee will return to work without a work release form.

(1) This can be faxed to the office and the original given to the site supervisor.

F. In case of a serious injury or death, contact the home (corporate) office immediately.

11.0 Corporate Accident & Injury Investigation, Reporting, and Recordkeeping Procedures:

A. It will be the responsibility of the Corporate Safety Director to investigate and make a written report for all job related injuries/illnesses as well as vehicle accidents involving company owned, leased or rented vehicles.

B. Employees injured on the job or involved in a vehicle accident will contact the Corporate Safety Director as soon as possible.

(1) Report injuries and illnesses using the "Incident Report" found in Tab 4 following this section.

(2) Report "Near Misses" using the "Incident Report" found in Tab 4 following this section.

C. The Corporate Safety Director will be responsible for maintaining the OSHA 300 form for the company.

(1) This form will be kept on record for a period of five years.

(2) Injuries/illnesses that are recordable by OSHA standards result in:
(a) A fatality
(b) Lost work days
(c) Transfer to another job or restricted duties
(d) Require medical treatment

D. Examples of medical treatment, as defined by OSHA standards, are:

(1) Treatment of second or third degree burns,

(2) Treatment for infections,

(3) Application of sutures or butterfly bandages,

(4) Removal of a foreign body from the eye,

(5) Prescription medication,

(6) Admission to a hospital,

(7) Back injuries, etc.

E. The Manager of the injured employee must complete the "First Report of Injury and inform the Corporate Safety Director when an injured employee returns to work if off longer than one day.

F. Employees injured on the job, or involved in a vehicle accident, will be subject to a substance abuse screen.

(1) Those employees testing positive will be disciplined in accordance with the Company's Substance Abuse policy.

G. In addition to the reporting required by law (see below), we will report all cases involving "First Aid" and all "Near Misses" (blank form included).

Reporting required by OSHA:

Within eight (8) hours after the death of any employee as a result of a work-related incident,

Within twenty-four (24) hours after the in-patient hospitalization of one or more employees or an employee's amputation or an employee's loss of an eye, as a result of a work-related incident.

Reporting required by Client:

Within twenty-four (24) hours after the death of any employee as a result of a work-related incident,

Within twenty-four (24) hours after the in-patient hospitalization of one or more employees or an employee's amputation or an employee's loss of an eye, as a result of a work-related incident.

H. The Safety Committee will review all cases to determine the root cause and will take the appropriate corrective actions, including revision of protocols and/or retraining of employees.

MJ VanDamme, Inc.

Hazard/Near Miss/Incident Initial Report

FORM

Date:	**Document Number:**	**Version:** 1

Risk = ***Consequence*** x ***Likelihood***

An uncertain event or condition that if it occurs will have an impact upon the achievement of objectives (both upside and downside).

The impact of an event, being a loss, harm, disadvantage or gain.

(NB: ALWAYS ASSESS CONSEQUENCE FIRST)

A qualitative description of probability or frequency.

DATE OF OCCUI			
☐ Mine			
Work Area:		**Company Represented:**	
Location Description:		**Date Reported:**	
Person(s) Involved In Incident or Injured Person		(add second sheet if more than three people)	
Name(s):			
Company:		**Occupation:**	**Gender:** ☐**Male** ☐**Female**
Shift Length: ☐ 8hrs ☐ 10hrs ☐ 12hrs ☐ Other		**Shift Type:** ☐**Day** ☐**Night**	**Start Time:**
Roster Type (i.e. 5 on/2 off):		**Days into Roster:**	**Total time on Project:**
Supervisor Name:			☐ **<1 Month** ☐ **1-3 Months** ☐ **4Mths-1yr** ☐ **>1 Year**

DESCRIPTION	**Please provide a summary of the near miss/hit or incident.**
What was the outcome?	☐ Near Miss/Hit ☐ First Aid ☐ Medical Treatment ☐ Lost Time Incident
What impact/s did it have?	☐ Health ☐ Safety ☐ Environment ☐ Property Damage
Rate the risk using the below 5x5 risk matrix.	☐ Low ☐ Moderate ☐ High ☐ Critical
What Happened: Please provide a summary of the incident (i.e. Person slipped while walking downstairs, falling and injuring wrist).	
How Did it Happen: Please describe (i.e. fell from scaffold, hit by falling object, electric shock)	
Why Did it Happen Please describe why it happened (i.e. operator could not hear alarm, walk way slippery)	
Immediate actions:	

Environmental Incident	
Type of Incident: ☐ Spill ☐ Air Quality ☐ Water Quality ☐ Land Quality ☐ Wildlife ☐ Solid or Hazardous Waste	
Involved Material:	
Estimated Quantity (gallons, cubic yards, acres, etc.):	
Spilled onto/into:	**Contained?** ☐ Yes ☐ No

	Consequence				
Likelihood	1 - Minor	2 - Medium	3 - Serious	4 - Major	5 - Catastrophic
A - Almost Certain	Moderate	High	Critical	Critical	Critical
B - Likely	Moderate	High	High	Critical	Critical
C - Possible	Low	Moderate	High	Critical	Critical
D - Unlikely	Low	Low	Moderate	High*	Critical
E - Rare	Low	Low	Moderate	High*	High*

Likelihood	Likelihood description	Frequency	Substance Exposure
ALMOST CERTAIN	Recurring event during the life-time of an operation/project.	Occurs more than twice per year.	Frequent (daily) exposure at > 10 x OEL.
LIKELY	Event that may occur frequently during the life-time of an operation/ project.	Typically occurs once or twice per year.	Frequent (daily) exposure at > OEL.
POSSIBLE	Event that may occur during the life-time of an operation/project.	Typically occurs in 1-10 years.	Frequent (daily) exposure at > 50% of OEL. Infrequent exposure at > OEL.
UNLIKELY	Event that is unlikely to occur during the life-time of an operation/project.	Typically occurs in 10-100 years.	Frequent (daily) exposure at > 10% of OEL. Infrequent exposure at > 50% of OEL.
RARE	Event that is very unlikely to occur very during the life-time of an operation/project.	Greater than 100 year event.	Frequent (daily) exposure at < 10% of OEL. Infrequent exposure at > 10% of OEL.

Consequence	MINOR	MEDIUM	SERIOUS	MAJOR	CATASTROPHIC
Non-Economic (Social and Environmental)					
HEALTH	Reversible health effects of little concern, requiring first aid treatment at most. Can include minor irritations of eyes, throat, nose and or skin, or minor unaccustomed muscular discomfort.	Reversible health effects of concern that would typically result in medical treatment. Can include temperature effects; travel effects; stress; and sunburn.	Severe, reversible health effects of concern that would typically result in a lost time illness. Can include acute/short-term effects associated with extreme temperature effects, or musculoskeletal effects, vibration effects, nervous system effects, some infectious diseases; and non falciparum malaria.	Single fatality or irreversible health effects or disabling illness. Can include effects of suspected carcinogens, mutagens, teratogens and reproductive toxicants, progressive chronic conditions and/ or acute/short-term high-risk effects.	Multiple fatalities or serious disabling illness to multiple people. Can include effects of known human carcinogens, mutagens, teratogens and reproductive toxicants, and life-threatening respiratory sensitization and falciparum malaria.
SAFETY	Low level short term subjective inconvenience or symptoms. Typically a first aid and no medical treatment.	Reversible injuries requiring treatment, but does not lead to restricted duties. Typically a medical treatment.	Reversible injury or moderate irreversible damage or impairment to one or more persons. Typically a lost time injury.	Single fatality and/or severe irreversible damage or severe impairment to one or more persons.	Multiple fatalities or permanent damage to multiple people.
ENVIRONMENT (on site)	Near-source confined and promptly reversible impact (typically a shift).	Near-source confined and short-term reversible impact (typically a week).	Near-source confined and medium-term recovery impact (typically a month).	Impact that is unconfined and requiring long-term recovery, leaving residual damage (typically years).	Impact that is widespread-unconfined and requiring long-term recovery, leaving major residual damage (typically years).
ENVIRONMENT (off site)	Not applicable.	Near-source confined and promptly reversible impact (typically a shift).	Near-source confined and short-term reversible impact (typically a week).	Near-source confined and medium-term recovery impact (typically a month).	Impact that is unconfined and requiring long-term recovery, leaving residual damage (typically years).

Incident Witness Statement

PROJECT: _____ LOCATION: _____

PRINT NAME: _____ SIGNATURE: _____

DATE OF INCIDENT: _____ DATE OF STATEMENT: _____
(Day/month/year) **(Day/month/year)**

Multipurpose Interaction

PROJECT:_____ LOCATION: _____

PRINT NAME:_____ SIGNATURE:_____

DATE/INTERACTION:_____ DATE/SUBMITTED:_____
(Day/month/year) **(Day/month/year)**

Job Safety Analysis Worksheet	Date:
Job/Operation:	Contractor Name:
Prepared By: Name	Job Title:
Approved By: Name	Job Title:
Personal Protective Equipment Recommended or Required:	

Basic Job Steps	Potential Accidents or Hazards	Recommended Safe Work Procedures
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MJ VanDamme Trucking, Inc.
Bloodborne Pathogens
In accordance with 29 CFR 1910.1030

1.0 Policy:

A. In compliance with OSHA and as a dimension of the Company's Health and Safety Program, employees must comprehend the danger and risks associated with bloodborne pathogens.

B. Understanding the procedures and actions that one must follow will greatly reduce the risk of infection as well as death.

2.0 Definitions:

Bloodborne pathogen: Any pathogenic organism in human blood that can cause disease in humans

HBV: Hepatitis B Virus; which is a virus that infects the liver. It is acquired by the exchange of infected blood and saliva.

HIV: AIDS is caused by the HIV virus, which attacks the body's immune system, destroying your defenses against infection. It is spread when there is an exchange of infected blood and saliva.

Blood: The term human blood components include plasma, platelets, and serosanguineous fluids. An example would be drainage from wounds.

Exposure: The act of condition of coming in contact with, but not necessarily being infected by, a disease causing agent.

Exposure Control Plan: The control plan is the key to the entire standard. It defines which employees are covered by the standard and includes a description of how each requirement of the standard will be accomplished. Coverage under the standard extends to all employees at potential risk of occupational exposure to blood or other infectious material.

Universal Precautions: Concept of infection control which requires that all human blood and other potentially infectious material be treated as if known to be infectious for blood borne pathogens, regardless of perceived allowed risk of a patient or patient population.

Engineering Controls: The mechanical means of eliminating or minimizing employee exposure.

Work Practice Controls: Methods of reducing exposure by changing the way a task is performed. A significant work practice control with respect to reducing exposure is hand washing.

Personal Protective Equipment: The third means of eliminating exposure (after work practice controls). It must be chosen based on anticipated exposure.

Body Substance Isolation: Defines all body fluids and substances as infectious. It incorporates not only the fluids and materials covered by OSHA but expands coverage to include all body fluids and substances.

3.0 Exposure Determinations:

A. Under the OSHA Bloodborne Pathogens standard, A Good Samaritan acts such as an employee assisting a fellow employee or other individual with an injury (e.g. nose bleed) are not covered.

B. In addition, those employees who receive first aid training but are not required to provide first aid as part of their job tasks are not covered.

C. The following list represents activities where employees may have occupational exposure.

(1) NONE

Note: Each field supervisor shall identify additional job classifications relative to their specific organizational structure and operations.

D. Exposure determination will be made without regards to the use of personal protective equipment.

4.0 Methods of Compliance:

The following practices and procedures will be implemented at the company job sites to minimize or eliminate occupational exposures to job classifications listed above.

A. Universal Precautions

(1) The concept of universal precautions requires us to require our employees to assume all human blood and specified human body fluids are potentially infectious for HIV, HBV and other bloodborne pathogens.

(2) Consequently, employees should avoid any unnecessary exposure to blood or other specified bodily fluids at all times.

B. Engineering and Work Practice Controls

(1) Engineering controls reduce or eliminate employee's exposures by either removing or isolating the hazard or worker from exposure.

(2) The following engineering and work practice controls shall be implemented and enforced:
- (a) Employees with lesions, dermatitis or other compromising conditions shall take extra precaution to avoid direct contact with blood or other infectious materials.
- (b) Eating, drinking, smoking or handling contact lenses are prohibited in area where there is a reasonable likelihood of occupational exposure.
- (c) Employees will wash their hands and skin with soap and water immediately or as soon as possible following contact with blood or other potentially infectious materials.
- (d) Where hand washing facilities are not available, antiseptic hand cleaners or towelettes along with a clean cloth or paper towel should be available.
- (e) Employees should proceed to wash hands or skin with soap and water once available.
- (f) Employees will flush mucous membranes (eyes, nose, mouth) with water immediately or as soon as possible following contact with blood or other potentially infectious materials.

(g) All first aid or other procedures involving blood or other potentially infectious materials will be performed in a manner that minimizes splashing or splattering of these substances.

(h) Contaminated needles or other contaminated sharps will not be bent, recapped or removed.

(i) All contaminated sharps will be placed in specified containers.

(j) All broken glass will be deposited in a specified puncture resistant container to avoid accidents (cuts) during storage and disposal.

(k) Mechanical means (i.e., broom and dust pan) should be used to clean up all broken glassware.

(l) Equipment or surfaces which have been contaminated with blood or other potentially infectious materials should be decontaminated as soon as possible.

(3) After each incident and at least monthly engineering controls will be examined and maintained to ensure effectiveness.

5.0 Personal Protective Equipment:

A. Personal protective equipment is used if occupational exposure remains after implementation of engineering and work practice controls, or if these controls are not feasible.

B. PPE is considered appropriate only if it does not permit blood or other potentially infectious materials to pass through the employee's clothes or come in contact with their skin, eyes, mouth or other mucous membranes under normal working conditions.

C. PPE shall be provided at no cost to the employee in appropriate sizes and be readily available.

D. The following PPE and practices shall be implemented:

(1) Gloves will be worn by the employee when contact with blood or other potentially infectious material is likely.

(2) Disposable gloves will be replaced as soon as practical when visibly contaminated, torn, and punctured.

(3) Disposable gloves will not be re-washed or decontaminated for re-use.

(4) Utility gloves may be decontaminated for re-use if the integrity of the gloves are not compromised (torn, cracked, and deteriorated).

(5) Hands should be washed with soap and water upon removal of gloves.

(6) Masks or protective eyewear (prescription glasses require side shields) will be worn when performing procedures that are likely to spray or splash blood or other potentially infectious materials.

(7) Protective body clothing (gown, overalls) will be worn by employees when performing procedures likely to generate splashes of blood or bodily fluids.

(8) All employees with occupational exposures should replace blood-contaminated or soiled clothing with clean clothing as soon as possible.

(9) Skin which has come in contact with blood or other potentially infectious materials should be washed with soap and water as soon as possible.

(10) Resuscitation bags or masks shall be made available to those responsible for providing cardiopulmonary resuscitation (CPR).

(11) Personal protective equipment should be removed prior to leaving the work area.

(12) Cleaning, repair, replacement or disposal of personal protective equipment will be provided at no cost to the employee.

Note: The employee may temporarily decline the use of personal protective equipment when they use their judgment that its use would have prevented delivery of health care of it would have posed a greater safety hazard to the employee.

6.0 Housekeeping Practices:

A. The job supervisor is responsible for maintaining a clean and sanitary environment.

B. Actual types of cleaning and cleaning schedules vary relative to location, site activities and types of surfaces.

C. The following are general housekeeping practices to be implemented when applicable.

(1) All equipment and environmental/working surfaces shall be cleaned and decontaminated after contact with blood or other potentially infectious materials as soon as possible.

(2) Special cleaning procedures can be provided by the corporate health and safety officer. Sodium hypoclorite (household bleach) solution in water (1:10 dilution) can also be used on most surfaces excluding metal and cloth.

(3) Reusable items which become contaminated during the cleaning process shall be properly decontaminated before putting them back into service.

(4) Protective coverings which become contaminated shall be properly disposed of and replaced with a new, clean cover.

(5) Any receptacles intended for re-use will be decontaminated on a regular basis or if visibly contaminated.

(6) Broken glassware shall be cleaned up using mechanical mean (i.e. brush and dust pan).

(7) Contaminated sharps or needles shall be stored in a closeable, puncture resistant container.

(8) Employees shall never reach their hands directly into the container.

7.0 Hepatitis B Vaccination:

A. The OSHA Bloodborne Pathogens standard requires that employees who are required to provide first aid as a primary part of their job description, be offered the hepatitis B vaccine and vaccination series.

(1) This includes initial vaccination post exposure evaluations and the potential need for a routine booster dose(s) if required.

(2) The standard does not require the vaccination be offer to other employees who are required to provide first aid as a collateral duty (those employees where first aid is not a primary job task assigned) relative to their overall job tasks.

(3) If an employee is subject to a job site which would require that the hepatitis shot be administered, it shall be provided to the employee at no cost.

(4) The following procedures will be implemented:
- (a) Specified employees who have occupational exposure will be provided, at no cost, the hepatitis B vaccine and vaccination series, as well as post-exposure evaluation and follow-up procedures.
- (b) Actual vaccination and follow-up procedures shall be performed under the supervision of a licensed physician or other licensed health care professional and provided in accordance with the recommendations of the U.S. Public Health Service.
- (c) The health care professional will be provided with a copy of the Blood borne Pathogens standard (29 CFR 1910.1030).

Note: The hepatitis B vaccination is not required if the employee has previously received the complete hepatitis B vaccination series and antibody testing reveals the employee is immune or the vaccine is inadvisable for medical reasons. A hepatitis B pre-screening program will not be a prerequisite for receiving the vaccination.

B. The hepatitis B vaccination will be available to specified employees within ten working days of initial assignment.

(1) Each employee receiving the vaccination must be informed on the following:
- (a) Efficacy of the vaccine
- (b) Safety of the vaccine
- (c) Method of administration
- (d) Benefits associated with the vaccine
- (e) Acknowledgment of free vaccine and vaccination

(2) An employee who initially declined the hepatitis B vaccination will be allowed to receive the vaccination at a later time.
- (a) All employees who decline the hepatitis B vaccination made available will be required to sign the Employee Hepatitis B Vaccine Declination form.
- (b) The company will offer the hepatitis B vaccination to all unvaccinated employees required to provide first aid as a collateral duty who have rendered first aid in any situation involving the presence of blood or other potentially infectious materials (regardless of whether an actual exposure incident occurred).
- (c) The vaccination should be made available as soon as possible, but in no event later than 24 hours.

8.0 Regulated Waste Management:

A. The following procedures will be implemented to comply with federal and state requirements for regulated infectious wastes.

(1) Containment
- (a) All regulated waste (blood or contaminated items) will be placed in containers that prevent any leakage during the collection, handling, process, storage, transport or shipping.
- (b) A secondary container will be used if outside contamination of the primary container occurs.
- (c) If waste items can puncture the primary container, the primary container will be placed within a secondary container, which is puncture resistant.
- (d) Contaminated sharps and needles will be immediately discarded in a closeable, puncture-resistant, leak-proof container.
- (e) The sharps container will be readily accessible to personnel and located as close as possible to the area of use preferably located centrally.
- (f) The sharps containers will be maintained upright, replaced routinely and not be overfilled at any time.
- (g) The containers will be closed prior to removal to avoid any spillage.
- (h) Reusable containers will not be emptied or cleaned manually to avoid any stick exposures to the skin
- (i) When applicable, all regulated (contaminated) waste will be stored in a secure area.

Note: OSHA does not consider typical Band-aids or feminine hygiene products to be regulated waste. Cleaners are recommended to apply Universal Precautions when disposing of feminine hygiene products to avoid any unnecessary direct skin contact. In addition, decontamination of any visible blood contamination in the receptacle may be required.

(2) Labeling:
- (a) Containers of regulated waste will be labeled with the Biohazard symbol and the wording biohazard.
- (b) The biohazard label will be fluorescent orange or orange red in color with the lettering in contrasting colors.
  - (I) The labels will be affixed so as to avoid their loss or unintentional removal.
- (c) Red bags or red containers may be substituted for the Biohazard label.
- (d) If Universal Precautions are utilized, the labeling/color-coded system is not necessary, provided the containers are recognizable and treated as containing regulated waste.
- (e) All regulated waste leaving the facility must be properly labeled or color-coded.

(3) Disposal
- (a) Disposal of regulated waste must be done at a state approved landfill or medical incinerator.
- (b) Disposal of regulated waste at a sanitary landfill is not permissible unless the waste is first deemed noninfectious.
- (c) Employees should not mix regulated (hazardous) waste with other waste.
- (d) All regulated waste shall be transported per state specific requirements.
- (f) All shipments will be manifested accordingly.

9.0 Exposure Evaluation and Follow-Up

A. The job supervisor will immediately provide a post-exposure evaluation and follow-up for

employees who have had an occupational exposure to blood or other potentially infectious materials.

B. The following protocol will be followed by the supervisor providing post-exposure evaluations and follow-up:

(1) All employees shall immediately report an occupational exposure to their supervisor.

(2) In addition, all employees who render first aid where blood or other potentially infectious materials were evident (regardless of whether an exposure incident occurred) shall immediately report the incident to their supervisor.

(3) Confidential medical evaluation and follow-up of the incident with a licensed health care professional will be made available.

Note: The supervisor will record the event on the OSHA 300 Log of Occupational Injuries and Illnesses and OSHA 301 Supplementary Record of Occupational Injuries and Illnesses (or equivalent: First Report of Injury), if applicable.

C. The Project Manager will document the circumstances under which the exposure occurred (or potential exposure in cases where first aid was provided), including routes of exposure, the HBV or HIV status of the source patient(s), if known, and the employees hepatitis B vaccine status.

(1) A copy of the OSHA Bloodborne pathogens standard and the above information collected upon review of the incident will be provided to the health care professional.

D. The Project Manager will notify the source patients of the incident and attempt to obtain written consent to collect and test the source's blood to determine the presence of HBV and/or HIV infections.

(1) If the source individual is known to be infected with HBV or HIV, testing of the source individual is not required.

(2) Results of the source individual=s testing will be made available to the exposed employee.

(3) All applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual will be available.

(4) The exposed worker's blood will be collected as soon as feasible and tested upon written consent being obtained for determination of HBV and/or HIV status.

(5) In addition, the company may be required to provide repeat HIV testing to the exposed employee on a periodic basis thereafter depending on the health care professional's opinion.

E. Follow-up of the exposed worker will include counseling, medical evaluation of any acute illness that occurs, post exposure prophylaxis and other post exposure methods according to recommendations for standard medical practices.

F. The health care professional will submit a written opinion to the Project Manager documenting the employee was informed of the evaluation results and the need for any further follow-up and whether the hepatitis B vaccine was received.

G. The Project Manager will provide a copy of the health care professional's written opinion within 15 days of completed evaluation.

10.0 Training:

A. Training will be provided to all identified employees with potential occupational exposures to blood or other potentially infectious materials.

B. This training will be conducted during normal work hours by a trainer knowledgeable on the subject matter.

C. The training requirements include the following:

(1) Training will be provided before an initial assignment to a task involving a potential occupational exposure, and annually thereafter (within 1 year of previous training).

(2) Additional training will be provided by the company when any new tasks or modifications of procedures affect the employee's occupational exposure.

D. The training program shall include the following components:

(1) Copy of the OSHA Bloodborne Pathogens standard.

(2) Routes of exposure and symptoms of bloodborne pathogens.

(3) Methods for identifying tasks which may involve exposure to blood or other potentially infectious materials.

(4) Overview of engineering controls, work practices and personal protective equipment.

(5) Information on hepatitis B vaccine.

(6) Emergency procedures and notification requirements.

(7) Incident reporting.

(8) Post exposure evaluation and follow-up.

(9) Explanation of levels and color coding system requirements.

(10) Typical labels and signs identifying infectious materials will be discussed. (Refer to 29CFR1910.1030 and training manual for specific examples)

11.0 Record Keeping:

A. Exposure records are required to be maintained for 30 years.

B. Training records shall be maintained at each respective employee's facility and a copy sent to the Corporate Health and Safety Department for retention (for a minimum of 3 years), which should include the following:

(1) Date of the training session(s).

(2) Summary of the training topics discussed.

(3) Name and qualifications of trainer.

(4) Names and titles of all employees who attended the training session.

12.0 Exposure Control Plan

A. A written exposure control plan is required to be maintained for all employees that reasonably anticipate exposure as part of their normal job function as specified in 29CFR1910.1030. Those employees listed in (B) below will be provided a copy of the exposure control plan.

B. The listing of employees included in (A) above is as follows:

None at this time

C. The noted exception to (B) above is that all employees trained in First Aid/CPR will receive additional instruction/certification regarding bloodborne pathogens.

13.0 Medical Records

A. Medical records are required to be maintained for each employee with occupational exposure as specified in 29 CFR 1910.1020 - Access to Employee Exposure and Medical Records.

B. Medical records are to remain confidential, sent directly to the Health and Safety Department for retention and shall be maintained for the duration of employment plus 30 years.

C. Medical records are to be made available to employees at their request and other as outlined in 29CFR1910.1020(h). Compliance with 29CFR1910.1020(h) will be maintained regarding transfer of exposure records should the need arise.

D. The medical records relative to the bloodborne pathogen's standard shall include the following:

(1) Employee name and social security number.

(2) Hepatitis B and vaccination status and dates.

(3) Results from evaluations and follow-up procedures.

(4) The copy of the health care professional's written opinion.

(5) Copy of the information provided to the health care professional by the Home office.

MJ VanDamme Trucking, Inc.
Confined Space Entry Policy
In accordance with 29 CFR 1910.146

1.0 PURPOSE

A. This procedure defines and specifies the specific safety standards and policies that govern the safe entry into all confined spaces at Company sites. If any sub-contractors are working at MJVD, they shall follow this procedure with MJVD providing the CS Attendant. If MJVD is a sub-contractor, MJVD will follow the Host facility procedures as long as they are at least as restrictive as this one.

B. This procedure complies with the Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1910.146.

2.0 RESPONSIBILITIES

A. The **Safety Officer** is responsible for ensuring that all elements of this procedure have been implemented and followed. He will review this program at least annually.

(1) The Safety officer will usually not oversee or coordinate confined space entries, but the Safety Officer will retain the ultimate responsibility to ensure compliance with all Federal, State, and Local Regulations and to the Corporate Policy and Program.

B. The **Project Manager** is responsible for assigning and initiating confined space entries; however, the project manager may not necessarily be the supervisor in charge at the entry site.

(1) The Project Manager is responsible for coordinating all confined space activities with the clients and any potential sub-contractor.

C. The **Entry Supervisor** will be directly responsible for specific site entries. It is extremely important to ensure that procedures are correctly followed.

3.0 Duties of Entry Supervisors

A. All entry supervisors must:

(1) Discuss the confine space entry with the Project Manager or the property owners Site Supervisor.

(2) Discuss any entry requirements relative to the Corporate Program.
- (a) The strictest procedure will be applicable.
- (b) All site personnel with be informed of any modifications to the Corporate Program.

(3) Know all the hazards and potential hazards associated with a confined space, including the mode, signs or symptoms, and consequences of exposure if there are chemical hazards.

(4) Verify that:
- (a) Appropriate entries on the entry permit have been made
- (b) All tests specified by the permit have been conducted
- (c) All procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin.
- (d) Terminate the entry and cancel the permit as required.
- (e) Verify that rescue services are available and that the means for summoning them are operable.
- (f) Secure the confined space entry location and post the entry permit.
- (g) Remove unauthorized individuals who enter or who attempt to enter the permit

space during entry operations.

(h) Ensure a proper exclusion area for protection of the entrance and all personnel has been established and maintained (ie. Barricades or barriers)

4.0 Duties of attendant(s)

A. All attendants must:

(1) Know the hazards they may come in contact with during entry, including the mode, signs or symptoms, and consequences of exposure.

(2) Be aware of the possible behavior effects experienced by authorized entrants as a result of their exposure to a hazard.

(3) Continuously maintain an accurate count of authorized entrant(s) in the permit space and ensure that the means used to identify authorized entrants is consistent and accurately identifies those in the permit space.

(4) Remain outside the permit space during entry operations until relieved by another attendant. Evacuate all entrants if a relief cannot be found or if outside hazards require abandonment of the post.

(5) Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space.

(6) Notify entry supervisor and rescue in case of an emergency.

B. An attendant must be continuously posted during entry into any Permit Required Confined Space and may not monitor multiple entrances.

5.0 Duties of the entrant(s)

A. All entrants must:

B. Know the hazards they may come in contact with during entry, including the mode, signs or symptoms, and consequences of exposure.

C. Use equipment as recommended by manufacturers.

D. Communicate with the attendant as necessary to enable the attendant to:

(1) Monitor entrant status and

(2) Alert entrants of the need to evacuate the space as required.

E. Alert the attendant whenever:

(1) Warning signs, symptoms of exposure, or dangerous situations are evident, or

(2) A prohibited condition is detected.

F. Exit the permit space as quickly as possible whenever:

(1) An order to evacuate is given by the attendant or the entry supervisor,

(2) Warning signs, symptoms of exposure, or dangerous situations are evident, or

(3) A prohibited condition is detected.

6.0 General procedures

A. The Safety Officer is responsible for ensuring that the following tasks have been accomplished:

(1) All permit-required confined spaces are evaluated prior to project acceptance.

(2) New confined spaces will be evaluated as they are discovered, constructed, or contracted to enter.

(3) All permit-required confined spaces have been grouped into one of seven classifications:
- (a) Tanks and vessels
- (b) Sewer pits
- (c) Air handling units
- (d) Ducts
- (e) Boilers
- (f) Excavations
- (g) Other

(4) Newly constructed, or confined spaces contracted to enter will be listed into these categories as appropriate.

(5) Every point of entry into permit-required confined spaces has been identified and illustrated to all personnel through labeling and training.
- (a) Labels or signs stating "Do Not Enter":
- (b) "Permit-Required Confined Space" is required on all points of entry to confined spaces.

(6) Entry into confined spaces will be prohibited unless there is no other means of performing the necessary work.
- (a) All entries must be authorized through the means described in this procedure.
- (b) All unauthorized entries will be handled through a formal disciplinary procedure.

(7) All personnel involved in confined space entry will have been trained to perform the tasks that are required. This training shall be conducted prior to initial assignment, prior to a change in assignment, if a new hazard has been created or any special deviations and at least annually thereafter. All training will be documented and include the following:
- (a) Discussion on the hazards that may be encountered
- (b) How to control the hazards
- (c) Air monitoring procedures
- (d) Ventilation requirements
- (e) Emergency rescue procedures to be implemented if necessary.
- (f) Lockout procedures
- (g) Fall protection

B. All confined space entries will have been authorized by means of a confined space entry permit.

(1) This permit, which will have been completed by the entry supervisor, indicates that, at a minimum, all hazards at the space will be temporarily controlled.

C. Entry into a confined space will be absolutely prohibited when:

(1) Flammable concentration is 10% of the lower explosive level (LEL) or greater

(2) Oxygen content is less than 19.5% or greater than 23.5%.

(3) Carbon Monoxide concentration is above 35 ppm.

(4) Hydrogen Sulfide concentration is above 10 ppm.

(5) Atmosphere is determined to be immediately dangerous to life and health.

(6) The entrants have a potential exposure at or above the OSHA Permissible Exposure Levels (PEL) or the ACGIH Threshold Limit Value (TLV).

Note 1: Entry under these above noted conditions may be required to lower exposures for other trades and subsequent work or modification to the confined space. Entry under these conditions requires special permits and personal protective equipment to protect the entrant from exposure.

Note 2: Emergency rescue services are an exception provided that rescue personnel are properly trained and use all of the proper personal protective equipment (PPE).

7.0 Training

A. The following requirements pertain to entry personnel:

(1) Entry supervisors must be trained with regard to the roles and responsibilities of all employees involved in confined space entries.
   (a) Entry supervisors must be trained in hazard identification techniques and the means to control and/or eliminate hazards when they are identified.
   (b) Entrants must be trained on the requirements of this procedure as well as the specific entry and self-rescue techniques required at each confined space.
   (c) Attendants must be trained on the duties of the attendant as described in this procedure as well as any specific requirements for the various confined spaces that exist at the facility.
   (d) All personal at the facility must receive awareness training that outlines in detail the requirements provided in this procedure and the techniques required to identify a confined space.

8.0 Pre-entry planning

A. The steps personnel must take once the decision has been made to enter a confined space include the following:

(1) Potential hazards that may be encountered in each of the seven families of confined spaces are described in this procedure.

(2) In addition to knowing what these potential hazards are, the entry supervisor must also take time to assess the condition of the confined space for any of the following hazards:
- (a) Toxicity,
- (b) Flammability
- (c) Asphyxiating gases or vapors,
- (d) Oxygen deficiency or enrichment,
- (e) Engulfment hazards
- (f) Entrapment hazards
- (g) Electrical hazards,
- (h) Explosive hazards,
- (i) Mechanical hazards,
- (j) Chemical hazards, and
- (k) Physical hazards (e.g., slippery surfaces, sharp edges, or low ceilings).

B. The pre-entry meeting must include a discussion of the techniques that will be used to render the confined space safe for entry.

(1) Specifically, these techniques include analysis of ventilation requirements, lockout of energy sources, isolation of piping, installation of illumination, and performance of air testing.

(2) All persons participating in confined space entry must be involved in the preparation of the confined space entry permit.

(3) A pre-entry meeting must be held between all members of the entry team to discuss:
- (a) How the entry will take place;
- (b) What exactly will be done in the confined space?
- (c) What hazards, if any, will be created as a result of the work performed;
- (d) What PPE is required?
- (e) How entrant(s) will exit the space; and
- (f) What activities personnel will be responsible for should an emergency arise.

(4) At the conclusion of the pre-entry meeting, team members will have a thorough understanding of what will happen during the entry and what to do should an emergency arise.

C. Equipment needs must be anticipated.

(1) All equipment required for the entry must be obtained in advance.

(2) All equipment being used during the entry must be inspected prior to the entry to ensure proper performance.

9.0 Preparation for entry

This section describes the steps necessary for personnel to prepare the confined space and ensure that it is safe for entry.

A. All sources of energy, including electrical, pneumatic, mechanical, and hydraulic, etc., must be de-energized and locked out in accordance with the Lockout Policy.

(1) At a minimum, each entrant must apply their lock to the energy disconnect.
(2) To prevent water, natural gas, or any hazardous material from entering the confined space during the entry operation, the space must be completely isolated from any inlet and outlet

piping.

(3) The piping must be isolated in one of two ways:
- (a) **Double Block and Bleed** - In this method, two valves in the pipe entering the confined space are locked closed.
  - (I) A third valve, which is located between the two locked valves, is opened to allow venting to the atmosphere, away from the confined space.
  - (II) This third valve must be locked in the open position and checked to ensure that it is not blocked or plugged in any way.
- (b) **Blanking** - In this method, a full-pressure blind flange is placed in the pipe as close to the confined space as possible.
  - (I) This blind flange must be:
    - (i) Bolted into place,
    - (ii) Compatible with the material in the pipe, and
    - (iii) Able to withstand the full pressure load of the pipe.

(4) Lockout of a single valve *is not* an acceptable means of isolating the confined space from chemicals and other hazardous material.

B. The confined space should be cleaned of any scale or build-up (especially grease and oils in pits) prior to entry.

(1) Flammable solvents must not be used because these may produce a hazardous atmosphere within the confined space.

(2) If possible, standing water or sewer water must be pumped from the confined space to avoid an engulfment hazard and the potential for the production of a hazardous atmosphere due to biological activity.

(3) If the confined space cannot be cleaned without entry, donning of all appropriate PPE may be required.

C. Environmental Testing will be conducted to assess the nature of the atmosphere within the confined space prior to and during entry (at least once per shift). Frequency may be increased by Entrant request as Entrants must review the IH Data prior to entry.

(1) A monitor that is capable of analyzing the presence of all gases must be used to determine the nature of the atmosphere within the confined space.

(2) The atmosphere in confined spaces must be tested for the following in the order listed:
- (a) Oxygen level (percent of atmosphere)
- (b) Flammable gas/vapor level (percent of LEL)
- (c) Toxic gas/vapor level (e.g., hydrogen sulfide or carbon monoxide [ppm])

(3) Safe levels for entry are provided in the definition of “Hazardous Atmosphere” (see Glossary).
- (a) Entry into the confined space will not be permitted if the atmosphere is hazardous.

(4) The gas monitoring equipment has a documented preventive maintenance schedule, calibration, and maintenance log.
   (a) Prior to use, the entry team will ensure the calibration of the monitor.

(5) The procedure for testing the atmosphere is provided as follows:
   (a) Lower or extend the gas monitor probe to the furthest point from the entryway.
   (b) Start the monitoring pump to begin the flow of gas to the monitor.
   (c) Follow the manufacturer's instructions on the proper length of time to allow the pump to run for the given length of tubing.
   (d) Move the sample probe 3 feet closer to the entryway once the furthest point has been properly monitored and sample again at this point.
   (e) Continue sampling in this manner until the confined space's atmosphere is fully tested.

D. Ventilation will be required if results of environmental testing reveal that the confined space contains a hazardous atmosphere, or if it is determined that activities within the confined space will produce a hazardous atmosphere.

(1) If after pre-entry preparations have been performed and the potential remains for a hazardous atmosphere to accumulate in the confined space, continuous ventilation is required.

(2) If all sources that could contribute to a potential hazardous atmosphere have been eliminated during pre-entry activities, then ventilation may be necessary for only a short period.

(3) Ventilation will be accomplished by the addition of a blower and flexible duct assembly.

(4) Air will be drawn from a safe location and delivered to the bottom of the confined space to facilitate ventilation of the entire space.

(5) The ventilation of the confined space will be performed as follows:
   (a) A determination will be made to ventilate the confined space.
   (b) A flexible duct will be extended to the bottom of the confined space.

   Note: When entering a manhole, the saddle vent must be used to allow ventilation to continue while the entrant is entering the space.

   (c) The blower will be started and ventilation begun.
   (d) Ventilation will be allowed to continue for at least 30 minutes prior to entry or testing.
   (e) The blower will be shut down and environmental testing will be repeated.
   (f) The blower will be started and allowed to operate until the atmosphere is no longer hazardous or until entry is complete.

E. Entrants are prohibited from entering dark confined spaces; therefore, lighting is a requirement and must be part of the pre-entry equipment needs.

(1) Temporary lighting must:
   (a) Be properly grounded; if used in wet or damp spaces, the light must have a ground fault circuit interrupter.
   (b) Be equipped with guards that prevent contact with the bulb.

(c) Have an OSHA approved heavy-duty electrical cord with insulation that is in good condition.
(d) Be suspended by a rope or cord other than the electrical cord.
(e) Preferably, low voltage lighting (less than 50 volts) will be used.

F. Personal Protection and Pre-entry activities may dictate the use of PPE to prevent entrant contact with any of the hazards that have been identified.

(1) Standard PPE worn at the site includes:
(a) Safety glasses with side shields.
(b) Steel-toed shoes.
(c) Work uniform.

(2) When necessary, the following equipment may also be required:
(a) Hard hat if an overhead hazard exists.
(b) Hearing protection if excessive noise exists.
(c) Gloves if a chance of laceration or chemical contact hazard exists.
(d) Face protection if a flying object hazard exists.
(e) Respiratory protection if an atmospheric hazard exists.
(f) Chemical Protective Clothing as needed

(3) Prior to wearing any PPE, entrants must be properly trained to choose, inspect, don, and doff the equipment.

(4) Respiratory protection equipment must be worn only by those medically fit and trained in the specifics of respirator use.

10.0 Entry

A. This section provides information to ensure compliance with regulations. No entry will be made into any spaces where an Imminent Danger to Life & Health (IDLH) exists.

B. Permit System

(1) Entry of personnel into confined spaces at the Site is expressly prohibited without a completed and signed confined space entry permit.

(2) A confined space entry permit can only be issued by an authorized entry supervisor and must accompany all pre-entry activities.

(3) The confined space entry permit (Tab 8 of this Policy) will be completed in the following manner:
(a) Information at the top of the form will be completed as requested.
(b) An explanation as to why and how long the space will be entered.
(c) The actual and potential hazards of the space will be described, as well as the steps necessary to control the hazards.
(d) Entrants and attendants will complete the section specified.
(e) Environmental testing will be performed and the results will be provided as requested. Employees have the right to observe testing results or to request retesting to verify results.
(f) Based on the results of environmental testing and initial ventilation, a decision will be made whether continuous ventilation will be required to prevent the accumulation of hazardous material in the atmosphere.

(g) If continuous ventilation is used, then continuous monitoring is required. The results from the continuous monitoring will be logged in the space provided in the permit.

(h) The appropriate boxes in the Rescue and Personal Protective Equipment section must be checked appropriately.

(i) The entry supervisor must sign one of the two statements indicating that the confined space is permit-required and is safe for entry, or that the hazards of the confined space have been eliminated and the confined space can be reclassified to being non-permit required.

(j) The entry supervisor will cancel the permit when all entrants have exited.

(4) The entry permit must be displayed at or near the point of entry during the duration of the entry.

(5) All entry permits will be filed and retained for at least 1 year.

11.0 Reclassification

A. There are a number of confined spaces at the Site that have the potential to be reclassified.

B. A space classified as a permit-required confined space may be reclassified as a non-permit confined space under the following circumstances:

(1) If the permit space poses no actual or potential atmospheric hazards.

(2) If there is only one hazard within the space and it can be eliminated without entry into the space.

(3) The only hazard is a potential atmospheric hazard that can be controlled by ventilation and air monitoring.

C. If it is necessary to enter the permit space to eliminate hazards, such entry shall be performed as a permit-required entry.

D. A non-permit required confined space is not subject to any of the requirements of OSHA *Permit-Required Confined Spaces* (29 CFR 1910.146).

(1) Special rescue arrangements, continuous monitoring, and confined space attendants are not necessary.

(2) Entrants to permit-required and non-permit required confined spaces will be equally trained.

E. It must be stressed that forced ventilation does not constitute elimination of a hazardous atmosphere.

F. A confined space with a hazardous atmosphere controlled by forced ventilation is still considered a permit-required confined space.

G. If during entry into a reclassified confined space a hazard arises, all entrants must exit the space.

12.0 Rescue

A. At least one person trained in First Aid/CPR shall be immediately available during entry.
B. Effective means of communication between entrant(s) and attendant shall be available at all times during entry.
C. An approved safety harness and lifeline shall be used. The free end of the lifeline shall extend outside the space and be secured.
D. At least one employee shall stand by outside the space ready to give assistance in case of an emergency. At least one additional employee shall be within sight or call of the stand by employee.
E. Rescue Teams shall be coordinated based on the size and configuration of the permit-required confined space to be entered. Proper Hazard Assessment and JSA shall be utilized to make this determination. Rescue Teams and Rescue Plans shall be documented in the Site Specific Health & Safety Plan.
F. Entry operations in excess of 5 feet vertical will require the use of mechanical retrieval devices and approved harnesses. Devices utilized shall render the user in the upright position.
G. Rescue Teams shall conduct drills at least annually, but more frequently as necessary to ensure their ability to provide rescue services when required. All training shall be documented by the Safety Manager.

Confined Space Entry Permit

In the event of an emergency call 9-1-1

SECTION 1

Date Permit Issued:	Is this a permit-required space? Yes ☐ No ☐ (If no permit required skip section #4)
Location of Confined Space (What area, floor, etc.):	
Description of confined space:	
Description of work to be performed:	

Material or Chemicals located and/ or brought into the confined spaces

	MSDS Yes ☐ No ☐		MSDS Yes ☐ No ☐
	MSDS Yes ☐ No ☐		MSDS Yes ☐ No ☐
	MSDS Yes ☐ No ☐		MSDS Yes ☐ No ☐

Air monitoring device information

Make/ Model:	Date of Calibration:

Pre-entry Atmospheric monitoring results

Oxygen (19.5%-23%) _____%	Carbon monoxide (< 35PPM) _____PPM	Flammables (<10% of LEL) _____ %	Other _____

SECTION 2

Other potential hazards

N/A	Yes	
☐	☐	Chemical exposures
☐	☐	Corrosive Substances
☐	☐	Carbon Monoxide
☐	☐	Potential Flammable/ Explosive Dust
☐	☐	O_2 Deficient
☐	☐	O_2 Enriched
☐	☐	Flammable Gas
☐	☐	Temperature Extremes
☐	☐	Slip/ Trip/ Fall
☐	☐	Vermin/ Animal
☐	☐	Limited Egress
☐	☐	Noise/ Vibration
☐	☐	Structural Collapse
☐	☐	Small Internal Size
☐	☐	Visual/ Lighting
☐	☐	Plumbing Lines
☐	☐	HVAC (Heating, Ventilation and Air conditioning)
☐	☐	Radiation (ionizing or non ionizing)
☐	☐	Pressurized Equipment
☐	☐	Mechanical Equipment
☐	☐	Electrical Hazards
☐	☐	Biohazards
☐	☐	Asbestos
☐	☐	other: _____

Controls needed for hazards

N/A	Yes	
☐	☐	Barricade/ Signs
☐	☐	Lock out/ Tag out
☐	☐	Double block and bleed
☐	☐	Lighting
☐	☐	Air purifying respirator
☐	☐	Supplied Air Respirator/ SCBA
☐	☐	Hearing Protection
☐	☐	Mechanical fresh air ventilation
☐	☐	Natural Ventilation
☐	☐	Protective clothing
☐	☐	Safety Glasses/ Face shield
☐	☐	Hard hat/ head protection
☐	☐	Ground fault interrupter (GFCI)
☐	☐	Harness/ Life lines/ Tripod
☐	☐	Gloves/ Hand Protection
☐	☐	Continuous air monitoring
☐	☐	Fire extinguisher. Type: _____
☐	☐	Two way communication equipment
☐	☐	Eye wash/ Emergency Shower
☐	☐	Hot work Permit
☐	☐	First Aid kit
☐	☐	other: _____
☐	☐	other: _____
☐	☐	other: _____

Additional Information:

SECTION 3

Continuous Atmospheric monitoring results (Tests must be recorded at least once per hour)
Remember to test at different levels (e.g. low, medium, and high)

Time	Sampled By (Initials)	$\%0_2$ (19.5-23%)	%LEL (<10%)	CO (PPM) (<35PPM)	Other	Notes:

List of all authorized personnel (Please Print Neatly)	Time In	Time Out	Time In	Time Out	Time In	Time Out	Time In	Time Out	Time In	Time Out

SECTION 4 (IF PERMIT REQUIRED CONFINED SPACE)

Post authorized permit at job site until completed.

Qualified Entry Supervisor.
I certify that all of the requirements of the confined space entry program have been met. I have ensured that all applicable hazards have been identified and sufficiently controlled.

Permit authorization		**Time Authorized Between** (What time is the permit authorized between)
Name:	Signature:	Start: _____ AM☐ PM☐ End: _____ AM☐ PM☐
Permit Cancellation		**Time Canceled**
Name:	Signature:	Actual Time Canceled: _____ AM☐ PM☐

In the event of an emergency Call 9-1-1

The Entry Supervisor is required to submit the completed permits to the Safety Administrator for 3 years.

1.0 General Instructions

A. The Occupational Safety and Health Act of 1970 require all places of employment to furnish a safe and healthy place for their employees to work.

B. The U. S. Department of Labor, Occupational Safety and Health Administration (OSHA) have promulgated Safety and Health Regulations to enforce the Act.

2.0 Responsibilities

A. Supervisors and Foremen to insure that all employees on the job or project are:

(1) Briefed on the hazards at the job site.

(2) Trained in accordance with current OSHA training requirements.

(3) Engineering controls and safety equipment are operating and used.

(4) Personal Protective Clothing and Equipment is provided for the level of hazards at the job site.

(5) Insure OSHA Health and Safety Regulations and safe work practices are followed

B. Employees are responsible for:

(1) Following OSHA regulations, safety procedures and guidelines for the job site.

(2) Wearing the personal protective clothing and safety equipment provided for the project.

(3) Reporting any discrepancies in the safety procedures.

3.0 Importance of Safety - from the Company Point of View

A. The company has always recognized that every employee should have safe and healthful working conditions because the employee and the company reap benefits.

B. The company benefits when an employee is able to remain on the job, accident free and to perform the work without interruptions.

(1) There are no delays in work schedules or added costs due to employees and supervisors having to look after the welfare of an injured employee.

(2) Properties are not damaged, thus eliminating costly repairs or replacements.

(3) Insurance costs are kept to a minimum, resulting in substantial savings.

C. The employee benefits by being able to earn competitive wages for as long as his services are needed on the job.

(1) On full wages, a safe employee can more easily obtain the necessities and luxury items to provide a happier life for his dependents and himself.

(2) A healthy and whole employee can enjoy the luxuries of life.

5.0 Disciplinary Policy and Procedures

A. In the event that an employee fails to follow the OSHA Health and Safety Regulations and the Corporate Health and Safety Program the company has the right to impose disciplinary actions to protect employees from injury or death, client's facilities from damage and the company from liability.

(1) The enforcement of Health and Safety policies and regulations is protecting:
- (a) The employee from injury or death.
- (b) Reduce the losses and damage to equipment and tools.
- (c) Control cost associated with losses due to accidents and injuries.
- (d) Protect the client's facilities and personnel while conducting operations on the client's facility.
- (e) To protect the company and it's management form prosecution and lawsuits from accidents, deaths and injuries to employees or other persons.

B. Management, Supervisors and Foremen are responsible in managing and enforcement of company policies and health and safety policies.

(1) Health and Safety violations constitute the failure to follow:
- (a) Federal and State health and safety regulations in accordance with:
  - (I) 29 CFR 1910 (OSHA)
  - (II) 29 CFR 1926 (COSHA)
  - (III) 40 CFR 260-265 (RCRA)
  - (IV) T8CALOSHA3203/1509
- (b) Corporate Health and Safety Policies.
- (c) Project specific safety guidelines and client facility safety and health guidelines.
- (d) Written or verbal directions from the project supervisor or foreman.
- (e) Commonly known rules or laws such as:
  - (I) Traffic laws
  - (II) Theft
  - (III) Battery

(2) The commitment of the company management and supervisors to safe projects and jobs is paramount to the company's continual growth.
- (a) This will be accomplished by.
  - (I) Employee training
  - (II) Project safety briefings
  - (III) Inspection and audits of projects and programs
  - (VI) Retraining as required
  - (V) Disciplinary actions when required

C. Disciplinary Procedures:

(1) When the management or supervisory personnel is notified or becomes aware of a health and safety violation, the following steps will be followed:

(2) Conduct an investigation (in writing) of the incident, accident, injury or near miss incident.
- (a) Interview all participant and observers.
- (b) Get signed statement from each participant and observers.
- (c) Take pictures if possible.
- (d) In case of an death or major property damage, do not disturb the scene, as it contains important and sensitive evidence and may be considered a crime scene.

(3) Review the violation of the health and safety policy with the effected employee.
- (a) Conduct this review /counseling session away from other employees
- (b) Where all possible, have another supervisor present to witness the discussion.
- (c) Explain:
  - (I) The violation.
  - (II) Its effects and ramifications on employees and the company.
  - (III) How to come into compliance or meet the health and safety standards.
- (d) Conduct any training review that may be required.
- (e) Inform the employee of any disciplinary actions that will be taken in conjunction with this violation.
- (f) Have employee sign the counseling / disciplinary form.
  - (I) If employee refuses to sign the counseling / disciplinary form, have the supervisor that witnessed the counseling session counter sign with you.

D. Disciplinary Action:

(1) The company may take any of the following disciplinary actions depending on the severity or frequency of the violation.
- (a) Verbal Warning (in writing)
- (b) Retraining prior to return to work.
- (c) One day off (first violation)
- (d) Three days off (second violation)
- (e) Termination

(2) Termination may be used at the discretion of the company management to protect the employees, equipment, clients and property from unsafe acts and losses.

(3) Management reserves the right to impose disciplinary action based on specific factors involved with specific incidents. This may or may not coincide with the policy stated in 5.0(D)(1) above.

E. Audits

(1) Physical safety audits of projects and job site will be conducted by corporate officers, Supervisors and foreman.
- (a) These audits will evaluate overall compliance with Federal, State and corporate safety and health regulations and standards.
- (b) Violations or non-compliance with safety regulations and/or standards by any supervisors and/or employees will be enforced as noted above in this section.

1.0 Policy:

A. This policy covers all workers in proximity to any part of an electrical power circuit in the course of their work, and the minimum standards for the protection of employees and the prevention of electrical shock.

2.0 Purpose:

A. Electricity has long been recognized as a serious workplace hazard, exposing employees to such dangers as electric shock, electrocution, fires, and explosions.

B. The following practices are intended to prevent work-related injuries from the electrical hazards present on our jobsites.

3.0 Procedure:

A. No employees are allowed to work near any part of an electric power circuit that the employee could contact in the course of work, unless the employee is protected against shock by de-energizing the circuit and grounding it or by guarding it effectively by insulation or other means.

B. Project supervision must insure barriers or other means of guarding to ensure workspace of electrical equipment will not be used as a passageway during the time when energized parts of electrical equipment might be exposed.

C. Walkways and similar working spaces must be kept clear of electric cords.

4.0 Live Electrical Wiring:

A. Employees will not work on live circuits above 50 volts.

B. If, at some time in the future, an employee will work on an energized circuit, they will be appropriately trained to become a qualified employee.

C. The training must include:

(1) Use of precautionary techniques.

(2) Electrical Personal Protective Equipment (PPE).

(3) Insulating and Shielding materials i.e., blankets and mats,

D. Insulated tools.

(1) The required use of insulated tools does not provide an excuse for taking short cuts of safe work procedures.

E. Working live is the absolute last resort that is pre-approved by the Operations Manager.

(1) Employees will not work under live high voltage (greater than 600 volts) electrical wires. If work is to be performed, the lines will be deenergized and grounded. Minimum clearance distances are listed in the table in Section 12.0 of this chapter. The distances listed cover clearances for employees and equipment used in the vicinity of overhead lines.

(2) Employees will not work in energized electrical rooms, vaults, pits, or enclosures.

5.0 Training:

A. All employees will be trained on the:

(1) Hazards of electricity

(2) How to identify potentially live parts.

(3) Minimum safe approach distances.

(4) Safe clearance distances.

(5) Lockout/Tagout

(6) General Work Rules

B. Site Supervisors will also be trained in:

(1) Examination, Installation, and Use of Equipment

(2) Grounding of Equipment Connected by Cord and Plug

(3) Guarding

(4) Grounding of Equipment Connected by Cord and Plug

(5) GFCI's

6.0 Lockout and Tagging of Circuits:

A. Only Authorized Employees will perform the Lockout/Tagout procedures.

(1) Locks and Tags must be placed on controls that are to be deactivated during the course of work on energized or de-energized equipment or circuits.

(2) Equipment and circuits that are de-energized must be rendered inoperative.

(3) Refer to the Lockout Tagout Program for the proper procedures to follow.

7.0 Examination, Installation, and Use of Equipment:

A. Electrical equipment must be free from recognized hazards that are likely to cause death or serious physical harm to employees.

B. All electrical work will comply with governing electrical codes.

C. All electrical equipment will be installed in a neat and workmanlike manner.

D. All electrical equipment will be firmly secured to the surface on which it is mounted.

E. The Operations Manager and Site Supervisor will determine the Safety of equipment by the following:

(1) Suitability for installation and use in conformity with provision of the standard.

(2) Listing may evidence suitability of equipment for an identified purpose, by labeling or by certification for that identified purpose.

(3) Mechanical strength and durability.
(a) For parts designed to enclose and protect other equipment, this includes the adequacy of the protection thus provided.

(4) Electrical insulation

(5) Heating effects under conditions of use.

(6) Arcing effects.

(7) Classification by type, size, voltage, current capacity and specific use.

(8) Other factors that contribute to the practical safeguarding of employees who use or are likely to come in contact with the equipment.

(9) Make a complete check and test of the circuit before energizing any equipment for the first time.

8.0 Guarding:

Live parts of electrical equipment operating at 50 volts or more must be guarded against accidental contact by proper insulation, barriers, or insulating blankets.

9.0 Grounding of Equipment Connected by Cord and Plug:

A. Exposed non-current carrying metal parts of cord and plug connected equipment that may become energized must be grounded in the following situations:

(1) When in a hazardous (classified) location.

(2) When operated at over 150 volts to ground, except when guarded motors and metal frames of electrically heated appliances if the appliance frames are permanently and effectively insulated from ground.

(3) When using one of the types of equipment listed below:
(a) Hand held motor-operated tools.
(b) Cord-and-plug-connected equipment used in damp or wet locations, by employees standing on the ground or metal floors.
(c) Tools likely to be used in wet and/or conductive locations.
(d) Portable hand lamps.

B. Exemptions:

(1) Tools likely to be used in wet and/or conductive locations need not be grounded if supplied through an isolation transformer with an ungrounded secondary of not over 50 volts.

(2) Listed or labeled portable tools and appliances protected by a system of double insulation, or its equivalent.
(a) In this case, equipment must be distinctively marked to indicate that the tools or appliance uses a system of double insulation.

10.0 Ground Fault Circuit Interrupter (GCFI):

A. All 120-volt, single-phase, 15 and 20 ampere receptacle outlets on our sites, which are not part or the permanent wiring of the building or structure and which are used by our employees, shall have approved ground fault circuit interrupters for personal protection.

B. Where GFCI receptacles are not available, plug in GCFIs will be used by our employees.

C. Receptacles on a two-wire, single-phase portable or vehicle mounted generator rated not more than 5kW, where the circuit conductors of the generator are insulated from the generator frame and all other grounded surfaces, a GFCI is not required.

11.0 Minimum Approach Distances:

A. The Minimum Approach Distances will be determined by the nominal voltage in accordance with the following Table:

Voltage	**< 300**	**300 – 750**	**750 - 2K**	**2K - 15K**
Distance (feet)	**Avoid Contact**	**1**	**3**	**7**

This table is to be referenced and applied by Qualified employees only. Refer to the complete S-5 chart as printed in 29CFR1910.333.

Core States Construction Services, Inc, nor Core States Group, Inc. employs QUALIFIED ELECTRICAL WORKERS, as defined by 29CFR1910.333.

12.0 Safe clearance distances:

A. The minimum safe clearance for vehicles and equipment around high voltage electrical lines will be determined by the following Table:

Voltage	**50 KV OR BELOW**	**>50 KV**
Distance (feet)	**10’**	**10’ plus 4” for every 10KV over 50KV**

This table applies to Unqualified employees only.

This table will be utilized by Core States Construction Services, Inc. and Core States Group, Inc. employees. Refer to Section 4.0 for additional procedures for working in the vicinity of energized overhead power lines.

13.0 Illumination:

A. Employees will only work in areas with adequate illumination.

B. Illumination must be provided for all working spaces around service equipment, switchboards, panel-boards, and motor control centers.

C. As a general rule, the illumination, without the aid of a flashlight, must be sufficient to allow employees to read manufactures name or mark on all electrical equipment.

D. Confined spaces are especially dangerous.

(1) All confined spaces will be illuminated prior to entry.

(2) Only low voltage lighting will be brought into a confined space without the expressed approval of the Project Manager.

14.0 General Work Rules

A. Use of applicable accident prevention signs to warn of temporary or permanent hazards; tags attached to parts or the structure and equipment to warn of existing or immediate hazards; padlocks for the purpose of locking out equipment; barricades as an obstruction to deter passage of persons or vehicles.

B. All tools and equipment will be inspected for faults and defects prior to use daily.

C. All power tools, equipment and cords will be protected by GFCI's.

D. Electrical circuits will be de-energized and locked out in accordance with the Lockout-Tagout Program prior to performance of any work on the circuit.

(1) In the event that the circuit cannot be de-energized and tagged, no employee will be permitted to work on or in close proximity to any part of an energized electrical circuit such that he might accidentally come in contact with or come within arcing distance of an energized part or component of the circuit unless the employee is protected against electric shock by guarding with insulating material appropriate for the voltage and component involved. Only "Qualified" persons are permitted to work on equipment or circuits that have not been deenergized.

(2) If any exposed or concealed electric power circuit is located so that the performance of the work may bring any person, tool or machine into physical or electrical contact, warning signs will be posted and maintained in al areas where such circuits exist.

(a) Employees will be informed or that location, the hazards involved and the protective measures to be taken.

E. Barricades and warning signs will be provided to ensure that work space for electrical equipment is not used as a passageway during periods when energized parts of electrical equipment are exposed.

F. All fixed and portable electrical service equipment will be contained in covered weatherproof boxes.

(1) Covers will be kept closed

(2) Boxes will be protected from exposure to weather, traffic and combustible materials.

(3) All equipment will be rigidly mounted on a panel or frame and be properly grounded.

(4) All switches, circuit breakers, etc. will be clearly marked to identify voltage and purpose.

(5) All switches will be clearly marked to indicate whether they are open or closed.

G. Non-conducting elevated platforms or rubber mats will be provided to protect employees operating switches from coming in contact with damp floors or earth.

H. Sufficient space will be provided and maintained in the area of electrical equipment to permit ready and safe operation and maintenance of such equipment.

(1) When parts are exposed, the minimum clearance for the workspace will not be less than a radius of 3 feet wide, and there will be clearance sufficient to permit at least a 90^{o} opening of all doors or hinged panels on equipment up to 600 volts.

I. All extension cords will be OSHA Approved of the three-wire grounded heavy-duty type and will be used only in continuous lengths without splices, except suitable molded or vulcanized splices may be used where properly made.

(1) The splice insulation will be equal to the insulation of the cable being spliced.

(2) Cords will be strung overhead or otherwise kept clear of working spaces, walkways or other locations in which they are readily exposed to damage.

(3) Cords are not to be fastened with staples, hung from nails or suspended by bare wire.

(4) Worn or frayed extension cords will not be used.

J. All portable ladders must have non-conductive side rails.

K. Conductive items of jewelry or clothing must not be worn.

(1) This includes eyeglass frames.

L. If long dimensional conductor objects (pipes, conduit, or ducts) are handled, the minimum safe approach distances and safe clearance distances must be increased by the length of the object.

M. All electrical circuits will be considered to be dangerous.

(1) Even electric shock from low voltages has caused workmen to fall from ladders and scaffolds.

N. Treat "**dead lines"** as though they are "**HOT"**.

(1) Use appropriate test equipment to verify that the circuit is not energized.

MJ VanDamme Trucking, Inc.
Excavation/Trenching Program
In accordance with 29 CFR 1926 Subpart P

1.0 Policy:

A. The following policy will be utilized to prevent injury and death associated with possible cave-ins and other related hazards.

2.0 Purpose:

A. Excavation and trenching are required for numerous reasons in the construction industry.

(1) Typical projects include building basements, installing foundations, laying pipes for various drain, sewer, water, phone, electric, and gas lines.

(2) This program will assist in identifying and correcting hazardous conditions and practices related to excavation and trenching.

3.0 Competent Person:

A. An individual must be designated who is capable of identifying or predicting hazards.

B. Able to monitor the excavation

C. Knowledge of unsafe or unsanitary working condition.

D. Knowledge of soil types.

E. Has the authorization to take prompt corrective measures to eliminate them.

4.0 Training:

A. All workers shall be trained in the hazards associated with each excavation and the control measures taken to protect themselves.

5.0 Surface encumbrances:

A. Structures, rocks, trees, telephone poles, fire hydrants, etc. must be removed or structurally supported prior to employees beginning work.

6.0 Underground installations (electrical, sewer, water, etc.):

A. Must be located and marked prior to excavation

(1) Property owners and/or utility companies should be notified at least 48 hours prior to excavating.

B. Be protected, disconnected, supported, or removed while the trench is open.

7.0 Access and Egress from trench:

A. Trenches 4 feet or more in depth must be provided with a means of egress and access.

B. Spacing between ladders, stairs, or ramps should be no more than 25 feet laterally from the point employees are working.

C. Ladders must be secured and extend 36 inches above the landing or lip of excavation.

D. Structural ramps

(1) Used solely by employees
(a) Must be designed by a competent person

(2) Used by equipment
(a) Must be designed by a competent person qualified in structural design (Registered Professional Engineer)

(3) Components must be:
(a) Connected together
(b) Uniform in thickness
(c) Provided with cleats or other surface treatments to prevent slipping/tripping if ramps are used instead of steps.

8.0 Exposure to vehicular traffic:

A. Employees must be provided with and MUST wear warning vests or highly visible garments when exposed to traffic.

B. Stop/slow signs shall be used to signal or reroute traffic.

9.0 Stability of adjacent structures:

A. Support systems such as shoring, bracing, or underpinning must be used to support structures that may be unstable due to excavation operations.

B. Excavating below the base or footing of a foundation or wall is not permitted unless the following conditions are met:

(1) Support system is provided to ensure the stability of the structure; or

(2) The excavation is in stable rock; or

(3) The operation is approved by a Registered Professional Engineer.

C. Support systems must be provided for sidewalks, pavements, and other structures that may have their structural integrity compromised by the excavation operations.

10.0 Protection of employees from loose rock and soil:

A. Employees must be protected from being struck by materials falling or rolling from the edge and face of the trench.

B. Spoils and equipment must be set back at least 2 feet from the edge of the trench and/or the edge of the trench and/or a retaining device must be installed.

11.0 Fall protection:

A. Bridges and walkways must be equipped with standard guardrails and toeboards.

B. Employees shall not be permitted underneath raised loads.

C. Employees are required to stand away from equipment that is being loaded.

D. Hard hats shall be worn at all times

12.0 Remotely located excavations:

A. Must be backfilled, covered, or barricaded (wells, pits, shafts, etc.)

B. Barricades shall be constructed to restrict entry into areas that contain safety hazards, abnormal conditions, or in which operations are being performed.

13.0 Warning system for mobile equipment:

A. All mobile equipment shall require a backup alarm or similar system to notify employees of vehicular movement.

B. Prevention of vehicles from falling into trenches can be accomplished by providing:

(1) Barricades

(2) Hand or mechanical signals

(2) Stop logs

(4) Grading away from the excavation

14.0 Hazardous atmospheres:

A. Workers shall be protected from exposure to harmful levels of airborne/atmospheric contaminants.

(1) Refer to confined space policy for guidelines to follow.

15.0 Water accumulation:

A. Water accumulation must be controlled to prevent cave-ins.

(1) Employees are not permitted to work in trenches where water accumulation exists, unless:

(2) Special support systems or shield systems are used to protect employees from cave-ins

(3) Pumps or well points will be used and monitored by a competent person to prevent water accumulation

B. Safety harnesses and lifelines are used to protect employees

C. Surface water must be diverted and controlled

(1) Trenches must be inspected after each rain storm by the competent person.

16.0 Inspections:

A. Daily prior to starting work and as needed throughout the shift.

B. After every rainstorm

C. After other hazard increasing occurrence (i.e. inclement weather)

D. Inspect the trench for indications of a possible cave-in:

(1) Fissures

(2) Tension cracks

(3) Undercutting

(4) Water seepage

(5) Bulging at the bottom

(6) Adjacent areas (i.e. spoil piles, structures)

E. Protective systems and their components (uprights, wales, shields, sheeting, hydraulics) before and during entry into excavation.

F. Check for indication of a hazardous or potentially hazardous atmosphere.

17.0 Soil Classifications:

A. Excavated soil shall be classified based on site and environmental conditions.

B. A visual and manual test shall be performed to classify soil type.

C. The tests may only be completed by a competent person

D. Unconfined compressive strength can be determined by using a pocket penetrometer, shearvane (shear test), or thumb penetration test.

E. Soil Types:

(1) Stable Rock

(2) Type "A"
(a) Cohesive soils with an unconfined compressive strength of 1.5 tons per square foot (tsf) or greater
(b) Examples: Clay, silty clay, sandy clay, clay loam, hardpan, cemented soils.

(c) No soil will be considered TYPE "A" if it is fissured, subjected to vibration, previously disturbed, part of a sloped layered system sloping into the trench at a slope greater than 4 feet horizontally (H): 1 foot vertically (V), or seeping water.

(3) Type "B"
- (a) Cohesive soil with an unconfined compressive strength greater than 0.5 tsf but less than 1.5 tsf.
- (b) Examples: Angular gravel, silt, silt loam, previously disturbed soils unless classified Type "C", dry unstable rock, sloped layered systems sloping into the trench at a slope less than 4H:1V.

(4) Type "C"
- (a) Cohesive soil with an unconfined compressive strength of 0.5 tsf or less.
- (b) Examples: Granular sands, sand loamy sand, submerged, soil with freely seeping water, or any soil not otherwise classified Type "A" or "B".

18.0 Protection Systems:

A. All employees must be protected from cave-ins by shields, sloping, or shoring except:

(1) When excavations are made in stable rock that is not fractured

(2) When excavations less than 5 feet deep where there is no indication of possible cave-in, as determined by a competent person.

B. Trench Shields

(1) Must have the strength to resist all intended or expected loads.
- (a) It must not be overloaded

(2) Workers must be protected from cave-ins when they are entering and exiting trench shields.

(3) Lateral or hazardous movement should be restricted.

(4) Workers are not permitted in shields when they are being installed, removed, or moved vertically.

(5) Workers may remain in trench shields if the shields are moved horizontally and not lifted.

(6) Removal of materials to a depth of 2 feet below the bottom of the support system is permitted if the system is designed to resist loads at the full depth of the trench.

C. Sloping and Benching Systems

(1) Must be selected and constructed by the employers or their designers using one or more of four alternative methods.
- (a) Trenches may be sloped at an angle of 34 degrees or 1.5 feet horizontally:1 foot vertically, or use another configuration described for Type "C" soil.
- (b) Trench systems may have sloping and benching configurations using the following:
  - (I) Soil and rock must be classified based on:
    - (i) Site and environmental conditions
    - (ii) The composition of the soil
    - (iii) Acceptable visual and manual tests for classifying soils.
- (c) Select sloping or benching configuration based on soil type.
  - (I) Designs using other tabulated date, such as tables and charts, may be used to select proper sloping and benching configurations.

(II) This must contain the following:
- (i) Identity of the RPE who approved the data must be stamped on the data.
- (ii) The tabulated data must be in written form, describing detailed information on its use and limitations.
- (iii) Tabulated data must be at the jobsite during construction of the protective system

(III) After construction of the protective system, the tabulated data may be kept off site but must be available for inspection.

(d) Sloping and/or benching designs prepared and approved by the RPE may be used if the following conditions are met:
- (I) Identity of the RPE who approved the data must be stamped on the sloping and/or benching designs.
- (II) Designs must identify the project
- (III) The configurations must be determined safe for the project
- (IV) Design must be at the jobsite during construction of the sloping and/or benching configuration
- (V) After construction of the sloping configuration, the design may be kept off site, but must be available for inspection.

(e) Excavations greater than 20 feet in depth shall be designed by a RPE and the tabulated data and design must be available for inspection.

D. Design of support systems:

(1) Trench shield and other protective systems must be selected and constructed by one or more of the alternative methods. Design of field-erected trench boxes to be by a RPE.

(2) A competent person may design timber shoring if designed per OSHA regulations 1926, subpart P, appendices A and C.
- (a) Similarly, appendix A and D may be used for hydraulic shoring if the manufacturer's tabulated data is not available or cannot be used.

(3) Designs using pre-manufactured protective systems (shoring, shields, or other) and components must be prepared using the manufacturer's tabulated data.
- (a) Changes to designs may only be approved by the manufacturer and a copy of the approval must be on site.

(4) Designs using other tabulated data, such as tables and charts, may be used to design support systems, shield systems, or other protective systems providing the following is known
- (a) There must be enough information to make an accurate selection of the protective system.
- (b) Identity of the RPE who approved the data must be stamped on the data.
- (c) The tabulated data must be in written form, describing detailed information on its use and limitations.
- (d) Tabulated data must be at the jobsite during construction of the protective.

(5) Materials and equipment used for protective systems shall be:
- (a) Free from damage or defects and maintained in good condition.
- (b) Be inspected by a competent person and removed from use if determined unsafe. If determined unsafe by a competent person the materials must be evaluated and approved by an RPE before being returned to service.

(6) Installation of support systems shall meet the following:
- (a) Supported members of the system must be securely connected together, and on overloaded.
- (b) Employees must be protected from cave-ins and other hazards during installation and removal.
- (c) Precautions must be taken to prevent cave-in during removal of structural supports. Removal must start from the bottom.
- (d) Observe structure for indications of failure during removal of support systems, and backfill as removal of support systems progresses.

(7) Additional requirements for support systems:
- (a) Removal of materials to a depth of 2 feet below the bottom of the support system is permitted if:
  - (I) The system is designed to resist loads at the full depth of the trench.
  - (II) There are no indications of the possible collapse of soil from behind or below the bottom of the support system.
  - (III) Support systems must be installed as the excavation of the trench proceeds.
  - (VI) Employees are not permitted to work on the faces of sloped or benched excavations above other employees, unless the employees at the lower levels are protected from being struck by materials or equipment.

1.0 Policy:

A. This Policy sets forth requirements for the use of fall protection systems and the protection of employees from death or injury from falls.

2.0 Scope:

A. Supervisors will determine if the walking/working surfaces on which its employees are to work have the strength and structural integrity to support employees safely.

B. Employees shall be allowed to work on those surfaces only when the surfaces have the requisite strength and structural integrity.

3.0 Definitions:

Anchorage means a secure point of attachment for lifelines, lanyards or deceleration devices.

Body belt (safety belt) means a strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

Body harness means straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest and shoulders with means for attaching it to other components of a personal fall arrest system.

Buckle means any device for holding the body belt or body harness closed around the employee's body.

Connector means a device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabiner, or it may be an integral component of part of the system (such as a buckle or dee-ring sewn into a body belt or body harness, or a snap-hook spliced or sewn to a lanyard or self-retracting lanyard).

Controlled access zone (CAZ) means an area in which certain work (e.g., overhand bricklaying) may take place without the use of guardrail systems, personal fall arrest systems, or safety net systems and access to the zone is controlled.

Dangerous equipment means equipment (such as pickling or galvanizing tanks, degreasing units, machinery, electrical equipment, and other units) which, as a result of form or function, may be hazardous to employees who fall onto or into such equipment.

Deceleration device means any mechanism, such as a rope grab, rip-stitch lanyard, specially-woven lanyard, tearing or deforming lanyards, automatic self-retracting lifelines/lanyards, etc., which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

Deceleration distance means the additional vertical distance a falling employee travels, excluding lifeline elongation and free fall distance, before stopping, from the point at which the deceleration device begins to operate. It is measured as the distance between the location of an employee's body belt or body harness attachment point at the moment of activation (at the onset of fall arrest forces) of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.

Equivalent means alternative designs, materials, or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

Failure means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

Free fall means the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

Free fall distance means the vertical displacement of the fall arrest attachment point on the employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

Guardrail system means a barrier erected to prevent employees from falling to lower levels.

Hole means a gap or void 2 inches (5.1 cm) or more in its least dimension, in a floor, roof, or other walking/working surface.

Infeasible means that it is impossible to perform the construction work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

Lanyard means a flexible line of rope, wire rope, or strap which generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline, or anchorage.

Leading edge means the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

Lifeline means a component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline), and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

Low-slope roof means a roof having a slope less than or equal to 4 in 12 (vertical to horizontal).

Lower levels mean those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

Mechanical equipment means all motor or human propelled wheeled equipment used for roofing work, except wheelbarrows and mop carts.

Opening means a gap or void 30 inches (76 cm) or more high and 18 inches (48 cm) or more wide, in a wall or partition, through which employees can fall to a lower level.

Personal fall arrest system means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these. As of January 1, 1998, the use of a body belt for fall arrest is prohibited.

Positioning device system means a body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

Rope grab means a deceleration device which travels on a lifeline and automatically, by friction, engages the lifeline and locks so as to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

Roof means the exterior surface on the top of a building. This does not include floors or formwork which, because a building has not been completed, temporarily becomes the top surface of a building.

Roofing work means the hoisting, storage, application, and removal of roofing materials and equipment, including related insulation, sheet metal, and vapor barrier work, but not including the construction of the roof deck.

Safety-monitoring system means a safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.

Self-retracting lifeline/lanyard means a deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under slight tension during normal employee movement, and which, after onset of a fall, automatically locks the drum and arrests the fall.

Snaphook means a connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types:

(A) The locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or

(B) The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. As of January 1, 1998, the use of a non-locking snaphook as part of personal fall arrest systems and positioning device systems is prohibited.

Steep roof means a roof having a slope greater than 4 in 12 (vertical to horizontal).

Toeboard means a low protective barrier that will prevent the fall of materials and equipment to lower levels and provide protection from falls for personnel.

Unprotected sides and edges means any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches (1.0 m) high.

Walking/working surface means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

Warning line system means a barrier erected on a roof to warn employees that they are approaching an unprotected roof side or edge, and which designates an area in which roofing work may take place without the use of guardrail, body belt, or safety net systems to protect employees in the area.

Work area means that portion of a walking/working surface where job duties are being performed.

4.0 Training:

A. All Employees exposed to fall hazards will be to recognize fall hazards and the procedures to be followed in order to minimize these hazards.

B. Fall protection training as a minimum will consist of the following:

(1) Nature of fall hazards in the work area;

(2) Correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used;

(3) Use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used;

(4) Safety monitoring system when this system is used;

(5) The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs;

(6) The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection;

(7) Fall protection plans;

(8) Personal fall protections systems.

(9) Hole covers.

(10) Guard rail systems.

(11) Leading edge protection.

C. Certification of training.

(1) Employees will be trained and issued a certification of training prior to working under condition that require fall protection.

(2) A copy of the latest training certification shall be maintained in the training file.

(3) Retraining

(a) When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill, the employer shall retrain each such employee.

(b) Circumstances where retraining is required include, but are not limited to, situations where:

(I) Changes in the workplace render previous training obsolete; or

(II) Changes in the types of fall protection systems or equipment to be used render previous training obsolete; or

(III) Inadequacies in an affected employee's knowledge or use of fall

protection systems or equipment indicate that the employee has not retained the requisite understanding or skill.

5.0 Fall Protection Requirements:

A. Unprotected sides and edges

(1) Walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected by the use of guardrail systems, safety net systems, or personal fall arrest systems.

B. Leading edges.

(1) Leading edge 6 feet (1.8 m) or more above lower levels shall be protected by guardrail systems, safety net systems, or personal fall arrest systems.
(a) Exception:
(I) When the employer can demonstrate that it is infeasible or creates a greater hazard to use these systems, the employer shall develop and implement a fall protection plan.

(2) Walking/working surface 6 feet (1.8 m) or more above a lower level where leading edges are under construction, shall be protected from falling by a guardrail system, safety net system, or personal fall arrest system.

(3) If a guardrail system is chosen to provide the fall protection, and a controlled access zone has already been established for leading edge work, the control line may be used in lieu of a guardrail along the edge that parallels the leading edge.

C. Hoist areas.

(1) Hoist area shall be protected from falling 6 feet (1.8 m) or more to lower levels by guardrail systems or personal fall arrest systems.

(2) If guardrail systems, [or chain, gate, or guardrail] or portions thereof, are removed to facilitate the hoisting operation (e.g., during landing of materials), and an employee must lean through the access opening or out over the edge of the access opening (to receive or guide equipment and materials, for example), that employee shall be protected from fall hazards by a personal fall arrest system.

D. Holes

(1) Employees will be protected from falling through holes (including skylights) more than 6 feet (1.8 m) above lower levels, by personal fall arrest systems, covers, or guardrail systems erected around such holes.

(2) Employees will be protected from tripping in or stepping into or through holes (including skylights) by covers.

(3) Employees will be protected from objects falling through holes (including skylights) by covers.

E. Formwork and reinforcing steel.

(1) Employees working on the face of formwork or reinforcing steel shall be protected from

falling 6 feet (1.8 m) or more to lower levels by personal fall arrest systems, safety net systems, or positioning device systems.

F. Ramps, runways, and other walkways.

(1) Ramps, runways, and other walkways higher than 6 feet (1.8 m) or more to lower levels shall be protected by guardrail systems.

G. Excavations.

(1) Excavations 6 feet (1.8 m) or more in depth shall be protected by a guardrail systems, fences, or barricades when the excavations are not readily seen because of plant growth or other visual barrier;

(2) The edge of a well, pit, shaft, and similar excavation 6 feet (1.8 m) or more in depth shall be protected by guardrail systems, fences, barricades, or covers.

H. Dangerous equipment.

(1) When employees are less than 6 feet (1.8 m) above dangerous equipment they will be protected from falling into or onto the dangerous equipment by guardrail systems or by equipment guards.

(2) Employee 6 feet (1.8 m) or more above dangerous equipment shall be protected from fall hazards by guardrail systems, personal fall arrest systems, or safety net systems.

G. Roofing work

(1) Low-slope roofs.
(a) Employees working on low-slope roofs, with unprotected sides and edges 6 feet (1.8 m) or more above lower levels shall be protected by:
(I) A guardrail systems,
(II) Safety net systems,
(III) Personal fall arrest systems, or
(IV) A combination of warning line system and guardrail system, warning line system and safety net system, or
(V) Warning line system and personal fall arrest system, or
(VI) Warning line system and safety monitoring system.

(2) Steep roofs.

(a) Employees working on a steep roof with unprotected sides and edges 6 feet (1.8 m) or more above lower levels shall be protected from falling by guardrail systems with toeboards, safety net systems, or personal fall arrest systems

7.0 Competent Person Qualifications, Duties, and Safety Monitoring:

A. A competent person will be designated to monitor the safety of other employees and comply with the following requirements:

(1) Be competent to recognize fall hazards;

(2) Installation of fall protection systems,

(3) Authority to make modifications to system as needed,

(4) Warn the employee when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner;

(5) On the same walking/working surface and within visual sighting distance of the employee being monitored;

(6) Close enough to communicate orally with the employee; and

(7) Have no other responsibilities which could take the monitor's attention from the monitoring function.

(8) Inspect fall protection system prior to use.

(9) Equipment shall not be used or stored in areas where safety monitoring systems are being used to monitor employees engaged in roofing operations on low-slope roofs.

(10) Employees working in a controlled access zone shall be directed to comply promptly with fall hazard warnings from safety monitors.

8.0 Safe Working Practices and Procedures:

A. "Guardrail systems".

(1) Guardrail systems and their use shall comply with the following provisions:

(a) Top edge height of top rails, or equivalent guardrail system members, shall be 42 inches (1.1 m) plus or minus 3 inches (8 cm) above the walking/working level.

(b) When conditions warrant, the height of the top edge may exceed the 45-inch height, provided the guardrail system meets all other criteria of this paragraph.

Note: When employees are using stilts, the top edge height of the top rail, or equivalent member, shall be increased an amount equal to the height of the stilts.

(2) Midrails, screens, mesh, intermediate vertical members, or equivalent intermediate structural members shall be installed between the top edge of the guardrail system and the walking/working surface when there is no wall or parapet wall at least 21 inches (53 cm) high.
- (a) Midrails, when used, shall be installed at a height midway between the top edge of the guardrail system and the walking/working level.
- (b) Screens and mesh, when used, shall extend from the top rail to the walking/working level and along the entire opening between top rail supports.
- (c) Intermediate members (such as balusters), when used between posts, shall be not more than 19 inches (48 cm) apart.
- (d) Other structural members (such as additional midrails and architectural panels) shall be installed such that there are no openings in the guardrail system that are more than 19 inches (.5 m) wide.

(3) Guardrail systems shall be capable of withstanding, without failure, a force of at least 200 pounds (890 N) applied within 2 inches (5.1 cm) of the top edge, in any outward or downward direction, at any point along the top edge.
- (a) When the 200 pound (890 N) test load is applied in a downward direction, the top edge of the guardrail shall not deflect to a height less than 39 inches (1.0 m) above the walking/working level.

(4) Midrails, screens, mesh, intermediate vertical members, solid panels, and equivalent structural members shall be capable of withstanding, without failure, a force of at least 150 pounds (666 N) applied in any downward or outward direction at any point along the midrail or other member.

(5) Guardrail systems shall be so surfaced as to prevent injury to an employee from punctures or lacerations, and to prevent snagging of clothing.

(6) The ends of all top rails and midrails shall not overhang the terminal

(7) Top rails and midrails shall be at least one-quarter inch (0.6 cm) nominal diameter or thickness to prevent cuts and lacerations.
- (a) If wire rope is used for top rails, it shall be flagged at not more than 6-foot intervals with high-visibility material.

(8) When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section shall be placed across the access opening between guardrail sections when hoisting operations are not taking place.

(9) When guardrail systems are used at holes, they shall be erected on all unprotected sides or edges of the hole.

(10) When guardrail systems are used around holes used for the passage of materials, the hole shall have not more than two sides provided with removable guardrail sections to allow the passage of materials.
- (a) When the hole is not in use, it shall be closed over with a cover, or a guardrail system shall be provided along all unprotected sides or edges.

(11) When guardrail systems are used around holes which are used as points of access (such as ladderways), they shall be provided with a gate, or be so offset that a person cannot walk directly into the hole.

(12) Guardrail systems used on ramps and runways shall be erected along each unprotected side or edge.

(13) Manila, plastic or synthetic rope being used for top rails or midrails shall be inspected as frequently as necessary to ensure that it continues to meet the strength requirements

B. Safety net systems

(1) Safety net systems and their use shall comply with the following provisions:
- (a) Safety nets shall be installed as close as practicable under the walking/working surface on which employees are working, but in no case more than 30 feet (9.1 m) below such level.
- (b) When nets are used on bridges, the potential fall area from the walking/working surface to the net shall be unobstructed.

(2) Safety nets shall extend outward from the outermost projection of the work surface as follows:

Vertical distance from working level to horizontal plane of net	Minimum required horizontal distance of outer edge of net From the edge of the working surface
Up to 5 feet	8 feet.
More than 5 feet up to 10 feet	10 feet.
More than 10 feet	13 feet.

(3) Safety nets shall be installed with sufficient clearance under them to prevent contact with the surface or structures below when subjected to an impact force equal to the drop test.
- (a) Safety nets and their installations shall be capable of absorbing an impact force equal to that produced by the drop test.
- (b) Safety nets and safety net installations shall be drop-tested at the jobsite after initial installation and before being used as a fall protection system, whenever relocated, after major repair, and at 6-month intervals if left in one place.
- (c) The drop-test shall consist of a 400 pound (180 kg) bag of sand 30 + or - 2 inches (76 + or - 5 cm) in diameter dropped into the net from the highest walking/working surface at which employees are exposed to fall hazards, but not from less than 42 inches (1.1 m) above that level.

(4) Defective nets shall not be used.
- (a) Safety nets shall be inspected at least once a week for wear, damage, and other deterioration.
- (b) Defective components shall be removed from service.
- (c) Safety nets shall also be inspected after any occurrence which could affect the integrity of the safety net system.

(5) Materials, scrap pieces, equipment, and tools which have fallen into the safety net shall be removed as soon as possible from the net and at least before the next work shift.

(6) The maximum size of each safety net mesh opening shall not exceed 36 square inches (230 cm) nor be longer than 6 inches (15 cm) on any side, and the opening, measured center-to-center of mesh ropes or webbing, shall not be longer than 6 inches (15 cm).

(a) All mesh crossings shall be secured to prevent enlargement of the mesh opening.

(7) Each safety net (or section of it) shall have a border rope for webbing with a minimum breaking strength of 5,000 pounds (22.2 kN).

(8) Connections between safety net panels shall be as strong as integral net components and shall be spaced not more than 6 inches (15 cm) apart.

C. Personal fall arrest systems.

(1) Personal fall arrest systems and their use shall comply with the provisions set forth by OSHA.

(2) All personal fall protection devices and arrest systems issued to employee will be tested and certified by ANSI or ASTM Testing and Standard program and labeled as such on the device.

(3) Connectors shall be drop forged, pressed or formed steel, or made of equivalent materials
(a) Connectors shall have a corrosion-resistant finish, and all surfaces and edges shall be smooth to prevent damage to interfacing parts of the system.

(4) Dee-rings and snaphooks shall have a minimum tensile strength of 5,000 pounds (22.2 kN).
(a) Dee-rings and snaphooks shall be proof-tested to a minimum tensile load of 3,600 pounds (16 kN) without cracking, breaking, or taking permanent deformation.
(b) Only locking type snaphooks shall be used.

(5) Full body harness and shock absorbing lanyard will be used by all employee requiring fall protection.
(a) Allow 3.5 feet for the shock absorber, plus length of the lanyard, and employee's height when calculating the heigh of the tie off point.

(6) Personal fall arrest systems, when stopping a fall, shall:
(a) limit maximum arresting force on an employee to 1,800 pounds (8 kN) when used with a body harness;
(b) be rigged such that an employee can neither free fall more than 6 feet (1.8 m), nor contact any lower level;
(c) bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet (1.07 m); and,
(d) have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet (1.8 m), or the free fall distance permitted by the system, whichever is less.

(7) The attachment point of the body belt shall be located in the center of the wearer's back.
(a) The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level, or above the wearer's head.
(b) Harnesses and components shall be used only for employee protection (as part of a personal fall arrest system or positioning device system) and not to hoist materials.

(8) Personal fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection until inspected and determined by a competent person to be undamaged and suitable for reuse.

(9) The employer shall provide for prompt rescue of employees in the event of a fall or shall assure that employees are able to rescue themselves.

(10) Personal fall arrest systems shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.

(11) Personal fall arrest systems shall not be attached to guardrail systems, nor shall they be attached to hoists

D. Lifelines and Lanyards

(1) On suspended scaffolds or similar work platforms with horizontal lifelines which may become vertical lifelines, the devices used to connect to a horizontal lifeline shall be capable of locking in both directions on the lifeline.

(2) Horizontal lifelines shall be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.

(3) Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds (22.2 kN).
(a) When vertical lifelines are used, each employee shall be attached to a separate lifeline.

(4) Lifelines shall be protected against being cut or abraded.

(5) Self-retracting lifelines and lanyards which automatically limit free fall distance to 2 feet (0.61 m) or less shall be capable of sustaining a minimum tensile load of 3,000 pounds (13.3 kN) applied to the device with the lifeline or lanyard in the fully extended position.

(6) Self-retracting lifelines and lanyards which do not limit free fall distance to 2 feet (0.61 m) or less, ripstitch lanyards, and tearing and deforming lanyards shall be capable of sustaining a minimum tensile load of 5,000 pounds (22.2 kN) applied to the device with the lifeline or lanyard in the fully extended position.

(7) Ropes and straps (webbing) used in lanyards, lifelines, and strength components of body belts and body harnesses shall be made from synthetic fibers.

E. Anchorages

(1) Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds (22.2 kN) per employee attached, or shall be designed, installed, and used as follows:
(a) as part of a complete personal fall arrest system which maintains a safety factor of at least two; and
(b) under the supervision of a qualified person.

F. Warning line systems.

(1) The warning line shall be erected around all sides of the roof work area.

(2) When mechanical equipment is not being used, the warning line shall be erected not less

than 6 feet (1.8 m) from the roof edge.

(3) When mechanical equipment is being used, the warning line shall be erected not less than 6 feet (1.8 m) from the roof edge which is parallel to the direction of mechanical equipment operation, and not less than 10 feet (3.1 m) from the roof edge which is perpendicular to the direction of mechanical equipment operation.

(4) Points of access, materials handling areas, storage areas, and hoisting areas shall be connected to the work area by an access path formed by two warning lines.

(5) When the path to a point of access is not in use, a rope, wire, chain, or other barricade, equivalent in strength and height to the warning line, shall be placed across the path at the point where the path intersects the warning line erected around the work area, or the path shall be offset such that a person cannot walk directly into the work area.

(6) Warning lines shall consist of ropes, wires, or chains and supporting stanchions erected as follows:

(7) The rope, wire, or chain shall be flagged at not more than 6-foot (1.8 m) intervals with high-visibility material;

(8) The rope, wire, or chain shall be rigged and supported in such a way that its lowest point (including sag) is no less than 34 inches (.9 m) from the walking/working surface and its highest point is no more than 39 inches (1.0 m) from the walking/working surface;

(9) After being erected, with the rope, wire, or chain attached, stanchions shall be capable of resisting, without tipping over, a force of at least 16 pounds (71 N) applied horizontally against the stanchion, 30 inches (.8 m) above the walking/working surface, perpendicular to the warning line, and in the direction of the floor, roof, or platform edge;

(10) The rope, wire, or chain shall have a minimum tensile strength of 500 pounds (2.22 kN), and after being attached to the stanchions, shall be capable of supporting, without breaking, the loads applied to the stanchions as prescribed in paragraph (f)(2)(iii) of this section; and

(11) The line shall be attached at each stanchion in such a way that pulling on one section of the line between stanchions will not result in slack being taken up in adjacent sections before the stanchion tips over.

(12) No employee shall be allowed in the area between a roof edge and a warning line unless the employee is performing roofing work in that area.

(13) Mechanical equipment on roofs shall be used or stored only in areas where employees are protected by a warning line system, guardrail system, or personal fall arrest system.

G. Hole and wall opening covers.

(1) Covers located in roadways and vehicular aisles shall be capable of supporting, without failure, at least twice the maximum axle load of the largest vehicle expected to cross over the cover.

(2) All other covers shall be capable of supporting, without failure, at least twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time.

(3) All covers shall be secured when installed so as to prevent accidental displacement by the wind, equipment, or employees.

(4) All covers shall be color coded or they shall be marked with the word "HOLE" or "COVER" to provide warning of the hazard.

H. Protection from falling objects.

(1) Toeboards, when used as falling object protection, shall be erected along the edge of the overhead walking/working surface for a distance sufficient to protect employees below.

(2) Toeboards shall be capable of withstanding, without failure, a force of at least 50 pounds (222 N) applied in any downward or outward direction at any point along the toeboard.

(3) Toeboards shall be a minimum of 3 ½ inches (9 cm) in vertical height from their top edge to the level of the walking/working surface.
(a) They shall have not more than 1/4 inch (0.6 cm) clearance above the walking/working surface.
(b) They shall be solid or have openings not over 1 inch (2.5 cm) in greatest dimension

(4) Where tools, equipment, or materials are piled higher than the top edge of a toeboard, paneling or screening shall be erected from the walking/working surface or toeboard to the top of a guardrail system's top rail or midrail, for a distance sufficient to protect employees below.

(5) Guardrail systems, when used as falling object protection, shall have all openings small enough to prevent passage of potential falling

8.0 Fall protection plan:

A. It is not a standard practice of Core States Construction Services, Inc. or Core States Group, Inc. to engage in the work covered by 29CFR1926.502(k). This option is available only when engaged in leading edge work, precast concrete erection work, or residential construction when it can be demonstrated that it is infeasible or it creates a greater hazard to use conventional fall protection equipment.

B. Because it is not a standard practice of the company to engage in the work covered by 29CFR1926.502(k), written fall protection plans are not an option available and controlled access zones will not be utilized.

C. In the event that the need for a fall protection plan should arise, contact your supervisor for assignment to the appropriate qualified person. The guidelines listed below will apply in situations that warrant the need for fall protection plans and controlled access zones.

D. The fall protection plan must conform to the following provisions.

(1) The plan shall be prepared by a qualified person and developed specifically for the site where the leading edge work, precast concrete work, or residential construction work is being performed and the plan must be maintained up to date. The qualified person selected will be determined by the region in which the work is being performed. Contact Dick Cote, President, for assignment to a qualified person. (Default: Art Sodermark, President, Platinum Engineering & Safety, Inc.)

(2) Any changes to the fall protection plan shall be approved by a qualified person.

(3) A copy of the fall protection plan with all approved changes shall be maintained at the job site.

(4) The implementation of the plan shall be under the supervision of a competent person.

(5) The plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety nets systems) are infeasible or why their use would create a greater hazard.

(6) The plan shall include a written discussion of other measures that will be taken to reduce or eliminate the fall hazard for workers who cannot be provided with protection from the conventional fall protection systems.
(a) For example, it shall discuss the extent to which scaffolds, ladders, or vehicle mounted work platforms can be used to provide a safer working surface and thereby reduce the hazard of falling.

(7) The plan shall identify each location where conventional fall protection methods cannot be used.
(a) These locations shall then be classified as controlled access zones.

(8) Where no other alternative measure has been implemented, the safety monitoring system will be implemented.

(9) The plan will include a statement which provides the name or other method of identification for each employee who is designated to work in controlled access zones.
(a) No other employees may enter controlled access zones

9.0 Control Access Zones:

A. When used to control access to areas where leading edge and other operations are taking place the controlled access zone shall be defined by a control line or by any other means that restricts access.

B. When control lines are used, they shall be erected not less than 6 feet (1.8 m) nor more than 25 feet (7.7 m) from the unprotected or leading edge, except when erecting precast concrete members.

(1) The control line shall extend along the entire length of the unprotected or leading edge and shall be approximately parallel to the unprotected or leading edge.

(2) The control line shall be connected on each side to a guardrail system or wall.

(3) The controlled access zone shall be defined by a control line erected not less than 10 feet (3.1 m) nor more than 15 feet (4.5 m) from the working edge.

(4) Additional control lines shall be erected at each end to enclose the controlled access zone.

C. Control lines shall consist of ropes, wires, tapes, or equivalent materials, and supporting stanchions as follows:

(1) Each line shall be flagged or otherwise clearly marked at not more than 6-foot (1.8 m) intervals with high-visibility material.

(2) Each line shall be rigged and supported in such a way that its lowest point (including sag) is not less than 39 inches (1 m) from the walking/working surface and its highest point is not more than 45 inches (1.3 m) [50 inches (1.3 m) when overhand bricklaying operations are being performed] from the walking/working surface.

(3) Each line shall have a minimum breaking strength of 200 pounds (.88 kN).

D. On floors and roofs where guardrail systems are in place, but need to be removed to allow leading edge work to take place, only that portion of the guardrail necessary to accomplish that day's work shall be removed.

10.0 Accident Investigation:

A. In the event an employee falls, or some other related, serious incident occurs, (e.g., a near miss) the employer shall investigate the circumstances of the fall or other incident to determine if the fall protection plan needs to be changed (e.g. new practices, procedures, or training) and shall implement those changes to prevent similar types of falls or incidents

11.0 Fall Protection Equipment:

A. All fall protection devices and equipment will meet current ANSI and ASTM Codes and standards for the manufacture and testing of fall protection in accordance with NIOSH requirements.

B. All fall protection equipment and systems will be certified and the NIOSH, ANSI or ASTM Certification or Testing Number attached to the unit.

C. Equipment or devices not certified and tested under these standards are unacceptable and will not be purchased or used.

1.0 Purpose:

A. Prevent injuries or loss of life due to fires.

B. Prevent loss or damage of property due to fires.

2.0 Definitions:

"Flashpoint" means the minimum temperature at which a liquid gives off vapor within a test vessel in sufficient concentration to form an ignitable mixture with air near the surface of the liquid.

"Combustible liquid" means any liquid having a flashpoint at or above 100 deg. F. (37.8 deg. C.) Combustible liquids shall be divided into two classes as follows:

A. **"Class II liquids"** shall include those with flashpoints at or above 100 deg. F. (37.8 deg. C.) and below 140 deg. F. (60 deg. C.), except any mixture having components with flashpoints of 200 deg. F. (93.3 deg. C.) or higher, the volume of which make up 99 percent or more of the total volume of he mixture.

B. **"Class III liquids"** shall include those with flashpoints at or above 140 deg. F. (60 deg. C.) Class III liquids are subdivided into two subclasses:

C. **"Class IIIA liquids"** shall include those with flashpoints at or above 140 deg. F. (60 deg. C.) and below 200 deg. F. (93.3 deg. C.), except any mixture having components with flashpoints of 200 deg. F. (93.3 deg. C.), or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.

D. **"Class IIIB liquids"** shall include those with flashpoints at or above 200 deg. F. (93.3 deg. C.). This section does not cover Class IIIB liquids. Where the term "Class III liquids" is used in this section, it shall mean only Class IIIA liquids.

E. When a combustible liquid is heated for use to within 30 deg. F. (16.7 deg. C.) of its flashpoint, it shall be handled in accordance with the requirements for the next lower class of liquids.

"Flammable liquid" means any liquid having a flashpoint below 100 deg. F. (37.8 deg. C.), except any mixture having components with flashpoints of 100 deg. F. (37.8 deg. C.) or higher, the total of which make up 99 percent or more of the total volume of the mixture. Flammable liquids shall be known as Class I liquids. Class I liquids are divided into three classes as follows:

A. **Class IA** shall include liquids having flashpoints below 73 deg. F. (22.8 deg. C.) and having a boiling point below 100 deg. F. (37.8 deg. C.).

B. **Class IB** shall include liquids having flashpoints below 73 deg. F. (22.8 deg. C.) and having a boiling point at or above 100 deg. F. (37.8 deg. C.).

C. **Class IC** shall include liquids having flashpoints at or above 73 deg. F. (22.8 deg. C.) and below 100 deg. F. (37.8 deg. C.).

"Safety can" shall mean an approved container, of not more than 5 gallons capacity, having a spring-closing lid and spout cover and so designed that it will safely relieve internal pressure when subjected to fire exposure. Must also have a spark arresting screen installed.

3.0 Fire Prevention:

A. Fire prevention measures are to be taken on all projects.

B. The following are guidelines for fire prevention and do not cover all OSHA requirements.

(1) Construction Regulations, Subpart F, 1926.150 to 1926.155, constitute minimum requirements and must be adhered to.

(2) If the job consists of maintenance, modification, or additions to existing facilities, follows fire prevention regulations of the Client.

(3) See that proper precautions are taken with welding and burning operations.
(a) Use a permit system and fire watcher when necessary.

(4) Tarpaulins, salamanders, and combustible materials should be placed to avoid possibilities of fire.

(5) Oily rags and waste from flammable or hazardous materials must be kept in covered metal containers.

(6) "No Smoking" areas must be conspicuously marked and employees advised accordingly.

(7) Gasoline shall be kept in only approved containers, properly marked and vented.

(8) Large portable gasoline tanks and pumps are to be set a minimum of 50 feet from any building.

(9) Combustible materials must be properly grounded.

(10) The storage area shall be kept free of weeds, debris and other combustible material not necessary to the storage.

(11) Job housekeeping is to be enforced with waste containers emptied at the end of each days work.

(12) Flammable debris is to be accumulated only in locations which will not endanger property in the event of fire and is to be placed no closer than 20 feet to any building or structure.

(13) Accumulations of flammable debris are to be placed in suitable containers (typically sealed metal containers) in remote locations and properly disposed of on a regular basis, at least weekly.

(14) Indoor storage of material shall not obstruct or adversely affect means of exit and only with the client's permission.

(15) All materials shall be stored, handled, and piled with due regard to their fire characteristics.

(16) Electrical wiring and equipment shall be installed in compliance with the National Electrical Code, NFPA, and the requirements of OSHA Construction Regulations, Subpart K.

(17) Conduct regular periodic inspections of the entire project to assure that it remains in a fire-safe condition.

4.0 Emergency Fire Procedures:

A. Arrange with local fire departments (private, plant, municipal) to fight fires.

B. Make sure emergency phone numbers are conspicuously posted throughout the project.

C. Instruct employees in the use of fire extinguishers.

D. Fire extinguishers are to be wall-mounted (if applicable), readily visible, and regularly inspected and maintained.

E. The Supervisor will be responsible for determining the number, sizes, and types of fire extinguishers needed to each job.

F. Listed below are fire classifications and the type of extinguishers used to combat the fires:

Class A Fires -	wood, textiles and rubbish. Type of Extinguisher used: soda acid, foam, dry chemical, water barrels, buckets, and water pumps**.**
Class B Fires -	fuel, oil and flammable liquids, greases, motor vehicles, Typeof Extinguisher used: foam, dry chemical, carbon dioxide.
Class C Fires -	live electrical equipment. Type of Extinguisher used: dry chemical, carbon dioxide.

5.0 Fire Considerations:

A. A few of the fire safety features to be concerned with are exits, travel distances, emergency lighting, and alarm systems.

B. Sealing off an area and blocking entrance/exit openings conflict with OSHA, NFPA, and local fire code requirements.

C. The contract specifications may state one means of egress through a properly; however, emergency plans should be developed to include alternative exits in emergency situations and these must be familiar to all employees.

6.0 Pre-Project Survey:

A. Perform a prework survey to determine potential fire hazards, sources of ignition, hot-spots, and location of exits.

B. Coordinate this with the number of workers to be in the area, the square footage, and the types and amount of combustible/flammable materials that will remain on site.

C. Some protective clothing will burn and melt quickly.

(1) It can shrink, adhere to skin and drip as it burns.

(2) Heavy black smoke is a combustion by-product.

D. Polyethylene (it's combustible) will start to burn slowly and pick up speed as the fire progresses.

(1) Flames spread is slow and steady.

(2) Sheeting should be kept away from heat sources such as transformers, steam pipes, boilers, etc., that will be heated during removal.

(3) Polyethylene should not be allowed to contact surfaces above 150 degrees Fahrenheit.

7.0 Avoidance:

A. Ensure all sources of ignition are removed.

B. Be sure that gas and other fuel sources are cut off and that pilot lights in boilers, heaters, hot water tanks, compressors, etc., are extinguished.

C. Locate "hot spots". Quite often you will have to drape equipment instead of sealing off to prevent overheating (i.e., computers, terminal boards, switch panels, transformers).

D. Cut off supply to steam lines, electric and steam heaters, and radiators.

(1) Do not permit the polyethylene to lie against hot surfaces.

E. Do not allow lighters, matches, etc., into the work area.

F. Strictly enforce no smoking, eating, or drinking inside the work area.

G. When using an oxygen/acetylene torch to cut pipe, etc., post a fire watch with an appropriate fire extinguisher such as pressurized water.

I. Do not use CO_2 extinguisher in confined or enclosed spaces.

J. Dry chemical extinguishers are effective, but the power is a respiratory irritant.

K. Know what is on the other side of the wall and below the floor.

(1) Use sheet metal or a treated tarp to catch sparks.

(L) Lighting of exits and exit routes should be provided.

(M) Be alert for flammable vapors in industrial areas (solvents such as naphtha, toluene, xylol, etc.).

8.0 OSHA Fire Safety Standards:

A. OSHA requires a written emergency action plan and fire prevention plan.

B. The requirements are detailed in 29 CFR 1910.38. Briefly, the essential items of the plan should include:

(1) The manner in which emergencies are announced.

(2) Emergency escape procedures and emergency escape routes.

(3) Procedures for employees who must remain to operate critical plant operations which may take time to shut down.

(4) Procedures to account for all employees after evacuation.

(5) Rescue and medical duties.

(6) Names and/or job titles of people responsible for maintenance of fire prevention equipment.

(7) Names and/or job titles of people responsible for the control of fuel source hazards.
- (a) Establish a system for alerting workers of a fire or other problem that may require evacuation of the work area.
- (b) A compressed air boat horn provides an effective alarm that can be heard and does not rely on a power source.
- (c) All persons entering the work area should be familiar with the evacuation alarm signal and primary and secondary exits.

(8) A simple floor plan drawing of the work area will be posted to familiarize persons entering the work area with the site and location of exits.

(9) Site specific written emergency procedures will cover procedures to be used in case of:
- (a) Fire, with heavy smoke conditions;
- (b) Power failure;
- (c) Compressor failure with the use of air-supplied respirators;
- (d) Accident; or employee injury.

9.0 Training:

A. All employees will be trained in the use of portable fire extinguishers provided at the workplace.

(1) Training will include:
- (a) Classes of fires.
- (b) Types of portable fire extinguishers.
- (c) Company fire prevention and evacuation plane.
- (d) Alarm system.
- (e) Proper use of the fire extinguisher using the P.A.S.S. System.
- (f) When possible a hands on portable fire extinguisher exercise will be conducted to provide employees with experience with the fire extinguishers.

B. Employee portable fire extinguisher training will be conducted initially on assignment and at least annually thereafter.

C. When using a fire extinguisher, follow the “P-A-S-S” guidelines:

P: **Pull** the pin.
A: **Aim low** at the base of the fire.
S: **Squeeze** the handle.
S: **Sweep** from side to side.

10.0 Fire Extinguisher Service and Maintenance:

A. In accordance with state and federal regulations portable fire extinguishers will be serviced annually.

B. Each portable fire extinguisher will be inspected by company employees at least monthly as follows:

(1) Fire extinguisher is in proper location

(2) Not blocked by stocks or debris

(3) Fully charged

(4) Label or plate in-place and readable

(5) Seal in-place

(6) Nozzle and hose properly attached

C. Records of annual services and monthly inspections shall be retained for one year or the life of the shell, whichever is less.

11.0 Flammable Liquid:

A. This section includes the following excerpts from OSHA Regulations (Standards - 29 CFR), Flammable and combustible liquids - 1910.106.

B. “Sources of ignition":

(1) Adequate precautions shall be taken to prevent the ignition of flammable vapors.

(2) Sources of ignition include but are not limited to:
(a) Open flames;
(b) Lightning;
(c) Smoking;
(d) Cutting and welding;
(e) Hot surfaces;
(f) Frictional heat;
(g) Static,
(h) Electrical, and mechanical sparks;
(i) Spontaneous ignition, including heat-producing chemical reactions; and
(j) Radiant heat.

D. "Grounding."

(1) Class I liquids shall not be dispensed into containers unless the nozzle and container are electrically interconnected.

E. Employees are expected to correct immediately or report for corrections any fire hazards in the work area.

(1) Employees should know the locations, operation and types of extinguishers in the work area(s).

F. Employees must use only metal “safety cans” for transferring flammable liquids.

(1) The use of plastic cans and funnels is prohibited. Gas cans must be in contact with the ground or pavement during filling.

(2) Never fill a gas can that is inside or on a vehicle.

G. Employees must properly ground or bond all containers during the transfer of flammable liquids.

(1) For instance, touch the nozzle to the spout of the metal safety can during dispensing.

H. Fire extinguishers vehicles must be inspected on a daily basis by a technician prior to leaving for a job site.

(1) Inspections include the following:
- (a) Extinguishers are in their designated receptacles.
- (b) Gauges indicate adequate operating pressure.
- (c) Seals are intact and not broken.
- (d) Physical damage, corrosion, or other impairments that could hamper operation are not present.
- (e) Any extinguisher found to be, or suspected of being defective must be repaired or replaced immediately.

(2) Fire extinguishers shall be serviced by authorized personnel only.
- (a) Any employee who uses an extinguisher shall insure that it is replaced with a fully charged and sealed unit.
- (b) Any vehicle with a discharged/non-functioning fire extinguisher will be out of service until said problem is corrected.

12.0 Smoking:

A. Employees must never smoke near flammable liquids, gases or materials, or where "No Smoking" signs are displayed.

B. Lighted matches, cigars, cigarettes, tobacco, or any other burning substances must be disposed of safely in a proper receptacle.

C. **Smoking is not permitted by any employee while working on any job site or while in uniform on or near any job site.**

D. Smoking is not permitted in the vehicle while the vehicle is on site.

(1) The driving compartment of the vehicle is the only area that smoking may be allowed, but only during travel to and from site.

MJ VanDamme Trucking, Inc.
First Aid / CPR Policy
In Accordance With 29 CFR 1910.151

1.0 Policy:

A. In accordance with federal and state health and safety regulations the following medical services and first aid program is instituted for the protection of employees.

B. This policy applies to on and offsite operations, projects and personnel.

2.0 Medical facilities and first aid trained personnel:

A. Medical facilities.

(1) Prior to commencement of a project or job the project manager will note on the job site safety plan the name, location, address, and phone number to the nearest medical facility to the project.

(2) This information will be posted and briefed to all employees on the project.

B. Emergency Medical Rescue and Transportation.

(1) Prior to commencement of a project or job the project manager will note on the job site safety plan the name, location, address, and phone number to the nearest ambulance service to the project.

(2) This information will be posted and briefed to all employees on the project.

(3) If no private ambulance service is within the project area the local fire department emergency medical / rescue will be notified by calling phone # 911.

C. Onsite First Aid personnel:

(1) Due to the requirement to provide emergency medical assistance with in four (4) minutes of the injury the company will provide an First Aid / CPR certified employee or supervisor on each project.

(2) First Aid / CPR duties will be a collateral duty.

(3) Training will be certified by programs such as presented by the American Red Cross or equivalent training programs.

D. Communications:

(1) At least one operating mobile phone or cell phone will be on each job site for emergency communications.

(2) Fully charged back-up batteries will be available in case of battery failure.

3.0 First aid supplies:

A. First aid supplies will be in the form of a standard first aid kit (sealed plastic caring case) carried in each vehicle and a job site first aid kit located with the project safety equipment. Easy access to supplies should be maintained at all times.

B. The first aid kits will contain individually sealed packages of first aid supplies. Supplies will be contained within a weatherproof container. The kits will be checked prior to issue to each vehicle/project. At a minimum the following supplies will be kept in the first aid kits:

(1) Adhesive strips (band aids), assorted

(2) Triangular bandage, 40“

(3) Gauze pads, 3" x 3"

(4) Gauze bandage, 4"

(5) Large wound dressing, 5"x9"

(6) Eye pads

(7) Adhesive tape

(8) Antiseptic wipes

(9) First aid and burn cream

(10) Scissors

(11) Forceps

(12) Exam Gloves

(13) Bloodborne Pathogens kit

(14) First aid instructions

(15) Adhesive tape (rolls of ½” desired)

(16) Packages of absorbent cotton

(17) Box of spirits of ammonia amulets

(18) Eye wash kits (sealed single use plastic bottles - or proper substitutes to flush particles from the eye)

(19) Finger cots (plastic or aluminum protector for an injured finger)

(20) Bottles Merthiolate or suitable disinfectant

C. Over the counter medication will not be supplied in the first aid kits.

D. Operators of the vehicles in which the first aid kits are assigned will inspect the kits, prior to each project or at least weekly to insure that supplies are available and current.

(1) Missing, expended or damaged first aid supplies will be replaced.

(2) Damaged first aid cases will be replaced.

(3) Date sensitive first aid supplies will be replaced before the expiration date.

4.0 Emergency eye wash and showers:

(1) Where employees are exposed to corrosive materials and chemicals, portable eye wash stations and emergency showers will be provided.

(2) Eye wash stations and showers will provide at least 15 minutes of operation insure the decontamination and neutralization of the chemical from the skin and eyes.

5.0 General Procedures:

A. Injuries sustained while on duty shall be reported to your supervisor immediately.

B. Medical attention must be obtained immediately after an injury is sustained.

C. All employees, injured on the job, shall report to a doctor for treatment as soon as possible.

D. First aid kits will be installed and maintained in all company vehicles at all times.

MJ VanDamme Trucking, Inc.
Grounding Conductor Program
In accordance with 29 CFR 1926.404

1.0 Policy:

A. In accordance with current federal and state regulations all electrical tools and equipment are subjected to the grounding requirements set forth in this policy.

B. Project management and supervisors are responsible for insuring compliance with the requirements of this policy.

C. This policy applies to all off site projects and operations.

2.0 Scope:

A. The scope of this policy is to insure that all tools and equipment is properly grounded.

B. Prevent shock or electrocution of employee due to shorts in the system, cords or tools.

C. A written description of grounding procedures will be posted on the project site.

(1) Site specific procedures will be noted and briefed to all employees.

(2) These procedures will be made available for review by employees and Federal and State Inspectors.

3.0 Grounding of Equipment Connected by Cord and Plug:

A. Exposed non-current carrying metal parts of cord and plug connected equipment that may become energized must be grounded in the following situations:

(1) When in a hazardous (classified) location.

(2) When operated at over 150 volts to ground, except when guarded motors and metal frames of electrically heated appliances if the appliance frames are permanently and effectively insulated from ground.

(3) When using one of the types of equipment listed below:
- (a) Hand held motor-operated tools.
- (b) Cord-and-plug-connected equipment used in damp or wet locations, by employees standing on the ground or metal floors.
- (c) Tools likely to be used in wet and/or conductive locations.
- (d) Portable hand lamps.

B. Exemptions

(1) Tools likely to be used in wet and/or conductive locations need not be grounded if supplied through an isolation transformer with an ungrounded secondary of not over 50 volts.

(2) Listed or labeled portable tools and appliances protected by a system of double insulation, or its equivalent.
- (a) In this case, equipment must be distinctively marked to indicate that the tools or appliance uses a system of double insulation.

4.0 Ground Fault Circuit Interrupter (GFCI):

A. All 120-volt, single-phase, 15 and 20 ampere receptacle outlets on our sites, which are not part or the permanent wiring of the building or structure and which are used by our employees, shall have approved ground fault circuit interrupters for personal protection.

B. Where GFCI receptacles are not available, plug in GFCI's will be used by our employees.

C. Receptacles on a two-wire, single-phase portable or vehicle mounted generator rated not more than 5kW, where the circuit conductors of the generator are insulated from the generator frame and all other grounded surfaces, a GFCI is not required.

5.0 Inspection:

A. All electrical cords, receptacles, plugs, tools, and equipment will be visually inspected for:

(1) Damaged or missing grounding pins or receptacles.

(2) Broken or damaged insulation.

(3) Missing guards, covers or insulation.

(4) Indication of internal damage.

B. Visual Inspections will be conducted as follows:

(1) Prior to use (daily).

(2) After repair.

(3) After an incident which it can be reasonable suspected to have caused damage.

(4) If stored and not in daily use at least quarterly (every three months).

C. Cords, tools, and equipment found to be damaged or defective will be removed from service and repaired or destroyed.

(1) Cords, tools, and equipment found to be damaged or defective will tagged as "Out of Service"

(2) No tagged cord, tool, and equipment will be allowed to be used.

6.0 Responsibility:

A. Project Managers and supervisors are designated and trained to act as a Competent Persons in accordance with this standard, to insure compliance with this policy.

B. All electrical cords, receptacles, plugs, tools, and equipment will be marked near the plug with a color coded tape to indicate compliance with the quarterly inspection.

C. Color Codes will be as follows:

(1)	Red	First quarter (January - March)
(2)	Blue	Second quarter (April - June)
(3)	Green	Third quarter (July -September)
(4)	Yellow	Fourth quarter (October - December)

D. Electrical cords, receptacles, plugs, tools, and equipment found with out of date coding will be removed from service until inspected and coded.

7.0 Repair:

A. If the damage to an electrical cord, receptacle, plug, socket, tool or system can not be made to meet the original insulation requirements and specifications (like new) it must be removed from service and destroyed.

8.0 Site Specific Grounding Procedures:

A. Static Electricity, Grounding and Bonding

(1) Static Electricity is often a source of ignition for an ignitable mixture.

(2) Static electricity is generated by the motion of particles, including liquids, gases, objects, vehicles, and people.

(3) The accumulation of static electricity can be prevented under many circumstances by bonding or grounding.
- (a) *Bonding: The process of connecting two or more conductive objects together by means of a conductor.*
- *(b) Grounding: The process of connecting one or more conductive objects to the ground, as a specific form of bonding.*

(4) Employees must connect a grounding wire to the testing vehicle and to all testing equipment in use, to eliminate any chance of a static spark that could be a source of ignition.

(5) Employees must use only approved metal containers for handling hazardous materials.
- (a) Touch the nozzle to the container while dispensing fuel in order to “bond” the container to the dispenser.
- (b) Place the container on the ground while fueling.
- (c) Never fuel a container that is in or on a vehicle.

MJ VanDamme Trucking, Inc.
Hazard Communications (HAZCOM) Program
In accordance with 29 CFR 1910.1200

Note: This section does not currently reflect any of the changes recently made to the HCS to bring it in line with the GHS. Extended compliance dates are being followed and will dictate compliance.

The provisions of this section will be followed through the next compliance date of June 1, 2015. At that time SDS sheets will be collected as per the guidelines and manufacturer's availability. Updates will be made as needed to comply with the new HCS/GHS with all changes in place no later than June 1, 2016.

As outlined in the "Training" section of this document, all employees are trained on the new labeling requirements, applicable pictograms, and the new SDS format/contents. This training was completed prior to the December 1, 2013 compliance deadline.

Additionally, all employees have been informed to retain any SDSs that are made available to the company in order that they be incorporated into the current program and/or replace existing MSDSs.

1.0 General:

A. It is the desire and intent that all employees be informed about the hazardous substances they may encounter in the workplace, and learn the appropriate protective measures for working safely with these substances.

B. The Hazard Communication Program, which is outlined in this section, is intended to comply with the requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200.

2.0 Content:

A. This written Hazard Communication Program is a resource document which provides details on the following components of the company program:

(1) Hazard Determination,

(2) Container Labeling,

(3) Material Safety Data Sheets (MSDSs), and

(4) Employee Education and Training.

B. The document also provides the following information:

(1) Lists of hazardous chemicals found in each work area (maintained under separate cover).

(2) How employees are informed of the hazards associated with non-routine tasks.

3.0 Accessibility:

A. This document is available to all company employees or their designated representatives upon request.

B. It is also available to the Assistant Secretary for Occupational Safety and Health, and the Director of the National Institute for Occupational Safety and Health (NIOSH).

C. Multi-employer job sites.

(1) Where the company is a sub-contractor to the general contractor on a job site the Foreman will:
   (a) Issue a copy of all MSDSs for chemicals brought on to the job site.
   (b) Review and brief all employees as to the chemical hazards that they might be exposed to at the job site.
   (c) Evaluate exposure hazards and establish levels of protective clothing if required.
   (d) Insure labeling system and correct labeling information is used on each transfer label.

(2) Where the company is the General Contractor on a job site the following requirements will be met.
   (a) All sub-contractors will ensure copies of MSDSs for all chemicals brought to the job site are placed in the job site Hazard Communications Program/MSDS binder.
   (b) Each sub-contractor briefs their employees as to the levels of exposure the may encounter.
   (c) Chemical Protective equipment is worn as required.

(3) MSDSs and Labels will be written in English in accordance with current federal law.
   (a) For employees who cannot read or comprehend English the employer will insure that the information is verbally explained to the employee in the employees own language.

(4) Off site jobs or multi-site jobs:
   (a) Where an employee must travel to multi-site jobs in a shift, a copy of the MSDSs for the chemicals on the service truck will be maintained on the truck.
   (b) In an emergency, copies from the company office can be faxed to a hospital, physician's office and/or jobsite.

(5) The written Hazard Communications Program and current Material Safety Data Sheets will be kept on file at the company office.
   (a) This program is available upon request from employees, employee representatives, and OSHA Federal And State inspectors in accordance with 29 CFR 1910.1200(e).

4.0 Employee responsibility:

A. It is the objective to ensure that all employees who handle hazardous chemicals be fully informed of the hazards involved and that they be trained to perform their jobs safely.

B. Active participation of each company employee in the program is essential to make the Hazard Communication Program a success.

5.0 Company policy and assigned responsibilities:

A. Right-To-Know Facility Coordinator:

(1) The company has assigned a facility Right-To-Know Coordinator who will be responsible for coordinating all activities pertaining to this program.

(2) The Right-To-Know Coordinator for the facility is the corporate Safety Officer.

B. Labels, MSDSs, and Employee Training

(1) Company programs for Hazard Determination, Labels, MSDSs, and Employee Training are described in separate sections of this manual under the respective subject headings.

(2) All MSDS and labeling systems will be written in English in accordance with Federal Law.
(a) The company will provide interpretation of the labels and MSDS information to employees who cannot understand English in their native language.

C. List of Hazardous Substances

(1) It is company policy to develop a list of hazardous chemicals used in each work area. This list will be developed as a result of the facility inventory.

(2) MSDSs obtained from suppliers for each product will be consulted in order to identify products which are hazardous.

D. Hazards of Non-Routine Tasks and Unlabeled Pipes.

(1) Prior to performing non-routine tasks, an employee shall review with his supervisor the potential hazards of the task and the proper safety and handling procedures.

(2) The MSDSs for each hazardous material used should always be consulted prior to performing the non-routine task.

(3) The employee's supervisor will be responsible for informing him/her on the hazards of materials used in non-routine tasks prior to performing the task.

E. Accessibility:

(1) Upon request, this Hazard Communication document will be made available to employees or their designated representatives within 15 working days of the request.

(2) The written program is located at Core States Group, Inc., 4191 Pleasant Hill Road Suite 400, Duluth, Georgia 30096

(3) Employees can request to see the written program by contacting their supervisor during normal working hours.

F. List of Hazardous Chemicals

(1) A list of hazardous chemicals can be obtained by contacting the Corporate Safety Officer.

6.0 Management of chemicals:

A. Products Manufactured by the Company:

(1) The company does *not* manufacture products and are thus exempt from the requirements of the Standard under Section (b) (4) or Section (b) (5) of the Standard.

B. Products Purchased/Raw Materials:

(1) The company will rely on the hazard evaluations performed by the chemical manufacturer/importer of all raw materials or products purchased.

(2) MSDSs obtained from suppliers on all chemicals purchased shall be used in determining the Health and Physical hazards of materials.

C. Incoming Containers:

(1) It is policy to require that suppliers of chemical products label their materials in accordance with the Standard.

(2) At a minimum, the following information should be listed on containers of hazardous substances:
(a) Identity of the material.
(b) Hazard warnings.
(c) Name and address of manufacturer or importer.

(3) No container will be accepted unless it is properly labeled with the required information.

(4) The department and name of the person responsible for ensuring that incoming containers are labeled with the required information is corporate Safety Officer.

(5) If a container is received without the required information, the manufacturer will be notified to provide properly labeled containers.

D. In-House Transfer Containers:

(1) Transfer containers will be compatible with the product.

(2) Transfer containers will be labeled with an NFPA or HMIS III HAZCOM Label.

7.0 Material safety data sheets:

A. MSDSs shall be obtained from manufacturers and/or distributors for *all* materials present at the facility.

B. The manufacturers and/or distributors shall be contacted a second time if the MSDS is not received or is found to be inadequate.

C. The responsibility for obtaining, maintaining, updating, distributing, and reviewing MSDSs is assigned to Purchasing Officer.

D. MSDSs for hazardous materials shall be placed in binders at each job site and shall be readily available to employees during each work shift.

8.0 Training:

A. Training is provided upon initial assignment to employees in accordance with current OSHA requirements.
B. As of the date of the most recent revision of this document, all employees have received training on the new label requirements, pictograms, and SDS format.

MJ VanDamme Trucking, Inc.
Hearing Conservation Program
In accordance with 29 CFR 1910.95

1.0 Policy and Purpose:

A. The purpose of the Hearing Conservation Program is to minimize the risk of occupational hearing impairment from hazardous noise levels that may exist in the work environment.

B. Each Site/project will implement a comprehensive Hearing Conservation Program in accordance to the guidelines herewith.

C. It is understood that hearing protection devices are not substitutes for engineering and/or administrative methods aimed at reducing exposure potential for people working in areas where noise levels are elevated.

D. Devices of this type are employed as an interim means of protection while feasible measures for control are developed which will eliminate health risks posed for people working in high noise areas.

2.0 Definitions:

Action Level: An 8-hour time-weighted average of 85 decibels measured on the A-scale, slow response, or equivalently, a dose of fifty percent.

Audiogram: A chart, graph, or table resulting from an audiometric test showing an individual's hearing threshold levels as a function of frequency.

Audiologist: A professional, specializing in the study and rehabilitation of hearing, who is certified by the American Speech-Language-Hearing Association or licensed by a state board of examiners.

Baseline Audiogram: The audiogram against which future audio grams are compared.

Criterion Sound Level: A sound level of 90 decibels.

Decibel (dB): Unit of measurement of sound level.

Hertz (Hz): Unit of measurement of frequency, numerically equal to cycles per second.

Medical Pathology: A condition or disease affecting the ear, which should be treated by a physician specialist.

Noise Dose: The ratio, expressed as a percentage, of (1) the time integral, over a stated time or event, of the 0.6 power of the measured SLOW exponential time-averaged, squared A-weighted sound pressure and (2) the product of the criterion duration (8 hours) and the 0.6 power of the squared sound pressure corresponding to the criterion sound level (90 dB).

Noise Dosimeter: An instrument that integrates a function of sound pressure over a period of time in such a manner that it directly indicates a noise dose.

Otolaryngologist: A physician specializing in diagnosis and treatment of disorders of the ear, nose and throat.

Representative Exposure: Measurements of an employee's noise dose or 8-hour time-weighted average sound level that the employers deem to be representative of the exposures of other employees in the work place.

Sound Level: Ten times the common logarithm of the ratio of the square of the measured A-weighted

sound pressure to the square of the standard reference pressure of 20 micropascals. Unit: decibels (dB). For use with this regulation, SLOW time response, in accordance with ANSI S1.4-1971 (R1976), is required.

Sound Level Meter: An instrument for the measurement of sound levels.

Standard Threshold Shift: A standard threshold shift (SIS) will be considered when there is a change in hearing threshold relative to the baseline audiogram equal to or greater than a 10dB average of 2,000, 3,000 and 4,000 H_2 in either ear.

Time-Weighted Average Sound Level: That sound level, which if constant over an 8-hour exposure, would result in the same noise dose as is measured.

3.0 Overview:

A. Permanent hearing loss may result from prolonged exposure to excessive noise.

B. There are occupations within the company's operations where the noise exposures are such that occupational hearing loss could result.

C. This irreversible hearing loss occurs slowly over a period of years, at a rate dependent upon the length and severity of exposure and individual acoustic susceptibility.

D. Noise induced hearing loss can also result from acoustic trauma (e.g., an explosion).

E. With this type of exposure the eardrum may be ruptured and the middle and inner ear damaged.

F. Non-occupational factors including aging, hobbies and social activities that involve exposure to excessive noise may also result in, or contribute to, permanent hearing loss.

G. The Hearing Conservation Program may also help reduce non-occupational hearing loss by influencing employees to exercise caution in all activities that involve high noise levels.

4.0 Program Administration:

A. The Operations Manager is responsible for the overall administration of the hearing conservation program.

(1) Such administration involves coordinating the cooperative efforts of the several disciplines within the organization, as well as the day to day implementation and evaluation of the program.

B. A professional audiologist will be utilized to provide surveillance/oversight of the hearing conservation program as required.

5.0 Program Elements:

A. The basic program elements of Hearing Conservation Program include:

(1) Noise Monitoring

(2) Audiometric Testing

(3) Evaluation of Audiometric Tests

(4) Employee Notification

(5) Use of Hearing Protection

(6) Education and Training

(7) Record Keeping

(8) Access to Information and Records

B. Each of the Program Elements is discussed separately.

6.0 Noise Monitoring:

A. The client's established noise areas will be reviewed and proper hearing protection will be selected.

(1) In suspected high noise areas, noise monitoring will be conducted.
   (a) Qualified industrial hygienists will conduct the noise level surveys and any additional studies that may be required.

(2) Monitoring results will be maintained on file.
   (a) Recommendations for feasible engineering and administrative controls, including the utilization of appropriate hearing protection, will be made as a result of these surveys.
   (b) All efforts toward compliance to these recommendations will be documented and maintained on file.
   (c) Affected employees or their representatives are to be provided the opportunity to observe any noise measurements conducted in their work place.

B. Audiometric Testing

(1) Before an employee's first exposure that equals or exceeds an 8-hour time-weighted average (TWA) of 85 decibels, a baseline audiogram will be established against which subsequent audio grams can be compared.

(2) All employees who work in areas where noise levels equal or exceed an 8-hour time-weighted average (TWA) of 85 decibels for more than 10 days per year will be given annual audio grams.

(3) All baselines, annual, and confirmation audio grams will be preceded by at least 14 hours without exposure to work place noise.
   (a) Hearing protectors may be used as a substitute for this requirement.

(4) The audiometric testing will be conducted at the clinic as part of the annual physicals.

(5) The audiometric report will include documentation on:

(6) Audiometric tests were pure tone, air conduction, hearing threshold examinations, with test frequencies including 500, 1000, 2000, 3000, 4000 and 6000 Hz.

(7) All audiometric testing was conducted by a technician who is certified by the Council for Accreditation in Occupational Hearing Conservation.
- (a) The technician must be responsible to an audiologist, otolaryngologist or physician. Recertification will be done within five (5) years of previous certification.

(8) Audiometric tests were conducted with audiometers that meet the specifications of, and are maintained in accordance with American National Standard Specification for Audiometers, S3.6-1969.

(9) The functional operation of the audiometer was checked before each day's use by testing a person with known, stable hearing thresholds, and by listening to the audiometer's output to make sure that the output is free from distorted or unwanted sounds.
- (a) Deviation of 10 decibels or greater requires an acoustic calibration.
- (b) The technician may perform this check on oneself.

(10) Audiometer calibration was checked annually, which included an exhaustive calibration in accordance with the American National Standard Specification for Audiometers.
- (a) A certified industrial hygienists perform this activity on an annual basis.

C. Evaluation of Audiometric Tests and Employee Notification

(1) Each employee's annual audiogram will be compared with that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift (STS) has occurred.
- (a) This comparison will be done by the computerized consulting audiologists.

(2) If the comparison of the annual test to the baseline indicates that an employee may have suffered a standard threshold shift, a confirmation test (retest) is to be obtained.
- (a) This test must be done within 30 days of the annual test.

(3) The audiologist responsible for the surveillance of the audiometric testing program will review all annual audiometric data, all problem audio grams, and all those audio grams showing STS.
- (a) He will determine whether there is a need for further evaluation.

(4) Computerized reports will be produced and utilized by the consulting audiologist in the evaluation of this hearing conservation program.

(5) A standard threshold shift (STS) will be considered when there is a change in hearing thresholds relative to the baseline audiogram equal to or greater than a 10 dB average of 2000, 3000 and 4000 Hz in either ear.

(6) The following steps are to be taken when a standard threshold shift occurs:

(a) The employee will be informed of this fact in writing, within 21 days of the determination.

(I) Notification letters will be generated from the consulting audiologists for distribution.

(b) Employees not using hearing protection will be fitted with hearing protectors, trained in their use and care and required to use them.

(c) Employees already using hearing protectors will be refitted and retrained in their use and provided hearing protectors offering greater attenuation if necessary.

(d) Following a review of audiogram data by the consulting audiologist, employees will be referred for a clinical audiological evaluation if additional testing is necessary or if it is suspected that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.

(I) The initial examination would be at Company's expense.

(e) Employees are to be informed of the need for an ontological examination if a medical pathology of the ear that is unrelated to the use of hearing protectors is suspected by the consulting audiologist.

(I) The examination would be at the employee's own expense.

7.0 Use of Hearing Protection:

A. Hearing protectors will be made available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to employees.

(1) Such protectors will be replaced as necessary.

B. For those employees found to have an 8-hour time-weighted average exposure greater than 90 decibels, the wearing of hearing protection will be mandatory.

C. It will be mandatory that hearing protection is worn by any employee who is exposed to a time-weighted average (TWA) of 85 decibels or greater who has experienced a standard threshold shift.

D. A variety of suitable hearing protectors will be provided for employees to select from.

(1) This would include at least one type of muff and two types of plugs.

E. The company will evaluate hearing protector attenuation for the specific noise environment in which the protector will be used.

F. Hearing protectors must attenuate employee exposure at least to an 8-hour time-weighted average of 90 decibels.

G. For employees who have experienced a standard threshold shift, hearing protectors must attenuate employee exposure to an 8-hour time-weighted average of 85 decibels or above.

H. For those employees who have an 8-hour time-weighted average exposure that exceeds 105 decibels (or a 12-hour TWA exposure that exceeds 102 decibels), the utilization of double hearing protectors (earplugs and muffs) is required.

8.0 Education and Training:

A. A training program will be instituted for all employees included in the Hearing Conservation Program and will be repeated annually.

B. The training program will be updated to be consistent with changes in protective equipment and work process.

C. Training program criteria includes informing each employee of the following:

(1) An explanation of the contents of the noise standard and the Hearing Conservation Program.

(2) Instruction in the nature of the noise hazards and the effects of noise on hearing.

(3) A description of specific work areas, processes, machinery or other equipment producing hazardous noise exposures.

(4) An explanation of the engineering and administrative control measures being used to reduce noise exposures.

(5) Instruction in the selection, use, sanitary care, maintenance, and limitations of hearing protection devices.

(6) An explanation of the purpose of the noise monitoring program and audiometric testing, and an explanation of the monitoring and testing procedures.

9.0 Record Keeping:

A. Records required pursuant to the Hearing Conservation Program will be retained for the following periods:

(1) Noise exposure measurement records for two (2) years.

(2) Audiometric test records will be retained indefinitely.

10.0 Access to Information and Records:

A. Copies of the OSHA noise standard will be made available upon request to affected employees or their designated representative.

(1) A copy of the standard will also be posted in the workplace.

B. Access to or request for records pertaining to the Hearing Conservation Program will be provided to employees or designated representatives upon written request addressed to the Director, Safety and Compliance.

MJ VanDamme Trucking, Inc.
Lockout/Tagout Program
In accordance with 29 CFR 1910.147

1.0 Policy:

A. Control of hazardous energy covers the servicing and maintenance of machines and the equipment in which the unexpected energizing or start-up of the machine to equipment, or release of any stored energy, could cause injury to employees.

(1) All supervisors will be trained regarding the requirements and provisions of this lockout procedure.

(2) Each supervisor is responsible to train the employees under his supervision regarding the requirements and provisions of this lockout procedure.

(3) Each supervisor will effectively enforce compliance of the lockout procedure.

(4) Each supervisor will assure that locks and lockout devices required for compliance are provided for his employees.

(5) Prior to any servicing or maintenance work, the supervisor will determine and instruct the employees of the steps to be taken to assure they are not exposed to injury due to unintended machine motion or release of energy.

2.0 Purpose:

A. This program is to assure that the employees are protected from unintended machine motion or unintended release of energy which could cause injury when they set up, adjust, repair, service, install or perform work on equipment, machinery or processes.

B. This procedure applies to all employees performing any of the aforementioned tasks.

C. Equipment that may require Lockout:

(1) On Site Systems:
- (a) Electrical Systems
- (b) Pump Systems
- (c) Valves
- (d) Pipe systems
- (e) Tanks

(2) Site Equipment – Including heavy equipment, lift equipment, and power tools.

D. All company employees are authorized employees under this standard.

E. Sub-contractors are listed as affected employees.

3.0 Definitions:

"AFFECTED EMPLOYEE" - An employee whose job requires him to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him to work in an area in which such servicing or maintenance is being performed.

"AUTHORIZED EMPLOYEE" - A person who locks or implements a tagout system procedure on machines or equipment to perform the servicing or maintenance on that machine or equipment. An authorized employee and affected employee may be the same person when the affected employee's duties also include performing maintenance or service on a machine or equipment which must be locked or tagged out.

"CAPABLE OF BEING LOCKED OUT" - An energy isolating device will be considered to be capable of being locked out if it is designed with a hasp or other attachment through which a lock can be affixed or if it has a locking mechanism built into it. Other energy isolating devices will also be considered to be capable of being locked out if lockout can be achieved without the need to dismantle, rebuild or replace the energy isolating device or permanently alter its energy control capability.

"ENERGIZED" - Connected to an energy source or containing residual or stored energy.

"ENERGY ISOLATING DEVICE" - A mechanical device that will physically prevent the transmission or release of energy, including but not limited to the following: a manually operated electrical circuit breaker; a disconnect switch; a manually operated switch by which the conductors of a circuit can be disconnected from all ungrounded supply conductors and, in addition, no pole can be operated independently; a slide gate; a slip blind; a line valve; a block; and any similar device used to block or isolate energy. The term does not include a push button, selector switch and other control circuit type device.

"ENERGY SOURCE" - Any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal or other energy.

"HOT TAP" - A procedure used in the repair, maintenance and service activities which involves welding on a piece of equipment (pipeline, vessel, or tank) under pressure in order to install connections or appurtenances. It is commonly used to replace or add sections or pipeline without the interruption of service for air, gas, water, steam, and petrochemical distribution systems.

"LOCKOUT" - The placement of a lockout device on an energy isolating device, in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

"LOCKOUT DEVICE" - A device that utilizes a positive means such as a lock, either key or combination type, to hold an energy isolating device in the safe position and prevent the energizing of a machine or equipment.

"NORMAL PRODUCTION OPERATION" - The utilization of a machine or equipment to perform its intended production function.

"SERVICING AND/OR MAINTENANCE" - Workplace activities such as constructing, installing, setting up, inspecting, adjusting, modifying and maintaining and/or servicing machines or equipment. The activities include cleaning, lubricating and unjamming of machines or equipment and making adjustments or tool changes, where the employee may be exposed to the unexpected energization or startup of the equipment or release of hazardous energy.

"SETTING UP" - Any work performed to prepare a machine or equipment to perform its normal production operation.

"TAGOUT" - The placement of a tagout device on an energy isolating device in accordance with an

established procedure to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

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

4.0 Requirements:

A. The power of any equipment, machine or process to be set up, adjusted, services, installed or where maintenance work is to be performed and the unintended motion or release of energy would cause personal injury, such a power source will be locked out by each employee doing the work.

B. The source of energy, such as springs, air, hydraulic and steam will be evaluated in advance to determine whether to retain or relieve the pressure prior to starting work.

C. Safety locks are for the personal protection of the employees and are to be used for locking out the equipment.

(1) These may be obtained from the office.

(2) Locks will be case hardened steel locks manufactured by American Lock or Master Lock with a 2" shank.

D. Personal locks will be tagged with the employee's name and number.

(1) The locks or tags will be durable to the environment, recognized as standard in color, shape and size for the procedure and be substantial enough so they cannot be accidentally or easily removed.

E. One key of every lock issued will be retained by the employee to whom it was issued and only other key to the lock may be retained by the supervisor on the job.

F. Employees will request assistance from their supervisor if they do not know how or where to lockout equipment and direct any questions to his attention.

5.0 Application of Control:

The established procedures for the application of energy control (the lockout and tagout procedures) shall cover the following elements and action and shall be done in the following sequence:

1. Preparation for Shutdown. Before an authorized or affected employee turns off a machine or equipment, the authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means to control the energy.

2. Machine or equipment shutdown. The machine or equipment shall be turned off or shut down using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.

3. Machine or equipment isolation. All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

4. Lockout or tagout device application.
   (i) Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
   (ii) Lockout devices, where used shall be affixed in a manner to that will hold the energy isolating devices in a "safe" or "off" position.
   (iii) Tagout devices, where used, shall be affixed in such a manner as will clearly indicate that the operation or movement of energy isolating devices from the "safe" or "off" position is prohibited.

      (A) Where tagout devices are used with energy isolating devices designed with the capability of being locked, the tag attachment shall be fastened at the same point at which the lock would have been attached.
      (B) Where a tag cannot be affixed directly to the energy isolating device, the tag shall be located as close as safely possible to the device, in a position that will be immediately obvious to anyone attempting to operate the device.

5. Stored energy.
   (i) Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained, and otherwise rendered safe.
   (ii) If there is a possibility of reaccumulation of stored energy to a hazardous level, verification of isolation shall be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists.

6. Verification of isolation. Prior to starting work on machines or equipment that have been locked out or tagged out, the authorized employee shall verify that isolation and deenergization of the machine or equipment have been accomplished.

6.0 Preparation for Lockout

A. The supervisor will make a survey to locate and identify all isolating devices to be sure which switches, valves or energy isolating devices apply to the equipment to be locked or tagged out.

   (1) More than one energy source may be involved.

B. Authorized employees will know:

   (1) The type and magnitude of the energy and hazards

   (2) The type and location of energy isolating means
      (a) Methods of isolation - locks, tags, other

   (3) Types of stored energy and methods to dissipate or restrain

   (4) Release methods for stored energy and possibility of reaccumulation.

C. Notify all affected employees that a lockout/tagout system is going to be utilized and the reason.

7.0 Lockout/Tagout Procedures:

A. If the machine, equipment or process is operating, shut it down by normal stopping procedures.

(1) The main disconnect switches will be turned off and locked in the off position.

(2) A machine connected to a 110 volt source of power by a plug-in cord will be considered locked out if the plug is disconnected and under the control of the employee at all times.

B. After locking out the power source, the employee will try the machine, equipment or process controls to be sure no unintended motion will occur or test the machine, equipment or process with appropriate test equipment to determine that the energy isolation has been effective.

C. **BE SURE TO RETURN OPERATING CONTROLS TO NEUTRAL OR OFF AFTER THE TEST**.

D. The equipment is now locked out.

8.0 Removal of Locks and Restoring Power:

A. Power may be turned on when it is required to perform tests or adjustments.

(1) All of the rules pertaining to removing locks and restoring power will be followed.
(a) Clear away all tools and equipment from with in the system.
(b) Notify all authorized and affected employees working on the system.
(c) Remove lockout/tagout devices and locks.
(d) Energize and proceed with testing.
(e) De-energize and reapply lockout/tagout controls on system.

(2) The machine, equipment or process will again be locked out if it is necessary to continue work after the test or adjustment is complete.

(3) The project foreman or lead man will verify that all locks and tags are applied to the system prior to work continuing.

B. When work continues to the next shift, the employee on the outgoing shift removes his lock and the employee on the new shift places his lock on the device.

C. Upon completion of the work, each employee will remove his lock, rendering the machine operable when the last lock is removed.

D. The employee responsible for removing the last lock, before doing so, will assure that all guards have been replaced, the machine, equipment or process is cleared for operation and the appropriate personnel are notified that power is to be restored.

E. Re-energization procedure:

(1) All of the rules pertaining to removing locks and restoring power will be followed.
(a) Clear away all tools and equipment from within the system.
(b) Notify all authorized and affected employees working on the system.
(c) Remove lockout/tagout devices and locks.
(d) Operate the energy isolating device to restore energy.

9.0 Multiple Lockout/Tagout (Group Lockout):

A. If more than one individual is required to lockout equipment, each will place his own personal lockout device on the energy isolating device.

(1) When an energy isolating device cannot accept multiple locks, a multiple lockout device (hasp) may be used.

B. In group lockout, the facility may lock all energy sources on the system and place a single lock. The key for this single lock is placed in a lockout box or lockout cabinet which allows the use of multiple locks to secure it.

(1) After inspection of the system and lockouts by the project foremen or lead man (authorized employees).
(a) Each employee will then use his lock to secure the box or cabinet.
(b) As each employee no longer needs to maintain his lockout protection, that employee removes his lock from the box or cabinet.

C. At all times each employee working on the system will be afforded protection equal to the protection provided by a personal lockout/tagout device.

D. Shift change:

(1) During shift change the following procedure will be used to ensure the continuity of the lockout/tagout procedures.
(a) The on-coming shift of authorized employees will place their locks and tags on the lockout devise, lock box or lockout cabinet.
(b) Then the off going shift of authorized employees will remove their locks and tags on the lockout devise, lock box or lockout cabinet.
(c) The on coming sift will verify that the system is locked out prior to working on the system.

10.0 Emergency Lock Removal:

A. If a lock is not removed at the proper time and needs to be cut off, the supervisor of the authorized employee who locked out the equipment will be responsible for removing the lock.

B. Verify that the authorized employee is not in the facility.

C. Every attempt must be made to contact the authorized employee prior to removal of the device.

D. The authorized employee must be informed of the removal before his next work shift.

11.0 Outside Personnel:

A. Whenever outside servicing personnel are to be engaged in activities covered by the scope and application of this standard the on-site employer and the outside employer will inform each other of their respective lockout procedures.

(1) The on-site employer will ensure that his personnel understand and comply with the restrictions and prohibitions of the outside employer’s energy control procedures.

12.0 Training and Communications:

A. Training will be provided to ensure that the purpose and procedures of the energy control program are understood by the employees and that the knowledge and skill for the safe application, usage and removal of energy controls is required of the employees.

B. Training will include:

(1) Each authorized employee will recognize the applicable hazardous energy source, the type and magnitude of the energy available, and the method and means for the energy isolation.

(2) Affected employees will be instructed in the purpose and use of the energy control procedure.

(3) All other employees will be instructed about the procedure and any prohibitions relating to attempts to restart or energize equipment or machines that are locked or tagged out.

(4) When tagout systems are used, employee training will also include the following:

(a) Tags are essentially warning devices affixed to energy isolating devices and do not provide the physical restraint provided by locks.
(b) When a tag is attached to an energy isolating means, it is not to be removed without the authorization of the authorized person who attached it.
(c) It is never to be bypassed, ignored or otherwise defeated.
(d) Tags must be legible and understandable by all authorized employees, affected employees and all other employees in the work area to be effective.
(e) Tags and their means of attachment must be made of materials which will withstand the environmental conditions encountered in the workplace.
(f) Since tags can evoke a false sense of security, their meaning needs to be understood as part of the overall energy control program.
(g) Tags must be securely attached to isolating devices so that they cannot be detached accidentally or inadvertently during use.

13.0 Employee Retraining:

A. Employee retraining will be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in the equipment, machines or processes that present a new hazard or when there is a change in the energy control procedure.

B. Additional retraining will be provided whenever a periodic inspection reveals a deviation from or inadequacy in the employee's knowledge or use of the energy control procedure.

C. The retraining will re-establish employee's proficiency and introduce new or revised control methods and procedures.

D. A record of employee retraining including employee name and date of retraining will be kept when any of the above conditions exist.

14.0 Periodic Inspections:

A. The Supervisor will conduct periodic inspections to ensure that the energy control procedure and the requirements of the standard are being followed. Annually inspections will be performed and documented.

B. The inspection will be performed by an authorized employee other than the one utilizing the procedure.

C. The inspection will be designed to correct any deviations of inadequacies observed.

D. Where lockout is used, the inspection will include a review with each authorized and each affected employee of his responsibility under the energy control procedure being inspected.

E. Where tagout is used, the inspection will include a review with each authorized and each affected employee of his responsibility under the energy control procedure being inspected and the elements contained in the TRAINING AND COMMUNICATION section regarding tagout systems.

F. The supervisor will certify that the periodic inspection has been made.

(1) It will identify the machine or equipment inspected, the date, the name of the employee included in the inspection and the name of the person inspecting.

1.0 Scope:

A. This policy sets the standards for operations of Aerial Platforms and Man lifts.

2.0 Operations

A. Only trained personnel are to operate any lifts.

B. All personnel must wear personal fall protection when using any lift with a hydraulic boom when the travel is controlled from the basket or platform.

3.0 Operators

A. Know the lift, how to operate it, the purpose of all controls, the location and normal readings of gauges and dials.

(1) Know the rated workload, safe speed ranges, braking, steering, turning radius, and operating clearances.

B. Read and understand the DANGER, WARNING, CAUTION, and other signs on the machine.

(1) Read and understand the Operator's Manual before using the machine. If there is no manual with the machine, get one.

C. Prior to starting the workday, inspect the machine and report all deficiencies.

(1) Do not operate the machine until deficiencies are corrected and all systems are in good operational condition.

D. Check the ground or floor level in the area you will be traveling across for holes, debris (especially if it can puncture the tires), drop-off, wet/oil spots, or rough areas, Repair/clean bad areas prior to traveling across them.

E. Check overhead prior to raising the platform.

(1) Be especially careful around power lines.

F. If using a lift with a combustion engine, make sure there is enough ventilation.

G. Never allow an unqualified individual to operate the lift.

H. Never position a lift over the top of another individual.

I. Always tie-off inside the basket, not to adjacent structures.

(1) **<u>YOU MUST TIE-OFF METAL TO METAL</u>**.

(2) Never attempt to exit a lift unless the basket is fully lowered, or is resting on a structure able to support it if a failure occurred.

(3) Always keep both feet flat on the floor of the platform - **DO NOT CLIMB ON THE RAILING.**

J. When traveling in the raised position use extreme caution. Always keep you attention in the direction of travel.

K. Insure that all outriggers, stabilizers, etc. are extended prior to raising the platform.

L. When lowering the platform, make sure that all personnel are clear below.

M. Never use ladders, planks, steps, or other devices to provide additional reach.

4.0 Standard Operating Procedures:

A. Manufactures Operators manual for each lift unit operated will be incorporated in to this policy by reference.

B. Each operator is to review the manufactures operating procedures and safety area prior to operating the lift equipment.

C. Daily, weekly and annual Inspection will be conducted in accordance with manufactures guideline and documented.

5.0 Training

A. The employer will certify the operator has been trained in the safe operation of the lift and mobile equipment they are assigned to operate.

6.0 Manufacturers Standard Operating Procedures:

A. Manufacturers Standard Operating Procedures are incorporated by reference for each lift used or operated by the company.

MJ VanDamme Trucking, Inc.
Scaffolding User Program
In accordance with 29 CFR 1926.454

1.0 Policy:

A. The Scaffolding Users Program has been established to provide guidelines for the safe use of scaffolding by all employees.

B. The company does not own nor assemble any scaffolding equipment.

(1) For work sites where work cannot be done safely from the ground or from solid construction, a scaffolding subcontractor will be employed.

C. The construction and maintenance of the scaffolding structure by the subcontractor will be in compliance with the OSHA Scaffolding Standard 29CFR1910.28.

D. The subcontractor will provide a "Qualified" person to design the appropriate scaffolding.

(1) The Operations Manager will provide the "Qualified Person" the designated use and appropriate load factors for the scaffold.

(2) The Site Supervisors have been trained as a "Competent Person" to inspect the scaffolding on a daily basis.

(3) The safety performance and regulatory history for a scaffolding company will be used in the evaluation of subcontractors.

2.0 Purpose:

A. To eliminate or minimize the potential for injury to personnel and/or damage to property as a result of scaffolding usage.

B. To comply with insurance and regulatory agency requirements.

3.0 Procedures:

A. The Company will utilize only scaffolding rented from reputable scaffolding companies who will erect and certify their scaffolding for all projects requiring scaffolding construction.

B. The Operations Manager and all supervisors will be trained as Competent Persons

C. All employees will receive proper training from the Operations Manager or site supervisor regarding hazards associated with scaffolding use.

4.0 Training:

A. Training will include hazards such as:

(1) Safe access

(2) Material handling

(3) Falls, falling objects, and fall protection

(4) Electrical,

(5) Load capacity and load balance.

B. Training will be provided at each new job site.

C. Training will be repeated whenever:

(1) There are changes or modifications to a scaffolding system.

(2) The operating procedures (work activities, loading, access, etc.) are modified or changed.

(3) The work site conditions change.

5.0 Inspections:

A. A Competent Person will conduct inspections of all scaffolding systems.

B. The inspections will take place prior to use of the scaffolding and be repeated on a daily basis

C. When an inspection reveals unsafe equipment or conditions the equipment (or condition) will be tagged.

(1) Employees must not use tagged equipment.

(2) Use of tagged equipment will result in disciplinary action.

D. The tag will identify the unsafe equipment or condition via a written description of the observed problem and will be physically attached.

E. Employees will not use scaffolding that has been tagged due to an unsafe condition until the condition is corrected.

F. Employees will be instructed to comply with all instructions provided on the tag.

(1) If employees do not comply with tagged out equipment, etc. they will be disciplined accordingly.

G. Modifications to a scaffolding system will only be performed by a Qualified Competent Person.

(1) Only scaffolding erection and rental company personnel are considered are Qualified to erect alter or modify scaffolding systems.

(2) Disciplinary action for unqualified modifications to scaffolding will be in accordance with the company Disciplinary Program.

F. The competent person will inspect the scaffolding to assure:

(1) Ground has not settled, base plates are centered on sills and screw jacks are in contact with each frame leg

(2) Scaffold was not dangerously modified.

(3) All bracing is in place.

(4) Scaffold is plumb.

(5) Scaffold members are properly installed and fastened.
- (a) The scaffold is properly tied if required.
- (b) All platform units are in place and fastened if required.
- (c) Guardrail components are in place on all ends and open sides of the scaffold.
- (d) Safe access to scaffold and to platform has not been removed or obstructed.
- (e) Platform gates close freely and are not wired open.
- (f) Overhead protection is available if workers are above the work platform.
- (g) Energized electrical power lines have not been placed within the allowable distance from the scaffold assembly.
- (h) Any missing or defects corrected, prior to employee use.

MJ VanDamme Trucking, Inc.
Hot Work Permit Control System Program
In accordance with 29 CFR 1910.252

1.0 Policy:

A. To provide guidelines for control of hot work (cutting, welding, heating, etc.) in critical fire areas.

2.0 Purpose:

A. To eliminate or minimize the potential for injury to personnel and/or damage to property as a result of fire or explosion.

B. To identify critical fire areas requiring a permit prior to the perForemance of hot work.

C. To comply with insurance and regulatory agency requirements.

3.0 Definition:

Hot Work: Activity that produces a source of ignition (e.g., welding, burning/cutting, heating, brazing, lancing, etc.).

Critical Fire Area: Any area/operation/process equipment where:

(1) Ordinary combustibles, flammable liquids, gases, dusts, oils, lubricants, etc. are in sufficient amount, concentration or arrangement that they may be ignited by the hot work.

(2) Property value or business interruption potential is determined to be significant.

NOTE: A permit is <u>always</u> required for hot work in critical fire areas.

Non-Critical Fire Area: Any area/operation/process where combustible loading and/or property value or business interruption potential is determined to be insignificant.

(1) A permit is not usually required for hot work in these areas (e.g., maintenance shop, outdoor grounds, etc.).

4.0 Procedure:

A. Hot Work Permit System:

(1) Review the client facility Hot Works Permit Program/ procedure for Implementation of hot work permit.

(2) Critical Fire Area Identification/Designation:
(a) Each Project will be review to identify all critical fire areas and develop a listing of their location.
(b) Typical examples of some critical fires areas are:

Fuel Storage Areas
Hydraulic Oil Systems (Flammable)
Electronic Equipment Rooms
Flammable Process Materials
Service Stations
Underground Tanks and Vaults
Fuel Pumping Islands

B. Hot Work Permit Procedure:

(1) Supervision involved with hot work will:
- (a) Review scope of the hot work with affected parties.
- (b) Assure that a permit has been issued in critical fire areas.
  - (I) If a supervisor is uncertain whether or not a hazardous condition exists, a permit should be issued.
- (c) It is supervisions responsibility to ensure that fire or health hazards which may develop during the course of hot work activity does not result in the work area changing from non-critical to critical (i.e., toxic or explosive vapors may develop as a result of the hot work).
  - (I) Should this occur, the responsible supervisor must notify all concerned and work will not continue until a new or revised permit is issued.
- (d) Upon completion of the work notify the individual who issued the permit and ensure that a final inspection is conducted and the area declared "fire safe" prior to removal of the permit form from the work area.

(2) Individual responsible for issuing permit will:
- (a) Visually inspect the proposed work area.
  Insure that all combustible materials and flammable liquids are at least 30 feet away from the hat works project.
- (b) Record all potential fire and safety hazards observed.
- (c) Determine whether toxic and/or explosive vapors, fumes, dusts, etc., are present in a quantity sufficient to create a fire or safety hazard.
  - (I) Where entry into a confined space is involved, refer to appropriate local procedures.
- (d) Specify measures required to control potential hazards and review these requirements with person(s) requesting the permit.
- (e) After the necessary requirements have been met, sign, date and post the permit in or near the work area.
- (f) The hot work permit will be valid for only one (1) work shift.
  - (I) At the start of a new work period, the area will be reevaluated and a new permit will be issued and posted.
- (g) Conduct a final inspection of the area approximately thirty (30) minutes after completion of the work.
  - (I) When the area is considered "fire safe", remove the permit form.
- (h) Maintain a file of completed permits from the preceding 12 months for review by insurance, regulatory agency and other authorized person(s).

(3) Hot Work Permit Form:
- (a) The company Hot work Permit, Form will be used on all projects except where the client facility requires the use of their form.
  - (I) An equivalent form may be utilized with prior approval of the Corporate Safety/Health Department.

(4) Hot works area will be monitored for Lower Explosive Limit (LEL) to insure that the flammable gases (vapors) are below 10% of the LEL.
- (a) Monitoring equipment will calibrated in accordance with manufactures specifications.
- (b) Only employees trained on the monitoring equipment will take LEL readings.
- (c) All LEL monitoring results will be recorded on the hot works permit.

(5) Any changes to the hot works area not allowed in the permit requires the immediate revoking of the permit

5.0 Non-company Hot Work Permits:

A. Hot work performed by non-company employees (contractors, service representatives, etc.) must be performed in accordance with this procedure.

B. The company official directly responsible for activities on non-company personnel will be responsible for notifying these individuals of the hot work permit requirements and for assuring compliance with this policy.

6.0 Fire Watch

A. Fire watch is a dedicated employee whose sole responsibility is to provide early warning and fire protection during the hot works procedure.

B. Fire Watch Procedures:

(1) Monitor hot works operation for any signs of uncontrolled fire.

(2) Know where all fire-fighting equipment is located.

(3) Know the procedure for alerting the facility and fire department in case of an uncontrolled fire.

(4) Post fire hose and/or fire extinguishers within reach of fire watch station.

(5) Never leave fire watch station unless relieved by another fire watch.

(6) Maintain fire watch for 30 minutes after the completion of the hot work project is completed.

(7) Inspect the hot works area before closing the permit.

7.0 Education and Training:

A. The Hot Work Permit Control System policy will be reviewed with all supervision annually.

B. This procedure will be reviewed annually with employees who perform tasks involving hot work.

8.0 Management Controls:

A. The Facility Hot Work Permit Control procedure will contain provision for specific audits of actual work in progress to assure its effectiveness.

B. Audit(s) will be conducted to assure that annual reviews are held and training of employees is effective.

9.0 Site Specific Hot Works Procedures:

A. "Hot Work" is any work that can produce a source of ignition, such as heat or sparks.

(1) Some examples are welding; brazing, cutting, grinding, chipping, and use of any power tools or open flame.

(2) Concrete sawcutting, and use of any internal combustion engine, such as a generator, compressor, car or truck, shall also be considered to be "Hot Work."

B. Extreme caution should be used while performing "Hot Work" in order to prevent fires or explosions.

C. Follow all instructions for proper use of the equipment.

(1) Maintain a clean work environment to minimize the chances of combustion.

(2) Follow standard good housekeeping procedures, and place 2 fire extinguishers on opposite sides of the work area.

(3) Wear appropriate Personal Protective Equipment for the procedure, such as goggles and gloves.

(4) Eliminate any source of flammable vapors, such open vent, vapor, or fill pipes.

(5) Close all manhole covers, lids, and caps.

D. "Hot Work" should only be conducted in a safe atmosphere.

(1) The locations near the pumps, dispensers, and vents of tanks have a potential hazardous atmosphere.

(2) If "Hot Work" is required in such an area, then the atmosphere must be tested with a combustible gas indicator (also called Oxygen/LEL meter).

E. While testing the atmosphere, first the Oxygen level must be within 19.5% and 23.5%.

(1) Then the LEL reading must be confirmed less than 10%.

(2) Continuous fresh air ventilation may be used to ensure that a safe atmosphere exists.

(3) Beware that other considerations such as confined space entry may also apply.

F. Don't conduct "Hot Work" if flammable liquids are present, either free-standing liquid or saturated soil.

(1) Instruct the Operations Manager of the condition, and wait for the flammable liquids to be properly cleaned up.

G. For "Hot Work" done in potential hazardous atmospheres, record all conditions on the following "Hot Work" permit. (Some customers require a special "Hot Work" permit be utililized.)

10.0 Fire Extinguisher:

A. All extinguishers will be UL/Factory Mutual/NFPA approved appliances

B. Extinguishers will be at least 20 lb units for the class of fires expected at the site.

C. Extinguishers will be inspected and services in accordance with current OSHA regulations.

(1) Serviced annually

(2) Inspected monthly or prior to placement on hot works project

D. All fire watch personnel will be trained in the firefighting appliance that they will be required to use

References

National Fire Protection Association -AFire Prevention in Use of Cutting and Welding Processes,@ NFPA Number 51-B-1984.

"Hot work" PERMIT

Site Address: _____ Work Order #: _____

Date: _____ Time: _____ Duration of Job: _____

1. Foreman or Leadman: _____
2. Other Helpers (write "None" if none): _____
3. Description of work to be performed: _____
4. Specific location of work to be performed: _____
5. Has lockout/tagout procedure been utilized: _____
6. Has work location been properly barricaded and prepared: _____
7. Are there any hazards other than potential hazardous atmosphere? _____
8. **Atmospheric Tests** (of each confined space) (tests conducted by entry supervisor):

   Acceptable limits: Oxygen (19.5%-23.5%), L.E.L (< 10%), Other (_____)

   Model of Gas Detector: _____ Bump Test O.K.? _____

Confined Space/Project	Time	Oxygen %	L.E.L. %	Other ( )
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

IF THE NATURAL VENTILATION PROVIDES A SAFE ATMOSPHERE, AND ANY OTHER POTENTIAL HAZARDS HAVE BEEN ELIMINATED, THEN HOT WORK MAY PROCEED.

9. Does natural ventilation provide a safe atmosphere? _____

IF CONTINUOUS FORCED VENTILATION WILL PROVIDE A SAFE ATMOSPHERE, AND ANY OTHER POTENTIAL HAZARDS ARE ELIMINATED, THEN HOT WORK MAY PROCEED WITH USE OF A VENTILATION SYSTEM.

10. Is continuous forced ventilation provided to establish safe atmosphere? _____

WE HAVE REVIEWED THE "HOT WORK" PROCEDURES PRIOR TO AND FOLLOWING THE JOB, AND UNDERSTAND OUR ROLES:

_____ _____
Foreman/Leadman (Entry Supervisor) Other technicians or helper

1.0 General:

A. Based on existing site conditions, it is anticipated that work shall be conducted in modified Level "D" PPE.

(1) The Site Supervisor in consultation with the Operations Manager, or his designee, shall determine appropriate initial PPE use and any upgrades based upon the monitoring of site conditions to ensure that safe work practices are followed.

(2) The initial hazard assessment and any follow ups will be documented, signed, and dated. Levels of PPE shall be determined based on criteria established in these standard operating procedures. Selection of PPE and the reasons for selection will be provided to employees and included in employee training (see Training below).

(3) All activities in the support zone will be performed under Level D protection, as described in the USEPA "Standard Operating Safety Guides."

B. All PPE will be supplied by the company

2.0 Respiratory Protection:

A. A respiratory protection program shall be established in accordance with OSHA standard 29 CFR 1910.134.

B. All required respiratory protection devices shall be provided and maintained in accordance with ANSI Z88.2-1980.

(1) Each worker shall be assigned a designated respirator.

(2) The respiratory protection program will establish procedures for ensuring the daily cleaning, maintenance, and replacement of filters.

(3) The program will also ensure that the respirator issued provides the least possible face piece of leakage and that the respirator is fitted properly.

(4) If an average reading above background or greater is indicated on the PID during the field investigation, Level C respiratory protection will be required.

C. Level C protection includes full-faced, air-purifying respirators equipped with combination cartridges for removing organic vapors, dusts, mists, and fumes.

(1) The following guidelines will be followed when using Level C respiratory protection:
- (a) Air-purifying cartridges will be replaced at the end of each shift or when breakthrough occurs.
- (b) Only employees who have had a pre-issue qualitative fit test will be allowed to work under Level C respiratory protection.
- (c) Only employees, who have passed a medical examination, including a pulmonary function test, will be allowed to use Level C respiratory protection.
- (d) Excessive facial hair (e.g., beards) that prohibits a proper seal between the respirator and face will not be allowed.

D. Level B respiratory protection will be required in areas where respiratory exposures exceed the ability of an air purifying respirator to remove the contaminants or in IDLH atmospheres.

(1) Prior to the commencement of activities at the site, the Site Supervisor will conduct an initial investigation by taking atmosphere sampling (monitoring) with an direct reading instrument to determine the appropriate level of protection.

(2) During this initial investigation, the Site Supervisor will be required to wear Level B respiratory equipment if IDLH Condition are known to exist or suspected.

3.0 Dermal Protection/Protective Clothing:

A. In addition to normal work clothes, any personnel entering the exclusion zone or contamination reduction zone shall wear the following protective clothing and equipment:

(1) Hard hat (OSHA Standard 29 CFR 1910.135),

(2) Face and eye protection (OSHA Standard 29 CFR 1910.133),

(3) Disposable Tyvek coveralls (regular and impervious materials),

(4) Disposable gloves (waterproof and resistant to site chemicals and oils),

(5) Boots (waterproof and resistant to site chemicals and oils) with steel toe and shank (OSHA Standard 29 CFR 1910.136), and

(6) Cold weather gear, if applicable.

B. Any work involving an intrusive field activity (e.g., Tank removal/repair, soil sampling or monitoring well installation) or the handling of contaminated liquids or soils will require the following protective clothing:

(1) Hard hat

(2) Safety goggles (unless full-faced respirators are required)

(3) Disposable Tyvek coveralls

(4) Disposable PVC inner gloves

(5) Chemical-resistant outer gloves

(6) Neoprene boots with steel toe and shank and overboots.

(7) Sleeves taped to gloves and cuffs taped to boots during handling of contaminated liquids or soils.

C. Upgrading or downgrading protective equipment will be the decision of the Site Supervisor and will be based on an assessment of the exposure potential determined from sampling and screening results.

4.0 Protection from Physical Hazards:

A. The physical hazards that employees will encounter range from the naturally occurring (i.e., irregular terrain) to use of heavy equipment and working near open excavations.

(1) The safety concerns of all activities will be reviewed at the beginning of each workday during the safety session.

B. The naturally occurring hazards related to tripping or footing will primarily be a result of the topography of the site and the materials that may be found on the ground surface.

(1) All personnel will be reminded that safety is their number one responsibility.

(2) Because the use of protective equipment will limit mobility and vision, each person will be instructed to pay special attention to his or her surroundings and to move with caution around the property.

C. The use of heavy equipment offers several special hazards.

(1) These primarily are related to noise level and limited vision by the operator.

(2) Site personnel will be advised that the equipment operator has limited vision and hearing.

(3) While working in areas immediately adjacent to such equipment, it will be the responsibility of each person to ensure that the equipment operator can see him or her.

(4) Contact will be confirmed by hand signals.

(5) The Site Supervisor will also enforce the buddy system.

D. Excavations, which may cause special hazards, will be isolated using barriers.

(1) Special signs and flags will also be used to aid site personnel in locating these hazardous areas.

(2) Trenches will be shored if the excavation exceeds the OSHA-mandated depth of 5.0 feet.

5.0 First Aid Provisions and Emergency Equipment:

A. A person certified in CPR and first aid shall be on site it all times.

(1) The size and number of first-aid kits shall be sufficient for a maximum number of people, including visitors, on the site at one time.

(2) The kits shall be equipped as per the recommendations of the physician.

(3) A portable emergency eyewash station with a 15-minute free-flow capacity shall also be on site.
(a) The portable eye wash units must be protected from freezing and shall be located close to the work area, outside of the change room.
(b) The emergency eyewash units shall meet the requirements specified in ANSI Z358.1-1981.

B. The Site Supervisor shall determine the type and number of fire extinguishers on site.

(1) At least one 20-pound, type ABC fire extinguishers shall be located at the entrance to the work area, with additional units located in on-site laboratories, offices, and each active workstation.

(2) All fire extinguishers will be inspected and maintained according to manufacturers' recommended procedures.

6.0 Training:

A. Employees will be properly trained for all PPE that they may be required to wear.

B. Examples of the training content will include:

(1) When PPE is necessary

(2) What PPE is to be worn?

(3) Limitations of the PPE

(4) How to properly don, adjust, etc., the PPE

(5) The selected PPE will be properly fitted to the individual employee

(6) Proper care and maintenance of the PPE

(7) PPE used must be maintained in a clean, sanitary, and operable condition for proper protection

(8) Proper cleaning and maintenance of PPE will be demonstrated

(9) Defective or damaged PPE will be removed from service

(10) Useful life of the PPE

(11) Proper disposal of the PPE

C. Additional training will be conducted based on the specific PPE and any relevant regulations covering training for the PPE

D. Employees will be retrained:

(1) If workplace changes are encountered

(2) If the type of PPE changes

(3) When employees are observed not using PPE properly

(4) According to the relevant governmental standards

E. The Operations Manager will keep a record of the training including the employee's name, the date(s) of training, and the training subject.

7.0 Employee Owned Equipment:

A. All required PPE will be supplied by the company.

B. Employee owned PPE will not be used without the consent of the Site Supervisor and the Operations Manager.

C. The employees preferred use of their own PPE will be documented in the project logbook; along with any stated reason the employees are not wearing the company supplied equipment.

D. If the Site Supervisor and the Operations Manager permit the use of an employee owned equipment, both the Site Supervisor and the Operations Manager will be held responsible for the adequacy of the PPE and the proper inspection, cleaning, maintenance, and storage.

E. The employee will be held jointly responsible for the proper use, storage, cleaning, and maintenance of the PPE.

F. Improper use of PPE by employees, subjects them to the company disciplinary program, which could lead to discharge.

MJ VanDamme Trucking, Inc.
Respiratory Protection Program
In accordance with 29 CFR 1910.134

1.0 Purpose:

A. When it is not feasible to render the atmospheric environment acceptable, it may be necessary to protect employees from contact with airborne contaminants.

B. Personal protective equipment will be provided and used:

(1) Where it is not possible to enclose or isolate the process or equipment, provide ventilation, or use other control measures; or

(2) Where there are short exposures to hazardous airborne concentrations of contaminants.

2.0 Policy:

A. It is understood that respiratory protection devices* are not substitutes for engineering and/or administrative methods aimed at reducing exposure potential for people working with toxic airborne substances.

B. Indeed, devices of this type are employed as an interim means of protection while feasible measures for control are developed which will eliminate health risks posed for people working with toxic substances or during emergencies and other situations in which the exposure risk is unknown.

* NOTE: So called dust masks are respirators and included within the scope of this program.

3.0 Program Administration:

A. Safety Officer is responsible for the overall administration of the Respiratory Protection Program.

(1) Assistance shall be sought from the Corporate Staff as needed.

(2) The Administrator's specific responsibilities include:
- (a) Formulating and making necessary changes in the Respiratory Protection Program.
- (b) Acting in an advisory capacity on all matters pertaining to this program.
- (c) Making certain the program complies with federal, state and local regulations and ordinances.
- (d) Periodic monitoring and advising appropriate projects of potential hazards arising out of any current or proposed process or operation.
- (e) Specifying controls necessary to minimize employee exposure to potentially harmful air contaminants and specifying the design and quality of the respiratory protective equipment.
- (f) Periodically measuring program effectiveness by conducting frequent random inspections to assure that respirators are properly selected, used, cleaned, and maintained.
- (g) Making a copy of this program and the OSHA standard available for employee review.

B. Supervisors are responsible for compliance to the Respiratory Protection Program as follows:

(1) Supervisors shall maintain a work environment that insures the maximum safety and health for their employees.

(2) Shall furnish their employees with the proper personal respiratory protective equipment, instruct them in its proper use, and enforce the wearing of such equipment.

(3) When filter / cartridge changes are necessary (as indicated by ESLI) supervisors will ensure that changes are made in clean, uncontaminated areas and atmospheres.

(4) Employees are responsible for compliance to the Respiratory Protection Program as follows:

(5) Shall make maximum use of all prescribed respiratory protective equipment and follow established practices and procedures.

(6) The employees are responsible for maintaining the respirators in optimal condition.

(7) The company will send employees to an Occupational Medical Specialist (MD) to provide surveillance and oversight of the Respiratory Protection Program as required.

(8) The hospital will provide and retain the questionnaires filled out by the employees, in accordance with the OSHA standard.

(9) Subsequent to the medical evaluation the employee will have the opportunity to discuss any findings regarding the medical review with the health care practitioner.

4.0 Program Elements:

A. The basic elements of the Respiratory Protection Program include:

(1) Industrial hygiene monitoring

(2) Selection and issuance of respirators

(3) Medical aspects of respirator usage

(4) Training

(5) Fit testing

(6) Maintenance and care of respirators

(7) Enforcement and monitoring

B. Each of the elements will be discussed separately.

5.0 Industrial Hygiene Monitoring:

A. In areas of established or suspected respiratory hazards/air contaminants, industrial hygiene surveys will be conducted.

B. The industrial hygiene surveys and any additional studies that may be required will be conducted by qualified Instrument operator, and assigned by the Operations Director.

C. When there are substantial changes in processes or materials used, additional industrial hygiene monitoring will be conducted.

D. Monitoring results shall be maintained on file, by job.

E. Recommendations for feasible engineering and administrative controls, including the utilization of appropriate respiratory protection, shall be made as a result of these surveys.

F. Affected employees or their representatives are to be provided the opportunity to observe any respiratory measurements conducted in their work place.

6.0 Selection and Issuance of Respirators:

A. The Site Supervisor, in consultation with the Operations Manager, and the qualified industrial hygienists conducting the Industrial Hygiene surveys, will make the selection and issuance of respiratory protection equipment.

B. Current respiratory selection is as follows:

(1) MSA Fullface Respirator, 7700 series.

(2) Organic Vapor Cartridge/w P100 Particulate prefilter.

C. In IDLH Conditions the following respiratory system will be used:

(1) SCBA.

(2) IDLH Conditions are noted in section 15.0.

7.0 Medical Aspects of Respirator Usage

A. Persons should not be assigned to tasks requiring use of respirator, including fit testing, unless it has been determined that they are physically able to perform the work and use the equipment as determined by the company's health care provider.

B. Pre-Placement Medical Procedures

(1) All personnel must complete the Medical Questionnaire (reference Appendix II)

(2) All personnel should have a medical examination including full size chest x-rays (14" x 17" posterior-anterior) and pulmonary function tests.

NOTE: Those employees using respirators on a voluntary basis or only occasionally may be medically screened via a medical questionnaire so long as it is reviewed and approved by the attending physician prior to implementation.

(3) Personnel with evidence of tuberculosis, either active or arrested, and/or other lung abnormalities will not be employed in areas where there is a potential risk unless medical approval is obtained.

C. Annual Medical Procedures

(1) All personnel potentially exposed to hazardous airborne contaminants should have annual pulmonary function tests.

(2) Personnel will be removed from a potential hazardous exposure if tuberculosis and/or other lung diseases are discovered.

(3) Any individual with early or simple lung abnormalities, who under medical advice is allowed to continue working in an area where potentially hazardous contamination is present, will be kept under close medical supervision.

D. Termination Medical Procedures

(1) All terminating personnel, having had potential hazardous airborne contaminants exposure, should be given a termination medical examination including full size (14" x 17") chest x-rays (posterior-anterior) and pulmonary function tests.

8.0 Medical Evaluations:

A. All medical evaluations will occur during normal working hours.

B. The medical examinations will include an allotted time to discuss the results of the medical examination with the doctor or designated person from the licensed health care provider.

C. All results, data, or information obtained from the medical exams will be treated as strictly confidential.

D. The medical records will be maintained in secure areas.

E. Information in the medical records will not be released without the signed consent of the employee.

F. The consent form will be maintained in the employee=s medical file.

9.0 Training:

A. Minimum training for both respirator user and supervisor shall include the following:

B. Instruction in the nature of the hazard, whether acute, chronic or both, with an honest appraisal of what may happen if the respirator is not used properly.

C. Explanation of why more positive control is not immediately feasible. This shall include recognition that every reasonable effort is being made to reduce or eliminate the need for respirators.

D. A discussion of why this is the proper type of respirator for the particular purpose.

E. A discussion of the respirator's capabilities and limitations.

F. Instruction and training in actual use of the respirator.
(1) This is to include having the respirator fitted properly, testing the face-piece-to-face seal and cleaning.

G. Special training (such as field training to recognize and cope with emergency situations.).

H. Respirators shall not be worn when conditions prevent a good face seal.
(1) Conditions such as growth of beard, sideburns and eyeglasses are examples.

I. Training shall be reviewed and repeated annually, and thoroughly documented.

10.0 Fit Testing:

A. It is essential that respiratory protection equipment be properly fitted to the user.

B. Fit testing for each respirator user will be administered during the employee training sessions, and thoroughly documented.

C. Qualitative Fit Test:

(1) A qualitative Fit test using banana oil or another suitable agent for cartridge respirators and irritant smoke for dust/mist/fume respirators will be performed in accordance with the testing protocols set forth by OSHA in 29 CFR 1910.134.

D. Quantitative Fit Testing:

(1) Quantitative fit testing measures the difference from the outside air verses the air inside the respirator.

(2) Quantitative fit testing will follow protocol set forth by the manufacture of the fit test interment.

NOTE: Self contained breathing apparatus or respirators for use in atmospheres immediately dangerous to life or health require quantitative fit testing/training/approval and are not included in this program.

11.0 Maintenance and Care of Respirators:

A. Inspection

(1) All respirators shall be inspected routinely before and after each use.

NOTE: Disposable respirators shall not be reused except in strict adherence to the manufacturer's instructions.

(2) A respirator that is not routinely used, but is kept ready for emergency use, shall be inspected after each use and at least monthly.

(3) A record shall be kept of inspection dates and findings for respirators maintained for emergency use.

(4) Respirator inspection shall include a check of the tightness of connections and the condition of the face-piece, headbands, values, connecting tube, and canisters.

(5) Rubber or elastomer parts shall be inspected for pliability and signs of deterioration.
(a) Stretching and manipulating rubber or elastomer parts with a massaging action will keep them pliable and flexible and prevent them from taking a set during storage.

(6) Frequent and random inspections shall be conducted by a qualified individual to assure that respirators are properly selected, used, cleaned, and maintained.
(a) These inspections will be documented.

(7) Requirement if supplied air or airline respirators are used.
(a) These include the following:
(I) Compressed breathing air must meet the requirements of for Type 1-Grade AD@ breathing air. Grade AD@ air has the following characteristics:

Oxygen content	19.5 - 23.5%
Oil mist content	< 5 mg/M^3
Carbon dioxide	<1000 ppm
Carbon monoxide	<10 ppm
Odors	None noticeable

Notes: ppm = parts per million mg/M^3 = milligrams per cubic meter of air

(II) The air intakes must be situated to prevent the entry of contaminated air.
(III) The system must have suitable in-line air purifying sorbet beds and filters.
(IV) The filters must be changed on a regular basis and the changes must be documented with a dated/signed tag located on or near the filter.
(V) Compressors must be equipped with a carbon monoxide alarm.

(VI) The monitor must alarm if carbon monoxide concentrations exceed 10

ppm.

(VII) The alarm should be calibrated at regular intervals. The manufacture should be consulted to determine how often the equipment should be calibrated.

(VIII) Calibrations should be documented; a signed/dated tag or label be used.

(IX) The airline couplings for the breathing air must be incompatible with the other air or gas systems in use at the site.

(X) Supplied air components, including self contained breathing apparatus (SCBA) should be inspected quarterly.

(XI) In-line filters and monitors should be replaced and/or calibrated according to the manufacturers specifications

12.0 Cleaning and Disinfection:

A. The following procedure is recommended for cleaning and disinfecting respirators (NOTE- Disposable respirators are not to be cleaned):

(1) Remove any filters, cartridges, or canisters.

(2) Wash face-piece and breathing tube in cleaner-disinfectant or detergent solution.

(a) Anti-Bactericidal agent is generally a quaternary ammonium compound and may be available from the manufacturer of the respirator.

(b) Use a hand brush to facilitate removal of dirt.

(3) Rinse completely in clean, warm water.

(4) Air dry in a clean area.

(5) Clean other respirator parts as recommended by the manufacturer.

(7) Inspect valves, head-straps, and other parts; replace with new parts if defective.

(8) Insert new filters, cartridges, or canisters (prior to use); make sure seal is tight.

(9) Place in plastic bag or container for storage.

(10) If different from above, manufacturer's recommendations should be followed.

B. Repair

(1) Only experienced person shall do replacement or repairs with parts designed for the respirator.

(2) No attempt shall be made to replace components or to make adjustments or repairs beyond the manufacturer's recommendations.

C. Storage

(1) After inspection, cleaning, and necessary repair, respirators shall be stored to protect against dust, sunlight, heat, extreme cold, excessive moisture or damaging chemicals.

(2) Respirators should be packed or stored so that the face-piece and exhalation valve will rest in a normal position and function will not be impaired by the elastomer setting in an abnormal position.

(3) Respirators placed at stations and work areas for emergency use should be stored in compartments built for the purpose, be quickly accessible at all times, and be clearly marked.

13.0 Enforcement and Monitoring:

A. It should be carefully explained to the respirator user that he/she must wear the respiratory equipment when exposed to hazardous contaminants.

B. Wearing this equipment is a condition of employment, and failure to do so will result in discipline, up to and including discharge.

C. The Respiratory Protection Program shall be evaluated at least annually with program adjustments made as appropriate to reflect the evaluation results.

D. This evaluation should be documented.

14.0 Non-routine Use:

A. As stated previously, respirators can be worn when responding to a non-routine task.

B. The program administrator will evaluate the potential exposures prior to issuing respirators.

C. The exposures and the use of respirators will be reviewed with each potential wearer prior to assignment.

D. All workers will be fit tested subsequent to the assignment.

15.0 Potential IDLH Atmospheres:

A. A confined space gas monitor will be used to ascertain the oxygen, carbon monoxide, hydrogen sulfide, and LEL concentrations.

B. If any of the following conditions are indicated, the atmosphere will be considered IDLH:

(1) Oxygen concentration less than 19.5 percent.

(2) LEL of 10 percent, given that the LEL for a typical hydrocarbon is at or above 1.5 percent.

(3) Hydrogen sulfide concentrations of 50 ppm

(4) Carbon monoxide concentrations of 500 ppm

C. If the above conditions are met, the Operations Manager will be informed and pending his approval, employees will don either SCBAs or airlines (pressure demand) equipped with emergency escape bottles for entry purposes.

D. If entry into the IDLH atmosphere is authorized, the area will be treated comparably to a confined space entry.

(1) One attendant will be provided for each location.

(2) Entrants will be equipped with a full body harness and appropriate rescue equipment must be available.

E. If an area exceeds 10 percent of the LEL it must not be entered until properly ventilated, and then only with authorization from the Operations Manager and the application of a Hot Work Permit.

Appendix C **to 1910.134:** OSHA **Respirator Medical Evaluation Questionnaire (Mandatory)**

To the employer:

1. Answers to questions in Section 1 and to question 9 in Section 2 of Part A. do not require a medical examination.

To the employee:

1. Can you read (circle one): Yes/No

2. Your employer must allow you to answer this questionnaire during normal working hours, or at a time and place that is convenient to you. To maintain your confidentiality, your employer or supervisor must not look at or review your answers, and your employer must tell you how to deliver or send this questionnaire to the health care professional who will review it.

Part A. Section 1. (Mandatory)

The following information must be provided by every employee who has been selected to **use** any type of respirator (please print).

1. Today's date: _____
2. Your name: _____
3. Your age (to nearest year): _____
4. Sex (circle one): Male/Female
5. Your height: _____in.
6. Your weight: _____lbs.
7. Your job title: _____
8. A phone number where you can be reached by the health care professional who reviews this questionnaire (include the Area Code): _____
9. The best time to phone you at this number: _____
10. Has your employer told you how to contact the health care professional who will review this questionnaire (circle one): Yes/No
11. Check the type of respirator you will use (you can check more than one category):
    - [ ] a. *N*, R. or P disposable respirator (filter-mask, non-cartridge type only).
    - [ ] b. Other type (for example, half- or full-facepiece type, powered-air purifying, supplied-air, self-contained breathing apparatus).
12. Have you worn a respirator (circle one): Yes/No

If "yes," what type(s):

Part A. Section 2. (Mandatory)

Questions I through 9 below must be answered by every employee who has been selected to use any type of respirator (please circle "yes" or no).

1.		Do you *currently* smoke tobacco, or have you smoked tobacco in the last month:	Yes/No
2.		Have you *ever had* any of the following conditions?	
	a.	Seizures (fits):	Yes/No
	b.	Diabetes (sugar disease):	Yes/No
	c.	Allergic reactions that interfere with your breathing:	Yes/No
	d.	Claustrophobia (fear of closed-in places):	Yes/No
	e.	Trouble smelling odors:	Yes/No
3.		Have you *ever had* any of the following pulmonary or lung problems?	
	a.	Asbestosis:	Yes/No
	b.	Asthma:	Yes/No
	c.	Chronic bronchitis:	Yes/No
	d.	Emphysema:	Yes/No
	c.	Pneumonia:	Yes/No
	f.	Tuberculosis:	Yes/No
	g.	Silicosis:	Yes/No
	h.	Pneumothorax (collapsed lung):	Yes/No
	i.	Lung cancer:	Yes/No
	j.	Broken ribs:	Yes/No
	k.	Any chest injuries or surgeries:	Yes/No
	1.	Any other lung problem that you've been told about:	Yes/No
4.		Do you *currently* have any of the following symptoms of pulmonary or lung illness?	
	a.	Shortness of breath:	Yes/No
	b.	Shortness of breath when walking fast on level ground or walking up a slight hill or incline:	Yes/No
	c.	Shortness of breath when walking with other people at an ordinary pace on level ground:	Yes/No
	d.	Have to stop for breath when walking at your own pace on level ground:	Yes/No
	e.	Shortness of breath when washing or dressing yourself.	Yes/No
	f.	Shortness of breath that interferes with your job:	Yes/No
	g.	Coughing that produces phlegm (thick sputum):	Yes/No
	h.	Coughing that wakes you early in the morning:	Yes/No
	i.	Coughing that occurs mostly when you are lying down:	Yes/No
	j.	Coughing up blood in the last month:	Yes/No
	k.	Wheezing:	Yes/No
	1.	Wheezing that interferes with your job:	Yes/No
	m.	Chest pain when you breathe deeply:	Yes/No
	n.	Any other symptoms that you think may be related to lung problems:	Yes/No

5. Have you *ever had* any of the following cardiovascular or heart problems?
   a. Heart attack: Yes/No
   b. Stroke: Yes/No
   c. Angina: Yes/No
   d. Heart failure: Yes/No
   e. Swelling in your legs or feet (not caused by walking): Yes/No
   f Heart arrhythmia (heart beating irregularly): Yes/No
   g. High blood pressure: Yes/No
   h. Any other heart problem that you've been told about: Yes/No

6 Have you *ever had* any of the following cardiovascular or heart symptoms?
   a. Frequent pain or tightness in your chest: Yes/No
   b. Pain or tightness in your chest during physical activity: Yes/No
   c. Pain or tightness in your chest that interferes with your job: Yes/No
   d. In the past two years, have you noticed your heart skipping or missing a beat: Yes/No
   e. Heartburn or indigestion that is not related to eating: Yes/No
   f. Any other symptoms that you think maybe related to heart or circulation problems: Yes/No

7. Do you *currently* take medication for any of the following problems?
   a. Breathing or lung problems: Yes/No
   b. Heart trouble: Yes/No
   c. Blood pressure: Yes/No
   d. Seizures (fits): Yes/No

8. If you've used a respirator. have you *ever had* any of the following problems? (If you've never used a respirator, check the following space and go to question 9:
   a. Eye irritation: Yes/No
   b. Skin allergies or rashes: Yes/No
   c. Anxiety: Yes/No
   d. General weakness or fatigue: Yes/No
   e. Any other problem that interferes with your use of a respirator: Yes/No

9. Would you like to talk to the health care professional who will review this questionnaire? about your answers to this questionnaire: Yes/No

Questions 10 to 15 below must be answered by every employee who has been selected to use either a full-Facepiece respirator or a self-contained breathing an apparatus (SCBA). For employees who have been selected to use other types of respirators. answering these questions is voluntary.

10. Have you *ever lost* vision in either eye (temporarily or permanently): Yes/No

11. Do you *currently* have any of the following vision problems?
   a. Wear contact lenses: Yes/No
   b. Wear glasses: Yes/No
   c. Color blind: Yes/No
   e. Any other eye or vision problem: Yes/No

12. Have you *ever had* an injury to your ears, including a broken ear drum: Yes/No

13. Do you *currently* have any of the following hearing problems?
   a. Difficulty hearing: Yes/No
   b. Wear a hearing aid: Yes/No
   c. Any other hearing or ear problem: Yes/No

14. Have you *ever had* a back injury: Yes/No

15. Do you *currently* have any of the following musculoskeletal problems?

a.	Weakness in any of your arms, hands, legs, or feet:	Yes/No
b.	Back pain:	Yes/No
c.	Difficulty fully moving your arms and legs:	Yes/No
d.	Pain or stiffness when you lean forward or backward at the waist:	Yes/No
e.	Difficulty fully moving your head up or down:	Yes/No
f.	Difficulty fully moving your head side to side:	Yes/No
g	Difficulty bending at your knees:	Yes/No
h.	Difficulty squatting to the ground:	Yes/No
i.	Climbing a flight of stairs or a ladder carrying more than 25 lbs:	Yes/No
j.	Any other muscle or skeletal problem that interferes with using a respirator:	Yes/No

Part B. Any of the following questions and other questions not listed, may be added to the questionnaire at the discretion of the health care professional who will review the questionnaire.

1. In your present job. are you working at high altitudes (over 5.000 feet) or in a place? that has lower than normal amounts of oxygen: Yes/No

   If "yes." do you have feelings of dizziness, shortness of breath, pounding in your chest, or other symptoms when you're working under these conditions: Yes/No

2. At Work or at home, have you ever been exposed to hazardous solvents, hazardous airborne chemicals (e.g., gases, fumes, or dust), or have you come into skin contact with hazardous chemicals: Yes/No

   If "yes." name the chemicals if you know them:

3. Have you ever worked with any of the materials, or under any of the conditions, listed below:

a.	Asbestos:	Yes/No
b.	Silica (e.g., in sandblasting):	Yes/No
c.	Tungsten/cobalt (e.g., grinding or welding this material):	Yes/No
d.	Beryllium:	Yes/No
e.	Aluminum:	Yes/No
f.	Coal (for example, mining):	Yes/No
g.	Iron:	Yes/No
h.	Tin:	Yes/No
i.	Dusty environments:	Yes/No
j.	Any other hazardous exposures:	Yes/No

   If "yes." describe these exposures:

4. List any second jobs or side businesses you have:

5. List your previous occupations:

6. List your current and previous hobbies:

7. Have you been in the military services? Yes/No

   If "yes," were you exposed to biological or chemical agents (either in training or combat): Yes/No

8. Have you ever worked on a HAZMAT team? Yes/No

9. Other than medications for breathing and lung problems, heart trouble, blood pressure, and seizures mentioned earlier in this questionnaire, are you taking any other medications for any reason (including over-the-counter medications): Yes/No

   If "yes." name the medications if you know them:

10. Will you be using any of the following items with your respirator(s)?
    a. HEPA Filters: Yes/No
    b. Canisters (for example, gas masks): Yes/No
    c. Cartridges: Yes/No

11. How often are you expected to use the respirators) (circle "yes" or "no" for all answers that apply to you):
    a. Escape only (no rescue): Yes/No
    b. Emergency rescue only: Yes/No
    c. Less than 5 hours *per week:* Yes/No
    d. Less than 2 hours *per day.* - Yes/No
    e. 2 to 4 hours *per day.* Yes/No
    f. Over 4 hours per Day: Yes/No

12. During the period you are using the respirators, is your work effort:

    a. *Light* (less than 200 kcal per hour): Yes/No

       If "yes," how long does this period last during the average shift: hrs. mins.

       Examples of a light work effort are *sitting* while writing, typing, drafting or performing light assembly work: or *standing* while operating a drill press (1 -3 lbs.) or controlling machines.

    b. Moderate (200 to 350 kcal per hour): Yes/No

       If "Yes," how long does this period last during the average shift: hrs. mins.

       Examples of moderate work effort are *sitting* while nailing or filing; *driving* a truck or bus in urban traffic; *standing* while drilling, nailing, performing assembly work or transferring a moderate load (about 35 lbs.) at trunk level; *walking* on a level surface about 2 mph or down a 5-degree grade about 3 mph; or *pushing* a wheelbarrow with a heavy load (about 100 lbs.) on a level surface.

c. Heavy (above 350 kcal per hour): Yes/ No

If "yes," how long does this period last during the average shift: hrs. mins.

Examples of heavy work are *lifting* a heavy load (about 50 lbs.) from the floor to your waist or shoulder; *working* on a loading dock; *shoveling,- standing* while bricklaying or chipping castings; walking up an 8-degree grade about 2 mph; *climbing* stairs with a heavy load (about 50 lbs.).

13. Will you be wearing protective clothing and/or equipment (other than the respirator) when you're using your respirator: Yes/No

If "yes," describe this protective clothing and/or equipment:

14. Will you be working under hot conditions (temperature exceeding 77' F): Yes/No

15. Will you be working under humid conditions: Yes/No

16. Describe the work you'll be doing while you're using your respirators):

17. Describe any special or hazardous conditions you might encounter when you are using your respirators. (for example, confined spaces. life threatening gases):

18. Provide the following information, if you know it, for each toxic substance that you'll be exposed to when you're using your respirators):

a. Name of the first toxic substance:

Estimated maximum exposure level per shift:

Duration of exposure per shift

b. Name of the second toxic substance:

Estimated maximum exposure level per shift:

Duration of exposure per shift:

c. Name of the third toxic substance:

Estimated maximum exposure level per shift:

Duration of exposure per shift:

d. The name of any other toxic substances that you'll be exposed to while using your respirator:

19. Describe any special responsibilities you'll **have** while using your respirators) that may affect the safety and well-being of others (for example, rescue, and security):

Medical Surveillance Program

Our company has established this medical surveillance program for our construction sites to monitor worker health and fitness when they are exposed to excessive noise, respiratory hazards, or toxic substances.

Our company has established a medical monitoring program. The Corporate Safety Director is in charge of developing and maintaining this program. A copy of the program can be reviewed by employees. It is located in Company Headquarters.

Covered Situations

Different workplace situations mandate different kinds of medical monitoring. Our facility falls into the following categories:

1. Although airborne contaminant scenarios may be encountered, levels above the OSHA PEL are not expected. Our employees do not wear respiratory protection more than 30 days per year.
2. We do not conduct hazardous material emergency response.
3. Our employees are not exposed to airborne contaminant levels greater than the OSHA PEL for more than 30 days per year.

Medical Evaluations

When an employee exhibits signs or experiences symptoms associated with exposure to a hazardous chemical used in the workplace, we provide employees with the opportunity to medical attention and evaluation. Contact your supervisor when signs and symptoms are present involving exposure to hazardous substances. Appropriate medical attention will be provided regarding your condition and location.

We also provide the opportunity for medical attention to any employee who is exposed routinely above the action level or, in the absence of an action level, above the PEL for an OSHA regulated substance for which there are exposure monitoring or medical surveillance requirements. Contact your supervisor when exposure to hazardous environments has occurred. Appropriate medical attention will be provided as needed.

In certain workplace situations, medical monitoring is required. Medical examinations may be part of this program. At MJ VanDamme Trucking, Inc. examinations are given:

- Prior to job assignment and annually thereafter (or every 2 years if a physician determines that is sufficient).
- At the termination of employment.
- Before reassignment to an area where medical examinations are not required.

- If the examining physician believes that a periodic follow-up is medically necessary.

- As soon as possible for employees injured or becoming ill from exposure to hazardous substances during an emergency, or who develop signs or symptoms of overexposure from hazardous substances.

Our examining physician plays an important role in our medical monitoring program. Therefore, we provide all necessary documentation to the physician.

Our examinations are performed under the supervision of a licensed physician, without cost to the employee, without loss of pay and at a reasonable time and place.

Our company provides the examining doctor with a medical and work history with special emphasis on symptoms related to the handling of hazardous substances and health hazards and to fitness for duty including the ability to wear any required personal protective equipment under conditions that may be expected at the work site.

We give the examining physician:

- A copy of the standard and its appendices.

- A description of the employee's duties relating to his/her exposure.

- The exposure level or anticipated exposure level.

- A description of any personal protective and respiratory equipment used or to be used.

- Any information from previous medical examinations.

Following any medical exams, the company receives a written opinion from the physician that contains the results of the medical examination and any detected medical conditions that would place the employee at an increased risk from exposure, any recommended limitations on the employee or upon the use of personal protective equipment, and a statement that the employee has been informed by the physician of the results of the medical examination.

Record Keeping

At our facility, we keep detailed records of medical monitoring. These records include:

- The name and social security number of the employee.
- Any physician's written opinions, recommended limitations, and results of examinations and tests.
- Any employee medical complaints related to exposure to hazardous substances.
- A copy of the information provided to the examining physician by the employer, with the exception of the standard and its appendices.

At our facility, we establish and maintain for each employee an accurate record of exposure monitoring results and any medical consultation and examinations, including tests or physician medical opinions, in accordance with OSHA's rule governing access to employee exposure and medical records, 29 CFR 1910.1020. We accomplish this by following each opportunity for exposure monitoring, the employee will be debriefed by the company Safety Officer. Copies of records will be provided to the employee upon request. The medical records for our facility are kept in Company Headquarters. Access is limited to Corporate Officers, Safety Officer, and the Employee.

Refer to MJ VanDamme Respiratory Protection Program for detailed program information.

MJ VanDamme Trucking, Inc.
Hand & Power Tools
In accordance with 29 CFR 1926.300/29 CFR 1910.242

1.0 Policy/Purpose:

A. The written Hand & Power Tools Plan describes methods and practices for care and use of hand and power tools that can be read and understood by all managers, supervisors, and employees. The written plan is intended to be used to:

(1) Create an awareness of the hazards associated with hand and power tools.

(2) Standardize procedures for use and care of hand and power tools.

(3) Minimize the possibility of injury or harm to our employees.

(4) Demonstrate compliance with 29CFR1926.300/29CFR1910.242

2.0 Procedures:

A. All hand and power tools and similar equipment, whether furnished by the employer or the employee, shall be maintained in a safe condition.

B. When power tools are designed to accommodate guards, they shall be equipped with such guards when in use. Reciprocating, rotating, or moving parts shall be guarded if such parts are exposed to contact by the user or otherwise create a hazard.

C. Employees using hand and power tools that are exposed to hazards such as falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases shall be provided with the particular PPE to protect them from the hazard.

D. All tools shall be operated and maintained in accordance with the manufacturer's recommended design and intent. Use the proper tool for the application within the correct environment.

E. Do not use tools that you are not familiar with. Proper instruction is required prior to operating any equipment to which you are not familiar.

F. Never use power cords and air hoses to raise or lower power tools.

G. When working on small items they shall be clamped to a solid working surface to prevent slipping.

H. Compressed air shall not be used for cleaning unless the operating pressure has been reduced to 30psi or less, and then only with effective chip guarding and PPE.

I. Do not overload tools.

J. At no time are employees permitted to override safety devices, guards, switches, and other manufacturer installed devices intended for safe operation of the tool. All tools will be operated with regard to the manufacturers recommendations.

H Hand tools in poor condition that renders them unsafe shall be replaced or removed from service.

K. Pneumatic tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.

L. Fuel powered tools used in an enclosed spaces require monitoring of toxic gases and/or use of PPE. Use of fuel powered tools in an enclosed space should be avoided.

M. Use of powder actuated tools is prohibited. Additional training is required for employees preparing to engage in powder actuated tool use.

N. Any tool found to be in non-compliance shall be repaired, replaced, destroyed or rendered inoperable.

3.0 Training:

A. Training will be conducted upon hire and as needed to include:

(1) Proper use and care of Hand & Power Tools.

(2) Recognition and avoidance of unsafe conditions.

B. Training will be repeated whenever:

(1) There are changes or modifications to Hand & Power Tool program.

(2) New equipment is introduced to the workplace or jobsite.

(3) Employee conduct dictates additional training is required.

4.0 Inspections:

A. Inspections of hand and power tools will be completed on a periodic basis and following incidents that could affect their use.

B. When an inspection reveals unsafe equipment, the equipment will be tagged “Do not use”.

(1) Employees must not use tagged equipment.

(2) Use of tagged equipment will result in disciplinary action.

C. At no time are employees authorized to repair power tools.

MJ VanDamme Trucking, Inc.
Ladder Safety
In accordance with 29 CFR 1926.1053

1.0 Policy/Purpose:

A. The written Ladder Safety Plan describes methods and practices for care and use of ladders that can be read and understood by all managers, supervisors, and employees. The written plan is intended to be used to:

(1) Create an awareness of the hazards associated with ladders.

(2) Standardize procedures for use and care of ladders.

(3) Minimize the possibility of injury or harm to our employees.

(4) Demonstrate compliance with 29CFR1926.1053.

2.0 Procedures:

A. When ascending or descending a ladder the user must face the ladder at all times.

B. Use ladders only on stable and level surfaces. Ladder rungs and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use.

C. Do not use ladders on slippery surfaces, unless the ladder has been secured or it has slip resistant feet to prevent accidental displacement. Never use slip resistant feet as a replacement for care in placing, lashing, or holding a ladder used on a slippery surface.

D. Always keep the area around the top and bottom of a ladder clear.

E. The bottom of a ladder should be barricaded to prevent movement by unauthorized personnel, and to ensure that no one is standing in an area where they may come in contact with a falling object.

F. Ladders shall be used only for the purposes for which they were designed.

G. Place the top of a non-self-supporting ladder so that the two rails are supported equally.

H. Ladders shall not be loaded beyond the maximum intended load for which they were built nor beyond the manufacturer's rated capacity.

I. Secure all tools and equipment that are being carried up a ladder. Whenever possible maintain 3 points of contact on any ladder while ascending or descending.

J. Do not stand on the top step of self-supporting ladders. Do not use the top two rungs of non-self-supporting ladders.

K. Ladders must extend a minimum of 3 feet beyond the surface to which the user is attempting to access.

L. Non self-supporting ladders must be deployed at an angle where the horizontal distance from the top support of the ladder to the foot is one fourth the working length of the ladder.

M. Ladders shall be kept free of oil, grease, and other slipping hazards.

N. Ladders shall not be moved, shifted, or extended while occupied.

O. Job made and single rail ladders are prohibited.

P. Cross bracing on the rear section of step ladders is not to be used for climbing unless the ladder is designed with steps on both front and rear sections.

Q. Do not overreach beyond the side rail of a ladder. At no time should the midpoint of the user's body extend past the side rail of the ladder.

3.0 Training:

A. Training will be conducted upon hire and as needed to include:

(1) Proper use and care of portable ladders.

(2) Ladder selection.

(3) Load capacity.

B. Training will be repeated whenever:

(1) There are changes or modifications to the ladder safety program.

(2) New equipment is introduced to the workplace or jobsite.

(3) Employee conduct dictates additional training is required.

4.0 Inspections:

A. A Competent Person will conduct inspections of portable ladders on a periodic basis and following incidents that could affect their use.

B. When an inspection reveals unsafe equipment, the equipment will be tagged "Do not use".

(1) Employees must not use tagged equipment.

(2) Use of tagged equipment will result in disciplinary action.

B. At no time are employees authorized to repair portable ladders.

Process Safety Management

1. **Purpose**

    a. To detail requirements for prevention or minimization of injuries and illnesses related to the consequences of catastrophic releases of toxic, reactive, flammable, or explosive materials within host employer's facilities.

2. **Scope**

    a. This section applies to all employees, worksites, and subcontractors working within a host employer's facility with covered processes.

3. **Responsibilities**

    a. Management at all levels is responsible for the anticipation, identification, application, coordination, and execution of this procedure. All employees shall be instructed in the significance of working safely in and around host employer's covered processes. To accomplish this requirement the additional roles and responsibilities are:

        i. Management

            1. Provide training for supervisors and employees

            2. Conduct inspections to identify process safety management deficiencies

            3. Advise the host employer of any hazards created by our work

            4. Document PSM training of all employees

            5. Assure each employee knows the emergency plans and alarms

        ii. Employees

            1. Report incidents, concerns, or deficiencies immediately

            2. Do not work in host employer's covered processes unless authorized and trained.

iii. Host Employer

1. The host employer's covered process work practices and rules will be adopted and adhered to. In addition state or local regulations may be more stringent than these guidelines and will be followed.

4. **Definitions**

a. Atmospheric tank - means a storage tank which has been designed to operate at pressures from atmospheric through 0.5 p.s.i.g. (pounds per square inch gauge, 3.45 Kpa).

b. Boiling point - means the boiling point of a liquid at a pressure of 14.7 pounds per square inch absolute (p.s.i.a.) (760 mm.).

c. Catastrophic release - means a major uncontrolled emission, fire, or explosion, involving one or more highly hazardous chemicals, that presents serious danger to employees in the workplace.

d. Facility - means the buildings, containers or equipment which contain a process.

e. Highly hazardous chemical - means a substance possessing toxic, reactive, flammable, or explosive properties and specified in 29 CFR 1910.119 Appendix A.

f. Hot work - means work involving electric or gas welding, cutting, brazing, or similar flame or spark-producing operations.

g. Normally unoccupied remote facility - means a facility which is operated, maintained or serviced by employees who visit the facility only periodically to check its operation and to perform necessary operating or maintenance tasks. No employees are permanently stationed at the facility. Facilities meeting this definition are not contiguous with, and must be geographically remote from all other buildings, processes or persons.

h. Process - means any activity involving a highly hazardous chemical including any use, storage, manufacturing, handling, or the on-site movement of such chemicals, or combination of these activities. For purposes of this definition, any group of vessels which are interconnected and separate vessels which are located such that a highly hazardous chemical could be involved in a potential release shall be considered a single process.

i. Replacement in kind - means a replacement which satisfies the design specification.

j. Trade secret - means any confidential formula, pattern, process, device, information or compilation of information that is used in an employer's business, and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it. Appendix D contained in 1910.1200 sets out the criteria to be used in evaluating trade secrets.

5. PSM Summary

a. This discussion summarizes the OSHA final process safety management (PSM) standard. The standard mainly applies to manufacturing industries - particularly, those pertaining to chemicals, transportation equipment, and fabricated metal products. Other affected sectors include natural gas liquids; farm product warehousing; electric, gas, and sanitary services; and wholesale trade. It also applies to pyrotechnics and explosives manufacturers covered under other OSHA rules and has special provisions for contractors working in covered facilities. In each industry, PSM applies to those companies that deal with any of more than 130 specific toxic and reactive chemicals in listed quantities; it also includes flammable liquids and gases in quantities of 10,000 pounds (4,535.9 Kg) or more. Subject to the rules and procedures set forth in OSHA's Hazard Communication Standard [*29 Code of Federal Regulations (CFR)* 1926.59(i)(1) through 1926.59(i)(12)], employees and their designated representatives must be given access to trade secret information contained within the process hazard analysis and other documents required to be developed by the PSM standard.

b. The key provision of PSM is process hazard analysis - a careful review of what could go wrong and what safeguards must be implemented to prevent releases of hazardous chemicals. Covered employers must identify those processes that pose the greatest risks and begin evaluating those first. Process Hazard Analysis (PHA's) must be completed as soon as possible. PSM clarifies the responsibilities of employers and contractors involved in work that affects or takes place near covered processes to ensure that the safety of both plant and contractor employees is considered. The standard also mandates written operating procedures; employee training; pre-startup safety reviews; evaluation of mechanical integrity of critical equipment; and written procedures for managing change. PSM specifies a permit system for hot work; investigation of incidents involving releases or near misses of covered chemicals; emergency action plans; compliance audits at least every 3 years; and trade secret protection.

c. To understand PSM and its requirements, employers and employees need to understand how OSHA uses the term "process" in PSM. Process means any activity involving a highly hazardous chemical including using, storing, manufacturing, handling, or moving such chemicals at the site, or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, and separate vessels located in a way that could

involve a highly hazardous chemical in a potential release, are considered a single process.

6. General Information

a. Host Employers must complete a compilation of written process safety information before conducting any process hazard analysis required by the standard. The compilation of written process safety information, completed under the same schedule required for process hazard analyses, will help the employer and the employees involved in operating the process to identify and understand the hazards posed by those processes involving highly hazardous chemicals. Process safety information must include information on the hazards of the highly hazardous chemicals used or produced by the process, information on the technology of the process, and information on the equipment in the process. Information on the hazards of the highly hazardous chemicals in the process shall consist of at least the following:

   i. Toxicity,

   ii. Permissible exposure limits,

   iii. Physical data,

   iv. Reactivity data,

   v. Corrosivity data, and

   vi. Thermal and chemical stability data and hazardous effects of inadvertent mixing of different materials.

b. Information on the technology of the process must include at least the following:

   i. A block flow diagram or simplified process flow diagram,

   ii. Process chemistry,

   iii. Maximum intended inventory,

   iv. Safe upper and lower limits for such items as temperatures, pressures, flows or compositions, and

   v. An evaluation of the consequences of deviations, including those affecting the safety and health of employees.

c. Where the original technical information no longer exists, such information may be developed in conjunction with the process hazard analysis in sufficient detail to support the analysis.

d. Information on the equipment in the process must include the following:

   i. Materials of construction,

   ii. Piping and instrument diagrams (P & lD's),

   iii. Electrical classification,

   iv. Relief system design and design basis,

   v. Ventilation system design,

   vi. Design codes and standards employed,

   vii. Material and energy balances for processes built after May 26, 1992, and

   viii. Safety systems (e.g., interlocks, detection or suppression systems)

e. The employer shall document that equipment complies with recognized and generally accepted good engineering practices. For existing equipment designed and constructed in accordance with codes, standards, or practices that are no longer in general use, the employer shall determine and document that the equipment is designed, maintained, inspected, tested, and operated in a safe manner.

f. The compilation of the above described process safety information provides the basis for identifying and understanding the hazards of a process and is necessary in developing the process hazard analysis and may be necessary for complying with other provisions of PSM such as management of change and incident investigations.

7. Process Hazard Analysis

a. The process hazard analysis is a thorough, orderly, systematic approach for identifying, evaluating, and controlling the hazards of processes involving highly hazardous chemicals. The host employer must perform an initial process hazard analysis (hazard evaluation) on all processes covered by this standard. The process hazard analysis methodology selected must be appropriate to the complexity of the process and must identify, evaluate, and control the hazards involved in the process.

b. First, host employers must determine and document the priority order for conducting process hazard analyses based on a rationale that includes such considerations as the extent of the process hazards, the number of potentially affected employees, the age of the process, and the operating history of the process. All initial process hazard analyses should be conducted as soon as possible. All process hazard analyses must be updated and revalidated, based on their completion date, at least every 5 years.

c. The host employer must use one or more of the following methods, as appropriate, to determine and evaluate the hazards of the process being analyzed:

    i. What-if,

    ii. Checklist,

    iii. What-lf/checklist,

    iv. Hazard and operability study (HAZOP),

    v. Failure mode and effects analysis (FMEA),

    vi. Fault tree analysis, or

    vii. An appropriate equivalent methodology.

d. Whichever method(s) are used, the process hazard analysis must address the following:

    i. The hazards of the process;

    ii. The identification of any previous incident that had a potential for catastrophic consequences in the workplace;

    iii. Engineering and administrative controls applicable to the hazards and their interrelationships, such as appropriate application of detection methodologies to provide early warning of releases. Acceptable detection methods might include process monitoring and control instrumentation with alarms, and detection hardware such as hydrocarbon sensors;

        1. Consequences of failure of engineering and administrative controls;

2. Facility siting;

3. Human factors; and a qualitative evaluation of a range of the possible safety and health effects on employees in the workplace if there is a failure of controls. OSHA believes that the process hazard analysis is best performed by a team with expertise in engineering and process operations, and that the team should include at least one employee who has experience with and knowledge of the process being evaluated. Also, one member of the team must be knowledgeable in the specific analysis methods being used.

iv. The host employer must establish a system to address promptly the team's findings and recommendations; ensure that the recommendations are resolved in a timely manner and that the resolutions are documented; document what actions are to be taken; develop a written schedule of when these actions are to be completed; complete actions as soon as possible; and communicate the actions to operating, maintenance, and other employees whose work assignments are in the process and who may be affected by the recommendations or actions.

e. At least every 5 years after the completion of the initial process hazard analysis, the process hazard analysis must be updated and revalidated by a team meeting the standard's requirements to ensure that the hazard analysis is consistent with the current process.

f. Host employers must keep on file and make available to OSHA, on request, process hazard analyses and updates or revalidation for each process covered by PSM, as well as the documented resolution of recommendations, for the life of the process.

8. Operating Procedures

a. The host employer must develop and implement written operating procedures, consistent with the process safety information, that provide clear instructions for safely conducting activities involved in each covered process. OSHA believes that tasks and procedures related to the covered process must be appropriate, clear, consistent, and most importantly, well communicated to employees. The procedures must address at least the following elements:

i. Steps for each operating phase:

1. Initial startup;

2. Normal operations;

3. Temporary operations;

4. Emergency shutdown, including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner;

5. Emergency operations;

6. Normal shutdown; and

7. Startup following a turnaround, or after an emergency shutdown.

ii. Operating limits:

1. Consequences of deviation, and

2. Steps required to correct or avoid deviations. Safety and health considerations:

3. Properties of, and hazards presented by, the chemicals used in the process;

4. Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment;

5. Control measures to be taken if physical contact or airborne exposure occurs;

6. Quality control for raw materials and control of hazardous chemical inventory levels; and

7. Any special or unique hazards.

8. Safety systems (e.g., interlocks, detection or suppression systems) and their functions.

iii. To ensure that a ready and up-to-date reference is available, and to form a foundation for needed employee training, operating procedures must be readily accessible to employees who work in or maintain a process. The

operating procedures must be reviewed as often as necessary to ensure that they reflect current operating practices, including changes in process chemicals, technology, and equipment, and facilities. To guard against outdated or inaccurate operating procedures, the host employer must certify annually that these operating procedures are current and accurate.

iv. The host employer must develop and implement safe work practices to provide for the control of hazards during work activities such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel. These safe work practices must apply both to employees and to contractor employees.

9. Employee Participation

a. Host employers must develop a written plan of action to implement the employee participation required by PSM. Under PSM, host employers must consult with employees and their representatives on the conduct and development of process hazard analyses and on the development of the other elements of process management, and they must provide to employees and their representatives access to process hazard analyses and to all other information required to be developed by the standard.

10. Training Initial Training.

a. OSHA believes that the implementation of an effective training program is one of the most important steps that a host employer can take to enhance employee safety. Accordingly, PSM requires that each employee presently involved in operating a process or a newly assigned process must be trained in an overview of the process and in its operating procedures. The training must include emphasis on the specific safety and health hazards of the process, emergency operations including shutdown, and other safe work practices that apply to the employee's job tasks. Those employees already involved in operating a process on the PSM effective date do not necessarily need to be given initial training. Instead, the host employer may certify in writing that the employees have the required knowledge, skills, and abilities to safely carry out the duties and responsibilities specified in the operating procedures.

11. Refresher Training.

a. Refresher training must be provided at least every 3 years, or more often if necessary, to each employee involved in operating a process to ensure that the employee understands and adheres to the current operating procedures of the process. The host employer, in consultation with the employees involved in

operating the process, must determine the appropriate frequency of refresher training.

12. Training Documentation.

a. The host employer must determine whether each employee operating a process has received and understood the training required by PSM. A record must be kept containing the identity of the employee, the date of training, and how the host employer verified that the employee understood the training.

13. Contractors Application.

a. Many categories of contract labor may be present at a jobsite; such workers may actually operate the facility or do only a particular aspect of a job because they have specialized knowledge or skill. Others work only for short periods when there is need for increased staff quickly, such as in turnaround operations. PSM includes special provisions for contractors and their employees to emphasize the importance of everyone taking care that they do nothing to endanger those working nearby who may work for another employer. PSM, therefore, applies to contractors performing maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. It does not apply, however, to contractors providing incidental services that do not influence process safety, such as janitorial, food and drink, laundry, delivery, or other supply services.

14. Host Employer Responsibilities.

a. When selecting a contractor, the host employer must obtain and evaluate information regarding the contract employer's safety performance and programs. The host employer also must inform contract employers of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process; explain to contract employers the applicable provisions of the emergency action plan; develop and implement safe work practices to control the presence, entrance, and exit of contract employers and contract employees in covered process areas; evaluate periodically the performance of contract employers in fulfilling their obligations; and maintain a contract employee injury and illness log related to the contractor's work in the process areas.

15. Contract Employer Responsibilities.

a. The contract employer must:

    i. Ensure that contract employees are trained in the work practices necessary to perform their job safely;

ii. Ensure that contract employees are instructed in the known potential fire, explosion, or toxic release hazards related to their job and the process, and in the applicable provisions of the emergency action plan;

iii. Document that each contract employee has received and understood the training required by the standard by preparing a record that contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training;

iv. Ensure that each contract employee follows the safety rules of the facility including the required safe work practices required in the operating procedures section of the standard; and

v. Advise the host employer of any unique hazards presented by the contract employer's work.

16. Pre-Startup Safety Review

a. It is important that a safety review take place before any highly hazardous chemical is introduced into a process. PSM, therefore, requires the host employer to perform a pre-startup safety review for new facilities and for modified facilities when the modification is significant enough to require a change in the process safety information. Prior to the introduction of a highly hazardous chemical to a process, the pre-startup safety review must confirm the following:

i. Construction and equipment are in accordance with design specifications;

ii. Safety, operating, maintenance, and emergency procedures are in place and are adequate;

iii. A process hazard analysis has been performed for new facilities and recommendations have been resolved or implemented before startup, and modified facilities meet the management of change requirements; and

17. Mechanical Integrity

a. OSHA believes it is important to maintain the mechanical integrity of critical process equipment to ensure it is designed and installed correctly and operates properly. PSM mechanical integrity requirements apply to the following equipment:

i. Pressure vessels and storage tanks;

ii. Piping systems (including piping components such as valves);

iii. Relief and vent systems and devices;

iv. Emergency shutdown systems;

v. Controls (including monitoring devices and sensors, alarms, and interlocks); and

vi. Pumps.

b. The host employer must establish and implement written procedures to maintain the ongoing integrity of process equipment. Employees involved in maintaining the ongoing integrity of process equipment must be trained in an overview of that process and its hazards and trained in the procedures applicable to the employee's job tasks. Inspection and testing must be performed on process equipment, using procedures that follow recognized and generally accepted good engineering practices. The frequency of inspections and tests of process equipment must conform to manufacturers' recommendations and good engineering practices, or more frequently if determined to be necessary by prior operating experience. Each inspection and test on process equipment must be documented, identifying the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of the inspection or test.

c. Equipment deficiencies outside the acceptable limits defined by the process safety information must be corrected before further use. In some cases, it may not be necessary that deficiencies be corrected before further use, as long as deficiencies are corrected in a safe and timely manner, when other necessary steps are taken to ensure safe operation.

d. In constructing new plants and equipment, the host employer must ensure that equipment as it is fabricated is suitable for the process application for which it will be used. Appropriate checks and inspections must be performed to ensure that equipment is installed properly and is consistent with design specifications and the manufacturer's instructions.

e. The host employer also must ensure that maintenance materials, spare parts, and equipment are suitable for the process application for which they will be used.

18. Hot Work Permit

a. A permit must be issued for hot work operations conducted on or near a covered process. The permit must document that the fire prevention and protection

requirements in OSHA regulations (29 CFR 1926.352) have been implemented prior to beginning the hot work operations; it must indicate the date(s) authorized for hot work; and identify the object on which hot work is to be performed. The permit must be kept on file until completion of the hot work.

19. Management of Change

a. Contemplated changes to a process must be thoroughly evaluated to fully assess their impact on employee safety and health and to determine needed changes to operating procedures. To this end, the standard contains a section on procedures for managing changes to processes. Written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures, and change to facilities that affect a covered process, must be established and implemented. These written procedures must ensure that the following considerations are addressed prior to any change:

   i. The technical basis for the proposed change,

   ii. Impact of the change on employee safety and health,

   iii. Modifications to operating procedures,

   iv. Necessary time period for the change, and

   v. Authorization requirements for the proposed change.

b. Employees who operate a process, and maintenance and contract employees whose job tasks will be affected by a change in the process must be informed of, and trained in, the change prior to startup of the process or startup of the affected part of the process. If a change covered by these procedures results in a change in the required process safety information, such information also must be updated accordingly. If a change covered by these procedures changes the required operating procedures or practices, they also must be updated.

20. Incident Investigation

a. A crucial part of the process safety management program is a thorough investigation of incidents to identify the chain of events and causes so that corrective measures can be developed and implemented. Accordingly, PSM requires the investigation of each incident that resulted in, or could reasonably have resulted in, a catastrophic release of a highly hazardous chemical in the workplace.

b. Such an incident investigation must be initiated as promptly as possible, but not later than 48 hours following the incident. The investigation must be by a team consisting of at least one person knowledgeable in the process involved, including a contract employee if the incident involved the work of a contractor, and other persons with appropriate knowledge and experience to investigate and analyze the incident thoroughly. An investigation report must be prepared including at least:

   i. Date of incident,

   ii. Date investigation began,

   iii. Description of the incident,

   iv. Factors that contributed to the incident, and

   v. Recommendations resulting from the investigation.

c. A system must be established to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions must be documented and the report reviewed by all affected personnel whose job tasks are relevant to the incident findings (including contract employees when applicable). The employer must keep these incident investigation reports for 5 years.

21. Emergency Planning and Response

a. If, despite the best planning, an incident occurs, it is essential that emergency pre-planning and training make employees aware of, and able to execute, proper actions. All employees are required to attend drills and training sessions, any employee missing these drills and training sessions will attend a makeup session when they return to the site. For this reason, an emergency action plan for the entire plant must be developed and implemented in accordance with the provisions of other OSHA rules [29 CFR 1926.35(a)]. In addition, the emergency action plan must include procedures for handling small releases of hazardous chemicals. Host employers covered under PSM also may be subject to the OSHA hazardous waste and emergency response regulation [29 CFR 1926.65(a), (p), and (q)].

22. Compliance Audits

a. To be certain process safety management is effective, host employers must certify that they have evaluated compliance with the provisions of PSM at least every 3 years. This will verify that the procedures and practices developed under the standard are adequate and are being followed. The compliance audit must be

conducted by at least one person knowledgeable in the process and a report of the findings of the audit must be developed and documented noting deficiencies that have been corrected. The two most recent compliance audit reports must be kept on file.

23. Trade Secrets

a. Host employers must make available all information necessary to comply with PSM to those persons responsible for compiling the process safety information, those developing the process hazard analysis, those responsible for developing the operating procedures, and those performing incident investigations, emergency planning and response, and compliance audits, without regard to the possible trade secret status of such information. Nothing in PSM, however, precludes the host employer from requiring those persons to enter into confidentiality agreements not to disclose the information.

Preventive Maintenance

1. **Purpose**

    a. To detail the written system for the monitoring and maintenance of workplace equipment such as preventive and predictive maintenance, to prevent equipment from becoming hazardous.

2. **Scope**

    a. This section applies to all employees, worksites, and subcontractors.

3. **Responsibilities**

    a. Management at all levels is responsible for the anticipation, identification, application, coordination, and execution of this procedure. All employees shall be instructed in the existence of the Preventative Maintenance program and its elements. To accomplish this requirement the additional roles and responsibilities are:

        i. Management

            1. Provide training for individuals responsible for Preventive Maintenance.

            2. Conduct inspections to identify deficiencies in the Preventive Maintenance program.

            3. Provide appropriate and adequate supplies on all sites.

            4. Assure documentation of the program is current and accurate.

        ii. Employees

            1. Report all incidents immediately

            2. Report suspect equipment conditions to supervision.

            3. Follow the Preventive Maintenance rules and requirements.

iii. Host Employer

iv. The host employer's Preventive Maintenance practices will be adopted and adhered to where they are more stringent that these requirements or where mandated. Our utilization of this procedure on a host employer's work site must be in compliance with the host employer's requirements as well as local, federal, and state regulations. In all cases, the most stringent requirements will be adopted and adhered to.

4. Elements of Preventive Maintenance

a. Preventive maintenance is the orderly, uniform, continuous, and scheduled action to prevent breakdown and prolong the useful life of equipment. Preventive maintenance is a shared responsibility among workers and site supervision. Advantages to be gained from preventive maintenance include safer working conditions, decreased downtime of equipment because of breakdown, and increased life of the equipment. Preventive maintenance has four (4) main components:

i. Scheduling and performing periodic maintenance functions

ii. Keeping records of service and repairs

iii. Repairing and replacing equipment and equipment parts

iv. Providing spare parts control or inventory.

5. Scheduling and Performing Periodic Maintenance

a. Maintenance schedules can be set up on either a time or use basis, whichever comes first. Factors to be considered include:

i. Age of the equipment

ii. Number of hours per day in use

iii. Past experience

iv. Manufacturers' recommendations

1. The manufacturers' recommendations provide standards that need to be maintained for the safe and economical use of the equipment.

6. Records and Documentation

a. Each piece of equipment should have a maintenance schedule established and documented. The schedule should indicate the parts to be serviced, the kind of service required, and the frequency of service. The manufacturers' recommendations should be referenced to determine the appropriate schedules. The individual conducting the maintenance should sign off on any repairs or maintenance activities.

7. Repairs and Replacements

a. Equipment repairs must be made in accordance with the manufacturers' specifications. Maintenance personnel should be aware of their limitations and recognize that their experience and expertise are not sufficient for all repairs. Those personnel assigned repair responsibilities require special safety training since many of the repairs may include testing or working on equipment with safety guards and safety devices removed. Any equipment being repaired should fall under the requirements of the lockout/tagout program.

8. Spare Parts Inventory

a. A benefit of the preventive maintenance program is that spare parts can be effectively ordered and kept on hand instead of having to order and wait which prolongs scheduled maintenance.

9. Equipment Inventory

a. Some, but not all, of the various items falling under the Preventive Maintenance program are:

i. PPE

ii. Trucks and vehicles

iii. Construction equipment

iv. Hand and Power tools

***Please add Site Specific items to complete inventory

10. Inspection and Maintenance

a. The inspection, maintenance and associated documentation are identified in the applicable procedures for the specific equipment or materials. The supervisor will assure that all of their employees who are assigned to perform work in the field are trained in accordance with these guidelines. Additionally, the supervisor will insure compliance with this training in the field.

b. Any equipment or materials identified as defective or in need of repair will be removed from service immediately and red-tagged and removed from the work area (to a secure location if possible) with signage posted “DO NOT USE”. Contact and notify supervision and/or site management.

c. Equipment or materials that cannot be repaired will be destroyed and discarded.

MJ VanDamme Trucking, Inc.
FLEET MANAGEMENT POLICY

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MOTOR VEHICLE SAFETY POLICY

1. Policy

Many employees operate company owned, leased, rental or personal vehicles as part of their jobs. Employees are expected to operate vehicles safely to prevent accidents which may result in injuries and property loss. It is the policy of MJ VanDamme Trucking, Inc. (MJVD) to provide and maintain a safe working environment to protect our employees and the citizens of the communities where we conduct business from injury and property loss. The company considers the use of automobiles part of the working environment. The company is committed to promoting a heightened level of safety awareness and responsible driving behavior in its employees. Our efforts and the commitment of employees will prevent vehicle accidents and reduce personal injury and property loss claims. This program requires the full cooperation of each driver to operate their vehicle safely and to adhere to the responsibilities outlined in the Motor Vehicle Safety Program. Elements of this program include:

- Assigning responsibilities at all levels of employment.
- Vehicle use and insurance requirements.
- Employee driver's license checks and identification of high risk drivers.
- Accident reporting and investigation.
- Company Accident Review Board.
- Vehicle selection and maintenance.
- Training standards.
- Safety regulations.

2. Responsibility

Management is responsible for successful implementation and on-going execution of this program. Supervisors and employees are responsible for meeting and maintaining the standards set forth in this program.

3. Scope

This policy applies to employees who operate vehicles on company business and will be reviewed by managers and supervisors to ensure full implementation and compliance.

_____ _____

Employee Signature Date

ORGANIZATION AND RESPONSIBILITIES

1. General Manager/Safety Director:

   Responsible for directing an aggressive vehicle safety program.

2. Management will:

   A. Implement the Motor Vehicle Safety Program in their areas of responsibility.
   B. Establish measurement objectives to ensure compliance with the program.
   C. Provide assistance and the resources necessary to implement and maintain the program.

3. Supervisors will:

   A. Investigate and report all accidents involving a motor vehicle used in performing company business. Forward all accident reports to the Safety Director.
   B. Be responsible for taking appropriate action to manage high risk drivers as defined by this program.
   C. Provide driver training either internally or through external means for high risk drivers.

4. Safety Director:

   A. Issue periodic reports of losses for the General Manager's review.
   B. Review motor vehicle accident reports as part of the Company Accident Review Board.
   C. Revise and distribute changes to the Motor Vehicle Safety Program to managers, supervisors and drivers as necessary.
   D. Maintain appropriate records.

5. Drivers will:

   A. Always operate a motor vehicle in a safe manner as explained under the section titled, "Driver Safety Regulations".
   B. Maintain a valid driver's license and minimum insurance requirements on personal vehicles used in company business.
   C. Maintain assigned vehicles according to established maintenance standards.

VEHICLE USE

1. Company Owned Vehicles

   A. Passenger Cars and Light Trucks
   Employees authorized by their supervisors will be permitted to operate a passenger car. When the vehicle is driven for personal use, only the employee will be permitted to operate the vehicle. No one under the age of 21 will be permitted to operate the vehicle.

   B. Commercial Vans and Trucks
   Employees with appropriate commercial driver's license (if required by the state), authorization from their supervisor and qualified by state and Federal DOT when applicable will be permitted to operate the vehicle.

2. Personal Vehicles on Company Business

   A. Employees who drive their personal vehicles on company business are subject to the requirements of this program including:

      1. Maintaining auto liability insurance with minimum limits of $50000 for bodily injury and $50000 for property damage with combined single limit of $100000.
      2. Maintain current state vehicle inspections when required.
      3. Maintain their own vehicle in a safe operating condition when driven on company business.
      4. Proof of insurance (copy of declaration page) will be sent to the Safety Director.
      5. Acceptable Motor Vehicle Report (MVR).
      6. No ‘business use’ exclusion on personal insurance policy.
      7. PreTrip Inspection required and documented using standard MJVD Inspection form. Maintain inspection documents in vehicle.

3. Rental Vehicles

   A. Rental vehicles will be leased from a national provider (Example; Hertz, Avis, Enterprise).
   B. Collision damage waiver will be refused.

4. Unauthorized Use of Vehicles

   Assigned drivers and other authorized employees will not allow an unauthorized individual to operate a company vehicle. No exceptions! Disciplinary action may be taken. Additionally, if unauthorized use results in an accident, the responsible employee will be required to make restitution for the damages.

DRIVER SELECTION

1. Driver Evaluation:

   Employees will be evaluated and selected based on their driving ability. To evaluate employees as drivers, management will:

   A. Review past driving performance and work experience through previous employers reference checks. All new employees and current employees recently assigned to driving duties will be required to complete the "Application Addendum For Employment Requiring Driving".

   B. Review the employee's Motor Vehicle Record (MVR) annually (more frequently if reasons warrant).

   C. Ensure the employee has a valid driver's license.

   D. Ensure the employee is qualified to operate the type of vehicle he/she will drive.

2. Driver Qualification:

   Effective driver qualification controls are important elements of a successful motor vehicle safety program. Management developed and incorporated standards into this program, which reflect the skills necessary for satisfactory job performance while taking into consideration applicable Federal and state regulations.

   A. The company has implemented three levels of driver qualification criteria. Use of any or all of these criteria is dependent upon the nature and scope of the driving requirements.

      1. State-regulated driver qualification parameters must be met. Regulatory information will be obtained from applicable state departments of transportation and motor vehicle services.

      2. Where applicable, drivers will comply with DOT Commercial Driver License (CDL) regulations.

      3. Drivers involved in interstate or foreign commerce in vehicles with Gross Motor Vehicle Weight Rating (GMVR) of 10,001 pounds or more, designed to transport 16 or more passengers, including the driver, or used in the transportation of hazardous materials in a quantity requiring placarding under the DOT Hazardous Materials Regulations, are subject to the requirements of the DOT Federal Highway Administration's Federal Motor Carrier Safety Regulations.

4. Drivers involved in intra or interstate operations with GMVR of 26,001 pounds or more must have a CDL license and be enrolled in a DOT Drug and Alcohol Testing Program.

5. For all CDL drivers a Driver Qualification file will be maintained. The following items will be maintained in the file:
   a. Application for employment
   b. Copy of the drivers MVR (annual)
   c. Drivers Road Test Certificate
   d. Annual review of driving record
   e. Violation History/Record
   f. Medical Certificate

B. The following criteria was established to identify high risk drivers. A driver is unacceptable if the driver's accident/violation history in the past year includes one or more of the following moving violation convictions:

1. Driving under the influence of alcohol or drugs (DWI).
2. Hit and run.
3. Failure to report an accident.
4. Negligent homicide arising out of the use of a motor vehicle.
5. Operating during a period of suspension or revocation.
6. Using a motor vehicle for the commission of a felony.
7. Operating a motor vehicle without the owner's authority.
8. Permitting an unlicensed person to drive.
9. Reckless driving.
10. Speeding (3 or more in a 3 year period).
11. Two preventable accidents in a 12 month period.

Drivers who are identified as high risk or in violation may be subject to several actions from management including, but not limited to:

1. Driver may be required to attend a Defensive or Safety Driving course on their own time & expense.

2. Driver may be required to operate their own personal vehicle on company business.

3. Driver may have their driving privileges suspended or revoked.

ACCIDENT RECORDKEEPING, REPORTING AND ANALYSIS

1. This company considers elimination of motor vehicle accidents as a major goal. To meet this objective, all accidents will be reported to management, investigated, documented and reviewed by the Company Accident Review Board. The investigation identifies need for:

   A. A more intensive driver training and/or remedial training.
   B. Improved driver selection procedures.
   C. Improve vehicle inspection and/or maintenance activities.
   D. Changes in traffic routes.

2. Motor vehicle accident recordkeeping procedures consist of the following components:

   A. Documentation of causes and corrective action.
   B. Management review to expedite corrective action.
   C. Analysis of accidents to determine trends, recurring problems and the need for further control measures.

3. Responsibility:

   Implementation of these procedures remains the responsibility of both the driver and manager.

   A. Driver
      Since the driver is the first person at the accident scene, he/she will initiate the information-gathering process as quickly and thoroughly as is feasible.
   B. Management
      Management will obtain accident data from the driver through the Transportation Accident Report form and/or by verbal communication. It is important for management to determine the extent of the accident, especially if it involves injury or death to the driver, passengers, or other parties.
   C. Management will immediately proceed with a formal investigation to determine the underlying causes as well as what can be done to prevent similar occurrences. The accident report will be forwarded to the insurance claims office along with any additional support data (e.g., witness statements, photographs, police reports, etc.).

4. Driver Participation In Repair Costs:

   On a case by case basis, drivers involved in preventable accidents that require vehicle repair, drivers are subject to participation in the repairs and/or repair costs of the vehicle(s) involved.

5. Preventable/Non-Preventable Accidents:

The following definitions relate to motor vehicle accidents:

A. A motor vehicle accident is defined as "any occurrence involving a motor vehicle which results in death, injury or property damage, unless such vehicle is properly parked. Who was injured, what property was damaged and to what extent, where the accident occurred, or who was responsible, are not relative factors".
B. A preventable accident is defined as "any accident involving the vehicle, unless properly parked, which results in property damage or personal injury and in which the driver failed to do everything he/she reasonably could have done to prevent or avoid the accident".

NOTE 1: A properly parked motor vehicle is one that is completely stopped and parked where it is legal and prudent to park such a vehicle or to stop to load/unload property. Vehicles stopped to load/unload passengers is not considered parked.

NOTE 2: Parking on private property will be governed by the same regulations that apply on public streets and highways. A vehicle stopped in traffic in response to a sign, traffic signal or the police is not considered parked.

C. The determination of preventability of an accident is the function of the Company Accident Review Board.

NOTE 3: See attached "Guide For Preventable and Nonpreventable Accidents" in Appendix.

EMPLOYEE ACCIDENT REPORTING PROCEDURE

Employees will take the following actions when there are injuries to persons and/or damage to other vehicles or property:

1. If possible, move the vehicle to a safe location out of the way of traffic. Call for medical attention if anyone is hurt.

2. Secure the names and addresses of drivers and occupants of any vehicles involved, their operator's license numbers, insurance company names and policy numbers, as well as the names and addresses of injured persons and witnesses. Record this information on the Accident Report form (in the reporting packet). Do not discuss fault with, or sign anything for anyone except an authorized representative of MJVD, a police officer, or a representative of MJVD insurance carrier.

3. Immediately notify the Safety Director. If any injuries were involved and the Vehicle Safety Coordinator is not available, contact your supervisor immediately.

4. You will be contacted by the Safety Director/Shop Manager to advise you how to arrange for repairs to the vehicle. Do not have the vehicle repaired until you receive authorization.

When there is theft of or damage to your vehicle only:

1. If you did not witness the damage to the vehicle, you must notify the local police department immediately.

2. Immediately notify the Safety Director or your supervisor.

3. You will be contacted by the Shop Manager to advise you how to arrange for repairs or replacement of the vehicle. Do not have the vehicle repaired until you receive authorization from the Shop Manager.

4. Send a copy of the police report along with a memo outlining any additional information to the Safety Director.

5, Document the damage.

COMPANY ACCIDENT REVIEW BOARD

All vehicle collisions should be analyzed, and a written report submitted to management for review. A determination of accident preventability should be made. Where the collision was preventable by the company driver, the driver should be counseled, given additional training, given time off without pay, placed on probation, transferred to non-driving duties, disciplined in other ways, or employment terminated according to corporate, union, and governmental guidelines.

However, this does not absolve management from improving safety of the work and driving environment. The Safety Director, drivers and management personnel should each participate in the analysis. Management deficiencies and/or lack of management action should also be part of the accident review. Management has the legal obligation not only for driver safety but the safety of the general public as well.

To determine preventability an accident review board has been established. Members consists of both management and field personnel. Their main charge, of the review board, is to determine whether the fleet accident was preventable or nonpreventable and whether or not it is chargeable to the driver.

The attached material, "Guide For Preventable and Nonpreventable Accidents", will be used as a guide for this determination. Majority vote rules.

The committee will report to the Safey Director within 3 working days the results of their review. The Safety Director will take the appropriate steps and communicate the results to the affected driver and supervisor.

VEHICLE SELECTION, INSPECTION AND MAINTENANCE

1. Introduction:

Proper selection and maintenance of equipment are important aspects of this program. Reduced operational costs and accidents from vehicle defects are the direct result of a well implemented maintenance policy.

2. Vehicle Selection:

Selection of vehicles begins with understanding the wrong equipment can result in excessive breakdowns, create hazards to personnel, incur costly delays and contribute to poor service and customer complaints. The company will purchase vehicles designed for their intended use.

3. Vehicle Inspection:

The employee responsible for the vehicle will inspect the vehicle daily pre-trip and post-trip using the Vehicle Inspection Report form (see appendix) and forward the report to the Shop Manager. The standard MJVD inspection form may be used in place of the inspection form included in this document. More frequent inspections and reports may be required based on heavy use.

If,while performing inspections, defects affecting the safe operation of the vevicle are noted the vehicle is to be tagged “out of service.” If a vehicle is placed “out of service” immediately notify the Shop Manager. At no time should an “out of service” vehicle be operated. Determinations as to return to service of any vehicle previously tagged “out of service” will be made by the Shop Manager only.

Annual vehicle inspections will be performed by the Shop Manager. The Vehicle Inspection Report Form (see appendix) will be used to conduct the annual inspection.

Roadside Inspections -- North American Standard Out-Of-Service Inspections:
Roadside Inspections are performed to ensure that both the vehicle and its driver are road worthy and can continue in service. The criteria are intended to be used in random roadside inspections to identify critical vehicle inspection items and provide criteria for placing a vehicle out-of-service A vehicle is placed out-of-service only when by reason of its mechanical condition or loading it is determined to be so imminently hazardous as to likely cause an accident or breakdown, or when such conditions would likely contribute to loss of control of the vehicles by the driver. A certain amount of flexibility is given to the inspecting official whether to place the vehicle out-of-service at the inspection site or if it would be less hazardous to allow the vehicle to proceed to a repair facility for repair. The distance to the repair facility must not exceed 25 miles.
The roadside type of inspection, however, does not necessarily mean that a vehicle has to be defect-free in order to continue in service. In order to maintain consistency across all

U.S. States, Canada and Mexico, the North American Standard Inspection Criteria was developed by the CVSA with the following levels of vehicle inspection for roadside inspections.

LEVEL I - North American Standard Inspection

The Level I inspection examines both the driver and the vehicle and includes:

- Driver's License
- Medical Examinees Certificate and Waiver (if applicable)
- Alcohol and Drugs
- Driver's Record of Duty Status as required
- Hours of Service
- Seat Belt
- Vehicle Inspection Report
- Brake System
- Coupling Devices
- Exhaust System
- Frame
- Fuel System
- Turn Signals
- Brake Lamps
- Tail Lamps
- Head Lamps
- Lamps On Projecting Loads
- Safe Loading
- Steering Mechanism
- Suspension
- Tires
- Van And Open-Top Trailer Bodies
- Wheels And Rims
- Windshield Wipers
- Emergency Exits On Buses
- HM Requirements (as applicable)

LEVEL II - Walk-Around Driver/Vehicle Inspection

The Level II inspection is a walk-around inspection that examines the driver and the vehicle. It includes everything that can be inspected without physically getting under the vehicle. As a minimum, Level II inspections must include examination of:

- Driver's License
- Medical Examinees Certificate and Waiver (if applicable)
- Alcohol and Drugs
- Driver's Record of Duty Status as required
- Hours of Service
- Seat Belt
- Vehicle Inspection Report
- Brake System
- Coupling Devices
- Exhaust System

• Frame
• Fuel System
• Turn Signals
• Brake Lamps
• Tail Lamps
• Head Lamps
• Lamps On Projecting Loads
• Safe Loading
• Steering Mechanism
• Suspension
• Tires
• Van And Open-Top Trailer Bodies
• Wheels And Rims
• Windshield Wipers
• Emergency Exits On Buses
• HM Requirements (as applicable)

LEVEL III - Driver-Only Inspection

Level III is a driver-only inspection which will include examination of the following

• Driver's License
• Medical Certification and Waiver, (if applicable)
• Driver's Record Of Duty Status As Required
• Hours Of Service
• Seat Belt
• Vehicle Inspection Report
• Hazardous Materials Requirements (as applicable)

LEVEL IV - Special Inspections

Inspections under this heading typically include a one-time examination of a particular item. These examinations are normally made in support of a study or to verify or refute a suspected trend.

LEVEL V - Vehicle-Only Inspection

The Level V is an inspection that includes each of the vehicle inspection items specified under the North American Standard Inspection (Level I), without a driver present, conducted at any location.

LEVEL VI - Enhanced NAS Inspection for Radioactive Shipments

An inspection for select radiological shipments, which include

• Inspection Procedures
• Enhancements To The Level I Inspection
• Radiological Requirements
• Enhanced Out-Of-Service Criteria

What Happens After The Inspection?

First, if there are actionable violations, such as operating the vehicle without a valid license or a headlight out; anything that would warrant a ticket anyway; the driver and/or

carrier may receive a citation. The penalty will depend on the jurisdiction of the law enforcement making the stop.
Second, if the vehicle is deemed to be unsafe to continue, it may be placed Out-of-Service, meaning it cannot continue to be operated until the items have been corrected.
Third, the data collected from the inspection will be input into the Safety Measurement System.
Third, Should a Roadside Inspection occur, contact your supervisor. Should the vehicle be placed “out of service” immediately contact the Shop Manager for instructions as to repair and/or towing.

4. Vehicle Maintenance:

Vehicle maintenance can take the form of three distinct programs: preventive maintenance, demand maintenance, and crisis maintenance. While all three types have their role in the Motor Vehicle Safety Program, the most cost effective control is preventive maintenance. The groundwork for a good preventive maintenance program starts with management. A review of manufacturer's specifications and recommendations for periodic preventive maintenance should be integrated with the actual experience of the vehicles. An annual inspection of each fleet vehicle will be performed by the Shop Manager every 12 months at a minimum.

A. Preventive maintenance (PM) is performed on a mileage or time basis. Typical PM includes oil/filter changes, lubrication, tightening belts and components, engine tune-ups, brake work, tire rotation, hose inspection/replacement and radiator maintenance. Next Preventive Maintenance mileage is posted on the windshield of each company vehicle.

B. Demand maintenance is performed only when the need arises. Some vehicle parts are replaced only when they actually fail. These include light bulbs window glass, gauges, wiring, air lines, etc. Other "demand maintenance" items involve vehicle components that are worn based on information from the vehicle condition report. These include tires, engines, transmissions, universal joints, bushings, batteries, etc. Since these situations are identified through periodic vehicle inspection, they can actually be classified within the PM program. Indicate the need for maintenance on the pretrip inspection form. Turn form in to Shop Manager or contact your supervisor.

C. Crisis maintenance involves a vehicle breakdown while on the road. While situations of this type may happen regardless of the quality of the PM program, it is an expensive alternative to not having an effective preventive maintenance program at all. Crisis maintenance situations should be minimized through proper PM procedures. Contact your supervisor regarding procedure to get the vehicle to a safe location. Shop Manager will make arrangement for field repair or towing.

5. Recordkeeping:

This company's vehicle selection, inspection and maintenance program is only as good as its recordkeeping procedures. Employees will forward all vehicle maintenance records for maintenance performed each quarter to the Shop Manager.

DRIVER TRAINING

1. Drivers hired by this company to operate a motor vehicle will have the basic skills and credentials necessary to perform this function as confirmed through the driver selection process.

2. New employees, contractor, and temporary hires will receive a copy of this program as part of their initial orientation. A formal orientation program is established to help assure all drivers are presented with the company policy, understand their responsibilities and are familiarized with their vehicle. Areas that must be addressed, with the driver, include:

   a. Understand, review and given a copy of the Fleet Safety Program.
   b Understand and sign the Vehicle Assignment Agreement.
   c. Review individual Motor Vehicle Report (MVR).
   d. Understand accident reporting & emergency procedures.
   e. Review operation and controls of vehicle being assigned.
   f. Inspect vehicle using Vehicle Inspection Form.
   g. Road Test as required.

   A copy of this program will be kept in the vehicle.

3. <u>License Suspension</u>:

   Drivers must notify the Safety Director if their license is suspended or revoked.

4. <u>Remedial Training</u>:

   Drivers may be required to attend a safe driving school (National Safety Council Defensive Driving course of equivalent) or an alcohol/drug abuse program on their own time and at their own expense if a review of the driver's MVR indicates:

   A. One or more violation convictions within any one-year period, or

   B. A conviction for driving while under the influence of alcohol or drugs.

   Also, depending on the severity of the conviction, the employee's driving privileges may be revoked and/or may result in employment termination.

DRIVER SAFETY REGULATIONS

1. Safety Belts:

   The driver and all occupants are required to wear safety belts when the vehicle is in operation or while riding in a vehicle. The driver is responsible for ensuring passengers wear their safety belts. Children under four years of age or under 40-pounds in weight must be secured in a DOT approved child safety seat.

2. Impaired Driving:

   The driver must not operate a vehicle at any time when his/her ability to do so is impaired, affected, influenced by alcohol, illegal drugs, prescribed or over-the-counter medication, illness, fatigue or injury.

3. Traffic Laws:

   Drivers must abide by the federal, state and local motor vehicle regulations, laws and ordinances.

4. Vehicle Condition:

   Drivers are responsible for ensuring the vehicle is maintained in safe driving condition. Drivers of daily rentals should check for obvious defects before leaving the rental office/lot and, if necessary, request another vehicle of the first vehicle is deemed unsafe by the employee. Drivers are encouraged to rent vehicles equipped with air bags and ABS brakes, where available.

5. Cellular Telephones, Walkmans and Pagers:

   The following procedures apply to employees driving on company business who wish to use cellular telephones in the vehicle.

   A. External speaker and microphone must be included to allow hands-free operation.
   B. Phone number memory and programming capabilities are to be included.
   C. Drivers are to refrain from placing outgoing calls or responding to texts while the vehicle is in motion.
   D. Incoming calls should be limited.
   E. For any vehicle equipped with cellular telephone that does not meet the above equipment specifications, use of the telephone/pager is authorized when the vehicle is safely parked.
   F. Employees are prohibited from using any hand held device while operating a motor vehicle.
   G. All texting while driving is prohibited.

6. Motorcycles:

Employees are prohibited from using motorcycles when traveling on company business.

7. General Safety Rules:

Employees are not permitted to:

A. Pick up hitchhikers.
B. Accept payment for carrying passengers or materials.
C. Use any radar detector, laser detector or similar devices.
D. Push or pull another vehicle.
E. Transport flammable liquids or gases unless a DOT or Underwriters' Laboratories approved container is used, and only then in limited quantities.
F. Use of burning flares will be discouraged. The preferred method is the use of reflective triangles.
G. Assist disabled motorists or accident victims beyond their level of medical expertise. If a driver is unable to provide the proper medical care, he/she must restrict his/her assistance to calling the proper authorities. Your safety and well being is to be protected at all times.
H. Loads shall be secured and within the manufacturer's legal limits and specifications of the vehicle.

8. Company and Personal Property:

Employees are responsible for company property such as computers, work papers and equipment under their control. The company will not reimburse the employee for stolen personal property.

APPENDIX

Forms/Attachments

- Vehicle Assignment Agreement
- Application Addendum For Employment Requiring Driving
- Guide For Preventable and Nonpreventable Accidents
- Vehicle Inspection Report

VEHICLE ASSIGNMENT AGREEMENT

The undersigned hereby acknowledges receipt of a company-owned or leased automobile. I understand this vehicle is to be regularly maintained and serviced, according to the service schedule outlined in the Owner's Manual or the instructions issued by the Vehicle Safety Coordinator, whichever is appropriate.

Further, it is agreed this vehicle will be operated in a safe manner. I agree to wear my seat belt whenever the vehicle is in motion and will require other occupants to do so. I agree to be responsible for all traffic and parking violations that occur while the vehicle is assigned to me.

I understand articles of this agreement apply regardless of who is operating this vehicle. I may authorize others to drive this vehicle according to the following guidelines:

- Licensed spouse except if under 21 years of age.
- Licensed employees of MJVD or its subsidiaries or affiliates.
- Other licensed drivers as I so designate in emergency situations only.

I agree to promptly report all accidents or incidents resulting in injury or damage to the vehicle or other property, no matter how slight.

I understand I am required to maintain a valid driver's license. Further, I herewith grant MJVD the right to investigate may motor vehicle driving record any time. My current driver's license is issued from the State of _____ and is No._____. I understand that I am responsible for my own license plate renewal.

If my driving record contains two moving violations within one-year period, my record will be brought up before the Company Accident Review Board for consideration of remedial training and/or loss of driving privileges.

I will be required to attend a safe driving class on my own time and at my expense, and to provide the Safety Director with confirmation of attendance within thirty days of notification if decided by the review board.

I understand I am not to modify the vehicle in any way without written permission.

I agree to reimburse the company for damages done to this vehicle because of my negligence. In the event of an accident, which has been determined to have been my fault by citation, traffic court conviction, by my own admission, or determination by management.

I understand the operation of this vehicle in a safe operating condition is my responsibility. If this vehicle becomes unsafe, it is my responsibility to notify my supervisor immediately.

I read and agree to the provisions of this Vehicle Assignment Agreement and the requirements of the Motor Vehicle Safety Program.

_____ _____

SIGNATURE **DATE**

VEHICLE ASSIGNED: _____
VIN NUMBER: _____
PLATE NUMBER:_____
MILEAGE: _____

OTHER DRIVERS

The undersigned agree to comply with the requirements of this Agreement, The Vehicle Safety Rules and the Vehicle Safety Program. (This section is to be completed by the employee's spouse and any other employees of the Company who seek eligibility to operate the Company vehicle.)

Name (Print)	Signature/Date	License #	ST	Birthdate	SS #

APPLICATION ADDENDUM FOR EMPLOYMENT REQUIRING DRIVING

COMPANY _____

ADDRESS _____

NAME _____ PHONE: (_____) _____
First Middle Last

DRIVER LICENSES: (list all licenses held in past 3 years and indicate those that are current)

STATE	LICENSE NUMBER	CLASS	ENDORSEMENT(S)	EXPIRATION

Have you ever been denied, or had revoked or suspended any license, permit, or privilege to operate a motor vehicle? Yes _____ No _____

If you answered YES to the above questions, give details: (if additional space is needed, attach sheet)

TRAFFIC CONVICTIONS AND FORFEITURES FOR PAST 3 YEARS: (Other than parking)

LOCATION (CITY & STATE)	DATE	CHARGE	PENALTY

DRIVING EXPERIENCE:

CLASS OF EQUIPMENT	DATES FROM	DATES TO	APROX. NO. OF TOTAL MILES
Automobile			
Van/Pickup			
Truck/Tractor			
Bus			
Other (Specify)			

ACCIDENT RECORD FOR PAST 3 YEARS: (if additional space is needed, attach sheet)

DATE	LOCATION	NATURE OF ACCIDENT	FATALITIES	INJURIES

GENERAL:

Have you ever been convicted of a felony? Yes _____ No _____

Have you ever been refused bond Yes _____ No _____

If you answered YES to either question, give details: (if additional space is needed, attach sheet)

LIST SPECIAL TRAINING RELATED TO TRANSPORTATION:
(If additional space is needed, attach sheet)

TO BE READ AND SIGNED BY APPLICANT:

This certifies that this application was completed by me, and that all entries on it and information in it are true and complete to the best of my knowledge. I understand that, if hired, any misrepresentation of information in this application is cause for immediate dismissal. I authorize (*INSERT COMPANY NAME HERE*) to investigate my background to ascertain all information of concern to my employment history, whether same is of record or not, and release those providing such information from all liability for any damages resulting from furnishing this information. Further, I understand that I may be asked to demonstrate my ability to perform the essential functions necessary to complete the job and, if offered the job, that it may be conditioned on results of a physical examination, and controlled substances and alcohol misuse test.

DATE _____ APPLICANT'S SIGNATURE _____

GUIDE FOR PREVENTABLE OR NONPREVENTABLE ACCIDENTS

An accident is preventable if the driver could have done something to avoid it. Drivers are expected to drive defensively. Which driver was primarily at fault, who received a traffic citation, or whether a claim was paid has absolutely no bearing on preventability. If there was anything the driver could have done to avoid the collision, then the accident was preventable.

An accident is nonpreventable when the vehicle was legally and properly parked, or when properly stopped because of a law enforcement officer, a signal, stop sign, or traffic condition.

If a stationary object is struck, then it is usually a preventable incident. If the driver rearends another vehicle then it is usually a preventable incident. It should be noted there are exceptions to any rule, but they are just that - exceptions!

It should be the objective of any person discussing or judging accidents to obtain as many facts as possible and to consider all conceivable conditions. Adverse weather conditions, actions of other drivers, or other such excuses must not influence the judgment of preventability. If procedures, scheduling, dispatching, or maintenance procedures out of the control of the driver were found to be factors, that should be taken into account. The company must take responsibility for the work environment and recognize that drivers cannot control some aspects. It is critical that drivers have the ability to refuse to operate an unsafe vehicle without reprisal from management.

Professional drivers are expected to drive in a manner which allows them to avoid conflicts when they arise. Whether a driver has a 25-year safe driving record, or started driving the day before has no bearing on whether an accident is or is not preventable. Taking a fair attitude does not mean leniency. If an accident is judged nonpreventable and the drivers know the accident could have been avoided, they will lose respect for the safety program.

QUESTIONS TO CONSIDER - GENERAL

When judging or discussing preventable accidents, these are some questions to consider:

1. Does the report indicate that the driver considers the rights of others or is there evidence of poor driving habits which need to be changed?

2. Does the report indicate good judgment? Such phrases as "I did not see," "I didn't think," "I didn't expect," or "I thought" are signals indicating there is something wrong. An aware driver should think, expect, and see hazardous situations in time to avoid collisions.

3. Was the driver under any physical handicap which could have been contributory? Did the accident happen near the end of a long and/or hard run? Does the driver tend to overeat? Did the driver get sufficient sleep before the trip? Is the driver's vision faulty?

4. Was the vehicle defective without the driver's knowledge? A gradual brake failure, a car which pulls to the left or right when the driver applies the brakes, faulty windshield wipers, and similar items are excuses, and a driver using them is trying to evade responsibility. Sudden brake failure, loss of steering, or a blowout may be considered defects beyond the driver's knowledge; however, the inspection and maintenance program should work to prevent these hazards.

5. Would taking a route through less congested areas reduce the hazardous situations encountered?

QUESTIONS TO CONSIDER

SPECIFIC TYPES OF ACCIDENTS

Intersection Collisions

Failure to yield the right-of-way, regardless of stop signs or lights, is preventable. The only exception to this is when the driver is properly proceeding at an intersection protected by lights or stop signs and the driver's vehicle is struck in the extreme rear, side, or back.

Regardless of stop signs, stop lights, or right-of-way, a professional driver should recognize that the right-of-way belongs to anyone who assumes it and should yield accordingly. In addition, a professional driver is expected to know the turning radius of the vehicle and be able to avoid damaging others. These accidents are normally considered preventable.

1. Did the driver approach the intersection at a speed safe for conditions?

2. Was the driver prepared to stop before entering the intersection?

3. At a blind corner, did the driver pull out slowly, ready to apply the brakes?

4. Did the driver operate the vehicle correctly to keep from skidding?

IF THE ANSWER TO ANY QUESTION IS NO,
THE DRIVER WAS NOT DRIVING DEFENSIVELY AND IS RESPONSIBLE.

Sideswipes

Sideswipes are often preventable since drivers should not get into a position where they can be forced into trouble. A driver should pass another vehicle cautiously and pull back into the lane only when he or she can see the other vehicle in the rearview mirror. A driver should also be ready to slow down and let a passing vehicle into the lane. A driver should not make a sudden move that may force another vehicle to swerve. Unless the driver is swerving to avoid another car or a pedestrian, sideswiping a stationary object is preventable.

Drivers are expected to be able to gauge distances properly when leaving a parking place and enter traffic smoothly.

A driver is expected, whenever possible, to anticipate the actions of an oncoming vehicle. Sideswiping an oncoming vehicle is often preventable.

The doors of a vehicle should never be opened when it is in motion. and should not be opened on the traffic side, unless clear of traffic, when it is parked.

A parked vehicle can be seen from a sufficient distance; therefore, the operator of an approaching vehicle should be prepared in case the doors of the parked vehicle are opened. This type of accident is nonpreventable only when the door is opened after the driver has passed it.

1. Did the driver look to front and rear for approaching and overtaking traffic immediately before starting to pull away from the curb?

2. Did the driver signal before pulling away from the curb?

3. Did the driver look back rather than depend only upon rearview mirrors?

4. Did the driver start into traffic only when this action would not require traffic to change its speed or direction in order to avoid his or her vehicle?

IF THE ANSWER TO ANY QUESTION IS NO,

THE DRIVER WAS NOT DRIVING DEFENSIVELY AND IS RESPONSIBLE.

Skidding

Many skidding conditions are caused by rain, freezing rain, fog, and snow, which all increase the hazard of travel. Oily road film, which builds up during a period of good weather, causes an especially treacherous condition during the first minutes of a rainfall.

Loss of traction on a grade can be anticipated, and these accidents usually are preventable. Chains or other suitable traction devices should be used, if they are available.

1. Was the driver operating at a safe speed considering weather and road conditions?

2. During inclement weather was the driver keeping at least twice the safe following distance used for dry pavement?

3. Were all actions gradual?

4. Was the driver anticipating ice on bridges, gutters, ruts, and near the curb?

5. Was the driver alert for water, ice or snow in shaded areas, loose gravel, sand, ruts, etc.?

6. Did the driver keep out of other vehicle tracks or cross them at wide angles?

IF THE ANSWER TO ANY QUESTION IS NO,

THE DRIVER WAS NOT DRIVING DEFENSIVELY AND IS RESPONSIBLE.

Pedestrian and Animal Collision

All types of pedestrian accidents, including collision with pedestrians coming from between parked cars, are usually considered preventable. There are few instances where the action of pedestrians is so unreasonable that the operator could not be expected to anticipate such an occurrence.

Collisions with animals are normally preventable, unless the movement on the part of an animal was unusual and unexpected. This is also taking into consideration the fact that the driver was aware of animals in the vicinity.

1. Did the driver go through congested sections expecting that pedestrians would step in front of the vehicle?

2. Was the driver prepared to stop?

3. Did the driver keep as much clearance between his or her vehicle and parked vehicles, as safety permitted?

4. Did the driver stop when other vehicles has stopped to allow pedestrians to cross?

5. Did the driver wait for the green light or stop for the caution light?

6. Was the driver aware of children and prepared to stop if one ran into the street?

7. Did the driver give all pedestrians the right-of-way?

8. Did the driver stop for a school bus which was stopped and properly signaling that passengers were loading or unloading?

IF THE ANSWER TO ANY QUESTION IS NO,

THE DRIVER WAS NOT DRIVING DEFENSIVELY AND IS RESPONSIBLE.

Parked or Stopped

Accidents occurring when vehicles are properly and legally parked are considered nonpreventable. Accidents occurring while the vehicle was double parked or in a "No Parking" zone are preventable.

1. Was the vehicle parked on the proper side of the road?

2. Was it necessary to park near the intersection?

3. Did the driver have to park on the traveled part of the highway, on the curve, or on the hill?

4. When required, did the driver warn traffic by emergency warning devices?

5. Did the driver park parallel to the curb?

6. Was it necessary to park so close to an alley or directly across from a driveway?

IF THE ANSWER TO ANY QUESTION IS NO,

THE DRIVER WAS NOT DRIVING DEFENSIVELY AND IS RESPONSIBLE.

Noncollision Vehicle Damage, Mechanical Failure, and Miscellaneous Problems

The accident should be considered preventable if the investigation shows a mechanical defect of which the driver was aware, a defect the driver should have found by inspecting the vehicle, or the driver caused by rough and abusive handling.

When a mechanical failure is sudden or unexpected, not resulting from abuse or ordinary wear, it may be considered nonpreventable. Bad brakes should not be considered a mechanical failure unless the failure was sudden and the driver could have had no previous knowledge of the condition. However, this type of failure cannot excuse a driver who does not know how to properly pre-trip inspect the vehicle or is too lazy to do the inspection correctly.

It is a driver's responsibility to keep the cargo in mind and be aware of any sudden vehicle movements which may cause damage to the cargo. Driving off the highway to avoid a collision may be preventable. Drivers should try not to place themselves in such a position. "U" turns are a monkey wrench in the smooth flow of traffic. Accidents which occur while this maneuver is attempted are considered preventable.

1. Could the driver have done anything to avoid the accident?

2. Was the driver's speed safe for conditions?

3. Did the driver obey all traffic signals?

4. Was the driver's vehicle under control?

5. Did the driver follow the routing and delivery instructions?

IF THE ANSWER TO ANY QUESTION IS NO,

THE DRIVER WAS NOT DRIVING DEFENSIVELY AND IS RESPONSIBLE.

VEHICLE INSPECTION REPORT

This report is due during the month of **April** and **October** each year. A separate report must be completed for each unit. After completion this report should be forwarded to: _____

Date: _____
Vehicle unit number: _____ License number: _____ Mileage:_____
Branch and Department number: _____ Driver: _____ _____
Reporting office:_____ Department:_____ _____
Year: _____ Make:_____ Model: _____
Serial number:_____

4 cylinder 6 cylinder _____other Cruise Tilt wheel

INSPECT AND CHECK ONE:

Lights

Head:	❑ OK	❑ Out	Back-up:	❑ OK	❑ Out
Parking:	❑ OK	❑ Out	Side:	❑ OK	❑ Out
Tail:	❑ OK	❑ Out	Flashers:	❑ OK	❑ Out
Directional:	❑ OK	❑ Out			

Tires

Front left:	❑ Good	❑ Fair	❑ Poor	Front right:	❑ Good	❑ Fair	❑ Poor
Rear left:	❑ Good	❑ Fair	❑ Poor	Rear right:	❑ Good	❑ Fair	❑ Poor
Conventional spare:	❑ Good	❑ Fair	❑ Poor	Snow tires:	❑ Yes	❑ No	

Mini spare: ❑ Yes ❑ No ❑ Good ❑ Fair ❑ Poor

Note and explain uneven wear:_____
_____

Brakes

Check for master cylinder leaks. If unusual conditions, explain: _____
_____
_____

Check brake pedal: ❑ High ❑ Low

Comments: _____
_____
_____

Check brake fluid: ❑ Full ❑ Low

Exterior

Paint, overall condition: ❑ Good ❑ Fair ❑ Poor
Chrome, overall condition: ❑ Good ❑ Fair ❑ Poor
Glass, overall condition: ❑ No damage ❑ Damage

Explanation of overall exterior condition: _____
_____

Nonstandard ornamentation or equipment? (decals, trailer hitch, etc.) ❑ Yes ❑ No

If "Yes," describe:_____
_____

Exterior damage? ❑ Yes ❑ No

If "Yes," note and explain estimated cost of repairs: _____
_____

If "Yes," was claim submitted? ❑ Yes ❑ No

If "No," why not:_____
_____

Interior

Overall appearance:	❑ Clean	❑ Worn	❑ Dirty		
Condition of seats:	❑ Good	❑ Springs broken	❑ Sagging		
Condition of upholstery:	❑ Clean	❑ Worn	❑ Dirty	❑ Torn	❑ Burn holes
Condition of carpets:	❑ Clean	❑ Worn	❑ Dirty	❑ Torn	
Floor mats:	❑ Yes	❑ No			
Windshield wipers:	❑ Good	❑ Fair	❑ Poor		
Knobs, handles, etc.:	❑ Good	❑ Broken	❑ Missing		

Accessories:		
Flash light:	❑ Yes	❑ No
Horn working:	❑ Yes	❑ No
Safety belts:	❑ Working	❑ Nonworking
Windshield scraper: (if applicable)	❑ Yes	❑ No
Rear window defroster:	❑ Working	❑ Nonworking
Accident report kit:	❑ Yes	❑ No
Driver's manual:	❑ Yes	❑ No
Condition of trunk:	❑ Clean	❑ Dirty
Accessories:		
Jack:	❑ Yes	❑ No
Handle and base:	❑ Yes	❑ No
Lug wrench:	❑ Yes	❑ No
Flares or reflectors (2-6):	❑ Yes	❑ No

Under Hood

Engine: ❑ Clean ❑ Dirty

Note apparent leakage: _____
_____

Engine oil: ❑ Full ❑ Low
Condition: _____

Mileage of last oil change: _____ Mileage of last filter change: _____
Mileage of last lubrication:_____

Windshield washer fluid: ❑ Full ❑ Low
Battery water level: ❑ Full ❑ Low
Nonfillable: ❑ Yes ❑ No
Transmission fluid condition: ❑ Full ❑ Low Color: ❑ Red ❑ Black
Power steering fluid: ❑ Full ❑ Low

Overall Rating of Car

Excellent ❑ Good ❑ Fair ❑ Poor

Driver's comments: _____
_____
_____

Inspector's comments and recommendations:_____
_____
_____

Inspector's signature:_____
Branch/Fleet Coordinator signature: _____
Driver's signature:_____
Scheduled completion date of corrective action: _____

Risk / Hazard Assessment Plan

1. **Overview**
    a. This section covers the development and requirements for Risk / Hazard Analysis Planning (RHAP) including Job Safety Analysis (JSA). All employees / sub-contractors shall be trained in this procedure prior to working on any MJVD worksite.

2. **Purpose**
    a. To provide a consistent methodology for conducting pre-job safety analysis.
    b. To assure identification, at all employee levels, of all potential hazards and the corrective measures to prevent injuries.
    c. To promote employee participation in the development of the safety plans for jobs and tasks.
    d. A number of approaches have been used in recent years to prevent incidents and improve safety and health conditions in the workplace. Among the most effective of these the Job Safety Analysis (JSA) which is developed following the completion of the Risk / Hazard Analysis Plan (RHAP). RHAP is based on the following ideas:
        i. That a specific job or task can be separated into a series of relatively simple steps:
        ii. That the hazards associated with each step can be identified, and:
        iii. That the solutions can be developed to control each hazard.

3. **BASIC STEPS TO DEVELOP RHAP**
    a. Select the job or task to be analyzed
    b. Separate the job or task into its basic steps
    c. Identify the hazards associated with each step
    d. Control / mitigate each hazard

4. **Job Selection**
    a. All jobs require the development of a Risk / Hazardous Analysis Plan; however, there are some jobs which require additional scrutiny. The following list may be useful in determining when to apply additional resources to the development of Risk / Hazard Analysis Planning:
        i. Jobs or tasks which have produced higher accident frequency
        ii. Jobs or tasks which have resulted in higher accident severity
        iii. Jobs or tasks which have a higher potential for accidents
        iv. Jobs or tasks which are new
        v. Jobs or tasks which are non-routine
        vi. Jobs or tasks which have had changes to personnel, materials, or procedures.
        vii. Routine jobs or tasks which have been overlooked

5. Break Down Jobs

a. Most jobs or tasks will break down into 10 or fewer basic steps. Careful consideration will result in the correct identification of the basic steps in the job or tasks. Care should be taken to assure the steps are not too long or detailed or the JSA can become unnecessarily long and trivial. Conversely, the steps should not be too broad or general to assure the steps which should be mentioned are not missed and the hazards associated with them are not overlooked.

6. Identify Hazards

a. Each basic step must be examined to identify hazards of potential accident sources. Included within this step are the hazards associated with machines, tools, supplies, job procedures, and the environment. The following questions should serves as guide in identifying specific hazards:
    i. Can the worker come in **CONTACT WITH** any energy source or hazardous material?
        1. Electricity
        2. Chemicals
        3. Heat / Cold
        4. Radiation
        5. Gases or fumes
        6. Water or steam
        7. Poor Air
    ii. Can the worker be **STRUCK BY** anything?
        1. Moving or flying objects
        2. Falling material
    iii. Can the worker **STRIKE AGAINST** anything?
        1. Stationary or moving objects
        2. Protruding objects
        3. Sharp or jagged edges
    iv. Can the worker be **CAUGHT IN, ON**, or **BETWEEN** anything?
        1. Pinch Points
        2. Protruding objects
        3. Moving and / or stationary objects
    v. Can the worker slip, trip, or **FALL**?
        1. To the same level
        2. To lower level
    vi. Is there a possibility of **OVEREXERTION**?
        1. Lifting
        2. Pulling
        3. Pushing
    vii. Can the worker be **EXPOSED** to anything?
        1. Noise
        2. Sun

7. Control the Hazard

a. The next part of the process is to develop Hazard Preventive Measures to eliminate or reduce potential accidents or hazards that have been identified.
b. The following points should be considered for each hazard identified:
    i. Can a less hazardous way to do the job be found?
    ii. Can the physical conditions that created the hazard be changed?
    iii. If the hazards cannot be engineered out of the job, can the job procedure be changed?
    iv. Can the necessity of doing the job or the frequency of performing the job be reduced?
    v. Can personal protective equipment be used?

8. Requirements

a. The supervisor is responsible for development of the Risk / Hazard Analysis Planning of every job and task worked.
b. Employees are responsible for following the RHAP and developing the Job Safety Analysis
c. **All** are responsible to assure the RHAP and JSA are current and updated as necessary.
d. The RHAP need not be developed on a daily basis but it must reflect current conditions on the job.
e. The JSA must be developed and reviewed daily with all employees prior to beginning work.
f. Every employee working on that job must have documented and dated proof of having reviewed the JSA

9. Additional Self-Inspections/Observations

a. Safety Interactions (observations) will be performed regularly on MJVD jobsites/employees. Safety Interaction (SI) Forms, found as Appendix A, shall be used as a tool by supervisors to aid in the development and growth of our Risk / Hazard identification, assessment, mitigation and control.
b. Interactions will be performed in accordance with the Interaction Schedule. This schedule is prepared in advance and made available to all supervisors for completion. Each employee will receive an Interaction at least twice per year. Additional observations will be made as needed in direct response to incident or near-miss follow-up. Observations will also be a tool when converting SSE to full service employees.
c. Interactions can/will be performed as project needs arise. Additionally, can/will be performed randomly, unannounced at any time.
d. The goal of each Interaction is to observe an employee while in a productive setting. During the interaction, all safe observations will be checked on the form. Unsafe observations will be noted as well. Conduct as follows:
    i. Obtain Interaction Form.
    ii. Complete Header Section of form as appropriate.

iii. Engage employee in their work environment. Explain the purpose/goals of the Interaction prior to beginning the Interaction.
iv. Observe the employee as they complete a task that is a normal part of their work assignment. Make as many safe observations as possible. Indicate the safe observations made in Group A-F of the form by simply making a check next to each item.
v. If an unsafe observation is made, place a number next to the item in Group A-F, in place of the checkmark. Transfer this number to the Unsafe Observation section. Complete the section as indicated by the form. Apply corrective action as appropriate.
vi. Complete comment section, sign the form when completed.
vii. Discuss findings with observed employee. Allow employee to comment by completed employee comment section. Observed employee signs form, completing the observation.
viii. Observer submits completed interaction form for distribution.
ix. Safety Director/Management Team will provide feedback/coaching to staff based on observations made. Findings of Interactions will also be used during staff training for behavior acknowledgement.

e. The Safety Director shall train all personnel on proper completion of these forms including proper assessment of the severity of the identified hazards.
    i. Safety Observations, utilizing the SI Forms shall be completed daily on all active MJVD work sites per the Interaction schedule.
    ii. After completion and promulgation, copies shall be turned in to the Safety Director for safety trend analysis and development of future safety training. Quantity of Safe Observations and Unsafe Observations will be compiled per Interaction. This information will be collected on a monthly basis for comparison.
    iii. Analysis of Unsafe Observation compiled by type and employee type will also be made on a monthly basis.

Appendix A

Safety Interaction Form (Revised:030615) **Employee:**_____ **Project:**_____

Date of Interaction:_____
Area:_____
Facilitator:_____
Tracking Number:_____

Group A Personal Protective Equipment		Group B Falling Hazards		Group C Work Environment		Group D Tools & Equipment		Group E Procedures		Group F Housekeeping	
Safety Belts/Harnesses		Ladders		Sufficient Lighting		Right Tool/Equipment		Lockout/Electrical/Mech.		Clear Passageways	
Eye Protection		Scaffolds/Complete		Adequate Ventilation		Proper Use/Guard		Vessel Entry/Confined Space		Scrap/Debris Disposed	
Respiratory Protection		Leading Edge		Temperature Extremes		Current Inspection-Tool		Work Permit/Hot Work Permit		Trash Cans/Dumpsters	
Head Protection		Floor Holes/Openings		Aware of Area Hazards		Trained/Task Training		Competent Person		Floor Broom Cleaned	
Hand Protection		Trip/Slip Hazards		Aware of Area Alarms		In Good Condition		JSA/Pre-Task		Materials Storage	
Foot Protection		Falling Objects		In Line of Fire		Using GFCI's		Hazard Communication/SDS		Hoses/Cords/Routing	
Hearing Protection		Work Surface Condition		Lifting Techniques		Seat Belt in Use		Barricades/Signage		Area free of waste	
Proper Clothing		3-Points/Contact		Excavation/Surface Pen		Back-up Alarm		Current Forms/Proper Useage			
Fire Extinguisher				Security/Traffic		Pre-Op Complete-Equip		Calibration of Instruments			
First Aid Kit								SOP			
# of Safe Observations		# of Safe Observations		# of Safe Observations		# of Safe Observations		# of Safe Observations		# Safe Observations	

Item Number	Group Category	Unsafe Observation	Responsible Supervisor	Corrective Action	Further Action Required Yes or No?	Person Corrected/Date of Completion

Facilitator Comments:

Employee Comments:

Facilitator Signature/Date:

Employee Signature/Date:

Multipurpose Interaction

PROJECT: _____ LOCATION: _____

PRINT NAME: _____ SIGNATURE: _____

DATE/INTERACTION: _____ DATE/SUBMITTED: _____
(Day / month / year) **(Day / month / year)**

It is the mission of MJ Van Damme Trucking, Inc. to keep our employees safe at all times and in all conditions. Additionally, it is MJVD's mission to keep all job sites safe and accident/incident free.

1. **Purpose**

   Eliminate incidents and accidents/improve team work/reinforce safety. The following procedures will be implemented to accomplish this objective.

2. **Short Service Employee**
   a. An employee is generally considered a "short service employee" if he/she has less than 6 months experience with his/her present employer, or in his/her present role.
   b. A "short service employee" may not work alone. A work crew of less than 5 employees may NOT have more than one "short service employee".
   c. Prior to starting a project, it is the responsibility of MJVD's Site Foreman to notify the client's site coordinator for the project that there is a "short service employee" working on the site.
   d. "Short service employees" will be visibly identifiable by the use of an "orange" vest with a badge indicating "training". MJVD's Site Foreman will make the client aware as to how they are able to identify these employees.
   e. Per the previous procedures under "training" the "short service employee" will be monitored and mentored. When they have attained the correct knowledge of not only the equipment but also the HASP and general operating procedures/safety measures the hi-visibility identifiers will be removed, the client will be notified and documentation will be sent to the office for files.
   f. A person mentoring may only have one Short-Service employee assigned to their crew at a time and they must remain on site with them at all times.
   g. Subcontractors must manage their "short service employees" in accordance with the requirements of the MJVD's "short service employee" procedures.
   h. MJVD is committed to providing both a job site which is free from recognized hazards as well as one supporting the health and safety of all their employees, subcontractors, as well as other individuals who may be exposed to potential hazards at the job site.
   i. A short service employee who is involved in an incident / accident within the first 30 days of employment will be subject to disciplinary action up to and including termination.
   j. The "supervisor" of a short service employee requiring termination will have a "reprimand" submitted to their personnel file.
   k. A "supervisor" who has received a "reprimand" may not serve as a supervisor to a short service employee for 30 days after an incident.

3. Annual Training

a. As part of our annual training certification for all equipment that is used in our "normal" day to day operation will be completed (this is to include equipment owned & rented by MJVD).

4. Safe Driver Training

a. All employees will be required to complete "safe driver training" annually. This training will incorporate an online training from the National Safety Council for defensive/safe driving as well as the MJVD internal drivers training which includes:
    i. Cell phone practices
    ii. Parking procedures
    iii. Safe driving knowledge

b. All employees are hired on a "profile" basis. Upon application, the prospective employee is required to submit documentation regarding the training and experience that they have accumulated. A resume, driving record review, references, and personal interview are utilized to ensure that each perspective employee fits the "profile".
    i. Minimum qualification requirements are identified for each position and all tasks involving operation of mobile equipment.
    ii. The HR Manager will verify prospective employees meet these minimum qualifications before hire.

c. Employees will be instructed to advise "Foreman" if the task they are going to perform or the equipment they are going to operate is "new" to them. At the time this is identified the following procedure will be followed:
    i. Coaching/Mentoring
        1. Foreman will proceed with a training/overview of equipment operation and/or task to include detailed operation as well as hazards when performing tasks.
        2. Foreman will observe employee for a period of time until Foreman feels employee has complete understanding/control of the equipment/situation.
        3. Foreman will make scheduled observations for the first week the employee operates new equipment/performs new task.
        4. Foreman will certify that the employee has completed training and can operate without observation. (Certification to be sent to MJVD office)
        5. Foreman will utilize the Qualification Checklist (on file) per equipment type, to verify operational proficiency. Submit completed checklist to MJVD office as stated in (4) above.
        6. Foreman will do weekly discussions with employee after certification to be sure employee has ample opportunities to ask questions about equipment/task.

7. MJVD employees onsite will be made aware that employee is "new" to this operation/task so as to observe and mentor employee for successful operation and safety for all.

5. SUBCONTRACTOR Employees

a. When issuing a Contract to a Subcontractor a list of equipment/tasks anticipated at job location will be included.
b. Contractor will be required to include training details for employees or notify us training is needed
c. Although it is preferred that Subcontractors come trained for the operation being performed it is also acknowledged that situations may occur that this is not possible and MJVD also acknowledges that equipment & tasks may change once arriving at the site location.
d. Subcontractor will be advised that all employees arriving at the job site will be required to follow MJVD's Coaching/Mentoring program as detailed below:
e. Employees will be instructed to advise "Foreman" if the task they are going to perform or the equipment they are going to operate is "new" to them. At the time this is identified the following procedure will be followed:
    i. Coaching/Mentoring
        1. Foreman will proceed with a training/overview of equipment operation and/or task to include detailed operation as well as hazards when performing tasks.
        2. Foreman will observe employee for a period of time until Foreman feels employee has complete understanding/control of the equipment/situation.
        3. Foreman will make scheduled observations for the first week the employee operates new equipment/performs new task.
        4. Foreman will certify that the employee has completed training and can operate without observation. (Certification to be sent to MJVD office/Subcontractor will be copied on all certifications)
        5. Foreman will do weekly discussions with employee after certification to be sure employee has ample opportunities to ask questions about equipment/task.
        6. All MJVD employees onsite will be made aware that employee is "new" to this operation/task so as to observe and mentor employee for successful operation and safety for all.

Ergonomics

1. **Purpose**

    a. It is our intent to take all reasonable precautions to protect the health and safety of its employees, the public, and the environment. As part of this commitment, we have implemented the Ergonomics Program, whose primary objective is to prevent injuries and illnesses in the workplace.

2. **Scope**

    a. This section applies to all employees, worksites, and subcontractors.

3. **Responsibilities**

    a. Management at all levels is responsible for the anticipation, identification, application, coordination, and execution of this procedure. All employees shall be instructed in the existence of the Ergonomics program and its elements. To accomplish this requirement the additional roles and responsibilities are:

        i. Management

            1. Provide training for individuals responsible for Ergonomics assessments and program implementation.

            2. Conduct inspections to identify deficiencies in the Ergonomics program.

            3. Provide appropriate supplies on all sites.

        ii. Employees

            1. Report all incidents immediately

            2. Report personal health conditions to supervision.

            3. Follow the Ergonomics program rules.

        iii. Host Employer

            1. The host employer's Ergonomics practices will be adopted and adhered to where they are more stringent than these requirements or where mandated.

2. Our utilization of this procedure on a host employer's work site must be in compliance with the host employer's requirements as well as local, federal, and state regulations.

4. Definitions

a. Ergonomics – the science of fitting the job to the worker

b. Administrative Controls – are procedures and methods that significantly reduce daily exposure by altering the way in which work is performed.

c. Engineering Controls – are physical changes to jobs that control exposures at the source by changing, modifying, or redesigning. The use of ergonomically-friendly equipment will also be considered as a form of engineering control.

d. Physicians or other Licensed Health Care Professionals (PHLCP) – are persons educated and trained in the delivery of health care services who are operating within the scope of their license, registration, certification or legally authorized practice.

e. Job Factors – are workplace conditions and physical work activities that must be considered when conducting a job hazard analysis.

f. Work Related Musculoskeletal Disorder (WMSD) – are injuries or illnesses to the muscles, joints, tendons, or nerves (Soft Tissues).

g. Manual Handling Operations – include:

   i. Lifting/lowering, pushing/pulling, or carrying, and

   ii. Exertion of considerable force because the particular load is heavy or the cumulative totals of the loads during the workday is heavy; and

   iii. Manual handling work activities which are a significant portion of the employee's regular job duties.

h. Musculoskeletal Disorders (MSD) – injuries and disorders of the muscles, nerves, tendons, ligaments, joints, cartilage, and spinal disks.

i. Signs (of WMSDs) – are objective, observable physical findings of MSDs

j. Symptoms (of WMSDs) – are physical reports (not observable) of physical pain or discomfort.

5. Ergonomics Assessment

a. Site management will conduct an Ergonomics Assessment quarterly. It is desirable that site management establish a site team with employees, supervisors, and safety personnel to conduct the assessment. The assessment will be forwarded to operating company safety manager and president.

6. Management Leadership and Employee Involvement

a. Employees are highly encouraged to bring their concerns to supervisors and management. Feedback from employees is an important means of identifying ergonomic hazards. When an Ergonomics concern or hazard is brought to management's attention, management will provide a response and recommendation within 72 hours of receiving notification of the hazard or concern.
b. Workers who experience fatigue/tiredness while at work are to report their condition to their supervisor immediately.

7. Hazard Identification

a. Hazards are identified through:

i. Routine safety audits, inspections, and observations.

ii. Review of Supervisors Incident Reports.

iii. Employee reports of hazards or concerns.

iv. Ergonomic Assessments

8. Employee Information

a. For those current and new employees in positions and crafts with potential for
b. WMSDs the following information will be provided:

i. How to recognize signs and symptoms of WMSDs and the importance of early reporting

ii. Hazards that are reasonably likely to be causing or contributing to WMSDs

iii. How to report hazards / concerns and how to make recommendations.

iv. Information methods include, but are not limited to:

1. Video presentations

2. PowerPoint slide presentations and handouts

v. Employees receive Ergonomics awareness through new employee orientation.

9. Job Hazard Analysis

a. The purpose of Job Hazard Analysis is to identify WMSD hazard elements to facilitate evaluation of effective control measures. When WMSD hazards are identified, a full JHA will be conducted and control measures implemented to eliminate or control the hazards to the extent feasible.

10. Control Measure Process

a. Where solutions are obvious and the hazards may be eliminated quickly, implementation of controls is permitted without following all of the steps of the Control Measure Process. Interim control measures may be implemented, if practical, until permanent controls are in place. The Control Measure process involves:

i. Identification, evaluation, implementation, and follow up of feasible control measures (interim and permanent) to control WMSD hazards. This includes prioritizing the control of WMSD hazards, where necessary.

ii. Tracking progress in controlling the WMSD hazards, particularly if prioritizing is necessary.

iii. Communication of results of the job hazard analysis to other areas of the workplace or company whose assistance may be needed to successfully control the WMSD hazard.

iv. Identification of hazards when equipment is changed, redesigned, or purchased and when change occurs in processes or facilities.

11. Control Methods

a. To control worker fatigue, limiting work hours and controlling work schedules (staff/work balance) will be practiced.
b. Additionally, the following steps in the hierarchy of controls will be considered in the following sequence:

    i. Elimination of the hazard.

    ii. Substitution

    iii. Engineering Controls

    iv. Work Practice Controls

    v. Administrative Controls

    vi. PPE

12. Training

a. Training will be provided to new employees at orientation and to all employees in crafts or tasks which have been identified as having potential WMSD hazards on an annual basis.

b. Supervisors and foreman

c. Managers and persons involved in setting up and administering the Ergonomics program.

d. Any employee observed not following ergonomics rules or whose job performance indicates they have not comprehended the program requirement will be retrained.

The following additional areas will be covered for all:

- Work/Rest regimen (Self Determination)
- Information regarding fluid intake
- Cool-down procedures
- Physical conditioning (eating properly, sufficient sleep, etc.)
- Effects of alcohol consumption and OTC medications
- Commitment that chronic use of OTC medications, prescriptions, drugs, or any other product that can affect ability to perform work safely, will be avoided.