SAFETY AND HEALTH MANAGEMENT SYSTEM (SHMS)

IN ACCORDANCE WITH
29 CFR 1910 (MIOSHA / OSHA – General Industry)
29 CFR 1926 (MIOSHA / OSHA - Construction)

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
01-23-2024	MMM	MMM

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SAFETY AND HEALTH MANAGEMENT SYSTEM

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Safety and Health Management System Statement

Scope

M.J. VanDamme Trucking, Inc. “MJVD” is committed to providing a safe, injury-free, and healthy work environment for all employees. 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

Responsibilities for providing a safe working environment rest at all levels within MJVD. Management at MJVD leads safety efforts to implement an effective safety and health program. It is important that communication be kept open at all times between management and employees. Employees who recognize potential hazards, hazards, unsafe working conditions, 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.

Employees have a personal responsibility to comply with all MJVD health and safety policies and procedures and regulatory standards. Supervisors will instill a positive safety attitude and awareness through personal adherence, employee interactions, training, toolbox talks, worksite analyses, 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 and follow the MJVD Code of Safe Practices – Think Safe, Work Safe, and Be Safe.

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

MJVD health and safety policies are based on experience and current standards and are an integral part of the company's personnel policies. 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.

Your health and safety are a top priority in this organization and is an integral part of productivity and quality. Following these policies will help you stay safe, healthy, and able to work, play, and enjoy life.

Management Team
MJ VanDamme Trucking, Inc.
Date – 12-29-2020

ACKNOWLEDGMENT

By my signature I establish that I have read the Corporate Safety and Health Management System, 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
_____	_____	_____

Health and Safety Policy

(HASP)

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

HASP Revision Date	Initials	Approved By (Initials)
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INTRODUCTION

M.J. VanDamme Trucking, Inc. "MJVD" strives to provide a workplace free from recognized hazards that may cause or are likely to cause death or serious physical harm, and to establish a system to prevent lost time and lost resources due to employee injuries. Personnel safety is the primary goal of MJVD, and our policy is to maintain the most protective environment possible for all employees.

MJVD personnel will follow all policies and procedures and applicable Federal and/or State Occupational Safety and Health Administration (OSHA) standards for General Industry (29 CFR Part 1910) and Construction (29 CFR Part 1926).

PURPOSE

The purpose of this Health and Safety Policy (HASP) is to establish corporate personnel protective standards and health and safety practices and procedures to be used by MJVD employees during work activities and at project sites to minimize the risk of injuries and illnesses by identifying, assessing, and controlling risks to all employees. The goal of this HASP is to help achieve regulatory compliance and ensure continual improvement of MJVD employee safety and health performance.

The MJVD site-specific health and safety plan, called the Accident Prevention Plan (APP) will be written specific to each project. The supplemental site-specific Accident Prevention Plan (APP) shall conform to the HASP as a minimum standard. The supervisor, Project Manager, Site Safety Officer, or other designated safety personnel will be responsible for developing the APP that meets the minimum requirements of the HASP and shall define project goals to improve workplace safety and health utilizing ways described under Worksite Analysis below to determine potential hazards and effective ways to mitigate these hazards.

APPLICABILITY

MJVD is committed to a safe and lawful working environment. The provisions of this HASP are mandatory for all MJVD activities. All MJVD personnel and contract employees who engage in on-site project activities must be familiar with the HASP, comply with its requirements, follow the site-specific APP, and provide a signature confirming review and understanding. The HASP includes work within the office, field activities, and use of vehicles.

Supervisors, Project Managers, Safety Director, Safety Specialist, and Project Site Safety Officers will be responsible for HASP and APP training, enforcement of all safety activities, and follow up on health and safety hazards.

STAFF SAFETY COMMITTEE

The Staff Safety Committee is an integral part of the HASP to help ensure implementation of the program. The Staff Safety Committee shall meet on a regular basis to discuss issues related to employee safety such as incidents and near misses, incident reports, zone inspections and corrective actions, employee-supervisor interactions, new equipment and/or processes, safety initiatives, and safe or unsafe behaviors. The Staff Safety Committee shall become familiar with appropriate MIOSHA/OSHA/MSHA rules, regulations, MJVD policies and procedures, and will act as an advisory group to Management. Members of the committee may be asked to participate in zone inspections and recommend corrective actions.

Written meeting minutes shall be maintained, and a copy of the minutes can be available upon e-mail request to the Safety Director or Safety Specialist.

Staff Safety Committee Duties & Responsibilities

1. Monitor and assist on the health and safety program.
2. Monitor findings and reports of workplace inspections to confirm appropriate corrective measures are implemented.
3. Participate in workplace zone inspections, recommend corrective actions, and follow-up on corrective actions if requested by the Safety Department.
4. Review employee complaints regarding health and safety hazards.
5. If hazardous conditions are presented, investigate, report to the Safety Director or Safety Specialist, and suggest remedial solutions.
6. Review incident reports, assist in performing incident investigations, and submit suggestions for incident protective measures.
7. Maintain written records of all safety & health issues that the committee discusses.
8. Review project toolbox talks, worksite analyses, and employee interactions that have been submitted to the Safety Department.

STOP WORK AUTHORITY

All MJVD employees and contractors have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health and safety risk exist. No work will resume until all stop-work issues and concerns have been adequately addressed. Any form of retribution or intimidation directed at any individual or company for exercising their authority as outlined in this program will not be tolerated. Stop Work Authority document can be obtained by contacting site management.

Responsibilities

MJVD management are responsible for creating a Stop Work Authority (SWA) culture that includes:

- Honoring a Stop Work request
- Working to resolve hazardous conditions before operations resume
- Recognize proactive participation
- Ensure all Stop Work actions are properly reported
- Ensure follow up is completed
- Identifying trends
- Communicating lessons learned to all employees.

Intervention Protocol

In general, the SWA process takes a stop, notify, correct, and resume approach to resolve a perceived unsafe work action or condition. These steps should be the framework for all Stop Work interventions.

A workforce that understands how to initiate, receive, and respond to a Stop Work intervention is more likely to participate.

Training

Training for the SWA program shall be conducted as part of all new employee and contractor site orientation. A review of the SWA shall be included as part of all field location safety briefings, and in regular safety meetings.

Protocol Instruction Steps

1. When a person identifies a perceived unsafe condition or act, error, omission, or lack of understanding that could result in an undesirable event, that person shall immediately initiate a Stop Work intervention with the person(s) potentially at risk.
2. If the supervisor is readily available and the affected person(s) is not in immediate risk, coordinate the Stop Work action through the supervisor. If the supervisor is not readily available or the affected person(s) is in immediate risk, initiate the Stop Work intervention directly with those at risk.
3. Initiate Stop Work interventions in a positive manner. Briefly introduce yourself and start the conversation with the phrase, "I am using my Stop Work Authority because…." Using this phrase will clarify the initiator's intent and set expectations.
4. Notify all affected personnel and supervision of the Stop Work issue. If necessary, stop associated work activities, remove person(s) from the area, stabilize the situation, and make the area as safe as possible.
5. All involved parties discuss the Stop Work issue and agree on how to proceed.
6. If it is determined and agreed the task or operation can proceed as-is (for example, the Stop Work initiator was unaware of certain facts or procedures), the affected persons should thank the initiator for their concern and proceed with the work.
7. If it is determined and agreed that the Stop Work issue is valid, then every attempt should be made to resolve the issue to the satisfaction of all affected persons before work is restarted.
8. If the Stop Work issue cannot be resolved immediately, suspend work until proper resolution is achieved. When opinions differ as to the validity of the Stop Work issue or adequacy of the resolution actions, site management makes the final determination.
9. Positive feedback should be given to all affected employees regarding resolution of the Stop Work issue. Under no circumstances should retribution be directed at anyone who exercises their SWA in good faith.

FOLLOW-UP

Stop Work reports will be reviewed by a supervisor/manager. The desired outcome of any Stop Work intervention is to address identified concerns to the satisfaction of all involved persons prior to resuming work. Although most issues can be adequately resolved in a timely fashion at the job site, additional investigation and corrective actions may be required occasionally to identify and address root causes. Stop Work interventions that require additional investigation or follow-up will use existing protocols and procedures for incident investigation and follow-up.

DISCIPLINARY PROGRAM

Violation of the HASP will result in disciplinary action, up to and including termination of employment, at the discretion of MJVD. Any safety procedures not followed in the HASP 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 on the MIP Disciplinary From, and placed in the project safety file and/or employee file.
3. Periodic inspections by the Corporate Safety Director, Safety Specialist, 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.

HASP ELEMENTS

To ensure this HASP and site-specific APPs are continually being improved, the following elements shall be applied.

1. Responsibilities
2. Hazard Identification and Assessment
3. Hazard Prevention and Control
4. Emergency Response Planning
5. Worksite Analyses
6. Education and Training
7. Program Evaluation and Improvement
8. Communication

Responsibilities

Responsibilities for providing a safe working environment rest at all levels within MJVD. We acknowledge the importance of creating a positive safety culture through employee involvement and effective policies and procedures. Our goal is to protect employees from injury. This goal will receive top priority from all employees.

Duties and responsibilities of personnel under this HASP are as follows:

Management Leadership

Management at MJVD leads safety efforts to continuously provide resources needed to implement an effective safety and health program for the corporation and for each project. This requires strong leadership and a solid commitment from upper management. This HASP shall be communicated to all employees prior to initial employment and annually thereafter, and at appropriate times and places may be communicated to relevant parties including contractors, subcontractors, other businesses, and visitors.

Corporate Health and Safety Director/Safety Specialist

1. Provide visible ongoing commitment, resources, and leadership to assure the implementation of the HASP and APP.
2. Administer MJVD health and safety programs.
3. Provide supports in the development of site-specific Work Plans and Accident Prevention Plans.
4. Develop, implement, and maintain health and safety policies, procedures, and training materials.

5. Perform annual reviews of MJVD health and safety policies and procedures to remain up to date with regulatory standards.
6. Advise on adequate safety precautions and compliance with regulatory standards.
7. Conduct and assist in employee health and safety training and maintain training documentation.
8. Investigate serious or reportable injuries and near misses.
9. Conduct periodic job site health and safety inspections of work area.
10. Coordinate safety zone inspections quarterly.
11. Ensure incidents are recorded and reported according to applicable federal and/or state regulations.
12. Process all paperwork associated with incidents, onsite inspections, and in-house audits.
13. Maintain all records and reports of incidents and near misses that have taken place during MJVD operations according federal and state regulations. Data shall be kept for five (5) years.

Supervisors/Project Managers

1. Provide visible ongoing commitment, resources, and leadership to assure the implementation and training of the HASP and APP.
2. Conduct or designates a Site Safety Officer to conduct site specific safety briefings with all employees under his/her supervision.
3. Ensure that safety equipment is available, maintained, used, and stored properly.
4. Ensure proper hazard control measures are in place and required PPE is being worn.
5. Require all outside personnel working on MJVD projects to comply with MJVD health and safety regulations.
6. Advise on safety precautions and ensure compliance with regulatory standards.
7. Ensure correction of unsafe conditions.
8. Ensure that injuries are treated promptly and reported properly.
9. Investigate and report employee near misses and incidents.
    - Report serious hazardous conditions and recordable incidents, those that require more than first aid treatment, to the Safety Director or Safety Specialist immediately.
    - Review all incidents with management, supervisors, and employees involved.
    - Ensure incident reports are complete and submit as appropriate.
    - Ensure that corrective action is taken immediately to eliminate the cause of the injury/incident.
10. Conduct daily toolbox talks and other worksite hazard analyses such as:
    - Field Level Hazard Assessment (FLHA) or Worksite Exam
    - Pre-Task Hazard Assessment (PTHA)
    - Job Hazard Analysis (JHA).
11. Provide toolbox talks and worksite analysis documents to the Safety Department daily.
12. Perform employee interactions as recommended by the Safety Department.
13. Meet with the Safety Department regularly to discuss employee health and safety.

Field Engineer/Field Team Leaders

This may also be the Project Manager and Site Safety Officer

1. Provide visible ongoing commitment, resources, and leadership to assure the implementation and training of the HASP and APP.
2. Direct and manage MJVD operations and site activities.
3. Implement this HASP, the site-specific APP, and ensure regulatory compliance.

4. Assist in determining mitigation controls and personnel protection levels.
5. Coordinate with other on-site personnel, including subcontractors to MJVD.
6. Conduct regular job site safety and health inspections throughout the day.
7. Document all field activities.
8. Advise on safety precautions and required PPE to be worn at all times.
9. Conduct daily toolbox talks and other worksite hazard analyses such as:
    - Field Level Hazard Assessment (FLHA) or Worksite Exam
    - Pre-Task Hazard Assessment (PTHA)
    - Job Hazard Analysis (JHA).
10. Provide toolbox talk and worksite analysis documents to the Safety Department daily.
11. Perform employee interactions as required by the Safety Department.

Site Safety Officer (SSO)

The Site Safety Officer shall have a minimum of 1 year of experience in the safety and construction industry or related field, a sound working knowledge of Federal and State Occupational Safety and Health Administration (OSHA) safety regulations, and experience in monitoring and administration of MJVD programs, such as the respiratory protection program.

1. Provide visible ongoing commitment, resources, and leadership to assure the implementation and training of the HASP and APP.
2. Certify employee health and safety is top priority.
3. Ensure that health and safety equipment is available, functional, maintained, used, and stored properly.
4. Ensure proper hazard control measures are in place and required PPE is being worn.
5. Ensures control of entry and exit at the Control Access Points (project specific).
6. Confirm each employee is suitability for work.
7. Monitor personnel for signs of stress such as cold exposure, heat stress, and fatigue.
8. Conduct onsite inspections periodically through the shift to ensure site conditions have not changed. If conditions change, discuss new safety measures with employees.
9. Enforce the “buddy” system.
10. Implement a contingency plan, if necessary.
11. Advise medical personnel of potential exposures and consequences.
12. Advise on safety precautions and ensure compliance with regulatory standards.
13. Conduct daily toolbox talks and other worksite hazard analyses such as:
    - Field Level Hazard Assessment (FLHA) or Worksite Exam
    - Pre-Task Hazard Assessment (PTHA)
    - Job Hazard Analysis (JHA).
14. Provide toolbox talk and worksite analysis documents to the Safety Department daily.
15. Perform employee interactions as required by the Safety Department.

MJVD Employees

Employees have a personal responsibility to comply with all safety and health rules. Employees shall participate in any safety related planning, implementation, evaluation, training, and corrective/preventive actions geared toward addressing hazards at the worksite.

Employees are encouraged to provide safety and health suggestions to help improve work processes, prevent incidents, or improve working conditions by providing recommendations on safety and health products, procedures, and training as it pertains to daily work operations. If any work activity is believed to be unsafe, inform a supervisor immediately before the work is performed.

Access to additional safety and health information such as Safety Data Sheets (SDSs), job hazard analyses, and equipment manufacturer safety recommendations can be provided upon request.

Employees will be required to:

1. Comply with all MJVD health and safety policies and procedures and regulatory standards.
2. Receive proper training prior to performing tasks.
3. Perform daily inspections on required safety devices and Personal Protective Equipment (PPE).
4. Inform supervisor if uncertain how to conduct a task in a safe manner or if required PPE and safety devices are impaired.
5. Notify supervisor/PM/SSO immediately of unsafe conditions, unsafe acts, incidents, near misses, and injuries after ensuring that no one will be injured while notifying the supervisor.
6. Assist in all efforts to provide and maintain a safe workplace.
7. Attend all required training courses and toolbox talks as determined by MJVD management and designated safety personnel. All documentation must be signed by the employee to verify attendance.
8. Comply with employee interactions recommended by management.
9. Follow the Code of Safe Practices.

Hazard Identification, Assessment, and Corrective Action

Identify Hazards

Workplace injuries, illnesses, and incidents can be prevented when hazards are recognized or anticipated. Ways to identify potential hazards include:

- Collect and review information about potential hazards at the worksite.
- Determine the severity and likelihood of potential hazards and use this information to prioritize corrective actions.
- Conduct initial and periodic workplace inspections throughout the shift and if conditions change.
- Investigate injuries, illnesses, incidents, and near misses to determine underlying hazards.
- Housekeeping and trip hazards shall be fixed on the spot.
- Consider hazards associated with emergency or nonroutine situations. Such hazards include:
    - Chemical releases
    - Hazardous material spills
    - Startups after planned or unplanned equipment shutdowns
    - Nonroutine tasks, such as infrequently performed maintenance activities
    - Structural collapse
    - Disease outbreaks
    - Weather emergencies and natural disasters
    - Medical emergencies
    - Workplace violence.

Information to Review

To identified potential hazards that may be present on the job, the following information may be reviewed.

- Equipment and machinery operating manuals
- Safety Data Sheets (SDSs)
- Exposure monitoring results
- Existing safety and health programs such as lockout/tagout, confined spaces, respirator protection
- Job hazard analyses

Planning Process

The planning process is a key component to help MVJD systematically prioritize safety and health hazards, establish appropriate objectives, and devise a plan to meet the established objectives prior to work being performed. Proper planning involves:

- Thoroughly reviewing and inspecting all equipment and processes to determine risk factors.
- Conducting job hazard analyses to identify potential and existing hazards and exposures and to evaluate the frequency employees will be exposed to the hazards.
- Identifying the hazard control measures/methods and evaluating the potential severity of the hazard.
- Plan for emergency response if an incident or exposure happens during work activity.
- Ensure proper documentation is obtained and provided to the appropriate departments.

Categories of typical hazards

When looking at typical hazards, many categories should be determined. Some examples of these categories include:

- General housekeeping
- Slip, trip, and fall hazards
- Electrical hazards
- Equipment operation and maintenance
- Fire protection
- Work organization and process flow (including staffing and scheduling)
- Work practices
- Workplace violence
- Ergonomic problems
- Lack of emergency procedures
- Fall protection
- Driving safety

Health Hazards

Health hazards specific to the job site will be investigated prior to the project being started. Such hazards include chemical, physical, and biological hazards such as:

- Gases and vapors
- Noise or vibration hazards
- Heat or cold hazards
- Infectious diseases, mold, animal scat, asbestos, lead, cadmium

Correcting Hazards

Unsafe or unhealthy work conditions, practices, or procedures shall be corrected in a timely manner based upon the severity of the hazard. Hazards shall be corrected when observed or discovered. If an imminent hazard exists that cannot be immediately abated without endangering employee(s) and/or property, all exposed employees shall be removed from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with the necessary protection. Document all hazards and corrective measures with the corresponding date on the appropriate form.

Hazard Prevention and Control

To protect MJVD employees from worksite hazards and to help avoid injuries, illnesses, and incidents, controls shall be implemented. This shall be accomplished by involving employees who have the best understanding of the conditions that create hazards and insights into how they can be controlled. These controls shall be continuously evaluated.

To have a strong Health and Safety Policy, specific controls and risk-reducing methods shall be applied. Using the hierarchy of controls for safety reduces the risk of injury or illness. Control methods at the top of the list are more effective than those at the bottom. These controls will be discussed in detail for each project on the APP. Note that PPE is at the bottom of this list and should not be considered a primary method of controlling a hazard.

Elimination

Eliminating the hazard is the most effective control at reducing the hazard.

Substitution

Substitute the hazard with a less hazardous material, process, or equipment. This is the second most effect control at reducing the hazard.

Engineering Controls

Engineering controls can be highly effective in protecting employees. These include controls to remove a hazard at the source or placing a barrier between the employee and the hazard. Examples include using ventilation systems, shoring, and proper machine guards.

Administrative Controls

Administrative controls are used when hazards cannot be controlled by elimination, substitution, or engineering controls. Administrative controls are policies, procedures, and training. MJVD shall apply job rotation, training on proper handling techniques, training on proper ways to operate machinery, and other administrative controls when applicable.

Personal Protective Equipment (PPE)

PPE should be considered after other methods have been exhausted to remove employee exposure to the hazard. Proper PPE needed to perform work safely shall be provided to MJVD employees at no cost. Standard PPE includes work gloves, safety glasses, hard hat, steel toe boots, hearing protection, and Hi-Vis clothing. Examples of additional PPE include respiratory protection and chemical protective clothing.

Emergency Response Planning

Emergencies can happen at any time and MJVD employees may be required to deal with an emergency when it is least expected. Proper planning prior to an emergency is necessary to respond effectively. Each employee shall know what hazards are associated with the work being performed and be prepared if an incident happens. All employees shall be trained on procedures to follow in an emergency. Notify the supervisor/PM/SSO as soon as possible for any near miss, hazardous situation, incident, or injury. Fill out an incident report as soon as possible, but within 24 hours. For each project, the site-specific APP shall identify emergency response phone numbers and locations.

Worksite Analysis

Worksite analyses shall be conducted prior to work being started each day and periodically throughout the day to recognize and understand hazards and potential hazards of the worksite. A daily toolbox talk shall be discussed at the beginning of each shift. In addition, other worksite analyses may be required such as a Field Level Hazard Assessment (FLHA) or Worksite Exam, Pre-Task Hazard Assessment (PTHA), Job Hazard Analysis (JHA), or other safety risk assessment document. All forms can be located on SharePoint, Safety.

Toolbox Talk

Toolbox talks are informal group conversations about a particular health or safety topic used to promote safety culture and to get employees thinking about safety at the beginning of each work shift. Toolbox talks are estimated to be 15 minutes but can take longer depending on the topic.

A daily toolbox talk is important for multiple reasons.

1. It is a reminder at the beginning of each shift about the importance of health and safety.
2. Start the day off on a positive note.
3. Provide information and training on what hazards may be encountered during the day or what may have occurred on a previous shift.
4. To get employees mentality focused on tasks at hand.
5. To raise awareness.
6. To show employees that MJVD management cares about their health and safety.
7. Toolbox talks are part of the daily routine on a project and will instill a positive health and safety culture.

Toolbox talk topics may be provided by the Safety Department to Management. Management is expected to discuss these topics with their employees. If a topic is not provided, it is up to the Project Manager or Site Safety Officer to print off a topic on SharePoint or request a topic from the Safety Department. Signatures are required by all employees who attend each toolbox talk. This must be submitted to the Safety Department daily.

There may be projects where a daily toolbox talk is not applicable, for example if an employee works alone. In this situation a daily pre-task hazard assessment is required along with a safety share with the supervisor. Toolbox talks may be performed with the employee and supervisor on a weekly basis to discuss the topics at that time.

Field Level Hazard Assessment

A Field Level Hazard Assessment (FLHA) is a continuous process used to control hazards as soon as they are identified on a construction site or work area. FLHAs help prevent injuries by providing a “stop and

think" safety culture. A FLHA should be filled out prior to each work shift and throughout the shift, especially during crucial situations such as:

- When there is a change in the task at hand (work plans, new equipment).
- When new tasks are given during a shift.
- If the worksite changes (weather, material availability).
- When new employees come on site.

Steps in performing a FLHA include:

1. Stop and think
2. Look around to identify hazards
    - Be aware of what is around the work area (people, equipment, materials)
    - Ask yourself, "What might cause an incident?"
    - Note anything that could potentially harm people or damage property on the FLHA form
3. Control hazards
    - After a hazard is identified, ask yourself "What can be done to prevent the hazard?"
    - Work through the hierarch of controls to mitigate the hazard
4. Resume work
5. Repeat

Steps to fill out the FLHA form:

1. Fill in all required information at the top of the form.
2. Place a checkmark next to all potential hazards or note other hazards.
3. Place a checkmark next to all possible controls for that hazard.
4. Write down all tasks/concerns, hazards or conditions associated with that task, and controls to correct the hazard.
5. All employees performing this task must print their name.
6. Fill out a review at the bottom, good catch, near miss, and if a corrective action was documented.
7. Provide a description.
8. The person filling out the FLHA must sign the bottom of the form.
9. Return this document daily to the Safety Department.

Pre-Task Hazard Assessment

A Pre-Task Hazard Assessment (PTHA) card can also be used to determine potential hazards prior to starting a task. This provides a "stop and think" safety culture by providing multiple scenarios to think through before you start any task, even a very simple one. Once each scenario is thoroughly investigated, a checkmark can be placed in the box if applicable. This must be returned daily to the Safety Department.

Steps to fill out the PTHA Form:

1. Think through the task.
2. Look for the hazards.
3. Assess the consequences.
4. Take the precautions.
5. Do the job safely.
6. Fill out the pre-task hazard assessment.
7. Indicate near miss reporting.
8. Indicate corrective actions.
9. Fill out reviewer information and sign the card.

Job Hazard Analysis

A Job Hazard Analysis (JHA) focuses on specific job tasks to identify hazards before they occur. JHAs focus on the relationship between an employee, the task, the tools, and the work environment. A JHA should be written prior to hazardous tasks being performed and provide information on ways to control the hazards or reduce them to an acceptable risk level. JHAs also show what PPE is required for performing that particular task. A JHA can be used as a training tool for new employees. A JHA can be requested from the Safety Department. If one is not available, there are basic steps to write a JHA. New JHAs shall be provided to the Safety Department for future use.

A job hazard analysis can be conducted on many types of jobs, so it is important to determine what jobs take priority. These types of jobs include:

- Jobs with the highest injury or illness rate.
- Jobs with the potential to cause severe or disabling injuries or illness, even if there is no history of previous incidents.
- Jobs where one simple human error can lead to a severe incident or injury.
- Jobs that are new to the operation or have undergone changes in processes and procedures.
- Jobs that are so complex that written instructions are required.

Basic steps to write a JHA:

1. Break the job task into steps.
2. Identify the hazards of each step.
3. Review the list of hazards with employees who perform the job.
4. Identify ways to eliminate or reduce the hazards.
5. Identify proper recommendations and PPE needed to perform the job safely.

Other Hazard Surveys and Site Inspections

If a worksite analysis as described above is not performed, another type of hazard survey or site inspection shall be performed. A hazard can present a potential for injury, illness, property damage, liability, and damage to the environment so it is very important these hazards are identified. A safety hazard survey should be conducted periodically on hand tools, electric tools, equipment, and PPE in the work environment that could injure employees. Job hazard analyses and standard operating procedures shall be reviewed. Employees who work specifically with equipment and tools shall be interviewed for input as to any hazards that may be encountered as part of their job, which may not be recognized by others. Other items that may be inspected during the hazard survey include:

- Illumination
- Noise exposure
- Airborne toxic substances
- Temperature exposure
- Ergonomics

A hazard survey report should be accurately and clearly written. Hazards shall be described with the exact location noted and photographs if applicable. Specific corrective actions should be listed with a designated time frame for correction depending on the severity of the hazard. A copy of this document shall be provided to the Safety Department.

Education and Training

For MJVD to provide a safe working environment for all employees and adhere to regulatory requirements for training, it is critical that employees receive the proper training to do their jobs in a safe manner. Quality safety and health training helps prevent work-related injuries and illnesses and encourages employees by educating and enabling them to advocate for safer working conditions.

Employee training shall encompass regulatory health and safety annual training, training on company policies and procedures, hazard recognition, and a review of this HASP. All employees shall receive training and instruction on general and job-specific safety and health practices upon initial hire (Short Service Employee, described on Tab 30 in the Safety and Health Management System) and annually thereafter.

Specific training may be required for project specific hazards and controls and will be outlined in accident prevention plans. Specific training shall be provided to employees prior to the start of a project. Education and training provide the following:

- Knowledge and skills needed to work safely and avoid creating hazards.
- Awareness and understanding of workplace hazards and how to identify, report, and control them.
- Specialized training when work involves unique hazards.

Additional training may be needed depending on the roles assigned to employers or individual managers, supervisors, and employees.

Retraining

Retraining may be conducted for any of the following circumstances.

- Project Manager/ Site Safety Officer deem it necessary for an employee to be retrained.
- It is apparent that an employee needs to be retrained.
- Changes in the workplace make previous training obsolete.
- Employees are involved in an incident and retraining is recommended.

Training Certification

To certify that the employee has taken the required training, all trainings shall have a signature page and a record of training will be maintained. If training certifications are required on a job site, a request must be made in advance to the Safety Department and obtained prior to the start of a project. Training certification and/or documentation shall be available for inspection by employees and their authorized representatives, as well as for state regulatory personnel if requested.

Program Evaluation and Update

Management and the Safety Department shall review the HASP and job specific APPs to help improve procedures being performed to decrease the frequency and severity of injuries that may occur. Upon review of the program(s), actions may need to be taken to be more effective in the workplace safety and health. This may include changes in equipment, materials, key personnel, or work practices.

Management should revise this Health and Safety Policy and site-specific Accident Prevention Plans as necessary to ensure that the provisions are being implemented and effective, or annually thereafter. Training shall be provided on such approved HASP revisions to all MJVD employees and to employees working specifically at a site on changes to the APP. Both lagging and leading indicators shall be used to monitor performance and progress for all MJVD projects.

Lagging indicators

Lagging indicators track employee exposures and injuries that have already occurred. Examples of lagging indicators include:

- Number and severity of injuries and illnesses
- Results of employee exposure monitoring that show that exposures are hazardous
- Workers' compensation data, including claim counts, rates, and cost

Leading indicators

Leading indicators track how well various aspects of the program have been implemented and reflects the steps taken to prevent injuries or illnesses before they occur. This is why near miss reporting is important. Examples of leading indicators include:

- Level of employee participation in program activities
- Number of employee safety suggestions
- Number of hazards, near misses and first aid cases reported
- Amount of time taken to respond to reports
- Number and frequency of management walkthroughs
- Number and severity of hazards identified during inspections
- Number of employees who have completed required safety and health training
- Timely completion of corrective actions after a workplace hazard is identified or an incident occurs
- Timely completion of planned preventive maintenance activities

Communication

If MJVD is working on a multiemployer worksite, communication on this Health and Safety Policy and the site-specific APP shall be communicated to other contractors to afford all employees equal protection against hazards. Effective communication and coordination include discussing the types of hazards present and the Work Plan.

All MJVD personnel and contract employees will respect confidentiality of MJVD work activities and our clients' trade secrets. MJVD personnel will also follow all applicable health and safety requirements provided by our clients when working on sites under the client's control.

MAINTAINING RECORDS

Human Resources is responsible for the following:

- Maintain and posts federal and state regulatory required Right-To-Know posters.
- Provide and post emergency contact information.
- Maintain permanent record for MJVD files maintaining all HIPAA privacy rules.
- Maintain all medical records, evaluations, and exposure monitoring records for a period of 30 years.
- Maintain all training records for a minimum of three (3) years.
- Credentials medical providers in person or by proxy explaining MJVD needs and abilities to provide modified work when physician directed.
- 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.

INCIDENT REPORTING

The most important reason to report an incident is to allow for prompt medical treatment. Beyond the need for medical treatment incidents and near misses, whether or not they result in injury, are warnings that there are uncontrolled hazards. Incidents, injuries, and near misses shall be reported immediately by MJVD employees to supervisor. The supervisor shall apply the call tree if the incident is recordable and contact the Safety Director or Safety Specialist. An investigation may be conducted to determine the cause of the uncontrolled hazard, develop corrective actions, and eliminate the hazard.

Recordkeeping

A record of serious work-related injuries and illnesses shall be maintained by Human Resources according to MIOSHA Part 11. Recording and Reporting of Occupational Injuries and Illnesses. This information can be utilized to help evaluate workplace safety, understand hazards, and help prevent or eliminate future workplace injuries and illnesses. Copies of these records will be provided to current and former employees, or their representatives, upon request.

MIOSHA Incident and Injury Forms

- OSHA Form 300 – Log of Work-Related Injuries and Illnesses
- OSHA Form 301 – Injury and Illness Incident Report
- OSHA Form 300a – Summary of Work-Related Injuries and Illnesses

These records shall be maintained for at least five (5) years. 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.

Recordable Incidents

Recordable injuries or illnesses are those that results in any of the following:

- Work-related fatality
- Work-related injury or illness that results in loss of consciousness, days away from work, restricted work, or transfer to another job
- Work-related injury or illness requiring medical treatment beyond first aid
- Work-related diagnosed case of cancer, chronic irreversible diseases, fractured or cracked bones or teeth, and punctured eardrums
- There are also special recording criteria for work-related cases involving: needlesticks and sharps injuries; medical removal; hearing loss; and tuberculosis.

If an injury occurs in a state outside of Michigan, the incident will be recorded on the same form(s) as they would if it occurred in Michigan.

Reportable Incidents

Reportable incidents consist of fatalities, in-patient hospitalizations, amputations, and loss of an eye. These need to be reported to Federal or State OSHA in a specific timeframe.

If a reportable incident occurs in Michigan, it must be reported to MIOSHA. If the incident occurs in a State outside of Michigan, it will need to be recorded as described above, but it must be reported to the State which the incident occurred. Federal OSHA can assist in contacting the State. A copy of the report must be maintained as documentation in the employee file to show that the incident was reported as required. This can be provided to Michigan OSHA if the incident is investigated.

Fatality:
Report within 8 hours to Michigan OSHA at 1-800-858-0397 or Federal OSHA at 1-800-321-6742.

In-patient hospitalization:
Report within 24 hours to Michigan OSHA at 1-844-464-6742 or Federal OSHA at 1-800-321-6742. OSHA defines in-patient hospitalization as formal admission to the in-patient service of a hospital or clinic for care or treatment. Treatment in an Emergency Room only is not reportable.

Amputation:
Report within 24 hours to Michigan OSHA at 1-844-464-6742 or Federal OSHA at 1-800-321-6742. OSHA defines amputation as the traumatic loss of all or part of a limb or other external body part. This would include fingertip amputations with or without bone loss; If and when there is a health care professional's diagnosis available, MJVD should rely on that diagnosis.

Loss of an eye:
Report within 24 hours to Michigan OSHA at 1-844-464-6742 or Federal OSHA at 1-800-321-6742.

Worker's Compensation Claims Management
The following actions will be implemented on all 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 are injured), who in turn will notify other appropriate MJVD officials, such as the Safety Director or Human Resources Manager.
2. All incidents will be investigated by the Safety Department, Director, or supervisor to determine the facts and take corrective actions to prevent future recurrences.
3. Employees, within ten (10) days after notification to the employer, will complete the necessary portions of MJVD workers compensation carrier Injury Report Form.
4. 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.
5. 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.
6. The incident investigation must confirm that the injury was job related for the resultant claim to be valid. This is why it is important to report the injury during the shift.
7. Injured employees will be entered into a modified job program if recommended by the attending physician and MJVD can accommodate the particular restriction(s). 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.

GENERAL SAFETY GUIDELINES
Employees shall adhere to basic general safety rules and procedures.

Tools and Equipment
1. Only use tools and equipment after receiving proper training.
2. Read the operation manual and Job Hazard Analysis if available prior to use.

3. Use tools and equipment that are suitable for the task being performed.
4. Inspect the tool or equipment prior to use.
5. Any broken or damaged tool shall not be used until it is repaired or replaced.
6. Adhere to federal/state regulatory requirements when operating equipment.
7. Proper training and certification must be obtained prior to using a Powered Industrial Truck (forklift) or crane.
8. Never get on or off equipment if it is in motion.
9. Throwing or dropping tools from one location to another is not permitted.
10. Sharp edged or pointed tools shall not be carried in employee's pockets.
11. Wear appropriate PPE.

Hazardous Material Handling

A hazardous material is any item or agent (biological, chemical, radiological, and/or physical), which has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. Some examples of hazardous materials are paints, oils, cleaning chemicals, degreasers, welding fumes, gases, diesel fuel, gas cylinders, chemicals, and liquefied petroleum gas.

1. All employees are required to receive Hazard Communication training at initial hire, whenever a new chemical hazard is introduced, and annually thereafter according to the OSHA Hazard Communication Standard, 1910.1200(h).
2. Follow all MJVD procedures when handing hazardous materials.
3. Prior to using a hazardous material, read the Safety Data Sheet and label to understand the hazards and precautions.
4. Inventory shall be performed for all hazardous materials annually and SDSs for those hazardous materials shall be located near the work area.
5. Inspect and wear appropriate PPE at all times when using a hazardous material (nitrile gloves, safety glasses, clothing).
6. Make sure all containers and secondary containers are properly labeled and are in appropriate containers. If a label is not legible or the container is damaged, inform a supervisor immediately.
7. Use all materials for their intended purposes. For example, do not use a solvent to wash your hands or gasoline to clean equipment.
8. Make sure all hazardous materials are stored properly and are stored separate if they are incompatible. For example, compressed gas cylinders stored inside should be at least 20 feet from highly combustible materials like oil.
9. If a hazardous material contacts the skin, wash the affected area as soon as possible for at least 15 minutes and notify a supervisor.
10. Wash hands prior to eating, drinking, smoking, touching the face, applying makeup, or handling contact lenses.
11. Never eat or drink while handling hazardous materials.
12. Know what to do if a spill occurs prior to using the hazardous material.
13. Keep work areas clean and follow housekeeping guidelines. Clean work areas at least once a shift and at the end of each shift to reduce the risk of contamination.

MJVD CODE OF SAFE PRACTICES

Think Safe, Work Safe, and Be Safe!

1. All employees shall follow these safe practice rules, MJVD policies and procedures, render every possible aid to safe operations, and report all unsafe conditions or practices.

2. A site-specific Work Plan is required for all projects. An Accident Prevention Plan (APP) may be written if applicable. Training shall be provided prior to the start of work, when conditions change, or at least every 10 working days thereafter.

3. Employee(s) under the influence of drugs or intoxicating substances that impair the ability to safely perform the assigned duties shall not be allowed on the job while in that condition. If illegal chemical substances are in possession while on duty, the employee(s) will be subject to dismissal.

4. Report all work related near misses, injuries, and illnesses immediately.

5. When multiple people are working with handling materials and equipment, work shall be well planned and supervised to prevent injuries.

6. Only authorized and trained MJVD employees may enter a confined space. Entry is allowed only after permits are properly issued for permit-required confined spaces.

7. Only authorized and trained employees may repair or adjust machinery and equipment. Lock Out /Tag Out procedures must be followed before working on powered machinery and equipment.

8. All machine guards and other protective devices shall not be removed, except during maintenance activities. Deficiencies shall be promptly reported to management.

9. Only authorized employees are allowed to handle or tamper with any electrical equipment, machinery, or air or water lines within the scope of their duties.

10. If an employee's ability or alertness is impaired by fatigue, illness, or other causes that may cause potential injury to him/her-self or another employee, that employee shall not be permitted or required to work.

11. Keep work areas clean and aisles clear. Do not block emergency equipment or exits.

12. Gambling is prohibited while on the job.

13. Horseplay, scuffling, and other acts that tend to have an adverse influence on the safety or well-being of the employees are prohibited. No job requires running – WALK, DON'T RUN.

14. 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. Crowding or pushing when boarding or leaving any vehicle or other conveyance is prohibited.

HASP TRAINING DOCUMENTATION

Date: _____ Presenter: _____

Record of Attendance:

	Name: (Please Print Legibly)	Signature:
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		

Accident Prevention Plan (APP)

Project Name: _____

Project Date: _____

Project Location: _____

APP Plan Creator: _____

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Contents

Project Information

Project Name: _____

Project Date: _____

Location: _____

Project Duration: _____

Manpower Onsite:
(Complete employee list for this project is on the last page – training documentation)

Project Manager:		Phone Number:	
Site Safety Officer:		Phone Number:	
Operator:		Phone Number:	
Laborer:		Phone Number:	
Competent Person:		Phone Number:	
Other:		Phone Number:	

Documentation Required for this Project:

1. Mark what documentation will be required for this project below (be specific).
2. Provide toolbox talks daily to the Safety Department.
3. Provide APP, Work Plan, Worksite Analyses, and Training Certifications to the Safety Department once the project is complete.
4. If additional information is required, please contact Management or the Safety Department (e.g.: Work Zones, Decontamination, Site Control, Exposure Monitoring)

☐ Work Plan – Required for every MJVD project

☐ Toolbox Talk Topics – _____

☐ Field Level Hazard Assessment (FLHA)

☐ Worksite Exam

☐ Pre-Task Hazard Assessment (PTHA)

☐ Job Hazards Analyses (JHAs): _____

☐ Employee Training Certifications Required for this Project (include copies with this APP)
- Describe: _____

☐ Other: _____

Introduction

Background

M.J. VanDamme Trucking, Inc., "MJVD", takes every reasonable precaution to provide a work environment that is safe for employees. A written Corporate Health and Safety Policy (HASP) provides an organized approach to manage and reduce safety and health hazards throughout MJVD. This project site-specific Accident Prevention Plan (APP) is in addition to the HASP. An APP is not only required by the Michigan Occupational Safety and Health Administration (MIOSHA), Part 1. General Rules but ensures improvement of safety and health performance at each MJVD project. MJVD personnel will follow all policies and procedures and applicable Federal and/or State Occupational Safety and Health Administration (OSHA) Standards for Construction (29 CFR Part 1926) and General Industry (29 CFR Part 1910).

Purpose

The purpose of this APP is to define project goals to improve workplace safety and health utilizing ways described under Worksite Analysis below to determine potential hazards and effective ways to mitigate these hazards.

No job or task is more important than worker health and safety. Every procedure must be a safe procedure. If a job represents a potential safety or health threat, every effort will be made to plan a safe way to do the task.

Project Scope of Work

A detailed description of the Scope of Work is in the Work Plan, which is required on all MJVD Projects.

_____

_____

_____

_____

_____

Elements of the APP

To ensure this site-specific Accident Prevention Plan is continually being improved throughout the entirety of the project, the following elements shall be utilized:

- Responsibilities
  - Management Leadership
  - Employee participation
- Hazard Identification and Assessment
- Hazard Prevention and Control
- Worksite Analyses
- Education and Training

- Program Evaluation and Improvement
- Communication
- Emergency Response Planning

Responsibility

Responsibilities for providing a safe working environment rest at all levels within MJVD. For this project, Supervisors, Site Safety Officers, Project Managers, Field Engineers, and Field Team Leaders shall ensure they are following all responsibilities defined in the Health and Safety Policy (HASP).

Responsibilities for All Management

- Certify employee health and safety as top priority.
- Implement the Corporate HASP and the site-specific APP and provide training to all employees working on this project.
- Conduct daily toolbox talks and other worksite analyses to determine potential hazards, mitigation controls, and personnel protection levels such as:
    - Field Level Hazard Assessments (FLHA)
    - Worksite Exam
    - Pre-Task Hazard Assessments (PTHA)
    - Job Hazard Analyses (JHAs)
    - Employee Interactions
- Conduct periodic job site health and safety inspections of work area and ensure all unsafe conditions are corrected before performing tasks that may injure an employee.
- Advise on safety precautions, ensure required PPE is worn at all times, and ensure compliance with regulatory standards.
- Ensure that health and safety equipment is available, functional, maintained, used, and stored properly.
- Ensure that injuries are treated promptly and reported properly.

Supervisors/Project Managers (PM)

- Require all outside personnel working on MJVD projects to comply with MJVD health and safety regulations.
- Investigate employee near misses and injuries.
    - Review all incidents with management, supervisors, and workers involved.
    - Ensure incident reports are complete and submitted as appropriate following the incident report policy.
    - Ensure that corrective action is taken immediately to eliminate the cause of the incident.

Field Engineer/Field Team Leaders

This may also be the Project Manager and Site Safety Officer

- Direct and manage MJVD operations and site activities.
- Coordinate with other on-site personnel, including subcontractors to MJVD.

Site Safety Officer (SSO)

The project Site Safety Officer shall have a minimum of 1 year of experience in the safety and construction industry or related field, a sound working knowledge of Federal and State occupational

health and safety regulations, and experience in monitoring and administration of MJVD programs, such as the respiratory protection program.

- Ensure the control of entry and exit at the Control Access Points
    - For this project – please circle Yes No
- Confirm each employee is suitable for work based on physical results.
- Monitor personnel for signs of stress, such as cold exposure, heat stress, and fatigue.
- Enforce the "buddy" system.
- Implement a contingency plan, if necessary.
- Advise medical personnel of potential exposures and consequences.

Employee

- Comply with all safety and health rules established by management.
- Participate in all health and safety training, toolbox talks, and worksite analyses.
- Participate in safety related planning, implementation, evaluation, and corrective/preventive actions geared toward addressing hazards at the worksite.
- Provide safety and health suggestions to the PM or SSO to help improve work processes, prevent incidents, or improve working conditions.
- Inform a PM or SSO immediately if any work activity is believed to be unsafe.
- Request additional safety and health information such as Safety Data Sheets (SDSs), JHAs, and equipment manufacturer safety recommendations.

Hazard Identification, Assessment, and Corrective Action

Identify Hazards

Workplace injuries, illnesses, and incidents can be prevented when hazards are recognized or anticipated. Ways to identify potential hazards include:

- Collect and review information about potential hazards at the worksite.
- Determine the severity and likelihood of potential hazards and use this information to prioritize corrective actions.
- Conduct initial and periodic workplace inspections throughout the shift and if conditions change.
- Housekeeping and trip hazards shall be fixed on the spot.
- Consider hazards associated with emergency or nonroutine situations. Such hazards include:
    - Chemical releases
    - Hazardous material spills
    - Startups after planned or unplanned equipment shutdowns
    - Nonroutine tasks, such as infrequently performed maintenance activities
    - Structural collapse
    - Disease outbreaks
    - Weather emergencies and natural disasters
    - Medical emergencies
    - Workplace violence

Review Information

To identified potential hazards that may be present on the job, the following information may be reviewed.

- Equipment and machinery operating manuals
- Safety Data Sheets (SDSs)
- Exposure monitoring results if exposure monitoring has been performed
- Existing safety and health programs such as lockout/tagout, confined spaces, respirator protection, PPE
- Job hazard analyses

Planning Process

The planning process is a key component to help MVJD systematically prioritize safety and health hazards, establish appropriate objectives, and devise a plan to meet the established objectives prior to work being performed. Proper planning involves:

- Thoroughly reviewing and inspecting all equipment and processes to determine risk factors.
- Conducting job hazard analyses to identify potential and existing hazards and exposures and to evaluate the frequency employees will be exposed to the hazards.
- Identifying the hazard control measures/methods and evaluating the potential severity of the hazard.
- Planning for emergency response if an incident or exposure happens during work activity.
- Ensuring proper documentation is obtained and provided to the appropriate departments.

Categories of Typical Hazards

When looking at typical hazards, many categories should be determined. Some examples of these categories include:

- General housekeeping
- Slip, trip, and fall hazards
- Electrical hazards
- Equipment operation
- Equipment maintenance
- Fire protection
- Work organization and process flow (including staffing and scheduling)
- Work practices
- Workplace violence
- Ergonomic problems
- Lack of emergency procedures
- Fall protection
- Driving safety

Health Hazards

Health Hazards specific to the job site will be investigated prior to the project being started. Such hazards include chemical, physical, and biological hazards.

- Gases and vapors
- Chemical hazards
- Noise or vibration hazards
- Heat or cold hazards
- Infectious diseases, mold, animal scat, asbestos, lead, cadmium

Hazards Identified

Describe any hazards that were identified. _____

_____

_____

_____

_____

_____

Correcting Hazards

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 when observed or discovered. If an imminent hazard exists, which cannot be immediately abated without endangering employee(s) and/or property, all exposed workers shall be removed 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. All such actions taken and dates they are completed shall be documented.

Hazard Prevention and Control

To protect MJVD employees from worksite hazards and to help avoid injuries, illnesses, and incidents, controls shall be implemented. Employees who have the best understanding of the conditions that create hazards shall provide insights into how they can be controlled and to continuously evaluate the controls throughout the project.

Specific controls and mitigation methods to reduce hazards shall be applied using the hierarchy of controls. Control methods being implemented for this project include:

Elimination

Eliminating the hazard is the most effective control at reducing the hazard.

Describe: _____

Substitution

Substitute the hazard with a less hazardous material, process, or equipment. This is the second most effect control at reducing the hazard.

Describe: _____

Engineering Controls

Engineering Controls can be highly effective in protecting workers. These include controls to remove a hazard at the source or placing a barrier between the worker and the hazard. Examples include using ventilation systems, shoring, and proper machine guards.

Describe: _____

Administrative Controls

Administrative controls are used when hazards cannot be controlled by elimination, substitution, or engineering controls. Administrative controls are policies, procedures, and training. MJVD shall apply job rotation, training on proper handling techniques, training on proper ways to operate machinery, and other administrative controls when applicable.

Describe: _____

Personal Protective Equipment (PPE)

PPE should be considered after other methods have been exhausted to remove employee exposure to the hazard. Required PPE needed to perform work safely shall be provided to MJVD employees at no cost, with the exception of steel toe boots. Standard PPE includes work gloves, safety glasses, hard hat, steel toe boots, hearing protection, and Hi-Vis clothing. Examples of additional PPE include respiratory protection and chemical protective clothing.

Describe what additional PPE is required for this project: _____

Worksite Analysis

A hazard can present a potential for injury, illness, property damage, liability, and damage to the environment, so it is very important these hazards are identified. A safety hazard survey should be conducted periodically on hand tools, electric tools, equipment, and PPE in the work environment that could injure employees. Job hazard analyses and standard operating procedures shall be reviewed. Employees who work specifically with equipment and tools shall be interviewed for input as to any hazards that may be encountered as part of their job, which may not be recognized by others. Other items that may be inspected during the hazard survey include:

- Illumination
- Noise exposure
- Airborne toxic substances
- Temperature exposure
- Ergonomics

A hazard survey report should be accurately and clearly written. Hazards shall be described with the exact location noted and photographs if applicable. Specific corrective actions should be listed with a designated time frame for correction depending on the severity of the hazard.

Worksite analyses shall be conducted prior to work being started each day and periodically throughout the day to recognize and understand hazards and potential hazards of the worksite. A daily toolbox talk shall be discussed at the beginning of each shift. In addition, other worksite analyses may be required such as a Field Level Hazard Assessment (FLHA) or Worksite Exam, Pre-Task Hazard Assessment (PTHA), Job Hazard Analysis (JHA), or other safety risk assessment document. All forms can be located on SharePoint, Safety.

Toolbox Talks

Toolbox talks are informal group conversations about a particular health or safety topic used to promote safety culture and to get employees thinking about safety at the beginning of each work shift. Toolbox talks are estimated to be 15 minutes but can take longer depending on the topic.

A daily toolbox talk is important for multiple reasons.

1. It is a reminder at the beginning of each day about the importance of health and safety while working.
2. Start the day off on a positive note.
3. Provide information and training on what hazards may be encountered during the day or what may have occurred on a previous shift.
4. To get employees mentality focused on tasks at hand.
5. To raise awareness.
6. To show employees that MJVD management cares about their health and safety.
7. Toolbox talks are part of the daily routine on a project and will instill a positive health and safety culture.

Toolbox talks topics may be provided by the safety department to management. Management is expected to discuss these topics to their employees. If a topic is not provided, it is up to the Project Manager or Site Safety Officer to print off a topic on SharePoint or request a topic from the safety department. Signatures are required of all employees who attend each toolbox talk. This must be submitted to the safety department daily.

Field Level Hazard Assessments

A Field Level Hazard Assessment (FLHA) is a continuous process used to control hazards as soon as they are identified on a construction site or work area. FLHAs help prevent injuries by providing a "stop and think" safety culture. A FLHA should be filled out prior to each work shift and throughout the shift, especially during crucial situations such as:

- Change in the task at hand (work plans, new equipment)
- New tasks are given during a shift
- Worksite changes (weather, material availability)
- New workers come on site

Steps in performing a FLHA:

- Stop and think
- Look around to identify hazards
  - Be aware of what is around the work area (people, equipment, materials)
  - Ask yourself, "What might cause an incident?"
  - Note anything that could potentially harm people or damage property on the FLHA form
- Control hazards
  - After a hazard is identified, ask yourself "What can be done to prevent the hazard?"
  - Work through the hierarch of controls to mitigate the hazard
- Resume work
- Repeat

Steps to fill out the FLHA form:

1. Fill in all required information at the top of the form.
2. Place a checkmark next to all potential hazards or note other hazards.
3. Place a checkmark next to all possible controls for that hazard.
4. Write down all tasks/concerns, hazards or conditions associated with that task, and controls to correct the hazard.
5. All employees performing this task must print their name.
6. Fill out a review at the bottom, good catch, near miss, and if a corrective action was documented.
7. Provide a description.
8. The person filling out the FLHA must sign the bottom of the form.
9. Return this document with the toolbox talk daily to the safety department.

Pre-Task Hazard Assessment

A Pre-Task Hazard Assessment (PTHA) form can also be used to determine potential hazards prior to starting a task. This provides a "stop and think" safety culture by providing multiple scenarios to think through before you start any task. Once each scenario is thoroughly investigated, a checkmark can be placed in the box if applicable.

Steps to fill out the PTHA form:

1. Think Through the Task
2. Look for the Hazards
3. Assess the Consequences
4. Take the Precautions
5. Do the Job Safely
6. Pre-Task Hazard Assessment
7. Near Miss Reporting
8. Corrective Actions
9. Reviewer information and signature

Job Hazard Analysis

A Job Hazard Analysis (JHA) focuses on specific job tasks to identify hazards before they occur. JHAs focus on the relationship between an employee, the task, the tools, and the work environment. A JHA can be written prior to tasks being performed and provide information on ways to control the hazards or reduce them to an acceptable risk level. JHAs also show what PPE is required for performing that particular job. A JHA can be used as a training tool for new employees in the steps required to perform a job safely. A JHA can be requested from the safety department. If one is not available, there are basic steps to write a JHA. New JHAs shall be provided to the safety department for future use.

A job hazard analysis can be conducted on many jobs, so it is important to determine what jobs take priority. These types of jobs include:

- Jobs with the highest injury or illness rate
- Jobs with the potential to cause severe or disabling injuries or illness
- Jobs where one simple human error can lead to a severe incidents or injury
- Jobs that are new to the operation or have undergone changes in processes and procedures

- Jobs that are so complex that written instructions are required.

Basic steps to write a JHA include:

- Break the job task into steps
- Identify the hazards of each step
- Review the list of hazards with employees who perform the job
- Identify ways to eliminate or reduce the hazards
- Identify proper recommendations and PPE needed to perform the job safely.

Education and Training

Employees must have knowledge and understand project specific hazards and controls to work safely and be productive while reducing the potential for injury. Prior to working on this project, it has been verified that all employees have had MJVD health and safety training to include Hazard Communication and Right-To-Know as well as training on the Corporate HASP. Additional training on this APP will be provided prior to the start of work. Training shall include:

- Knowledge and skills needed to do work safely and avoid creating hazards that could place themselves or others at risk.
- Awareness and understanding of workplace hazards and how to identify, report, and control them.
- Specialized training when their work involves unique hazards.
- At least one person on site must be CPR/First Aid Certified.

Additional training may be needed depending on the roles assigned to employers or individual managers, supervisors, and workers. Additional training for this project includes (be descriptive – crane, heavy equipment, scaffolding, respirator protection, trenching and excavation, etc.):

_____

_____

_____

Retraining

Retraining will be conducted if:

- Site Safety Officer/Project Manager deem it necessary for an employee to be retrained.
- If it is apparent that an employee who has already been trained does not have the understanding or skill required to comply with the APP.
- Changes in workplace make previous training obsolete.
- If employees are involved in an incident.

Training Certification

To certify that the required training has been accomplished, all appropriate training certifications have been requested and obtained prior to the start of the project. Training documentation on this APP can be found at the end of this policy. Training certification and/or documentation shall be available for

inspection by employees and their authorized representatives, as well as for state regulatory personnel if requested.

Certifications required for this project include:

Program Evaluation and Update

- Supervisors/Project Managers/Site Safety Officers will conduct periodic evaluations of the worksite throughout the day to ensure that the provisions of this program are being implemented and effective.
- Evaluations will include regular consultations with employees and monitoring the worksite to determine if conditions have changed. If conditions change during the day, additional employee safety hazard training may be required.
- Modifications to the APP must be reviewed and approved by the Site Safety Officer/Project Manager before such modifications are implemented.
- All modifications are documented in Project Notes at the end of this APP along with the date of the modification.

Communication

This APP and the scope of work shall be communicated to other contractors, subcontractors, or anyone other than MJVD working on this project to afford all workers equal protection against hazards. Communication has been provided to the following:

Name:	Date:
Name:	Date:
Name:	Date:

Incident Reporting

All incidents requiring medical treatment shall be attended to immediately and an incident report filled out as soon as possible. Beyond the need for medical treatment, incidents and near misses, whether or not they result in injury, are warnings that there are uncontrolled hazards. Incidents, injuries, and near misses shall be reported by MJVD employees to the Supervisor, Site Safety Officer, or Project Manager who will notify the appropriate personnel. An investigation may be conducted to determine the cause of the uncontrolled hazard, develop corrective actions, and eliminate the hazard.

Basic First Aid

Exposures that cause adverse health conditions shall be reported to the Project Manager or Site Safety Officer, who will implement necessary and appropriate corrective actions. The following general health and first aid information is provided only as a guide.

Acute Exposure Symptoms	First Aid
Eyes – slight to moderate irritation	Flush with water for 15-20 minutes
Skin – irritation or redness	Wash with soap and water
Respiratory – dizziness, headache, vomiting, bluish skin	Remove to fresh air and seek medical attention immediately

Emergency Response Planning

Emergencies can happen at any time and MJVD employees may be required to deal with an emergency when it is least expected. Proper planning prior to an emergency is necessary to respond effectively. Each employee shall know what hazards are associated with the work being performed and be prepared if an incident happens. All employees shall be trained on procedures to follow in an emergency. Notify the Site Safety Officer/Project Manager as soon as possible for any near miss, hazardous situation, incident, or injury. Fill out an incident report as soon as possible within 24 hours of an incident.

<u>Emergency Contact List – Emergency Procedures</u>

- Notify appropriate MJVD personnel
- Call 911
- Fill out an incident report
- Local Police Department: _____ Phone: _____
- Local Fire Department: _____ Phone: _____
- Closest Hospital
    - Hospital Name: _____
    - Address: _____
    - Phone Number: _____
- Local Electrical Company_____ Phone: _____
- Who to contact for environmental emergencies (Michigan EGLE for example):
  _____ Phone: _____

- Other (chemical spill response team, building personnel, etc.):

  _____ Phone: _____

  _____ Phone: _____

List any emergency procedures that need to be followed for this project.

_____

_____

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MJVD Code of Safe Practices - Think Safe, Work Safe, and Be Safe!

1. All employees shall follow these safe practice rules, MJVD policies and procedures, render every possible aid to safe operations, and report all unsafe conditions or practices.

2. A site-specific Accident Prevention Plan (APP) shall be written for each project and training shall be provided prior to the start of work, when conditions change, or at least every 10 working days thereafter.

3. Employee(s) under the influence of drugs or intoxicating substances that impair the ability to safely perform the assigned duties shall not be allowed on the job while in that condition. If illegal chemical substances are in possession while on duty, the employee(s) will be subject to dismissal.

4. Report all work injuries and illnesses immediately.

5. When multiple people are working with handling materials and equipment, work shall be well planned and supervised to prevent injuries.

6. Only authorized and trained MJVD employees may enter a confined space. Entry is allowed only after permits are properly issued for permit-required confined spaces.

7. Only authorized and trained employees may repair or adjust machinery and equipment. Lock Out /Tag Out procedures must be followed before working on powered machinery and equipment.

8. All machine guards and other protective devices shall not be removed, except during maintenance activities. Deficiencies shall be promptly reported to management.

9. Only authorized workers are allowed to handle or tamper with any electrical equipment, machinery, or air or water lines within the scope of their duties.

10. If an employee's ability or alertness is impaired by fatigue, illness, or other causes that may cause potential injury to him/her-self or another employee, that employee shall not be permitted or required to work.

11. Keep work areas clean and aisles clear. Do not block emergency equipment or exits.

12. Gambling is prohibited while on the job.

13. Horseplay, scuffling, and other acts that tend to have an adverse influence on the safety or well-being of the employees are prohibited. No job requires running – WALK, DON'T RUN.

14. 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. Crowding or pushing when boarding or leaving any vehicle or other conveyance is prohibited.

APP Training Documentation

Project:_____ Date: _____

Start Time: _____ End Time: _____ Total Training Time: _____ (required)

Record of Attendance:

	Name: (Please Print Legibly)	**Signature:**
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Additional training materials

- ☐ Toolbox Talks
- ☐ Field Level Hazard Assessment (FLHA)
- ☐ Pre-Task Hazard Assessment (PTHA)

- ☐ Job Hazards Analyses (JHAs)/Job Safety Analyses (JSAs)
- ☐ Workplace Exam
- ☐ Employee Training Certifications
- ☐ Work Plan

Return this APP to the safety department when the project is complete.

Project Notes

Inspections, Audits, Corrective Actions, Follow-ups

Describe - include the date of the observation, changes, etc..

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Incident Investigation Program

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
01-23-2024	MMM	MMM

Contents

Introduction

An incident is a preventable, unplanned event that interrupts operations and can result in lost time, property damage, or bodily injury. It is important to perform incident investigations to assist in the prevention of these incidents. This incident investigation program provides guidance on investigating incidents and serves as a guide in training personnel in the duties, responsibilities, and necessary techniques required to perform incident investigations. Incident refers to a fatality, injury, illness, or close call/near miss in this document.

Purpose

This program was developed to ensure that incidents are thoroughly investigated, relevant findings are documented, corrective actions are implemented, and results of the incident investigation are communicated throughout the organization. The goal of this program is to identify root causes of incidents and address the causes through corrective actions to prevent reoccurrence.

Incident investigations and reporting are important to not only identify hazards and prevent incidents, but also to enforce MJVD safety culture and reduce costs. Reducing the number of incidents helps improve efficiency and profitability by reducing lost time, work interruptions, equipment repairs, and the other indirect costs associated with employee accidents.

Incident investigations document the circumstances at the time of the incident and can be used to accurately recall the incident several years after the occurrence, which can be extremely helpful in defending a lawsuit or fraudulent claim.

Scope

All incidents that result in, or could have the potential to result in, the following may be investigated:

- Serious personal injuries
- Minor personal injuries
- Property damage
- MJVD vehicle damage
- Significant equipment/structural damage
- Fires/explosions
- An uncontrolled release of toxic materials or other hazardous material
- Injuries to the public
- Environmental impacts
- Significant impacts on reliability, productivity, or customer satisfaction.
- Significant impact on financial loss.
- Near miss incidents may also be investigated to ensure the cause of the near miss is detected and corrected prior to an injury occurring.

This scope includes injuries to MJVD employees, contractor employees, contractors, subcontractors, visitors, clients, and damage to equipment owned by contractors, employees, clients, or visitors. Unexpected shutdowns of equipment and failing to meet project requirements are also included.

Investigation Team

The incident investigation team will vary depending on the incident. The Safety Department shall be included in all incident discussions and investigations. At least one person knowledgeable of the incident shall be on the investigation team along with a team leader and/or others with appropriate knowledge and skills to thoroughly investigate and analyze the event. Investigation team leaders must have training in this incident investigation program and in basic investigation techniques.

Incident Investigation Responsibilities

MJVD Personnel

- Report all incidents and near misses to management immediately.
- Fill out an incident report as soon as possible or within 24 hours.
- All individuals involved in or witnessing the incident shall complete an Incident Witness Statement and submit it to a supervisor.
- Incident Communication Form can be utilized to document any additional notes on the incident.
- Assist the incident investigation team on investigating the event.

Minor Incidents and Near Misses

- Minor incidents shall include those that are not recordable.
- Supervisor/management shall inform the Safety Department of any minor incident or near miss.
- The Safety Director will ensure that the area is secure to prevent further injuries and/or equipment loss.
- The investigation must be completed as soon as possible, and results submitted to management.
- Management and the Safety Department will determine if further investigation is warranted.

Catastrophic or Major Incidents

- Catastrophic and major incidents are those that are recordable. Some major incidents may not be recordable so management should use their best judgement.
- Supervisor/management shall inform Upper Management, the Safety Department, and Human Resources immediately.
- The Safety Director shall appoint the appropriate incident investigation team and determine the scope of the investigation.
- The area must be secured to prevent further injuries and equipment losses and to ensure proper emergency response for the incident.

Investigation Team

- Follow basic investigative procedures outlined in this Incident Investigation Program.
- Being the investigation within 24 hours if possible, but no later than 48 hours of the incident.
- Complete the investigation as quickly and as thoroughly as possible.
- Document all results and recommendations.
- Submit the report to the Safety Department for subsequent review, distribution, and communication with management and MJVD employees.

Team Leader

- The team leader is the Safety Director, unless otherwise specified.
- The team leader is responsible for communicating with management when necessary to properly conduct the investigation.
- The Safety Director shall provide a written report on all job-related incidents.

Incident Investigation

Incidents usually arise from problems in at least one of four areas:

- EQUIPMENT - Tools, Machinery, Vehicles, Cords, Ladders
- MATERIAL - Solvents, Adhesives, Compressed gases, Lubricants
- PEOPLE - MJVD Employees, Outside Subcontractors, Human Error
- ENVIRONMENT - Temperature, Ventilation, Noise, Rain, Snow, Dust, etc.

An investigation is a report of the facts, causes, and contributing factors that lead to the incident and an action plan for correcting the problem. The investigation should:

- Obtain the facts during an incident.
- Determine causal factors. These are factors that caused or allowed the incident to occur, or factors that allowed the consequences of the incident to be worse than they might have been.
- Develop recommendations for each causal factor.
- Determine loss potential and actual consequences of the incident.
- Follow the MJVD incident investigation steps
- Report incident investigation summary.
- Provide recommendations for future investigations.

Obtain the Facts

To understand what occurred, it is necessary to gather factual information related to the event(s). Events with greater consequence or greater actual or potential losses may require more effort to gather this information. Follow these steps and actions as a guideline for all incidents:

STEP	ACTION / EXAMPLES
Inspect the entire scene (surroundings, equipment, tools, structures)	Ensure the area/equipment is in a safe condition. Once safe and stable, secure the area so it is not disturbed during the investigation.
Obtain eyewitnesses information, if possible	Have witnesses complete an Incident Witness Statement from SharePoint and submit to a supervisor.
Schedule interviews with those directly involved as soon as possible	• Interview those who were injured (if any) and others whose input might be useful • Interview those directly involved in the incident as soon after the incident as possible • Conduct interviews privately and individually so that the comments of one witness will not influence the responses of others Document the results of these interviews
Prepare visual aids of the affected physical data for the investigation	Photographs, videos, field sketches, maps

Determine the physical data that are relevant to the investigation	Structures, Equipment, Chemicals, Environment, Other
Obtain samples of unknown spills, vapors, residues, etc.	Note conditions that may have affected the samples
Perform the analysis of the equipment components	When a preliminary analysis reveals that an item may have failed to operate correctly or was damaged, decide to either preserve the items or carefully document any subsequent repairs or modifications.
Review all sources of potentially useful documentation and information	Work plan, JHA, FLHA, PTHA, equipment manuals, SOPs, previous incident reports, other hazard surveys, APPs, training records
Examine the applicable written procedures	MJVD policies/procedures, operating procedures, JHAs, Safety procedures
Carefully document the sources of information contained in the incident report	*Note*: This will be valuable if further investigation of the incident is necessary

Determine Causal Factors

1. Develop an understanding of the causes of the event. Work backwards from the end result and let the questions generated by each step backwards determine what data needs to be collected. This will lead to the determination of conditions that must have existed or events that must have occurred.
2. Document the facts of the events and conditions of the incident and include timing information
3. Focus on data collection, not who is to blame for the incident.
    a. What happened?
    b. How did it happen?
    c. When did it happen?
    d. Where did it happen?
    e. What actions were or were not taken?
    f. Who was involved?
4. Define alternative scenarios if the precise scenario cannot be established due to missing or contradictory information. Some cases may not be economically feasible to collect sufficient data, even though it is technically feasible.
5. Finally, identify all of the casual factors and document these.

Recommendations for Causal Factors

1. Determine what could have prevented the causal factors in the incident, as well as similar causal factors, and provide recommendations to address these causal factors.
2. Recommendations should be achievable, practical, and feasible.
3. Recommendations are intended to reduce future incidents.

Determine Risk and Loss Potential

When an incident or near miss is detected and reported, it is an opportunity to examine the potential risk. The investigation should determine the consequence and potential outcomes if the incident happened under slightly different circumstances. To estimate the loss potential for an incident, the investigation team may use the following tables to estimate the risk depending on the impact of the incident and the potential severity. These tables provide guidance to develop effective corrective actions depending on the risk severity and to perform incident trending.

Risk						
Consequence Category		**Impact of Incident**				
Rating	**Category**	**Personal Safety**	**Equipment Damage**	**Work Performance**	**Property Damage**	**Reputation**
No Risk	**1**	No injuries	Minor	No delays	Minor	No impact
Minor Risk	**2**	Minor injuries	Moderate	Modest delays	Moderate	Potential damage
Moderate Risk	**3**	Moderate to life impacting injuries	Substantial	Significant delays	Substantial	Damaged
High Risk	**4**	Life threatening	Severe	Major operational disruptions	Severe	Loss of confidence

Potential Severity				
Category	**A**	**B**	**C**	**D**
Personal Injury	First Aid Injury	Medical Treatment Injury	Permanent / Disabling Injury	Fatal Injury
Equipment / Property Damage	≥ $ 1,000 ≤ $ 10,000	> $10,000 ≤ $ 100,000	> $ 100,000 ≤ $ 1,000,000	> $1,000,000
Schedule Impact	> 2 hours, ≤ 10 hours	> 10 hours, ≤ 1 day	> 1 day ≤ 7 days	> 7 days
Environment	> 1 drop ≤ 1 tsp	> 1 tsp ≤ 1 cup	> 1 cup ≤ 1 gallon	> 1 gallon

Loss Potential				
	Potential Severity Low ◄——► High			
High	A4	B4	C4	D4
Impact of Incident ↕	A3	B3	C3	D3
	A2	B2	C2	D2
Low	A1	B1	C1	D1

Steps for Incident Investigation

1. Go to the Scene Immediately.
    a. Failure to respond right away prevents proper management of the incident 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.

2. 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 incident to surrounding equipment or articles.
    c. Articles that have a direct relationship to the incident should be photographed with a ruler or some other reference alongside to show the size of the object.
    d. Basic information should be included along with the photos such as:
        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 incident scene
    e. Posed photographs can also be used to illustrate or refute the statement of a witness or incident 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.
3. 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 incident have been prevented?
    d. The superintendent/foreman should ask the witness to walk him verbally and visually through the accident.
    e. The statement should be reviewed with the witness to ensure the accuracy of the statement and all facts should be documented.
    f. Thank the witness for their help.
    g. Remember to get the facts not conclusions.
4. Review the Facts
    a. Examine all the incident 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
        iv. 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.
5. Determine Incident 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.

IMMEDIATE INCIDENT CAUSES

Unsafe Acts

1. Unsafe acts represent 90% of all accidents.
2. Unsafe acts may be committed deliberately, unknowingly or may result from uncontrollable means.
3. Unsafe acts are usually short in duration, do not 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.

Unsafe Conditions

1. About 10% of all accidents can be associated with unsafe conditions such as 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, vapor, or lights.
3. Unsafe conditions tend to remain until they cause a problem or an incident 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 such as loose clothing, jewelry, long hair, and improper footwear.

Other Incident Causes

Job Factors

1. Involve poor indoctrination
2. Inadequate training
3. No training follow-up
4. Failure to follow safety rules
5. Communication breakdown
6. Lack of material handling equipment

Personal Factors

1. Involve poor morale caused by job change
2. Drinking
3. Drugs
4. Fatigue or stress

Corrective Action

Once the immediate and basic incident causes are identified, determine what corrective measures will be taken to prevent a recurrence. Corrective actions generally fall into three categories:

Physical Change

Physically changing the hazard is the most effective type of corrective measure when it can be used. Generally, it is easier to replace or repair broken equipment than to train all employees on how to avoid the hazard.

Procedural Change

Changing how certain jobs or tasks are done can be a way to mediate a hazard. Employee training and enforcement of the change shall be performed.

Training

Employees may need refresher training. Training may be provided to all employees who may be exposed to the same hazard condition or situation.

Reports to Management -

All appropriate investigation and report forms must be filled out completely and accurately by the team leader/Safety Director. These reports will include facts, results of the investigation, and recommended corrective actions. Reports should be written in detail so that someone unfamiliar with the situation can understand it, such as claims adjusters, consultants, Occupational Safety and Health Administration (OSHA), and attorneys. These reports may be utilized at a later date to recall these details.

The report, regardless or the type of incident, will contain at a minimum:

- Date and time of the incident
- Date and time the investigation started
- A description of the incident (Who, What, Why, When, Where, How)
- Identification of causal (contributing) factors
- Recommendations from the investigation
- List of investigation team members and their roles.

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

Follow-up and Prevention

Recommendations for all investigations shall be tracked to resolution. Designated personnel shall respond to each assigned recommendation by either resolving the issue or documenting that the recommendation is modified or rejected and provide periodic updates to the Safety Director on the status.

Typical reasons for rejection of a recommendation include:

- Implementation of the recommendation would increase the overall risk of operations.
- The recommendation is no longer valid.

- Implementation of other team recommendations adequately address this recommendation.
- The risk reduction associated with this item can be accomplished by a more effective (less costly, less complicated, or greater risk reduction) action.
- The recommendation is not necessary to protect the health and safety of personnel or the environment.
- The recommendation is infeasible.

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 incident 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.

Incidents and hazardous conditions can be prevented by:

- Stopping incorrect methods or procedures
- Finding alternative ways of getting the job done
- Providing necessary training to correct the problem and train all employees doing the same job
- Enforce procedures to ensure compliance
- Removing, guarding, or provide warnings about hazardous conditions
- Recommend policies and procedures to help eliminate them.

General Liability Accidents

General liability accidents require special handling, or they may result in a lawsuit. The potential financial loss may be greater than employee accidents. Injured parties will tend to rely on the legal system to resolve a claim, particularly when they consider failure of a prompt and fair response.

Supervisors who are aware of a liability claim situation should adhere to the following general procedures.

1. Never admit to guilt or company wrongdoing.
    a. A sympathetic or reassuring statement made at an incident scene could cause serious damage in court.
    b. Let the court determine who is at fault.
2. Prompt notification of the incident is essential.
    a. This should be a joint effort by all employees and supervisors.

   b. An expensive claim and lawsuit can best be avoided by prompt investigation, claims handling and settlement.
   c. 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.
3. Statements should be obtained from the injured parties as soon as possible.
   a. These should be detailed and provide a full description of the apparent injuries or damage.
   b. If possible, these statements should be taken in the presence of a 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. The full name, address and telephone number of each witness should be obtained.
5. Photographs should be taken of incident scene elements, particularly those that reflect favorably on the company. This might include photographs of the scene that clearly show there was no hazard.
6. Follow-up activities should include contact with the injured parties to show concern and interest in their recovery. This must be handled carefully, sometime at the direction of legal counsel. 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.
7. Prompt communication is essential, and the supervisor should keep management up to date on any new developments.

Incident Reporting

MJVD employees shall immediately notify a Supervisor, Project Manager, Site Safety Office, or other MJVD management of an incident, including close calls or near miss incidents, who will notify the Safety Director/Safety Specialist via phone. Any incident involving personal injury must be reported immediately to the Safety Director/Safety Specialist. The Safety Director, along with management, shall determine if the incident will be investigated. Medical care is the top priority in any incident. The notification process must not hinder medical treatment or personal care. All incident reports must be provided to Human Resources and the Safety Department within 24 hours of the incident.

Employees injured on the job, or involved in a vehicle accident, will be subject to a substance abuse screen. Those employees testing positive will be disciplined in accordance with the MJVD Substance Abuse policy.

Recordkeeping

A record of serious work-related injuries and illnesses shall be maintained by Human Resources according to MIOSHA Part 11. Recording and Reporting of Occupational Injuries and Illnesses. This information can be utilized to help evaluate workplace safety, understand hazards, and help prevent or eliminate future workplace injuries and illnesses. Copies of these records will be provided to current and former employees, or their representatives, upon request.

Human Resources Forms

Forms maintained by Human Resources include:

- Supervisors report of injury

- Employees injury report
- Release for return to work
- Light duty status report
- All medical bills and reports

Other forms that may be submitted for incidents include the Incident Witness Statement and Incident Communication Form, both located on SharePoint, Safety.

MIOSHA Incident and Injury Forms

- OSHA Form 300 – Log of Work-Related Injuries and Illnesses
- OSHA Form 301 – Injury and Illness Incident Report
- OSHA Form 300a – Summary of Work-Related Injuries and Illnesses

These records shall be maintained for at least five (5) years. 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.

Recordable Incidents

Recordable injuries or illnesses are those that results in any of the following:

- Work-related fatality
- Work-related injury or illness that results in loss of consciousness, days away from work, restricted work, or transfer to another job
- Work-related injury or illness requiring medical treatment beyond first aid
    - Medical treatment means the management and care to combat disease or disorder
    - Medical treatment does NOT include visits to a physician or licensed health care professional for observation or counseling, diagnostic procedures (x-rays and blood tests), or first aid.
- Work-related diagnosed case of cancer, chronic irreversible diseases, fractured or cracked bones or teeth, and punctured eardrums
- There are also special recording criteria for work-related cases involving: needlesticks and sharps injuries; medical removal; hearing loss; and tuberculosis.

If an injury occurs in a state outside of Michigan, the incident will be recorded on the same form(s) as they would if it occurred in Michigan.

Reportable Incidents

Reportable incidents consist of fatalities, in-patient hospitalizations, amputations, and loss of an eye. These need to be reported to Federal or State OSHA in a specific timeframe.

If a reportable incident occurs in Michigan, it must be reported to MIOSHA. If the incident occurs in a State outside of Michigan, it will need to be recorded as described above, but it must be reported to the State in which the incident occurred. Federal OSHA can assist in contacting the State. A copy of the report must be maintained as documentation in the employee file to show that the incident was reported as required. This can be provided to Michigan OSHA if the incident is investigated.

Commented [MM1]: Obtained this information from MIOSHA CET Construction on 12-23-2020 - MMM

Fatality:

Report within 8 hours to Michigan OSHA at 1-800-858-0397 or Federal OSHA at 1-800-321-6742.

In-patient Hospitalization:

Report within 24 hours to Michigan OSHA at 1-844-464-6742 or Federal OSHA at 1-800-321-6742. OSHA defines in-patient hospitalization as formal admission to the in-patient service of a hospital or clinic for care or treatment. Treatment in an Emergency Room only is not reportable.

Amputation:

Report within 24 hours to Michigan OSHA at 1-844-464-6742 or Federal OSHA at 1-800-321-6742. OSHA defines amputation as the traumatic loss of all or part of a limb or other external body part. This would include fingertip amputations with or without bone loss; If and when there is a health care professional's diagnosis available, MJVD should rely on that diagnosis.

Loss of an Eye:

Report within 24 hours to Michigan OSHA at 1-844-464-6742 or Federal OSHA at 1-800-321-6742.

MJVD Statement of Management Endorsement of an Incident Investigation Program

One of the challenges we face is to continue our efforts to improve employee health and safety performance. In order to prevent injuries from occurring we need to eliminate the underlying conditions that create the potential for them to occur.

If we are going to be successful in accomplishing this, it is critical that we determine the causes of incidents. We must go beyond addressing the symptoms to address the underlying root causes of these incidents. Unless we are certain that the root causes are identified and actions are taken to eliminate them, we cannot ensure that the incidents will not occur again.

We have begun taking steps to improve the process we use for investigating incidents. This process is used not only for incidents involving injury, but also for near misses. Near misses are incidents in which there are no significant losses or injury, but there is a potential for serious losses and/or injury.

It is important for everyone to understand that the intent of this process is not to find fault or place blame. It is, by design, a process for identifying failures or weaknesses associated with a safety and health management system. Once the root causes are identified, we will develop recommendations to eliminate the root causes and set individuals up to succeed in future operations. Punishment of employees involved in investigations will NOT occur unless they are involved in illegal activities such as use of drugs, stealing, or sabotage.

We have already started performing incident investigation using the personnel we have recently trained. This requires that those individuals be released from their normal duties to collect information, conduct interviews, analyze the incidents, determine the root causes, and develop recommendations.

As a result, other people will need to fill in for those conducting the investigations or, in some cases, work may get delayed. Preventing someone else from getting hurt far outweighs the temporary inconvenience resulting from the person's participation in the investigation process.

We, as members of the MJVD management team, support this investigation process and ask that employees support the efforts of their co-workers when they are asked to participate.

Signed, The Management Team

MJ VanDamme, Inc.

Hazard/Near Miss/Incident Initial Report

FORM

Tracking Number		Revised: 1/1/21

DATE OF OCCURENCE	Month		Day		Year		Time	
Work Area Location Description				Incident Reported By Company Represented Date Reported				
Person(s) Involved in Incident or Injured Person				List Additional Involved/Witnesses:				
Name								
Company								
Occupation								
Gender	☐ Male ☐ Female			☐ Male ☐ Female			☐ 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 ☐ 1-4 Months ☐ 4 Mths-1 Yr ☐ >1 Year	

DESCRIPTION	Please provide a summary of the near miss/hit or incident:
Personal Injury	☐ Fatality ☐ Recordable/Lost Time-Restricted Duty ☐ Recordable/Medical Treatment ☐ First Aid ☐ Report Only ☐ Near Miss ☐ Hazard Recognition
Mobile Equipment	☐ Property Damage – Significant or w/ Injury ☐ Property Damage – Low or No Injury ☐ Mechanical Failure – Significant or w/ Injury ☐ Mechanical Failure – Low or No Injury ☐ Speed Alert–Traffic w/ Ticket ☐ Hazard Recognition–Traffic w/o Ticket ☐ Near Miss
Environmental	☐ Spill – Large Quantity (>5 Gals/5 Yards) ☐ Spill – Small Quantity (<5 Gals/5 Yards) ☐ Environmental – Exposure ☐ Environmental – Contamination ☐ Wildlife
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:	

Report Acknowledgement

Employee Signature: _____

Supervisor/Project Manager Signature: _____

Safety Signature: _____

MJ VanDamme, Inc.

Hazard/Near Miss/Incident Initial Report

FORM

Tracking Number		Revised: 1/1/21

Investigation Completed by: (names of those who performed)		
List the root causes of the incident - contributing factors that caused the hazard/incident:		
Corrective Action:	Person Responsible:	Completion Date:

MJ VanDamme, Inc.

Hazard/Near Miss/Incident Initial Report

FORM

Tracking Number		Revised: 1/1/21

Incident Investigation Complete Correction Actions Complete Communications Complete Area Manager Signature for Closure	Project Manager:	Date:
	Operations Manager:	Date:
	Safety Manager:	Date:

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.

	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

Thank you for helping us analyze this incident so that we can prevent someone from getting injured in the future. Accuracy is very important in helping us get to the root cause of this incident.

Incident Date: _____ (Month/Day/Year)	Time of Incident: (circle) a.m. p.m.	Injured Employee Name (print):
Witness Name:	Witness Job Title:	Statement Date: _____ (Month/Day/Year)
Project:	Project Work Location:	Supervisor:
Location of Incident:		

Please be very descriptive in what you witnessed.

What events occurred immediately before the incident?
Describe in detail how the incident occurred from start to finish:
What were you doing just before, during, and after the incident?
What was the condition of the tools, equipment, machinery, and/or other materials involved in the incident?
Were any injuries sustained in this incident (if yes, please describe and include location of injuries):
Recommendations on how to prevent this incident from reoccurring:

Witness Signature: _____ Phone Number: _____

Return this form to your Supervisor

Incident Communication Form

Communication is the key for injury prevention.
Use this form to document any past, present, and/or future communication regarding the incident.

Incident Date: _____ (Month/Day/Year)	Injured Employee Name (print):
Incident Description:	
Project:	Project Work Location:
Your Name:	Date:

Communication

Communication

Communication

Return this form to your Supervisor

JOB HAZARD ASSESSMENT (JHA)
ACTIVITY:

M.J. VanDamme Trucking, Inc.

DATE PREPARED:

PREPARED BY:

PERSONAL PROTECTIVE EQUIPMENT REQUIRED (circle):

☐ **Other (describe)**

QUALIFICATIONS, EXPERIENCE, OR TRAINING REQUIRED:

Qualifications:

Experience:

Training:

Review:

BASIC JOB STEPS	HAZARDS	SAFE JOB PROCEDURE
Break work down to basic elements (such as remove, lift, carry, stop, start, apply, return, squeeze, weld, saw, walk, hold, grind, place, etc.). Describe what is done, not how it is done.	**For each job step, state what accident could occur and/or what hazard is present. To determine this, ask yourself, "Can the person fall; overexert; be exposed to burns, fumes, rays, gas, etc.; hit against; be struck by; in contact with; be caught in, on, or between?"**	**State how each element of work should be performed to prevent the accident, or to avoid the hazard. What should the person do or not do? Be specific. What precautions should be taken? Ask yourself, "What can I do to eliminate, modify, guard, identify, or protect against the potential hazard or accident, including such things as how the worker stands, holds, uses, carries, dresses, etc.?"**
I.	**I.**	**I.**
II.	**II.**	**II.**
III.	**III.**	**III.**

Bloodborne Pathogens

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
01/24/2024	MMM	MMM

Contents

Policy

In compliance with the Occupational Safety and Health Administration (OSHA) and as a dimension of M.J. VanDamme Trucking, Inc. "MJVD" Safety and Health Management System, employees must comprehend the danger and risks associated with bloodborne pathogens. Understanding the procedures and actions that one must follow will reduce the risk of infection as well as death.

Definitions

Bloodborne pathogen	Any pathogenic organism in human blood that can cause disease in humans.
Hepatitis B Virus - HBV	A virus that infects the liver. It is acquired by the exchange of infected blood and saliva.
Human Immunodeficiency Virus - 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.

Exposure Determinations

Under the OSHA 1910.1030 Bloodborne Pathogens standard and MIOSHA Part 554. Bloodborne Infectious Diseases standard, an exposure means anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties. "Exposure" does not include incidental exposures that may take place on the job, that are neither reasonably nor routinely expected, and that the worker is not required to incur in the normal course of employment. Good Samaritan acts such as an employee assisting a fellow employee or other individual with an injury (e.g., nosebleed) are not covered. Employees who receive first aid training but are not required to provide first aid as part of their job tasks are not covered.

MJVD has determined there is no actual or reasonably anticipated employee exposure to blood or other potentially infectious materials based on routine and anticipated tasks. Each field supervisor shall identify additional job classifications relative to their specific organizational structure and operations. Exposure determination will be made without regard to the use of personal protective equipment.

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

- NONE

Methods of Compliance

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

Universal Precautions

The concept of universal precautions requires MJVD employees to assume all human blood and specified human body fluids are potentially infectious for HIV, HBV and other bloodborne pathogens. Consequently, employees should avoid any unnecessary exposure to blood or other specified bodily fluids at all times.

Engineering and Work Practice Controls

Engineering controls reduce or eliminate employee's exposures by either removing or isolating the hazard or worker from exposure. The following engineering and work practice controls shall be implemented and enforced:

1. Employees with lesions, dermatitis or other compromising conditions shall take extra precautions to avoid direct contact with blood or other infectious materials.
2. Eating, drinking, smoking, or handling contact lenses are prohibited in areas where there is a reasonable likelihood of occupational exposure.
3. Employees shall wash their hands and skin with soap and water immediately, or as soon as possible, following contact with blood or other potentially infectious materials.
4. Where hand washing facilities are not available, antiseptic hand cleaners or towelettes along with a clean cloth or paper towel should be available.
5. Employees should proceed to wash hands or skin with soap and water once available.
6. Employees shall flush mucous membranes (eyes, nose, mouth) with water immediately, or as soon as possible, following contact with blood or other potentially infectious materials.
7. All first aid or other procedures involving blood or other potentially infectious materials shall be

performed in a manner that minimizes splashing or splattering of these substances.
8. Contaminated needles or other contaminated sharps shall not be bent, recapped, or removed.
9. All contaminated sharps shall be placed in specified containers.
10. All broken glass shall be deposited in a specified puncture resistant container to avoid accidents (cuts) during storage and disposal.
11. Mechanical means (i.e., broom and dustpan) should be used to clean up all broken glassware.
12. Equipment or surfaces which have been contaminated with blood or other potentially infectious materials should be decontaminated as soon as possible.

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

Personal Protective Equipment

Personal protective equipment shall be used if occupational exposure remains after implementation of engineering and work practice controls, or if these controls are not feasible. If PPE is required, it shall be provided at no cost to the employee in appropriate sizes and be readily available.

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.

The following PPE and practices shall be implemented:

1. The employee will wear gloves 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/or punctured.
3. Disposable gloves will not be washed or decontaminated for re-use.
4. Utility gloves may be decontaminated for re-use if the integrity of the gloves is not compromised (torn, cracked, or deteriorated).
5. Hands should be washed with soap and water upon removal of gloves.
6. Masks or protective eyewear (prescription glasses require side shields) shall be worn when performing procedures that are likely to spray or splash blood or other potentially infectious materials.
7. Employees shall wear protective body clothing (gown, overalls) when performing procedures likely to generate splashes of blood or bodily fluids.
8. All employees with occupational exposure 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 if it is determined that its use would have prevented delivery of health care, or it would have posed a greater safety hazard to the employee.

Housekeeping Practices

The project supervisor/manager is responsible for maintaining a clean and sanitary environment. Types of cleaning and cleaning schedules vary relative to location, site activities, and types of surfaces. The following are general housekeeping practices to be implemented when applicable.

1. All equipment and working surfaces shall be cleaned and decontaminated after contact with blood or other potentially infectious materials as soon as possible.
2. The Safety Director can provide special cleaning procedures. Sodium hypochlorite (household bleach) solution in water (1:10 dilution) can also be used on most surfaces, excluding metal and cloth.
3. Reusable items that become contaminated during the cleaning process shall be properly decontaminated before putting them back into service.
4. Protective coverings that become contaminated shall be properly disposed of and replaced with new protective coverings.
5. Any receptacles intended for re-use will be decontaminated on a regular basis or if visibly contaminated.
6. Broken glassware shall be cleaned using mechanical means (i.e., brush and dustpan).
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.

Hepatitis B Vaccination

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

MJVD does not have any employees who fall into this job description. If it is determined that an employee is required to do this for a specific task, the vaccine shall be offered within ten working days of initial assignment at no cost to the employee.

The following procedures will be implemented:

- 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.
- 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.
- The health care professional will be provided with a copy of the Blood borne Pathogens standard.

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.

Each employee receiving the vaccination shall be informed on the following:

- Efficacy of the vaccine
- Safety of the vaccine
- Method of administration
- Benefits associated with the vaccine
- Acknowledgment of free vaccine and vaccination

An employee who initially declined the hepatitis B vaccination will be allowed to receive the vaccination at a later time.

- All employees who decline the hepatitis B vaccination made available will be required to sign the Employee Hepatitis B Vaccine Declination form.
- MJVD 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).
- The vaccination should be made available as soon as possible, but in no event later than 24 hours.

Regulated Waste Management

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

Containment

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.

1. A secondary container will be used if outside contamination of the primary container occurs.
2. If waste items can puncture the primary container, the primary container will be placed within a secondary container, which is puncture resistant.
3. Contaminated sharps and needles will be immediately discarded in a closeable, puncture-resistant, leak-proof container.
4. The sharps container shall be readily accessible to personnel and located as close as possible to the area of use preferably located centrally.
5. The sharps containers shall be maintained upright, replaced routinely, and not be overfilled at any time.
6. The containers will be closed prior to removal to avoid any spillage.
7. Reusable containers shall not be emptied or cleaned manually to avoid any stick exposures to the skin
8. When applicable, all regulated (contaminated) waste shall be stored in a secure area.

OSHA does not consider typical Band-aids or feminine hygiene products to be regulated waste, unless saturated. These materials can be thrown away in non-regulated containers. 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.

Labeling

1. Containers of regulated waste will be labeled with the Biohazard symbol and the wording "biohazard".
2. The biohazard label will be fluorescent orange or orange red in color with the lettering in contrasting colors.
3. The labels will be affixed so it cannot be removed accidentally.
4. Red bags or red containers may be substituted for the Biohazard label.
5. If Universal Precautions are utilized, the labeling/color-coded system is not necessary, provided the containers are recognizable and treated as containing regulated waste.
6. All regulated waste leaving the facility must be properly labeled or color-coded.

Disposal

1. Disposal of regulated waste shall be done at a state approved landfill or medical incinerator.
2. Disposal of regulated waste at a sanitary landfill is not permissible unless the waste is first deemed noninfectious.
3. Employees should not mix regulated (hazardous) waste with other waste.
4. All regulated waste shall be transported per state specific requirements.
5. All shipments shall be manifested accordingly.

Exposure Evaluation and Follow-Up

The project supervisor/manager will immediately provide a post-exposure evaluation and follow-up for employees who have had occupational exposure to blood or other potentially infectious materials. The following protocol will be followed by the supervisor providing post-exposure evaluations and follow-up:

1. All employees shall immediately report 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. The circumstances under which the exposure occurred (or potential exposure in cases where first aid was provided) shall be documented, including routes of exposure, the HBV or HIV status of the source patient(s), if known, and the employee's hepatitis B vaccine status.
4. Confidential medical evaluation and follow-up of the incident with a licensed health care professional shall be made available.
    a. 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.
5. 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.
6. The source patients of the incident shall be notified, and attempts shall be made to obtain written consent to collect and analyze the source's blood to determine the presence of HBV and/or HIV infections.

a. If the source individual is known to be infected with HBV or HIV, testing of the source individual is not required.
b. Results of the source individual testing will be made available to the exposed employee.
c. All applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual will be implemented.
d. The exposed worker's blood will be collected as soon as feasible and upon written consent being obtained, tested for determination of HBV and/or HIV status.
e. In addition, MJVD 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.

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.

The health care professional will submit a written opinion to MJVD 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. A copy of the health care professional's written opinion shall be provided within 15 days of the completed evaluation.

Training

Training will be provided to all identified employees with potential occupational exposure to blood or other potentially infectious materials per regulatory standards. This training will be conducted during normal work hours by a trainer knowledgeable on the subject matter.

Training shall be provided before an initial assignment to a task involving a potential occupational exposure, and annually thereafter (within 1 year of previous training). Additional training shall be provided by the company when any new tasks or modifications of procedures affect the employee's occupational exposure.

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.

Training Recordkeeping

Training records shall be maintained at each respective employee's facility and a copy sent to Human Resources for retention (for a minimum of 3 years). Training records shall include the following:

- Date of the training session(s)
- Summary of the training topics discussed
- Name and qualifications of trainer
- Names and titles of all employees who attended the training session

Exposure Control Plan

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

The listing of employees included in Category A is as follows:

- None at this time

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

Medical Records

1. 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.
2. 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.
3. Exposure records are required to be maintained for 30 years.
4. Medical records are to be made available to employees at their request and other as outlined in OSHA 1910.1020 Access to employee exposure and medical records. Compliance shall be maintained regarding transfer of exposure records should the need arise.
5. The medical records relative to the bloodborne pathogen's standard shall include the following:
    a. Employee name and social security number.
    b. Hepatitis B and vaccination status and dates.
    c. Results from evaluations and follow-up procedures.
    d. A copy of the health care professional's written opinion.
    e. Copy of the information provided to the health care professional by the Home office.

Confined Space

Permit-Required Confined Space

Policy

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6-21-24	MMM	MMM

CONTENTS

PURPOSE

This procedure identifies specific safety standards and policies for M.J. VanDamme Trucking, Inc. "MJVD" employees that govern the determination of confined space versus permit-required confined space on a project site, safe entry into permit-required confined spaces at project sites, training required, and personal protective equipment mandated. This procedure complies with the following regulatory agency standards:

- OHSA 1926 Subpart AA - Confined Spaces in Construction
- Michigan OSHA construction standards
  - Part 1. General Rules
  - Part 7. Welding and Cutting
  - Part 9. Excavation, Trenching, and Shoring
  - Part 14. Tunnels, Shafts, Caissons, and Cofferdams
  - Part 35. Confined Space in Construction

DEFINITIONS

Acceptable entry conditions	Conditions that must exist in a permit space, before an employee may enter that space, to ensure that employees can safely enter into, and safely work within, the space.
Attendant	An individual stationed outside one or more permit spaces who assesses the status of authorized entrants and who must perform attendant duties.
Authorized entrant	An employee who is authorized by the entry supervisor to enter a permit space.
Barrier	A physical obstruction that blocks or limits access.
Blanking or blinding	The absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.
Competent person	One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has the authorization to take prompt corrective measures to eliminate them.
Confined space	A space that: (1) Is large enough and so configured that an employee can bodily enter it; (2) Has limited or restricted means for entry and exit; and (3) Is not designed for continuous employee occupancy.
Early-warning system	The method used to alert authorized entrants and attendants that an engulfment hazard may be developing. Examples of early-warning systems include, but are not limited to: Alarms activated by remote sensors; and lookouts with equipment for immediately communicating with the authorized entrants and attendants.
Engulfment	The surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, crushing, or suffocation.
Entry	The action by which any part of a person passes through an opening into a permit-required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane

	of an opening into the space, whether or not such action is intentional, or any work activities are actually performed in the space.
Entry permit	The written or printed document designating the space a permit space to allow and control entry into a permit space.
Entry supervisor	The qualified person responsible for determining if acceptable entry conditions are present at a permit space, for authorizing entry and overseeing entry operations, and for terminating entry as required by this standard.
Hazardous atmosphere	An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness from one or more of the following causes: (1) Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL) (2) Airborne combustible dust at a concentration that meets or exceeds its LFL (3) Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent (4) Atmospheric concentration which could result in employee exposure in excess of its dose or permissible exposure limit (5) Any other atmospheric condition that is immediately dangerous to life or health
Immediately dangerous to life or health (IDLH)	Any condition that would interfere with an individual's ability to escape unaided from a permit space and that poses a threat to life or that would cause irreversible adverse health effects.
Isolate or isolation	The process by which employees in a confined space are completely protected against the release of energy and material into the space, and contact with a physical hazard, by such means as: Blanking or blinding; misaligning or removing sections of lines, pipes, or ducts; a double block and bleed system; lockout or tagout of all sources of energy; blocking or disconnecting all mechanical linkages; or placement of barriers to eliminate the potential for employee contact with a physical hazard.
Lower flammable limit	The minimum concentration of a substance in air needed for an ignition source to cause a flame or explosion.
Non-permit confined space	A confined space that meets the definition of a confined space but does not meet the requirements for a permit-required confined space.
Oxygen deficient atmosphere	An atmosphere containing less than 19.5 percent oxygen by volume.
Oxygen enriched atmosphere	An atmosphere containing more than 23.5 percent oxygen by volume.
Permit-required confined space (permit space)	A confined space that has one or more of the following characteristics: (1) Contains or has a potential to contain a hazardous atmosphere (2) Contains a material that has the potential for engulfing an entrant (3) Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section (4) Contains any other recognized serious safety or health hazard
Qualified person	One who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.
Retrieval system	The equipment (including a retrieval line, chest or full body harness, wristlets or anklets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.

CONFINED SPACE EXAMPLES

TABLE 1: LOCATIONS WHERE CONFINED SPACES MAY OCCUR			
Bins	Concrete pier columns	Enclosed beams	Silos
Boilers	Sewers	Drilled shafts	Air receivers
Pits, such as elevator, escalator, pump, valve or other equipment	Heating, ventilation, and air-conditioning (HVAC) ducts	Precast concrete and other pre-formed manhole units	Turbines Chillers
Manholes, such as sewer, storm drain, electrical, communication, or other utility	Tanks, such as fuel, chemical, water, or other liquid, solid or gas	Step up transformers	Mixers, such as reactors
Storm drains	Water mains	Vessels	Sludge gates
Incinerators	Transformer vaults	Digesters	Air preheaters
Scrubbers	Lift Stations	Cesspools	Bag houses
Air Handling Units	Excavations		

GENERAL INFORMATION

Confined Space - Characteristics

1. Has limited means of access or egress.
2. Has adequate size and configuration for entry.
3. Is not Intended for continuous occupancy.

Permit-Required Confined Space – Characteristics

1. Hazardous atmosphere.
2. Engulfment or suffocation hazard.
3. Entrapment or asphyxiation hazard through converging walls or a sloped floor.
4. Other serious hazard that can interfere with the ability to exit the space without assistance.

Confined Space MJVD Requirements

1. A non-permit required confined space is not subject to any of the requirements of OSHA *Permit-Required Confined Spaces* (29 CFR 1910.146).
2. Notify employees they are working in a confined space.
3. A competent person shall reevaluate the space if there is a change that could increase the hazards or potential hazards to entrants.
4. Confined spaces that do not contain known hazards have reduced requirements for entry. Spaces classified as Non-Permit do not involve hazards considered serious. Non-Permit spaces do not require a written permit or attendant for entry. Non-Permit spaces do not require any special testing or training.

Permit Required Confined Space MJVD Requirements

1. General Requirements (1926-1203)
2. Permit-required confined space program (1926.1204)
3. Permitting process (1926.1205)

4. Entry permit (1926.1206)
5. Training (1926.1207)
6. Duties of authorized entrants, attendants, and entry supervisors (1926.1208-1210)
7. Rescue and emergency services (1926.1211)

GENERAL REQUIREMENTS

1. Competent person identifies all confined spaces and permit-required confined spaces. For confined space, all employees shall be informed of working in a confined space and the competent person shall reevaluate the confined space if conditions change.
2. Permit-required confined spaces shall be evaluated prior to project acceptance.
3. Permit-required confined spaces must:
    a. Inform exposed employees by posting danger signs and a sign reading:

    b. Train employees of the existence and location of, and the danger posed by, each permit space.
4. Prevent unauthorized employees from entering a permit space.
5. Training shall be provided to all MJVD employees whose job relates to confined spaces and permit-required confined spaces prior to working on the project.
6. A copy of this program shall be at each project site where there is a confined space and must be available prior to and during entry operations for employees and authorized representatives.
7. Alternate procedures may be used if monitoring and inspection data are utilized to determine:
    a. All physical hazards in the space are eliminated or isolated through engineering controls.
    b. Continuous forced air ventilation alone is sufficient to maintain that permit space safe for entry.
    c. Reclassification of a permit space after all hazards within the space have been eliminated.
8. Prior to entry of a permit space, the locations of each know permit space, the hazards or potential hazards, and any precautions must be communicated.

PERMIT-REQUIRED CONFINED SPACE

MJVD management shall determine if an employee is authorized to enter a permit space as described in this program and prevent unauthorized entry. All potential hazards of the permit-required confined space shall be identified and evaluated before employees enter them. Some examples of potential hazards include:

Potential Hazards

- Toxicity
- Flammability

- Asphyxiating gases or vapors
- Oxygen deficiency or enrichment
- Engulfment hazards
- Entrapment hazards
- Electrical hazards
- Explosive hazards
- Mechanical hazards
- Noise hazards
- Chemical hazards
- Physical hazards (e.g., slippery surfaces, sharp edges, or low ceilings)

Techniques used to render the permit-required confined space safe for entry shall be determined during pre-entry planning. These techniques include some of the following:

- Analysis of ventilation requirements
- Lockout of energy sources
- Isolation of piping
- Installation of illumination
- Performance of air testing.

Safe permit space entry operations

1. Acceptable entry conditions shall be specified in the project-specific Accident Prevention Plan.
2. Each authorized entrant can observe any monitoring or testing of the permit space.
3. The permit space and physical hazard(s) within the space shall be isolated.
4. Purging, inerting, flushing, or ventilating the permit space may be performed as necessary to eliminate or control atmospheric hazards.
5. Monitoring procedures will be implemented to detect an increase in atmospheric hazard levels in sufficient time for the entrants to safely exit the permit space in the event the ventilation system stops working.
6. Pedestrian, vehicle, or other barriers shall be utilized as necessary to protect entrants from external hazards.
7. Acceptable entry shall be verified throughout the duration of employee entry. Employees will not be allowed to enter into, or remain in, a permit space with a hazardous atmosphere unless it is determined personal protective equipment (PPE) will provide effective protection.
8. At least one attendant shall be positioned outside the permit space for the duration of the entry operations.

Equipment

Equipment needs shall also be projected during pre-entry planning. All equipment required for the entry must be obtained in advance. MJVD shall provide the following equipment at no cost to each employee, maintain that equipment properly, and ensure that each employee uses the equipment properly. All equipment being used during the entry must be inspected prior to the entry to ensure proper performance. Types of equipment include:

1. Testing and monitoring equipment.
2. Ventilating equipment needed to obtain acceptable entry conditions.

3. Communications equipment.
4. Personal protective equipment if engineering and work-practice controls do not adequately protect employees. If respirators are required, employees shall follow the MJVD Respiratory Protection Program.
5. Lighting equipment that meets the minimum illumination requirements in § 1926.56, that is approved for the ignitable or combustible properties of the specific gas, vapor, dust, or fiber that will be present, and that is sufficient to enable employees to see well enough to work safely and to exit the space quickly in an emergency.
6. Barriers and shields as required.
7. Equipment, such as ladders, needed for safe ingress and egress by authorized entrants.
8. Rescue and emergency equipment unless it is provided by rescue services.
9. Any other equipment necessary for safe entry into, safe exit from, and rescue from, permit spaces.

Permit Space Conditions

All persons participating in permit-required confined space entry must be involved in the preparation of the confined space entry permit. A pre-entry meeting must be held between all members of the entry team. 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. Topics to discuss during the pre-entry meeting include:

- How the entry will take place
- What exactly will be done in the permit-required confined space
- What hazards, if any, will be created as a result of the work performed
- PPE required
- How entrant(s) will exit the space
- What activities personnel will be responsible for should an emergency arise.

MJVD shall evaluate permit space conditions when entry operations are conducted by performing the following procedures:

1. Test conditions in the permit space to determine if acceptable entry conditions exist and provide the results to authorized entrants upon request.
    a. Perform pre-entry testing to the extent feasible before entry is authorized.
    b. If entry is authorized, continuously monitor entry conditions in the areas where authorized entrants are working.
    c. Provide an early-warning system that continuously monitors for non-isolated engulfment hazards, which must alert authorized entrants and attendants in sufficient time for the authorized entrants to safely exit the space.
2. Continuously or periodic monitoring shall be used to monitor atmospheric hazards.
3. When testing for atmospheric hazards, test in this order:
    a. Oxygen
    b. Combustible gases and vapors
    c. Toxic gases and vapors.

Entry into a permit-required confined space is based on the following levels for oxygen and for air contaminants:

Entry into a confined space will be absolutely prohibited when:

- Flammable concentration is 10% of the lower explosive level (LEL) or greater.
- Oxygen content is less than 19.5% or greater than 23.5%.
- Carbon Monoxide concentration is above 35 ppm.
- Hydrogen Sulfide concentration is above 10 ppm.
- Atmosphere is determined to be immediately dangerous to life and health.
- The entrants have a potential exposure at or above the OSHA Permissible Exposure Levels (PEL) or the ACGIH Threshold Limit Value (TLV).

PERMITTING PROCESS

Before permit-required confined space entry is authorized, the following documentation shall be obtained:

- MJVD Permit Required Confined Space Entry Permit (signed by the entry supervisor to authorize entry)
- MJVD Permit Required Compliance Checklist

The permit shall be available at the time of entry to all authorized entrants or their authorized representatives, by posting it at the entry portal or by any other equally effective means, so that the entrants can confirm that pre-entry preparations have been completed. The duration of the permit may not exceed the time required to complete the assigned task or job identified on the permit.

The entry supervisor must terminate entry and take the following action when any of the following apply:

1. Cancel the entry permit when the entry operations have been completed.
2. Suspend or cancel the entry permit and fully reassess the space before allowing reentry when a condition that is not allowed under the entry permit arises in or near the permit space and that condition is temporary in nature and does not change the configuration of the space or create any new hazards within it.
3. Cancel the entry permit when a condition that is not allowed under the entry permit arises in or near the permit space.

Entry permits and any canceled entry permits shall be retained for at least 1 year. Any problems encountered during an entry operation must be noted on the pertinent permit so that appropriate revisions to the permit space program can be made.

MJVD PERMIT REQUIRED CONFINED SPACE ENTRY PERMIT

The MJVD entry permit for permit required confined space entry shall be utilized to identify the following information. The permit can be found on SharePoint, Safety.

1. Location of the permit space to be entered.
2. The purpose of the entry.
3. The date and the authorized duration of the entry permit.

4. The names of authorized entrants within the permit space.
5. Means of detecting an increase in atmospheric hazard levels if the ventilation system fails.
6. Attendant names.
7. Entry Supervisor name(s) and signature(s).
8. The hazards of the permit space to be entered.
9. The measures used to isolate the permit space and to eliminate or control permit space hazards before entry, such as the lockout or tagging of equipment and procedures for purging, inerting, ventilating, and flushing permit spaces.
10. The acceptable entry conditions.
11. The results of tests and monitoring performed, accompanied by the names or initials of the testers and by an indication of when the tests were performed.
12. The rescue and emergency services that can be summoned and the means (such as the equipment to use and the numbers to call) for summoning those services.
13. The communication procedures used by authorized entrants and attendants to maintain contact during the entry.
14. Equipment, such as personal protective equipment, testing equipment, communications equipment, alarm systems, and rescue equipment, to be provided for compliance with this standard.
15. Any other information necessary, given the circumstances of the particular confined space, to ensure employee safety.
16. Any additional permits, such as for hot work, that have been issued to authorize work in the permit space.

TRAINING

MJVD shall provide training to each employee whose job tasks involve working at a confined space or permit-required confined space. All employees shall possess the understanding, knowledge, and skills necessary for the safe performance of the duties assigned. Training shall include:

- Understanding hazards associated in a permit space.
- Methods used to isolate, control, or protect themselves and other employees from these hazards.
- Only authorized employees can enter a permit-required confined space.
- Only authorized employees who receive additional rescue training can attempt entry rescues.
- The dangers of attempting entry rescues.
- Review of this Confined Space Program.

Training shall be provided to each affected employee:

- Before the employee is first assigned duties on a project
- Before there is a change in assigned duties
- Whenever there is a change in permit space entry operations that presents a hazard the employee has not previously been trained
- Whenever there is any evidence of a deviation from the permit space entry procedures
- If MJVD management feels that there are inadequacies in the employee's knowledge or use of these procedures.

Training Requirements

The following training requirements pertain to affected MJVD employees for permit-required confined spaces:

1. All affected personnel shall be trained on the MJVD Permit-Required Confined Space Entry Policy and applicable federal or state regulatory standards.
2. Entry supervisors must be trained on the roles and responsibilities of all employees involved in confined space entries.
3. Entry supervisors must be trained in hazard identification techniques and the means to control and/or eliminate hazards when they are identified.
4. 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.
5. 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.
6. 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.
7. All personnel involved in confined space entry will have been trained to perform the tasks that are required. At a minimum, this training will include:
    - Discussion on the hazards that may be encountered
    - How to control the hazards
    - Air monitoring procedures
    - Ventilation requirements
    - Emergency rescue procedures to be implemented if necessary
    - Lockout/tagout procedures
    - Fall protection

Training Records

MJVD shall maintain training records to show that required employee training has been accomplished.

Training records shall contain the following:

- Type of training performed
- Employee's name, printed legibly
- Employee's signature
- Name of the trainer(s)
- Dates of training.

Training documentation shall be available upon request by employees, their authorized representatives, and regulatory personnel for the period of time the employee is employed by MJVD.

RESPONSIBILITIES

Safety Director

- Ensures that all elements of this procedure are being implemented and followed.
- The Safety Director will not oversee or coordinate confined space entries but will retain the ultimate responsibility to ensure compliance with all Federal, State, and Local Regulations and to comply with the MJVD Safety and Health Management System.

- Evaluate all permit-required confined spaces prior to project acceptance.
- Evaluate confined spaces as they are discovered, constructed, or contracted to enter.
- Ensure proper labels and signage are posted at permit-required confined spaces.
- Train personnel involved in confined space entry to perform the tasks required.

Project Manager

- Assign and initiate confined space entries; however, the project manager may not be the supervisor in charge at the entry site.
- Coordinate all confined space activities with clients and any potential sub-contractor.

Duties of Authorized Entrant(s)

1. Know the hazards they may come in contact with during entry, including the mode, signs or symptoms, and consequences of exposure.
2. Use equipment as recommended by manufacturers and provided to perform work safely.
3. Communicate with the attendant as necessary to enable the attendant to:
    a. Assess entrant status.
    b. Enable the attendant to alert entrants of the need to evacuate the space as required.
4. Alert the attendant whenever warning signs, symptoms of exposure, or dangerous situations are evident, or a prohibited condition is detected.
5. Exit the permit space as quickly as possible whenever:
    a. An order to evacuate is given by the attendant or the entry supervisor.
    b. Warning signs, symptoms of exposure, or dangerous situations are evident.
    c. A prohibited condition is detected.
    d. An evacuation alarm is activated.

Duties of Attendant(s)

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 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.
5. Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space.
6. Assess activities and conditions inside and outside the space to determine if it is safe for entrants to remain in the space.
7. Orders authorized entrants to evacuate the permit space immediately under any of the following conditions:
    a. If there is a prohibited condition
    b. If the behavioral effects of hazard exposure are apparent in an authorized entrant
    c. If there is a situation outside the space that could endanger the authorized entrant
    d. If the attendant cannot effectively and safely perform all the duties required.
8. Summon rescue and emergency service as well as the entry supervisor s as soon as it is

determined by the attendant that authorized entrants may need assistance to escape from permit space hazards.

9. Warns an unauthorized person to stay away from a permit space, exit immediately if they have entered a permit space, and inform authorized entrants and entry supervisor if unauthorized persons have entered the permit space.
10. Performs non-entry rescues as determined prior to a confined space being entered.
11. Performs no duties that might interfere with the attendant's primary duty to assess and protect the authorized entrant.

Duties of the Entry Supervisor

1. Directly responsible for specific site entries. It is extremely important to ensure that procedures are correctly followed.
2. Discuss the confine space entry with the Project Manager or the property owner Site Supervisor.
3. 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.
4. 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.
5. 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.
6. Terminate the entry and cancel the permit as required.
7. Verify that rescue services are available and that the means for summoning them are operable.
8. Secure the confined space entry location and post the entry permit.
9. Remove unauthorized individuals who enter or who attempt to enter the permit space during entry operations.

RESCUE

1. At least one person trained in First Aid/CPR shall be immediately available during entry.
2. Effective means of communication between entrant(s) and attendant shall be available at all times during entry.
3. An approved safety harness and lifeline shall be used. The free end of the lifeline shall extend outside the space and be secured.
4. 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 of or call of the standby employee.
5. 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 Accident Prevention Plan.

Entry operations more than 5 feet vertical will require the use of mechanical retrieval devices and approved harnesses. Horizontal devices may also be used.

Rescue

For each permit-required confined space entry, procedures shall be implemented in the Accident Prevention Plan for rescue and emergency services. Non-entry rescue shall be performed. MJVD employees shall not enter a confined space to rescue entrants unless they have specific training certifying them to perform this type of rescue.

Confined Space Entry Permit

Entry Type: Full Permit Confined Space ☐ Alternate Entry Proc. ☐ Reclassified ☐ Explain: _____
Note: Permit is not required for entry if using alternate entry procedures or for reclassified spaces (See MIOSHA Part 35 for details).

1. Permit space to be entered (i.e. sewer, tank, manhole, crawlspace, attic):	Host, GC and Subs notified of the work? Yes ☐ NA☐
2. Purpose of entry:	Location:
3. Date of entry: Auth. duration of entry permit:	Entry supervisor print name/contact information:
4. Rescue type selected: Non-entry ☐ or Entry ☐ Equipment: Tri-pod/Davit arm ☐ or Emergency service ☐ Emer. Service Available (Permit Space only): Onsite ☐ or ☐ Off-site (name & phone): _____ Rescuer(s) trained in 1st Aid/CPR (Permit Space only): ☐ (Note: Part 1 1st Aid requirements	Project: Communication Equipment : Radio ☐ Voice ☐ Cell Phone ☐ Air Horn ☐ Other ☐

5. Authorized entrants (Print Names) Use back or attach page for more entrants	**Entry time**		**Entry time**		**Entry time**		**Entry time**	
	In	**Out**	**In**	**Out**	**In**	**Out**	**In**	**Out**

6. Attendant (Print Name)	**Date and Time**	**7. Current training for confined space workers verified?**
	AM ☐ PM ☐	Yes ☐ No ☐
	AM ☐ PM ☐	

8A. Identify, evaluate and record hazards of space to be entered.	**Yes**	**No**	**8B. Specify equipment and measures required to eliminate/control hazards before and during entry**
A. Lack of Oxygen or Inert Gas Present (i.e. Argon, Nitrogen)	☐	☐	Continuous forced air ventilation ☐ Blank, Block and Bleed ☐ Purge, Clean, Drain ☐ Intrinsicly Safe Lighting ☐ Respiratory Protection: Supplied Air with Escape Bottle ☐ SCBA ☐ Other (list) ☐
B. Flammable Gas/Vapor (%LEL)	☐	☐	
C. Toxic Gas/Vapor (i.e. CO and H_2S)	☐	☐	
D. Chemical (impairs self-rescue)	☐	☐	
E. Electrical	☐	☐	Lock out/Tagout ☐ Isolate/Guard ☐ Blank, Block and Bleed ☐ Other (list) ☐
F. Mechanical	☐	☐	
G. Hydraulic/Pneumatic	☐	☐	
H. Temp. Extreme	☐	☐	Continuous forced air ventilation ☐ Ice Vest ☐ Other (list) ☐
I. Engulfment	☐	☐	Drain ☐ Pump ☐ Other (list) ☐
J. Entrapment/Converging Walls	☐	☐	Install Work Platform ☐ Hole Covers ☐ Guard Rails ☐ Personal Fall Arrest /Restraint ☐ Other (list) ☐
K. Fall Hazard	☐	☐	
L. Introduced Hazards (i.e. Chemical, Hot Work)	☐	☐	Fire extinguisher ☐ Hot Work Permit ☐ Other (list) ☐
M. Other	☐	☐	Warning signs posted at access ☐ Additional PPE ☐

9. Gas tester(s)/monitor model(s)/type(s):	Serial/unit no(s):
	Bump test to confirm function? Yes ☐ Verified: On-site test ☐ Documentation ☐

Test Required	**Permissible levels**	**Initial test levels (before vent)**	**Subsequent test type**: Sample ☐ Continuous ☐ (take readings before **EACH** entry into space) **Test 2**	**Test 3**	**Test 4**	**Test 5**	**Test 6**
A. Oxygen (O2)	19.5 to 23.5%						
B. Combustible gas/vapor (LEL)	10% LEL						
C. Hydrogen sulfide (H2S)	5 PPM						
D. Carbon monoxide (CO)	< 25 PPM						
E. Other							
	Tester initials						
	Test Times						

10. Are entry conditions acceptable? (Remove debris and other obstructions from entry point) Yes ☐ No ☐

Entry Suspended (time): _____ AM ☐ PM ☐ **Time of reentry:** _____ AM ☐ PM ☐
Reason for suspending permit: _____
Permit Canceled date/time ___/___ AM ☐ PM ☐ **Unanticipated Hazards?** No ☐ Yes ☐ If yes, describe below:
Debriefing occurred after entry? Yes ☐ No ☐ _____

Confined Space Entry Permit

If permit was terminated due to abnormal or emergency conditions, document the conditions encountered and the steps taken to counteract.

5. Authorized entrants (continued from front) Print names	Entry time		Entry time		Entry time		Entry time	
	In	Out	In	Out	In	Out	In	Out

EntrySupervisor Signature: _____

References and Additional Information
1926.1202 DEFINITIONS
Confined space means a space that:

1. Is large enough and so configured that an employee can bodily enter it;
2. Has limited or restricted means for entry and exit; and
3. Is not designed for continuous employee occupancy

Permit-required confined space (permit space) means a confined space that has one or more of the following characteristics:

1. Contains or has a potential to contain a hazardous atmosphere;
2. Contains a material that has the potential for engulfing an entrant;
3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or
4. Contains any other recognized serious safety or health hazard

Hazardous atmosphere means an atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness from one or more of the following causes:

1. Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL);
2. Airborne combustible dust at a concentration that meets or exceeds its LFL; Note to paragraph (2) of the definition of “Hazardous atmosphere”. This concentration may be approximated as a condition in which the combustible dust obscures vision at a distance of 5 feet (1.52 meters) or less;
3. Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
4. Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in subpart D of this part (Occupational Health and Environmental Control), or in subpart Z of this part (Toxic and Hazardous Substances), and which could result in employee exposure in excess of its dose or permissible exposure limit. An atmospheric concentration of any substance that is not capable of causing death, incapacitation, impairment of ability to self-rescue, injury, or acute illness due to its health effects is not covered by this definition.
5. Any other atmospheric condition that is immediately dangerous to life or health. For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Safety Data Sheets that comply with the Hazard Communication Standard,§ 1926.59, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

Reference
MIOSHA Construction Safety Standards:
Part 1. General Rules
Part 7. Welding and Cutting
Part 9. Excavation, Trenching, and Shoring
Part 35. Confined Space in Construction

MIOSHA Health Standards:
Part 451. Respiratory Protection (29 CFR 1910.134)
Part 621. Health Hazard Control for Specific Equipment and Operations for Construction

DISCIPLINARY PROGRAM

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
01-25-2024	MMM	MMM

Contents

Purpose

M.J. VanDamme Trucking, Inc. "MJVD", takes every reasonable precaution to provide a work environment that is safe for employees. No job or task is more important than worker health and safety and every procedure must be a safe procedure. Work-related injuries and illnesses are costly to both employees and MJVD, so it is important to keep the workplace safe and healthy.

Responsibilities

Supervisors, Project Managers, Site Safe Officers

1. Ensure all employees on the job know the hazards at the job site.
2. Ensure employees have the proper training required to perform the job safely and understand MJVD policies and procedures as well as regulatory standards that apply to the job task.
3. Certify mitigation controls are in place to reduce potential hazards on the job.
4. Make sure safety equipment is maintained and operating properly.
5. Require Personal Protective Equipment (PPE) and protective clothing be worn while working.
6. Ensure an employee incident report and witness statements are filled out for any near miss, injury, or illness on the job.
7. Assess day-to-day employee behaviors that may create unnecessary risks.
8. Provide hazard assessment information to employees prior to starting a job task, including Toolbox talks, Job Hazard Analyses (JHAs), Pre-Task Hazard Assessments (PTHA), Field Level Hazard Assessments (FLHA), Standard Operating Procedures (SOPs), Workplace Exams, or other hazard assessment pertinent to a project.

Employees

1. Make sure you have the proper training prior to starting a job task.
2. Follow MJVD policies and procedures, OSHA regulations, and safety procedures and guidelines for the job site.
3. Inspect safety equipment prior to and following use.
4. Wear the required PPE and protective clothing at all times.
5. Report all near misses, injuries, and illnesses to a supervisor immediately.
6. Review all toolbox talks, JHAs, and SOPs prior to performing a job task.
7. Perform a workplace exam, PTHA, FLHA or some type of hazard assessment prior to starting a job task to assess potential hazards and understand how to mitigate these hazards.
8. It is ultimately up to you to work safely and keep your co-workers safe on the job.

Importance of Safety

Work injuries and illnesses can affect every aspect of life for employees and can cost MJVD money.

For Employees

Injuries and illnesses can cause:

- Loss of life
- Pain and suffering
- Loss of job or career

- Loss of income
- Relationship stress
- Low-self esteem
- Health care costs
- Mental health problems.

When a workplace is free from hazards and employees understand the importance of safety, employees may:

- Feel good about working for the company
- Feel more confident
- Increase production
- Earn competitive wages
- Have good relationships
- Enjoy a healthy life.

For MJVD

When an employee suffers from an injury or illness, it can mean financial disaster and reduce employee confidence.

- Production losses
- Wages lost for work not performed
- Increased workers' compensation insurance costs
- Damage to equipment, machinery, and/or property
- Hiring and/or training new employees
- Decline in product quality
- Decline in worker morale
- High turnover and lost work time.

Providing a workplace that is free from hazards, training employees on the importance of safety, and ensuring employee safety can:

- Lower injury/illness costs
- Reduce absenteeism and turnover
- Increase productivity and quality
- Raise employee morale
- Attract and retain quality employees
- Operate more efficiently
- Have more satisfied, productive workers
- Establish positive community relations.

Disciplinary Policy and Procedures

If an employee fails to follow MJVD policies and procedures and regulatory compliance, MJVD has the right to impose disciplinary actions to protect employees from injury or death, client's facilities from damage, and the company from liability.

The enforcement of Health and Safety policies and regulations:

- Protects the employee from injury or death.
- Reduce the loss and damage to equipment, machinery, and tools.
- Controls the cost associated with losses due to accidents and injuries.
- Protects the client's facilities and personnel while conducting operations on the client's facility.
- Protects the company and its management from prosecution and lawsuits from incidents, death, and illnesses to employees or other persons.

Safety Commitment

MJVD shall continually provide a healthy and safe workplace for all employees for their benefit as well as to the company's continual growth. This will be accomplished by:

- Employee training
- Project safety briefings
- Inspection and audits of projects and programs
- Retraining as required
- Disciplinary actions when required.

Disciplinary Procedures

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

1. Investigate the incident or near miss.
    a. Document the investigation in writing.
    a. Interview all participants and observers.
    b. Get signed statements from each participant and observers.
    c. Take pictures.
    d. In case of a death or major property damage, do not disturb the scene, as it contains important and sensitive evidence and may be considered a crime scene.
2. 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 possible, have another supervisor present to witness the discussion.
    c. Explain:
        - The violation.
        - Its effects and ramifications on employees and the company.
        - How to come into compliance or meet the health and safety standards.
3. Conduct any training review that may be required.
4. Inform the employee of any disciplinary actions that will be taken in conjunction with this violation.
5. Have employees sign the counseling / disciplinary form.
    a. If an employee refuses to sign the counseling / disciplinary form, have the supervisor that witnessed the counseling session counter sign with you.

Disciplinary Action

MJVD may take any of the following disciplinary actions depending on the severity or frequency of the violation.

1. Verbal Warning (in writing)
2. Retraining prior to return to work.
3. One day off (first violation)
4. Three days off (second violation)
5. Termination.

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

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 above.

Audits

Physical safety audits of projects and of the job site shall be conducted by MJVD management, Supervisors, Project Managers, Site-Safe Officers, or the Safety Department. These audits will evaluate overall compliance with Federal, State, and corporate safety and health regulations and standards.

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.

MPI – Disciplinary Form

PROJECT:_____ LOCATION: _____

PRINT NAME:_____ SIGNATURE:_____

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

ELECTRICAL SAFETY

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
2/2/2023	AJS	AJS
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Introduction

M.J. VanDamme Trucking, Inc. "MJVD" strives to provide a workplace free from recognized hazards that may cause or are likely to cause death or serious physical harm. Electricity poses many hazards, including shock, fires, and explosions. Electrical shock happens when current passes through the body to a ground and can cause electrocution, forceful muscle contractions, burns, and falls.

Purpose

This policy is intended to establish safety requirements for all MJVD employees who work near electrically energized equipment during normal activities. The following practices are intended to prevent work-related injuries from the electrical hazards present on job sites. Separate lockout/tagout policies are in place to cover the service and repair of electrical equipment.

Applicability

The provisions of this electrical safety policy are mandatory for all MJVD employees. Management will be responsible for electrical safety training at project sites and follow up of electrical hazards.

Definitions

Qualified Persons

Those who have training in avoiding the electrical hazards of working on or near exposed energized parts and one who is permitted to work on or near exposed energized parts.

Unqualified persons

Those not permitted to work on or near energized parts and have little or no training in avoiding the electrical hazards of working on or near exposed energized parts.

Training

All employees will be trained on the:

- General work rules
- Hazards of electricity
- How to identify potentially live parts.
- Minimum safe approach distances.
- Safe clearance distances.
- Lockout/Tagout

Site Supervisors will also be trained in:

- Examination, installation, and use of equipment.
- Guarding.
- Grounding of equipment connected by cord and plug.
- GFCI's.

General Work Rules

No employee shall work near any part of an electric power circuit that the employee could contact during work unless the circuit is deenergized and grounded. Only qualified persons may directly work on parts of an electric circuit or equipment that has not been de-energized. If energized parts of electrical equipment are exposed, barriers and warning signs shall be used to ensure the workspace is not used as a passageway.

Electrical Panels

All electrical panels shall have 3 feet of clearance. Panel doors shall be closed unless work is being done to the panel. The panel door must be able to open a minimum of 90 degrees. Any open panel slot shall have circuit breaker blanks installed. All panels and breakers shall be labeled to indicate the circuit's specific function. The movement of circuit breaker switches must not be restricted by tape or other material placed across the breaker. The use of tape to restrict breaker movement is not an acceptable method of lockout/tagout.

Portable Electric Power Tools

Handheld power tools are to be inspected before each use for frayed or damaged power cords. Power tools with observed damage shall be taken out of service immediately and replaced or repaired by a qualified person. Electric power tools shall be plugged into a Ground Fault Circuit Interrupter (GFCI) either at the extension cord, outlet, or at the circuit breaker panel. Extension cords used with power tools must be rated for the power requirements of the tool and have an intact grounding pin. Portable electrical equipment must be handled in a manner that will prevent damage to the electrical cord and equipment.

Power Strips

Power strips shall not be used for appliances or equipment requiring a large electrical load or in series with other power strips or extension cords. No daisy chaining is allowed. Power strips can be used when the following conditions are met.

- They are UL listed.
- There is built-in overcurrent protection.
- The overall length is not too long for what is it being used for.
- They are used within the manufacturer's guidelines.

Extension Cords

- Extension cords will not be used for permanent use. Extension cords are for temporary use only and shall not exceed use for a 90-day period.
- 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.
- Cords will be strung overhead or otherwise kept clear of working spaces, walkways, or other locations in which they are readily exposed to damage and trip hazards.
- Cords are not to be fastened with staples, hung from nails, or suspended by bare wire.
- Cords must be inspected before use for external and internal damage.
    - External damage to the insulation may be repaired by a qualified electrician.

    - Worn or frayed extension cords will not be used.
    - If internal wiring is damaged, the cord shall be disposed of immediately.
- Extension cords must not be run through walls, above ceilings, through window openings, under rugs and floor mats, or used in any manner may damage the cord or prevent inspection.
- Extension cords running along or across areas of foot traffic must be secure to prevent a tripping hazard.

Electrical Circuits

Electrical circuits will be de-energized and locked out in accordance with the MJVD Lockout/Tagout Policy prior to performance of any work on an electrical circuit. If 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. Only qualified persons are permitted to work on equipment or circuits that have not been deenergized.

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 all areas where such circuits exist. Employees will be informed of that location, the hazards involved, and the protective measures to be taken.

Live Electrical Wiring

Employees will not work on live circuits above 50 volts. Treat all wire as hot until tested to verify that the circuit is not energized. Prior to an employee working on an energized circuit, the appropriate training shall be provided to become a qualified employee.

Qualified persons must be training in and familiar with:

- Distinguish exposed live parts from other parts of electrical equipment.
- Determine the nominal voltage of exposed live parts and determine clearance distances
- Use of precautionary techniques.
- Electrical Personal Protective Equipment (PPE).
- Insulating and shielding materials i.e., blankets and mats.

Lockout/Tagout of Circuits

- Only Authorized Employees will perform lockout/tagout procedures.
- Locks and Tags must be placed on controls that are to be deactivated on energized or de-energized equipment or circuits.
- Equipment and circuits that are de-energized must be rendered inoperative.
- Refer to the Lockout/Tagout Policy for the proper procedures to follow.

Working Near Exposed Energized Parts

All electrical circuits are considered dangerous. Even electric shock from low voltages has caused burns and falls from ladders and scaffolds.

1. All fixed and portable electrical service equipment will be contained in covered weatherproof boxes.
    a. Covers will be kept closed.
    b. Boxes will be protected from exposure to weather, traffic, and combustible materials.

c. All equipment will be rigidly mounted on a panel or frame and be properly grounded.
d. All switches, circuit breakers, etc. will be clearly marked to identify voltage and purpose.
e. All switches will be clearly marked to indicate whether they are open or closed.

2. Non-conducting elevated platforms or rubber mats will be provided to protect employees operating switches from coming in contact with damp floors or earth.
3. All portable ladders must have non-conductive side rails.
4. Conductive items of jewelry or clothing must not be worn. This includes eyeglass frames.
5. 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.
6. All electrical outlets shall have a cover, faceplate, or fixture canopy.
7. No storage is allowed in rooms designated for electrical equipment.
8. Walkways and similar working spaces must be kept clear of electric cords.

Examination, Installation, and Use of Equipment

1. Electrical equipment must be free from recognized hazards that are likely to cause death or serious physical harm to employees.
2. All electrical work will comply with governing electrical codes.
3. All electrical equipment will be installed in a neat and workmanlike manner.
4. All electrical equipment will be firmly secured to the surface on which it is mounted.
5. The Project Manager and Site Supervisor will determine the safety of equipment by the following:
    a. Suitability for installation and use in conformity with provision of the standard.
    b. Suitability of equipment for an identified purpose, by labeling or by certification for that identified purpose.
    c. Mechanical strength and durability.
        i. For parts designed to enclose and protect other equipment, this includes the adequacy of the protection thus provided.
    d. Electrical insulation.
    e. Heating effects under conditions of use.
    f. Arcing effects.
    g. Classification by type, size, voltage, current capacity, and specific use.
    h. Other factors that contribute to the practical safeguarding of employees who use or are likely to come in contact with the equipment.
    i. Make a complete check and test of the circuit before energizing any equipment for the first time.

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.

Grounding of Equipment Connected by Cord and Plug

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. Handheld 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.

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. This equipment must be distinctively marked to indicate that the tools or appliance uses a system of double insulation.

Ground Fault Circuit Interrupter (GCFI)

1. 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.
2. Where GFCI receptacles are not available, plug in GCFIs will be used by employees.
3. 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.

Minimum Approach Distances

The minimum approach distances for qualified persons will be determined by the voltage in accordance with Table S-5 according to OSHA 29 CFR 1910.333 Electrical and Michigan OSHA Part 40 - Safety-Related Work Practices.

Voltage	**≤ 300**	**> 300 – 750**	**> 750 – 2kV**	**> 2K - 15K**
Distance	**Avoid Contact**	**1 ft. 0 in.**	**1 ft. 6 in.**	**2 ft. 0 in.**

Illumination

Employees will only work in areas with adequate illumination.

Illumination must be provided for all working spaces around service equipment, switchboards, panelboards, and motor control centers.

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

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.

Vehicular and Mechanical Equipment

Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines shall be operated so that a clearance of 10 ft. (305 cm) is maintained. If the voltage is higher than 50kV, the clearance shall be increased 4 in. (10 cm) for every 10kV over that voltage.

EXCAVATION SAFETY

M.J. VanDamme Trucking, Inc.
301 Avenue A
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Objective

This Excavation Safety Program has been developed to protect M.J. VanDamme Trucking, Inc. "MJVD" employees from safety hazards that may be encountered when working in trenches and excavations. This program is intended to assure that:

1. Employees who perform excavation work are aware of their responsibilities and know how to perform the work safely.
2. Project Managers, Site Safety Officers, and Supervisors are aware of their responsibilities. MJVD management shall assure compliance with the requirements of this program and provide site-specific training on projects.
3. All employees involved in excavation and trenching shall receive appropriate training in the safe work practices that must be followed when performing this type of work prior to starting the job task.
4. This program will assist in identifying and correcting hazardous conditions and practices related to excavation and trenching.

Responsibilities

MJVD Management

1. The Safety Department, Project Managers, and Site Safety Officers shall provide appropriate training to affected employees and supervisors.
2. Provide protective systems, equipment, and appropriate Personal Protective Equipment (PPE) as needed.
3. Provide atmospheric testing and technical assistance as needed.
4. Monitor the overall effectiveness of the program.
5. Review and update the program as needed or annually thereafter.
6. Determine the competent person for the project.

Competent Person/Qualified Person

MIOSHA uses the term Qualified Person where OSHA uses Competent Person.

1. Receive appropriate training to perform duties safely, ensure employees are performing the excavation or trenching work safely, and monitor the excavation.
2. Perform excavation daily checklist inspections, tests, and hazard assessments needed for the project.
3. Document inspections, tests, assessments, and return the documentation to the Safety Department once the project is complete.
4. Identify existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous, or dangerous to employees, and take prompt corrective measures to eliminate them.
5. Have knowledge of soil types.

Employees

1. All MJVD employees who work around excavations and trenches shall comply with the requirements of this program and MJVD health and safety policies and procedures.
2. Report hazardous conditions, situations, or practices to MJVD management immediately.
3. Report incidents and near misses to management immediately.

Training

Training Components

All MJVD employees who perform work in excavations shall be trained on the following:

1. Work practices that must be followed during excavating or working in or near excavations.
2. MJVD applicable health and safety policies and procedures and project-specific Accident Prevent Plans and Worksite Analyses performed that include hazards associated with each excavation and the control measures taken to protect employees.
3. The use of PPE required including, but not limited to steel toe boots, hardhats, Hi-Vis clothing, safety glasses, hand protection, fall protection devices.
4. Procedures to be followed if a hazardous atmosphere exists or could reasonably be expected to develop during work in an excavation.
5. Regulatory standard applicable to the state being worked in. This program covers Occupational Safety and Health Administration OSHA 1926 Subpart P - Excavations and Michigan OSHA MIOSHA Part 9. Excavation, Trenching, and Shoring.
6. Emergency and non-entry rescue methods as described in the project-specific Accident Prevention Plan, and the procedure for calling rescue services.

Training Duties – MJVD Management

1. Project Managers, Site Safety Officers, and other MJVD Management affected with excavation or trenching projects shall receive additional training detailed in the OSHA excavation standard.
2. Ensure on a daily basis or when conditions change on the project site, that worksite conditions are safe for employees who work in or near an excavation.
3. Determine the means of protection for the excavation project.
4. Ensure that the design of the protective system has been completed and reviewed by a Registered Professional Engineer (RPE) prior to work beginning if required.
5. Provide and document training of all employees on a project and submit to the Safety Department once the project is complete.
6. Have a copy of this program and the applicable federal or state standard on site.

Training Schedule

1. Employees shall be trained prior to being assigned duties in excavating or working in or near excavations.
2. Retraining shall be performed when MJVD management determines the employee does not have the necessary knowledge or skills to safely work in or near excavations.
3. Retraining shall be performed when working conditions change.
4. Retraining shall be performed when there are changes made to this program.

Recordkeeping

All training shall be documented for each project and shall include:

1. Date
2. Name of trainer
3. Printed name of employee who attended the training
4. Signature of the employee (required)
5. Copies of any additional written materials, worksite analyses, hazard assessments.

Regulatory Standards

There are several differences between the federal Occupational Safety and Health Administration (OSHA) standard OSHA 1926 Subpart P - Excavations and the Michigan OSHA Standard MIOSHA Part 9. Excavation, Trenching, and Shoring. This policy covers both the OSHA and MIOSHA standards. If MJVD employees work in a different state other than Michigan, training specific to that states plan shall be performed and followed if different than OSHA. See the OSHA-Approved State Plan Coverage map on the last page.

Definitions

MIOSHA Definitions

Angle of repose - The maximum permissible slope as determined by Table 1 in the standard.

Excavation - Any man-made cavity or depression in the earth's surface, including its sides, walls, or faces, formed by earth removal. For the purpose of this part, a trench is an excavation.

Qualified person - A person who, by possession of a recognized degree or certificate of professional standing, or who, by extensive knowledge, training, and experience, has successfully demonstrated the ability to solve or resolve problems relating to the subject matter and work.

Trench - An excavation having a depth greater than its width measured at the bottom.

OSHA Definitions

Aluminum Hydraulic Shoring – A pre-engineered shoring system comprised of aluminum hydraulic cylinders (cross braces) used in conjunction with vertical rails (uprights) or horizontal rails (wales). Such systems are designed specifically to support the sidewalls of an excavation and prevent cave-ins.

Benching (Benching system) – A method of protecting employees from cave-ins by excavating the sides of an excavation to form one or a series of horizontal levels or steps, usually with vertical or near-vertical surfaces between levels.

Cave-in – The separation of a mass of soil or rock material from the side of an excavation, or the loss of soil from under a trench shield or support system, and its sudden movement into the excavation, either by falling or sliding, in sufficient quantity so that it could entrap, bury, or otherwise injure and immobilize a person.

Competent person – One who is capable of identifying existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Excavation – Any man-made cut, cavity, trench, or depression in an earth surface, formed by earth removal.

Protective system – A method of protecting employees from cave-ins, from material that could fall or roll from an excavation face or into an excavation, or from the collapse of adjacent structures. Protective systems include support systems, sloping and benching systems, shield systems, and other systems that provide the necessary protection.

Registered Professional Engineer – A person who is registered as a professional engineer in the state where the work is to be performed. However, a professional engineer, registered in any state is deemed to be a "registered professional engineer" within the meaning of this standard when approving designs for "manufactured protective systems" or "tabulated data" to be used in interstate commerce.

Shield (Shield system) – A structure that is able to withstand the forces imposed on it by a cave-in and thereby protect employees within the structure. Shields can be permanent structures or can be designed to be portable and moved along as work progresses. Additionally, shields can be either premanufactured or job-built in accordance with 1926.652(c)(3) or (c)(4). Shields used in trenches are usually referred to as "trench boxes" or "trench shields."

Shoring (Shoring system) – A structure such as a metal hydraulic, mechanical, or timber shoring system that supports the sides of an excavation and which is designed to prevent cave-ins.

Sloping (Sloping system) – A method of protecting employees from cave-ins by excavating to form sides of an excavation that are inclined away from the excavation so as to prevent cave-ins. The angle of incline required to prevent a cave-in varies with differences in such factors as the soil type, environmental conditions of exposure, and application of surcharge loads.

Support system – A structure such as underpinning, bracing, or shoring, which provides support to an adjacent structure, underground installation, or the sides of an excavation.

Tabulated data – Tables and charts approved by a registered professional engineer and used to design and construct a protective system.

Trench (Trench excavation) – A narrow excavation (in relation to its length) made below the surface of the ground. In general, the depth is greater than the width, but the width of a trench (measured at the bottom) is not greater than 15 feet (4.6 m).

Trench box and Trench shield - See "Shield."

tsf – tons per square foot.

Excavation Requirements

Utilities and Pre-Work Site Inspection

Prior to excavation, the site shall be thoroughly inspected to determine if special safety measures must be taken.

Surface Encumbrances

All surface encumbrances, such as equipment, materials, supplies, permanent installations (i.e., buildings or roadways), trees, brush, boulders, and other objects at the surface, that could present a hazard to employees working in the excavation shall be removed or supported as necessary to protect employees.

Underground Installations/Locating Utility Lines

MIOSHA	OSHA
1. MJVD shall locate all underground public utilities prior to excavation in a street, highway, public place, a private easement of a public utility, or near the location of a public utility facility owned, maintained, or installed on a customer's premises. 2. Extreme caution shall be taken when working in close proximity to a public utility. Hand digging shall be utilized if utilities are exposed or likely to be exposed. 3. MJVD shall notify the public utility if during operations, there is contact with or damage to any pipe, cable or its protective coating, or any other underground facility. 4. If there are hazards associated with damage, all employees shall evacuate the area immediately.	1. MJVD shall determine underground utility installations, such as sewer, telephone, fuel, electric, water, or underground wires prior to excavation by speaking with utility companies. The utility entity shall be contacted as for the protection, removal, shutdown, or relocation of underground installations. 2. If it is not possible to establish the exact location of these installations, work may proceed with caution if detection equipment or other safe and acceptable means are used to locate the utility. 3. Excavation shall be done in a manner that does not endanger the underground installations or the employees engaged in the work. 4. Utilities left in place shall be protected by barricades, shoring, suspension, or other means as necessary to protect employees.

Access and Egress

Trenches or excavations 4 feet (48 inches) or more in depth and occupied by an employee shall have means of egress and access via a stairway, ladder, ramp, or other safe means of egress. Means of egress shall be placed so employees do not have to travel more than 25 feet from the work area to exit.

MIOSHA	OSHA
1. All material and excavated material shall be stored and retained over 2 feet from the excavation edge. 2. Either a ladder extending over 3 feet above the top of the excavation, ramp, or stable earth ramp with appropriate side angles and height according to R 408.40933, Rule 5 shall be utilized.	1. Structural ramps, used by employees only, shall be designed by the competent person. 2. Structural ramps used by equipment shall be designed by a Registered Professional Engineer. 3. Components must be connected, uniform in thickness, and provided with cleats or other surface treatments to prevent tripping or slipping if using ramps.

Exposure to Vehicular Traffic

Employees are required to wear Hi-Vis clothing when exposed to traffic. Signage shall be utilized to stop, slow, or reroute traffic when necessary.

Exposure to Falling Loads

1. Employees are not permitted underneath loads handled by lifting or digging equipment.
2. Employees shall stand away from any vehicle/equipment being loaded or unloaded to avoid being struck by any spillage or falling materials.
3. Operators may remain in the cabs of vehicles being loaded or unloaded when the vehicles are equipped, in accordance with §1926.601(b)(6), to provide adequate protection for the operator during loading and unloading operations.

Warning System for Mobile Equipment

When mobile equipment is utilized or permitted adjacent to an excavation where the operator's vision is restricted, a warning system shall be utilized such as barricades, hand or mechanical signs, or stop logs. The grade should be away from the excavation.

Hazardous Atmospheres

Employees shall be protected from exposure to harmful levels of airborne/atmospheric contaminants. If there are any of the following potential hazards in excavations greater than 4 feet, the atmosphere shall be tested prior to occupancy. Adequate mitigation controls shall be implemented in hazardous atmospheres and may include Personal Protective Equipment such as respiratory protection. Testing shall be conducted as necessary to ensure the atmosphere remains safe. Hazardous atmosphere examples are:

- Oxygen ($< 19.5\%$ or $> 23.5\%$)
- Flammable gas ($> 20\%$ of LFL)
- Explosive
- Poisonous
- Corrosive
- Irritating
- Toxic
- Otherwise harmful.

Emergency Rescue Equipment

If hazardous atmospheric conditions exist, emergency rescue equipment, such as breathing apparatus, a safety harness and line, or a basket stretcher, shall be readily available and attended when in use.

Employees entering bell-bottom pier holes, or other similar deep and confined footing excavations, shall wear a harness with a lifeline securely attached to it. The lifeline shall be separate from any line used to handle materials and shall be individually attended at all times while the employee wearing the lifeline is in the excavation.

Water Accumulation

Employees shall not work in excavations in which there is accumulated water or accumulating water unless precautions have been taken to prevent the hazard of slides or cave-ins such as:

- Shield systems
- Water removal
- Use of a safety harness and lifeline.

If excavation work interrupts the natural drainage of surface water (such as streams), diversion ditches, dikes, or other suitable means shall be used to prevent surface water from entering the excavation and to provide adequate drainage of the area adjacent to the excavation.

A competent/qualified person shall perform the following when the hazard has been mitigated:

- Continuously monitor the equipment and operations.
- Perform ongoing inspections of the excavation or trench for any evidence of possible slides or cave-ins, in which work shall cease immediately until the hazard is further mitigated.
- Inspect excavations subject to runoff from heavy rains.

Stability of Adjacent Structures

If an adjacent structure to an excavation has the potential to become unstable during excavation, or if the adjacent structure is below the level of the base or footing of any foundation or retaining wall, the structure shall be protected against settlement, lateral movement, undermining, or washout. The design of the protection used shall be determined by a qualified person prior to the start of the excavation.

Excavation below the level of the base or footing of any foundation or retaining wall that could be reasonably expected to pose a hazard to employees shall not be permitted unless:

- A support system is provided to ensure the stability of the structure such as shoring, bracing, or underpinning.
- The excavation is in stable rock.
- The operation is approved by a Registered Professional Engineer.

Support systems shall be provided for sidewalks, pavements, and other structures that may have their structural integrity compromised by the excavation operations. Support systems shall be inspected daily or more often, as conditions warrant, by a competent/qualified employee.

Protection of Employees from Loose Rock and Soil

Employees shall be protected from being struck by materials or excavated materials falling or rolling from the edge and face of a trench or excavation. Protection shall consist of:

- Scaling to remove loose material.
- Installation of protective barricades at intervals as necessary on the face to stop and contain falling material.
- Other means that provide equivalent protection.
- 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.

Inspections

Daily inspections of excavations, the adjacent areas, and protective systems shall be made by a competent/qualified person prior to the start of work and throughout the shift for possible cave-ins, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions. Inspections shall be made after every rainstorm or other condition that may increase the hazard when employee exposure can be reasonably anticipated. If a hazardous condition is detected, exposed employees shall be removed from the hazardous area until precautions have been taken to ensure safety.

Walkways, Sidewalks, Roadways

MIOSHA	OSHA
1. If an employee or equipment is required or permitted to cross a trench or ditch, a walkway, runway, ramp, or bridge shall be provided and shall have a designed capacity of not less than 3 times the imposed load. 2. A guardrail prescribed by the provisions of Part 21. Guarding of Walking and Working Areas and Part 45. Fall Protection shall be used (6 feet). 3. A sidewalk shall not be undermined unless it is shored to support a live load of not less than 125 pounds per square foot.	1. Walkways shall be provided where employees or equipment are required or permitted to cross over excavations. 2. Guardrails which comply with §1926.502(b) shall be provided where walkways are 6 feet (1.8 m) or more above lower levels.

Remotely Located Excavations

Employees shall backfill, cover, or barricade any remotely located excavations. Barricades shall be constructed to restrict entry into areas that contain safety hazards or abnormal conditions.

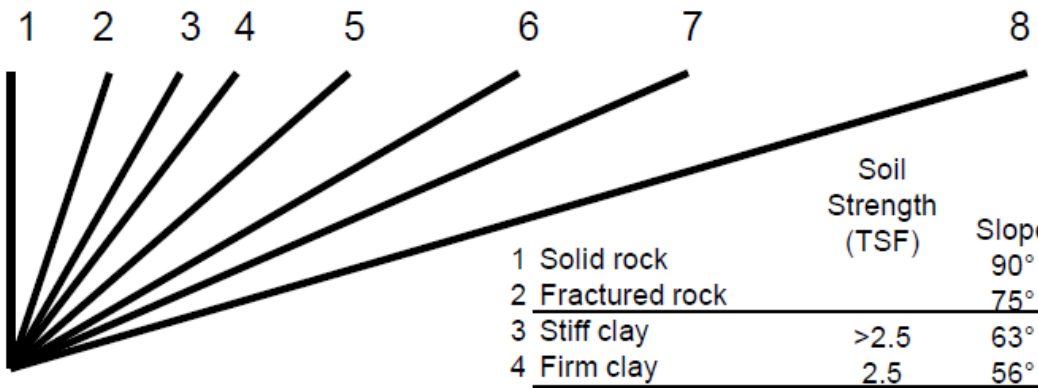
Requirements for Protective Systems

Protection of Employees in Excavations

MIOSHA - R 408.40941 Excavation; Angle of Repose	OSHA - 1926.652
1. The side of an excavation more than 5 feet deep shall be sloped as prescribed in Table 1 in the standard, unless supported. 2. An excavation less than 5 feet in depth shall also be effectively protected when examination of the ground indicates hazardous earth movement may be expected. 3. When mobile equipment is utilized or permitted adjacent to an excavation where the operator's vision is restricted, stop logs, barricades, or a signal person shall be used.	1. All employees shall be protected from cave-ins by shields, sloping, or shoring except: a. When excavations are made entirely in stable rock. b. When excavations less than 5 feet deep where there is no indication of possible cave-in, as determined by a competent person. 2. Protective systems shall have the capacity to resist without failure all loads that are intended or could reasonably be expected to be applied or transmitted to the system.

MIOSHA Part 9. Excavations, Trenching, and Shoring

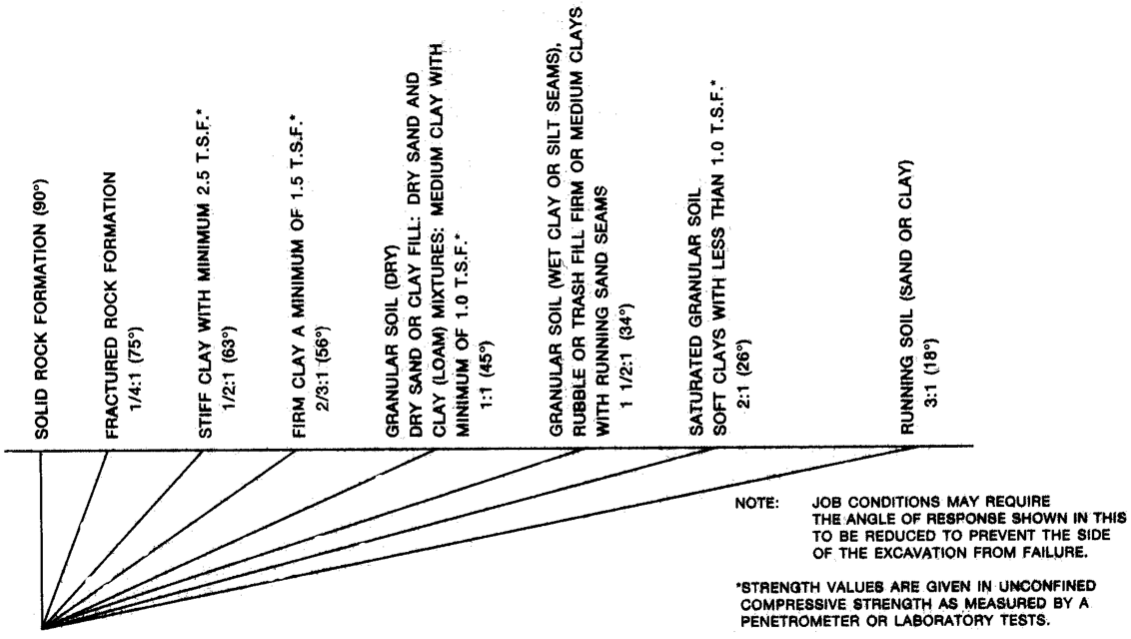
Table 1: Max Angle of Repose for Excavation Sides in Excess of 5' Depth



		Soil Strength (TSF)	Slope	Ratio
1	Solid rock		90°	
2	Fractured rock		75°	¼:1
3	Stiff clay	>2.5	63°	½:1
4	Firm clay	2.5	56°	2/3:1
5	Previously disturbed soil	1.5	45°	1:1
6	Granular soil wet	1.0	34°	1 ½:1
7	Saturated granular soil	<1.0	26°	2:1
8	Running soil		18°	3:1

TABLE 1

MAXIMUM ALLOWABLE ANGLE OF REPOSE FOR THE SIDE OF AN EXCAVATION IN EXCESS OF 5' DEPTH



Design of Sloping and Benching Systems

MIOSHA Standard

R 408.40932 - Excavation; consideration of soil types; water; slide hazards

If different textured soils are encountered in the side of an excavation, each soil type of the excavation shall be cut to the proper angle of repose, except that the slope shall not steepen between the toe of the slope and the ground level where soft clay or running soil is encountered in the lower cut.

R 408.40942. Supporting systems; angle of repose; tie backs; tight sheeting; additional bracing

The angle of repose and the design of the supporting system for a side of an excavation shall be based on the evaluation of all of the following factors:

- Depth of cut and type of soil.
- Possible variation in the water content of the material while the excavation is open.
- Anticipated changes in the material due to exposure to air, sun, water, or freezing.
- Load imposed by structures, equipment, overlying material, or stored material.
- Vibration from traffic, equipment, or blasting.

Examples of excavation and trench protection can be found in the Appendix in the standard.

OSHA Standard, 1926.652(b)

The slopes and configurations of sloping and benching systems shall be selected and constructed by MJVD or their designers using one or more of four alternative methods. Excavations greater than 20 feet in depth shall be designed by a RPE and the tabulated data and design must be available for inspection.

Option (1)-Allowable configurations and slopes

Excavations shall be sloped at an angle not steeper than one and one-half horizontal to one vertical (34 degrees measured from the horizontal) or excavated to form configurations that are in accordance with the slopes shown for Type C soil in 1926 Subpart P App B.

Option (2)-Determination of slopes and configurations using Appendices A and B

Option (3)-Designs using other tabulated data

Designs of sloping or benching systems shall be selected from and be in accordance with tabulated data, such as tables and charts with required written information described in 1926.652(b)(3).

Option (4)-Designed by a Registered Professional Engineer (RPE)

Design of Support Systems, Shield Systems, and Other Protective Systems

MIOSHA Standard

R 408.40942. Supporting systems; angle of repose; tie backs; tight sheeting; additional bracing

1. A support system shall be designed by a qualified employee and maintained at the jobsite. Changes from the design of the support system shall be approved by a qualified employee.
2. Tie rods and other forms of tie backs used to restrain the top of sheeting shall be anchored a minimum of 10 feet. The measurement to the anchor point shall start at the intersection of an

angle ofrepose with the surface of the soil retained. The tie back and anchor shall be capable of restraining any pressure exerted on the system.

3. When tight sheeting or sheet piling is used, pressures due to existing ground water conditions shall be considered in the design. Sheet piling shall be driven to the predetermined depth set forth in the required design. Changes from the design shall be approved by the designer of the support system.
4. Materials used for a supporting system shall be in good serviceable condition. When timbers are used, they shall be sound and free of large or loose knots.
5. A supporting system shall include additional bracing approved by the designer of the support system when the sides of excavations are cut adjacent to a previous known excavation or a known fill, particularly when the separation between the previous excavation and the new excavation is less than the depth of the excavation.
6. Tight sheeting shall be braced or anchored atthe bottom and along the vertical plane to prevent lateral movement.
7. A brace or trench jack that is used for a support system for a trench shall be spaced as designed and shall be secured to prevent sliding, failing, or kickout.

OSHA Standard 1926.652(c)

Designs of support systems shield systems, and other protective systems shall be selected and constructed by MJVD or a designee.

Option (1) - Designs using appendices A, C and D

Designs for timber shoring in trenches and aluminum hydraulic shoring in accordance with 1926.652(c)(1).

Option (2) - Designs Using Manufacturer's Tabulated Data

Designs of support systems, shield systems, or other protective systems that are drawn from manufacturer's tabulated data, specifications, recommendations, and limitations in accordance with 1926.652(c)(2).

Option (3) - Designs using other tabulated data

Designs of support systems, shield systems, or other protective systems shall be selected from and be in accordance with tabulated data, such as tables and charts in accordance with 1926.652(c)(3).

Option (4) - Design by a Registered Professional Engineer (RPE)

Support systems, shield systems, and other protective systems not utilizing Option 1, Option 2, or Option 3 above, shall be approved by a registered professional engineer, be in written form, and include requirements according to 1926.652(c)(4).

Materials and Equipment

Materials and equipment used for protective systems shall be:

- Free from damage or defects and maintained in good condition.
- 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.

Shield Systems

MIOSHA	OSHA
Portable trench boxes or sliding trench shields may be used for the protection of personnel in place of a shoring system or sloping. Where such trench boxes or shields are used, they shall be designed, constructed, and maintained in a manner that provides protection equal to or greater than the sheeting or shoring required for the trench.	1. Shield systems shall not be subjected to loads exceeding those which the system was designed to withstand. 2. Shields shall be installed in a manner to restrict lateral or other hazardous movement of the shield in the event of the application of sudden lateral loads. 3. Employees shall be protected from the hazard of cave-ins when entering or exiting the areas protected by shields. 4. Employees shall not be allowed in shields when shields are being installed, removed, or moved vertically. 5. Excavations of earth material to a level not greater than 2 feet (.61 m) below the bottom of a shield shall be permitted, but only if the shield is designed to resist the forces calculated for the full depth of the trench, and there are no indications while the trench is open of a possible loss of soil from behind or below the bottom of the shield.

Installation and Removal of Support Systems

MIOSHA Standard

R 408.40943. Additional requirements for trench support systems

1. A brace or trench jack that is used for a support system for a trench shall be spaced as designed and shall be secured to prevent sliding, failing, or kickout.
2. The backfilling and the removal of a support system for a trench shall progress together from the bottom of the trench. In unstable or running soil, the jacks and braces shall be removed from above the trench after employees have cleared the trench.
3. The excavation of material to a level that is not more than 2 feet (.61 m) below the bottom of the members of a support system shall be permitted, but only if the system is designed to resist the forces calculated for the full depth of the trench and if there are no indications, while the trench is open, of a possible loss of soil from behind or below the bottom of the support system.
4. The installation of a support system shall be closely coordinated with the excavation of trenches.

R 408.40945. Trenching boxes and shields

1. The use of benching in conjunction with a portable trench box is permitted when the toe of the trench box is not more than 2 feet above the trench bottom, but only if the trench box is designed to resist the forces calculated for the full depth of the trench and if there are no indications, while the trench is open, of a possible cave-in below the bottom of the trench box.
2. An employee shall not be allowed in shields when shields are being installed, removed, or moved.

OSHA Standard

1926.652(e)

1. Supported members of the system must be securely connected together to prevent sliding, falling, kickouts, or other predictable failure.
2. Support systems shall be installed and removed in a manner that protects employees from cave-ins, structural collapses, or from being struck by members of the support system.
3. Individual members of support systems shall not exceed what they were designed for.
4. Before temporary removal of individual members begins, additional precautions shall be taken to ensure the safety of employees.
5. Removal shall start from the bottom of the excavation.
6. Backfilling shall progress together with the removal of support systems from excavations.

Excavation of material to a level no greater than 2 feet (.61 m) below the bottom of the members of a support system shall be permitted, but only if:

1. The system is designed to resist the forces calculated for the full depth of the trench.
2. There are no indications while the trench is open of a possible loss of soil from behind or below the bottom of the support system.
3. Installation of a support system shall be closely coordinated with the excavation of trenches.

Sloping and Benching Systems

MIOSHA Standard

R 408.40944. Benching and sloping

1. The angle of repose shall be flattened when an excavation has water conditions, silty materials, loose boulders, or areas where erosion, deep frost action, or slide planes appear.
2. When benching the side of an excavation, the vertical rise shall not be more than 5 feet and the step back shall extend at least to the angle of repose as required by Table 1.
3. When benching a side of a trench, the height of the lower bench shall not be more than the lesser of 5 feet or width of the trench measured at the bottom.
4. An employee shall not be permitted to work on sloped or benched excavations at levels above another employee, except when an employee at the lower level is protected from the hazard of falling, rolling, or sliding material or equipment.

OSHA Standard

Appendix B

Employees shall not work on the faces of sloped or benched excavations at levels above other employees except when employees at the lower levels are adequately protected from the hazard of falling, rolling, or sliding material or equipment.

The maximum allowable slope, or the steepest incline of an excavation face acceptable to protect against cave-ins is expressed as a ratio of horizontal distance to vertical rise (H:V) and can be determined using the Table B-1 in 1926 Subpart P App B.

Table B-1: Maximum Allowable Slope

SOIL OR ROCK TYPE	MAXIMUM ALLOWABLE SLOPES (H:V)(1) FOR EXCAVATIONS LESS THAN 20 FEET DEEP(3)
STABLE ROCK	VERTICAL (90º)
TYPE A (2)	3/4:1 (53º)
TYPE B	1:1 (45º)
TYPE C	1 ½:1 (34º)

- Footnote 1 - Numbers shown in parentheses next to maximum allowable slopes are angles expressed in degrees from the horizontal. Angles have been rounded off.
- Footnote 2 - A short-term maximum allowable slope of 1/2H:1V (63º) is allowed in excavations in Type A soil that are 12 feet (3.67 m) or less in depth. Short-term maximum allowable slopes for excavations greater than 12 feet (3.67 m) in depth shall be 3/4H:1V (53º).
- Footnote 3 - Sloping or benching for excavations greater than 20 feet deep shall be designed by a registered professional engineer.

Slope Configurations

Examples of configurations of sloping and benching systems shall be in accordance with Figure B-1 in 1926 Subpart P App B. Please see the OSHA standard for specific examples.

MIOSHA Soil Classifications

"Soil" means any of the following:

Clay

A very fine textured soil that derives its resistance to displacement from cohesion and may be:

- Soft clay — a clay-type soil that has an unconfined strength of less than 1.0 ton per square foot.
- Medium clay, sometimes called plastic — a clay-type soil that has a minimum unconfined strength of 1.0 ton per square foot.
- Firm soil — a clay-type soil that is resistant to forces causing rupture or displacement. A firm clay has a minimum unconfined strength of 1.5 tons per square foot.
- Stiff clay — a clay-type soil that is very resistant to forces causing rupture or displacement. A stiff clay has a minimum unconfined strength of 2.5 tons per square foot.

Fill

A man-made soil condition that may be constructed of any type of soil or combination thereof.

Granular Soil

A course grained soil that does not possess cohesion but derives its strength from internal friction.

Organic Soil

A soil that contains significant amounts of peat, muck, or marl.

Running Soil

Any type of soil that has insufficient strength to stand unsupported. Running soil tends to run or slough into the excavation as the excavation is being dug.

Solid Rock

Natural solid mineral that can be excavated with vertical sides and remain intact when exposed.

OSHA Soil Classifications

Classification of soil and rock deposits shall be performed when:

- A sloping or benching system is designed to protect employees from cave-ins.
- When timber shoring for excavations is designed as a method of protection from cave-ins in accordance with Appendix C to Subpart P of Part 1926.
- When aluminum hydraulic shoring is designed in accordance with Appendix D.

Soil classification shall be performed on site based on environmental conditions and on the structure of the earth deposits. Soil and rock deposits shall be categorized as Stable Rock, Type A, Type B, and Type C, which is in decreasing order of stability.

Stable Rock

Natural solid mineral matter that can be excavated with vertical sides and remain intact while exposed.

Type A Soil

1. Cohesive soils with an unconfined compressive strength of 1.5 ton per square foot (tsf) (144 kPa) or greater.
2. Examples of cohesive soils are: clay, silty clay, sandy clay, clay loam and, in some cases, silty clay loam and sandy clay loam.
3. Cemented soils such as caliche and hardpan are also considered Type A.
4. No soil is Type A if:
    - The soil is fissured.
    - The soil is subject to vibration from heavy traffic, pile driving, or similar effects.
    - The soil has been previously disturbed.
    - The soil is part of a sloped, layered system where the layers dip into the excavation on a slope of four horizontal to one vertical (4H:1V) or greater.
    - The material is subject to other factors that would require it to be classified as a less stable material.

Type B Soil

1. Cohesive soil with an unconfined compressive strength greater than 0.5 tsf (48 kPa) but less than 1.5 tsf (144 kPa).
2. Granular cohesionless soils including angular gravel (similar to crushed rock), silt, silt loam, sandy loam and, in some cases, silty clay loam, and sandy clay loam.
3. Previously disturbed soils except those which would otherwise be classified as Type C soil.
4. Soil that meets the unconfined compressive strength or cementation requirements for Type A but is fissured or subject to vibration.

5. Dry rock that is not stable.
6. Material that is part of a sloped, layered system where the layers dip into the excavation on a slope less steep than four horizontal to one vertical (4H:1V), but only if the material would otherwise be classified as Type B.

Type C Soil

1. Cohesive soil with an unconfined compressive strength of 0.5 tsf (48 kPa) or less.
2. Granular soils including gravel, sand, and loamy sand.
3. Submerged soil or soil from which water is freely seeping.
4. Submerged rock that is not stable.
5. Material in a sloped, layered system where the layers dip into the excavation on a slope of four horizontal to one vertical (4H:1V) or steeper.

OSHA Requirements

1. A competent person shall classify soil and rock deposits as Stable Rock, Type A, B, or C.
2. Classification shall be made based on the results of at least one visual and at least one manual analysis.
3. The visual and manual analyses shall be designed and conducted to provide quantitative and qualitative information to identify the properties, factors, and conditions affecting the classification of the deposits.
4. In a layered system, the system shall be classified in accordance with its weakest layer. However, each layer may be classified individually where a more stable layer lies under a less stable layer.
5. If, after classifying a deposit, the classification change in any way, the changes shall be evaluated by a competent person. The deposit shall be reclassified.

Acceptable Visual and Manual Tests

Visual Tests

Visual analysis shall be conducted to determine qualitative information regarding the excavation site in general, the soil adjacent to the excavation, the soil forming the sides of the open excavation, and the soil taken as samples from excavated material.

1. Observe samples of soil that are excavated and soil in the sides of the excavation. Estimate the range of particle sizes and the relative amounts of the particle sizes.
    a. Soil that is primarily composed of fine-grained material is cohesive material.
    b. Soil composed primarily of coarse-grained sand or gravel is granular material.
2. Observe soil as it is excavated.
    a. Soil that remains in clumps when excavated is cohesive.
    b. Soil that breaks up easily and does not stay in clumps is granular.
3. Observe the side of the opened excavation and the surface area adjacent to the excavation.
    a. Crack-like openings such as tension cracks could indicate fissured material.
    b. If chunks of soil spall off a vertical side, the soil could be fissured.
    c. Small spalls are evidence of moving ground and are indications of potentially hazardous situations.
4. Observe the area adjacent to the excavation and the excavation itself for evidence of existing utility and other underground structures, and to identify previously disturbed soil.

5. Observe the opened side of the excavation to identify layered systems. Examine layered systems to identify if the layers slope toward the excavation. Estimate the degree of slope of the layers.
6. Observe the area adjacent to the excavation and the sides of the opened excavation for evidence of surface water, water seeping from the sides of the excavation, or the location of the level of the water table.
7. Observe the area adjacent to the excavation and the area within the excavation for sources of vibration that may affect the stability of the excavation face.

Manual Tests

Manual analysis of soil samples shall be conducted to determine quantitative as well as qualitative properties of soil and to provide more information to classify soil properly.

Plasticity

1. Mold a moist or wet sample of soil into a ball and attempt to roll it into threads as thin as 1⁄8-inch in diameter.
2. Cohesive material can be successfully rolled into threads without crumbling. For example, if at least a two-inch (50 mm) length of 1⁄8-inch thread can be held on one end without tearing, the soil is cohesive.

Dry Strength

1. If the soil is dry and crumbles on its own or with moderate pressure into individual grains or fine powder, it is granular (any combination of gravel, sand, or silt).
2. If the soil is dry and falls into clumps which break up into smaller clumps, but the smaller clumps can only be broken up with difficulty, it may be clay in any combination with gravel, sand, or silt.
3. If the dry soil breaks into clumps which do not break up into small clumps and which can only be broken with difficulty, and there is no visual indication the soil is fissured, the soil may be considered unfissured.

Thumb Penetration

The thumb penetration test estimates the unconfined compressive strength of cohesive soils. This test should be conducted on an undisturbed soil sample as soon as practicable after excavation.

1. Type A soils with an unconfined compressive strength of 1.5 tsf can be readily indented by the thumb; however, they can be penetrated by the thumb only with very great effort.
2. Type C soils with an unconfined compressive strength of 0.5 tsf can be easily penetrated several inches by the thumb and can be molded by light finger pressure.

Other Strength Tests

Estimates of unconfined compressive strength of soils can also be obtained by use of a pocket penetrometer or by using a hand-operated shear vane.

Drying Test

1. The basic purpose of the drying test is to differentiate between cohesive material with fissures, unfissured cohesive material, and granular material.
2. The procedure for the drying test involves drying a sample of soil that is approximately one inch thick (2.54 cm) and six inches (15.24 cm) in diameter until it is thoroughly dry.
    a. If the sample develops cracks as it dries, significant fissures are indicated.

b. Samples that dry without cracking are to be broken by hand. If considerable force is necessary to break a sample, the soil has significant cohesive material content. The soil can be classified as an unfissured cohesive material and the unconfined compressive strength should be determined.
c. If a sample breaks easily by hand, it is either a fissured cohesive material or a granular material. To distinguish between the two, pulverize the dried clumps of the sample by hand or by stepping on them. If the clumps do not pulverize easily, the material is cohesive with fissures. If they pulverize easily into very small fragments, the material is granular.

OSHA Appendices

For additional information, please see the following links to the OSHA appendices.

1926 Subpart P App A - Soil Classification

1926 Subpart P App B - Sloping and Benching

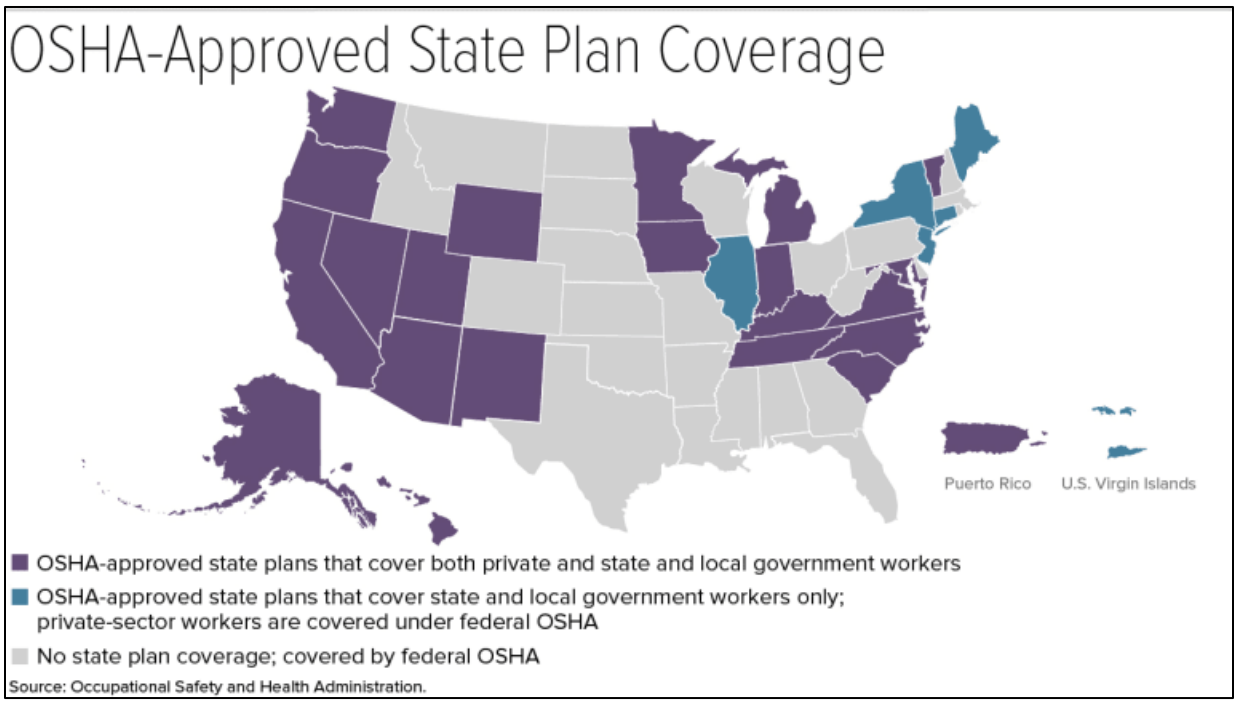
1926 Subpart P App C - Timber Shoring for Trenches

1926 Subpart P App D - Aluminum Hydraulic Shoring for Trenches

1926 Subpart P App E - Alternatives to Timber Shoring

1926 Subpart P App F - Selection of Protective Systems

OSHA-Approved State Plan Coverage Map



FALL PROTECTION

General Industry and Construction

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Revision Date	Initials	Approved By (Initials)
6-21-24	MMM	MMM

Contents

Policy

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

Scope

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.

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

Regulatory Standards

Note: Michigan OSHA has adopted federal OSHA Fall Protection Standard for both construction and general industry.

- MIOSHA GI Part 2. Walking-Working Surfaces
- OSHA 1910 Subpart D - Walking-Working Surfaces GI
- MIOSHA Construction Part 45. Fall Protection
- OSHA 1926 Subpart M – Fall Protection Construction
- MSHA - 30 CFR 56.15005, Safety Belts and Lines

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 higher 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 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.

Training

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

Certification of Training.

Employees will be trained and issued a certification of training prior to working under condition that require fall protection. A copy of the latest training certification shall be maintained in the training file.

Retraining

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. Circumstances where retraining is required include, but are not limited to, situations where:

1. Changes in the workplace render previous training obsolete; or
2. Changes in the types of fall protection systems or equipment to be used render previous training obsolete; or
3. 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.

Fall Protection Requirements

Note: Fall protection requirements for General Industry work is for 4 feet or above a lower level, where construction work is regulated at 6 feet. All requirements below indicate the construction standard of 6 feet, but all employees shall understand that if working in general industry conditions (such as working on the roof at the office location or on a truck parked inside the truck shop), the 4-foot rule shall apply.

On MSHA sites, fall protection shall be worn when persons work where there is danger of falling. There is no set limit on when fall protection is required to be worn.

Unprotected Sides and Edges

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 using guardrail systems, safety net systems, or personal fall arrest systems.

Leading Edges

- 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.
- 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.
- 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.

Hoist Areas

- 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.
- 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.

Holes

- 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.

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

Formwork and Reinforcing Steel

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.

Ramps, Runways, and other Walkways

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

Excavations

- 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.
- 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.

Dangerous Equipment

- 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.
- 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.

Roofing Work

Low Slope Roofs

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:

1. A guardrail system,
2. Safety net systems,
3. Personal fall arrest systems, or
4. A combination of warning line system and guardrail system, warning line system and safety net system, or
5. Warning line system and personal fall arrest system, or
6. Warning line system and safety monitoring system.

Steep Roofs

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 toe-boards, safety net systems, or personal fall arrest systems.

Competent Person Qualifications, Duties, and Safety Monitoring

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.
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.

Safe Working Practices and Procedures

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.
    c. 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.

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.

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.

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.

Anchorages

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:

1. As part of a complete personal fall arrest system which maintains a safety factor of at least two; and
2. Under the supervision of a qualified person.

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.

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 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.

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.

Fall Protection Plan

MJVD shall **not** develop a Fall Protection Plan according to OSHA 29 CFR 1926.502(k). MJVD does not engage in work covered by 29 CFR 1926.502(k). If MJVD ever performs leading edge work, precast concrete erection work, or residential construction, it shall only be performed when fall protection measures can be implemented. If conventional fall protection measures make work infeasible or if it creates a greater hazard to use, the work shall not be performed.

Control Access Zones

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.

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.

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).

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.

Accident Investigation

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.

Fall Protection Equipment

1. 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.
2. All fall protection equipment and systems will be certified and the NIOSH, ANSI or ASTM Certification or Testing Number attached to the unit.
3. Equipment or devices not certified and tested under these standards are unacceptable and will not be purchased or used.

FIRE PREVENTION PLAN

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
01-24-2024	MMM	MMM

Contents

Purpose

The purpose of this Fire Prevention Plan is to eliminate the causes of fire, prevent loss of life and property by fire, and comply with the regulatory standards on fire prevention. The plan helps employees recognize, report, and control fire hazards.

Definitions

Carbon dioxide	A colorless, odorless, electrically nonconductive inert gas (chemical formula CO_2) that is a medium for extinguishing fires by reducing the concentration of oxygen or fuel vapor in the air to the point where combustion is impossible.
Class A fire	A fire involving ordinary combustible materials such as paper, wood, cloth, and some rubber and plastic materials.
Class B fire	A fire involving flammable or combustible liquids, flammable gases, greases and similar materials, and some rubber and plastic materials.
Class C fire	A fire involving energized electrical equipment where safety to the employee requires the use of electrically nonconductive extinguishing media.
Class D fire	A fire involving combustible metals such as magnesium, titanium, zirconium, sodium, lithium, and potassium.
Closed container	A container that is sealed by means of a lid or other device so that neither liquid nor vapor will escape from it at ordinary temperatures.
Combustion	Any chemical process that involves oxidation sufficient to produce light or heat.
Dry chemical	An extinguishing agent composed of very small particles of chemicals such as, but not limited to, sodium bicarbonate, potassium bicarbonate, urea-based potassium bicarbonate, potassium chloride, or monoammonium phosphate supplemented by special treatment to provide resistance to packing and moisture absorption (caking) as well as to provide proper flow capabilities. Dry chemical does not include dry powders.
Dry powder	A compound used to extinguish or control Class D fires.
Extinguisher classification	The letter classification given an extinguisher to designate the class or classes of fire on which an extinguisher will be effective.
Flammable	To ignite easily and burn intensely or means to have a rapid rate of flame spread.
Flammable liquid	Any liquid having a vapor pressure not exceeding 40 pounds per square inch at 100ºF and flashpoint at or below 199.4 ºF. Category 1 - flashpoints below 73.4 ºF, boiling point at or below 95 ºF Category 2 - flashpoints below 73.4 ºF, boiling point above 95 Category 3 - flashpoints at or above 73.4 ºF and at or below 140 ºF Category 4 - flashpoints above 140 ºF and at or below 199.4ºF

Flashpoint of the liquid	The temperature at which it gives off vapor sufficient to form an ignitable mixture with the air
Foam	A stable aggregation of small bubbles which flow freely over a burning liquid surface and form a coherent blanket which seals combustible vapors and thereby extinguishes the fire.
Liquefied petroleum gas, (L.P.G.)	Any material that is composed predominately of hydrocarbons or mixtures of hydrocarbons:
Means of egress	A continuous path of travel from any part within a building to the open air outside at ground level.
Portable tank	A closed container that has a liquid capacity of more than 60 United States gallons, which is not intended for fixed installation.
Safety can	An approved metal or nonmetallic closed container that has a capacity of not more than 5 gallons, that has a flash-arresting screen, spring-closing lid, and spout cover, and that is designed so that it will safely relieve internal pressure when exposed to fire.
Vapor pressure	The pressure, measured in pounds per square inch (absolute), exerted by a volatile liquid.

Regulatory Standards

- MIOSHA, General Industry - Part 8. Portable Fire Extinguishers
- MIOSHA, Construction – Part 18. Fire Protection and Prevention
- OSHA, General Industry - 1910.155. Fire Protection
- OSHA, Construction - 1926.150. Fire Protection and Prevention

Fire Prevention

Fire prevention measures are to be taken on all projects and in all MJVD locations. The following are guidelines for fire prevention. These do not cover all OSHA requirements.

1. If the job consists of maintenance, modification, or additions to existing facilities, follows fire prevention regulations of the client.
2. See that proper precautions are taken with welding and burning operations. Use a permit system and fire watcher when necessary.
3. Tarpaulins, salamanders, and combustible materials should be placed to avoid possibilities of fire.
4. Oily rags and waste from flammable or hazardous materials must be kept in covered metal containers.
5. “No Smoking” areas must be conspicuously marked, and employees advised accordingly.
6. Gasoline shall be kept in approved containers, properly marked, and vented.
7. Large portable gasoline tanks and pumps are to be set a minimum of 50 feet from any building.
8. Combustible materials must be properly grounded.
9. The storage area shall be kept free of weeds, debris, and other combustible material not necessary for storage.
10. Job housekeeping is to be enforced with waste containers emptied at the end of each day's work.
11. 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.

12. 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.
13. Indoor storage of material shall not obstruct or adversely affect means of exit and only with the client's permission.
14. All materials shall be stored, handled, and piled with due regard to their fire characteristics.
15. Electrical wiring and equipment shall be installed in compliance with the National Electrical Code, NFPA, and the requirements of OSHA Construction Regulations, Subpart K.
16. Conduct regular periodic inspections of the entire project to assure that it remains in a fire-safe condition.

Emergency Fire Procedures

1. Arrange with local fire departments (private, plant, municipal) to fight fires.
2. Make sure emergency phone numbers are conspicuously posted throughout the project.
3. Instruct employees in the use of fire extinguishers.
4. Fire extinguishers are to be wall-mounted (if applicable), readily visible, and regularly inspected and maintained.
5. The Supervisor will be responsible for determining the number, sizes, and types of fire extinguishers needed for each job.
6. Listed below are fire classifications and the type of extinguishers used to combat the fires:

HAZARD	DESCRIPTION	EXTINGUISHER TYPE AND CONTENTS
Class "A" Fire	Combustible Material - wood, textiles, and rubbish	Loaded stream, Multipurpose dry chemical, Pressure-operated water, Water pump tanks, Water mist, Halon 1211
Class "B" Fire	Flammable Liquids, Gas, or Grease	Carbon dioxide, Dry chemical, Foam, Loaded stream, Multipurpose dry chemical, Halon 1211.
Class "C" Fire	Electrical Equipment	Carbon dioxide with plastic horn only, Dry chemical, Multipurpose dry chemical, Water mist, Halon 1211.
Class "D" Fire	Combustible Metal	Extinguishing agent listed for use on a specific combustible metal hazard.
Class "K" fire	Kitchen – animal and vegetable fats present in cooking oil and grease	Potassium acetate, potassium carbonate, potassium citrate, or a combination of these chemicals mixed with water.

Fire Considerations

A few of the fire safety features to be concerned with are exits, travel distances, emergency lighting, and alarm systems. Sealing off an area and blocking entrance/exit openings conflict with OSHA, NFPA, and local fire code requirements.

Emergency plans should be developed to include alternative exits in emergency situations, and these must be familiar to all employees.

Pre-Project Survey

Perform a prework survey to determine potential fire hazards, sources of ignition, hot-spots, and location of exits. Coordinate this with the number of workers to be in the area, the square footage, and the types and number of combustible/flammable materials that will remain on site.

Avoidance

1. Ensure all sources of ignition are removed.
2. 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.
3. Locate "hot spots". Quite often you will have to drape equipment instead of sealing it off to prevent overheating (i.e., computers, terminal boards, switch panels, transformers).
4. Cut off supply to steam lines, electric and steam heaters, and radiators.
5. Do not permit the polyethylene to lie against hot surfaces.
6. Do not allow lighters, matches, etc., into the work area.
7. Strictly enforce no smoking, eating, or drinking inside the work area.
8. When using an oxygen/acetylene torch to cut pipe, etc., post a fire watch with an appropriate fire extinguisher such as pressurized water.
9. Do not use CO_2 extinguisher in confined or enclosed spaces.
10. Dry chemical extinguishers are effective, but the power is a respiratory irritant.
11. Know what is on the other side of the wall and below the floor.
12. Use sheet metal or a treated tarp to catch sparks.
13. Lighting of exits and exit routes should be provided.
14. Be alert for flammable vapors in industrial areas (solvents such as naphtha, toluene, xylol, etc.).

OSHA Fire Safety Standards

OSHA requires a written emergency action plan and fire prevention plan. The plan should include the following:

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 people 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. Incident, or employee injury.

Training

All employees will be trained in the use of portable fire extinguishers provided at the workplace. Training will include:

1. Classes of fires.
2. Types of portable fire extinguishers.
3. Company fire prevention and evacuation plan.
4. Alarm system.
5. Proper use of the fire extinguisher using the P.A.S.S. System.
6. When possible, a hands-on portable fire extinguisher exercise will be conducted to provide employees with experience with the fire extinguishers.

Employee portable fire extinguisher training will be conducted initially on assignment and at least annually thereafter. 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.

Fire Extinguisher Service and Maintenance

In accordance with state and federal regulations portable fire extinguishers will be serviced annually. Each portable fire extinguisher will be inspected by company employees at least monthly as follows:

1. The fire extinguisher is in the 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.

Records of annual services and monthly inspections shall be retained for one year or the life of the shell, whichever is less.

Flammable Liquid

This section includes the following excerpts from OSHA Regulations (Standards - 29 CFR), Flammable and combustible liquids - 1910.106.

1. Sources of ignition - Adequate precautions shall be taken to prevent the ignition of flammable vapor. Sources of ignition include but are not limited to:
    - Open flames
    - Lightning
    - Smoking
    - Cutting and welding

- Hot surfaces
- Frictional heat
- Static
- Electrical, and mechanical sparks
- Spontaneous ignition, including heat-producing chemical reactions
- Radiant heat.

2. Grounding - Class I liquids shall not be dispensed into containers unless the nozzle and container are electrically interconnected.
3. Employees are expected to correct immediately or report for corrections any fire hazards in the work area. Employees should know the locations, operation, and types of extinguishers in the work area(s).
4. Employees must use only metal “safety cans” for transferring flammable liquids.
    a. The use of plastic cans and funnels is prohibited. Gas cans must be in contact with the ground or pavement during filling.
    b. Never fill a gas can that is inside or on a vehicle.
5. Employees must properly ground or bond all containers during the transfer of flammable liquids. For instance, touch the nozzle to the spout of the metal safety can during dispensing.
6. Fire extinguishers vehicles must be inspected daily by a technician prior to leaving for a job site. 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.
7. 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.

Smoking

1. Employees must never smoke near flammable liquids, gases, or materials, or where "No Smoking" signs are displayed.
2. Lighted matches, cigars, cigarettes, tobacco, or any other burning substances must be disposed of safely in a proper receptacle.
3. **Smoking is not permitted by any employee while working on any job site or while in uniform on or near any job site.**
4. Smoking is not permitted in the vehicle while the vehicle is on site.
5. The driving compartment of the vehicle is the only area that smoking may be allowed, but only during travel to and from site.

First Aid Policy

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
01-24-2024	MMM	MMM

Contents

Policy

The following medical services and first aid program is instituted for the protection of employees. This policy applies to on and offsite operations, projects, and personnel. M.J. VanDamme Trucking, Inc. "MJVD" shall ensure the availability of medical personnel and make provisions for prompt medical attention in case of a serious injury before beginning a project.

Regulatory Compliance

The following regulatory standards shall be followed for medical services and first aid.

- MIOSHA Construction Part 1. General Rules, Rule 132 Medical Services and First Aid
- MIOSHA Part 472. Medical Services and First Aid
- OSHA 29 CFR 1926.50 – Construction Medical Services and First Aid
- OSHA 29 CFR 1910.151 – General Industry Medical Services and First Aid

Medical Facilities and First Aid Trained Personnel

Prior to commencement of a project, the Project Manager shall document the name, location, address, and phone number to the nearest facilities below in the Accident Prevention Plan. This information will be posted and briefed to all employees on the project.

- Local Police Department
- Local Fire Department
- Closest Hospital
- Other Emergency Services

Onsite First Aid Personnel

An employee who has a valid certificate in first aid training shall be present at the worksite at all times to render first aid. Additional provisions shall be made to ensure alternate first aid persons are available when the primary first aid person is absent from the jobsite. Training will be certified by programs such as presented by the American Red Cross or equivalent training programs. First Aid/CPR duties will be a collateral duty.

Where a remote location or a single employee worksite exists, a written plan shall be provided that includes alternate methods of assuring available treatment for employees at a remote location or single-employee worksite. The written plan must be communicated to all affected employees.

Communications

At least one operating mobile phone or cell phone will be on each job site for emergency communications. Fully charged back-up batteries will be available in case of battery failure.

When working in a remote location that may not provide the caller's latitude and longitude information to the 911 emergency dispatcher, the following information shall be posted in a conspicuous location at the worksite:

- The latitude and longitude of the worksite.
- Other location-identification information that communicates effectively to employees the location of the worksite.

Transport Equipment

Proper equipment shall be provided to transport an injured person promptly and safely to a hospital or physician.

First Aid Supplies

First aid supplies will be readily accessible at each project site and in designated office locations. Employees shall be informed of these designated locations. For offsite projects, 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.

The first aid kits shall contain supplies sealed in individual packages and stored in a weatherproof container. At a minimum, the following supplies will be kept in the first aid kits according to the most current ANSI standard Z308.1:

Required:	**Recommended:**
Absorbent Compress - 1	Oral Analgesic
(32 sq. in., minimum 4" side)	Antibiotic Treatment
Adhesive Bandages (1"x 3") - 16	Bandage Compress
Adhesive Tape (3/8" x 5yd.) - 1	Breathing Barrier
Antiseptic (0.14 fl. oz.) - 10	Burn Dressing
Burn Treatment (1/32 oz.) – 6	Cold Pack
Medical Exam Gloves - 2 pair	Eye Covering
Sterile Pad (3"x 3") - 4	Eye Wash
Triangular Bandage (40"x 40"x 56") – 1	Roller Bandage

** Over the counter medication will not be supplied in first aid kits

Inspection

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 ensure that supplies are available and current.

- Missing, expended or damaged first aid supplies will be replaced.
- Damaged first aid cases will be replaced.
- Date sensitive first aid supplies will be replaced before the expiration date.

General Procedures

- Injuries sustained while on duty shall be reported to your supervisor immediately.
- Medical attention must be obtained immediately after an injury is sustained.
- All employees injured on the job should report to a doctor for treatment as soon as possible.
- First aid kits will be installed and maintained in all company vehicles at all times.

Emergency Eyewash and Showers:

Where employees are exposed to corrosive materials and chemicals offsite, portable eyewash stations and emergency showers shall be provided. Where employees are exposed to corrosive materials and chemicals on site, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area.

Eye wash stations and showers will provide at least 15 minutes of operation to ensure the decontamination and neutralization of the chemical from the skin and eyes.

American National Standards Institute (ANSI) Standard Z358.1 provides detailed information on what is appropriate for safety showers and eyewash stations, which is used by OSHA as a guide. The following information is recommended specs for acceptable safety equipment.

ANSI Safety Shower Specs

- The shower head must be capable of flowing 20 gallons per minute (gpm) at 30 psi and producing a 20-inch diameter spray pattern at 60 inches above the surface where the user stands.
- The center of the spray head pattern should be at least 16 inches from any wall, door, or obstruction.
- It is recommended that the shower head be mounted between 82 and 96 inches off the floor, with the valve no higher than 69 inches.

ANSI Eyewash Specs

- Flow of 0.4 gpm also at 30 psi.
- The nozzles should be at least six inches from any obstruction and mounted between 33 and 45 inches above the floor.
- An eyewash gauge should be used to verify and test the flow pattern.

ANSI Requirements for Both

- Provide the recommended flow for at least 15 minutes.
- The equipment must be designed to avoid freezing.
- Activation valves must open within one second and remain open until intentionally closed or turned off.
- Constructed of corrosion-resistant materials.
- Tepid water required - having a temperature of between 60- and 100-degrees Fahrenheit (15 to 37 degrees Celsius).
- Simultaneous operation for combination units.
- Travel to the unit should be under 10 seconds for all hazardous areas that need this equipment. This equals about 55 feet.
- The drench shower or eyewash must be on the same level as the hazard and have a clear path for travel. Marking the floor area underneath the shower may be performed to help keep it clear.
- Equipment shall be in a brightly lit area and marked with a highly visible safety sign.

Maintenance and Training

ANSI recommends flushing all equipment weekly to verify proper flow and clearing the plumbing of any deposits. If there are no floor drains, a large plastic trash can may be used to catch the water. The weekly flushing can also provide a great training opportunity to refresh the operation and travel paths for your employees. For portable eyewash stations, ensure the solution is within the expiration date.

Grounding Conductor Program

M.J. VanDamme Trucking, Inc.
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(906) 346-2641

Revision Date	Initials	Approved By (Initials)
01-24-2024	MMM	MMM

Contents

Policy

In accordance with current federal and state regulations, all electrical tools and equipment are subjected to the grounding requirements set forth in this policy. This policy applies to all on and off-site projects and operations.

Scope

The scope of this policy is to ensure that all tools and equipment are properly grounded to prevent shock or electrocution of an employee due to shorts in the system, cords, or tools.

A written description of grounding procedures will be posted on the project site. Site specific procedures will be noted and briefed to all employees and will be made available for review by employees and regulatory agencies.

Responsibility

1. Project Managers and supervisors are designated and trained to function as a Competent Persons in accordance with this program.
2. Project management and supervisors are responsible for ensuring compliance with the requirements of this policy.

Grounding of Equipment Connected by Cord and Plug

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:
    - Handheld motor-operated tools.
    - Cord-and-plug-connected equipment used in damp or wet locations, by employees standing on the ground or metal floors.
    - Tools likely to be used in wet and/or conductive locations.
    - Portable hand lamps.

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. Equipment must be distinctively marked to indicate that the tools or appliance use a system of double insulation.

Ground Fault Circuit Interrupter (GFCI)

1. All 120-volt, single-phase, 15 and 20 ampere receptacle outlets, 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.
2. Where GFCI receptacles are not available, plug in GFCI's will be used by our employees.
3. 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.

Inspection

Visual Inspections will be conducted as follows:

- Prior to use (daily).
- After repair.
- After an incident which it can be reasonable suspected to have caused damage.
- If stored and not in daily use at least quarterly (every three months).

All electrical cords, receptacles, plugs, tools, and equipment will be visually inspected for:

- Damaged or missing grounding pins or receptacles.
- Broken or damaged insulation.
- Missing guards covers or insulation.
- Indication of internal damage.

Cords, tools, and equipment found to be damaged or defective will be removed from service and repaired or destroyed.

- Cords, tools, and equipment found to be damaged or defective will be tagged as "Out of Service".
- Untagged cords, tools, or equipment shall not be used.

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. Color Codes will be as follows:

- Red First quarter (January - March)
- Blue Second quarter (April - June)
- Green Third quarter (July -September)
- Yellow Fourth quarter (October - December)

Electrical cords, receptacles, plugs, tools, and equipment found with out-of-date coding will be removed from service until inspected and coded.

Repair

If the damage to an electrical cord, receptacle, plug, socket, tool, or system cannot be made to meet the original insulation requirements and specifications (like new) it must be removed from service and destroyed.

Static Electricity, Grounding and Bonding

Static Electricity is often a source of ignition for an ignitable mixture. Static electricity is generated by the motion of particles, including liquids, gases, objects, vehicles, and people. The accumulation of static electricity can be prevented under many circumstances by bonding or grounding.

Bonding

The process of connecting two or more conductive objects together by means of a conductor.

Grounding

The process of connecting one or more conductive objects to the ground, as a specific form of bonding.

Procedures

1. 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.
2. 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.

HAZARD COMMUNICATION

M.J. VanDamme Trucking, Inc.
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Revision Date	Initials	Approved By (Initials)
01-24-2024	MMM	MMM

Contents

Introduction

M.J. VanDamme Trucking, Inc. "MJVD" management is committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable federal and state health and safety rules. Under this program employees are informed of the contents of the OSHA Hazard Communications Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals. These chemicals may be physical or health related. This written hazard communication plan is available on SharePoint, Safety.

Identifying Hazardous Chemicals

All hazardous chemicals with a potential for employee exposure at each workplace shall be identified and put on an inventory list and updated annually or when new hazardous materials are introduced. Safety Data Sheets (SDSs) shall be provided for each hazardous material at each location. Project-specific SDSs will be located onsite during the entirety of the project. The inventory list shall include:

- Product Name (as it appears on the label)
- Manufacturer Name
- Supplier/Distributor
- CAS #
- Product Code/Model Number/Series
- Total Amount
- Location
- SDS Link

Identifying Containers of Hazardous Chemicals

Labels will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals. The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including symbols, signal words and hazard statements.

All hazardous chemical containers used at each workplace will have:

1. The original manufacturer's label that includes a product identifier, an appropriate signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
2. A label with the appropriate label elements just described.
3. Workplace labeling that includes the product identifier and words, pictures, symbols, or combination that provides at least general information regarding the hazards of the chemicals.
4. If a hazardous substance is transferred to a secondary container for immediate use, the label shall include the product name. If not for immediate use, the signal word, hazard statement, pictogram, and precautionary statement shall be on the label.

The Safety Department and MJVD Management will ensure that all containers are appropriately labeled. No container will be released for use until this information is verified. Workplace labels must be legible and in English.

Safety Data Sheets

The manufacturer or importer of a hazardous material is required by OSHA to develop a Safety Data Sheet (SDS) that contains specific, detailed information about the chemical's hazard using a 16-section format. The distributor or supplier of the chemical is required to provide this SDS to the purchaser. If a SDS is not provided, MJVD shall contact the supplier to obtain the SDS.

SDS's are readily available to all employees during their work shifts. Employees can review SDS for all hazardous chemicals used at this workplace. Project specific SDSs shall be available at the project site. (Need to determine how we access SDSs for office locations).

The SDS's are updated and managed by the Safety Department or the Project Manager.

Training

Training on hazard communication shall be performed for all MJVD employees. This will include any chemical hazards an employee may encounter before they start a job or if there is potential for exposure to new hazardous chemicals. Hazard Communication training shall cover the following topics:

- An overview of the requirements in OSHA's Hazard Communication Standard 1910.1200.
- Hazardous chemicals are present in the workplace.
- Any operations in their work area where hazardous chemicals are used.
- The location of the written hazard communication plan and where it may be reviewed.
- How to understand and use the information on labels and in Safety Data Sheets.
- Physical and health hazards of the chemicals in their work areas.
- Methods used to detect the presence or release of hazardous chemicals in the work area.
- Steps we have taken to prevent or reduce exposure to these chemicals.
- How employees can protect themselves from exposure to these hazardous chemicals through use of engineering controls/work practices and personal protective equipment.
- An explanation of any special labeling present in the workplace.
    - What are pictograms (shown on Page 6 of this policy)?
    - What are the signal words?
    - What are the hazard statements?
    - What are the precautionary statements?
- Emergency procedures to follow if an employee is exposed to these chemicals.

The Safety Department is responsible for ensuring that employees receive this training. After attending the training, employees will sign a form verifying that they understand the above topics and how the topics are related to our hazard communication plan.

Prior to introducing a new chemical hazard into any department, each employee in that department will be given information and training as outlined above for the new chemical hazard by a supervisor or MJVD management in that area.

Informing Employees who do Special Tasks

Before employees perform special (non-routine) tasks that may expose them to hazardous chemicals, their supervisors will inform them about the chemicals' hazards. Their supervisors will also inform them about how to control exposure and what to do in an emergency. The employer will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment and additional training as required.

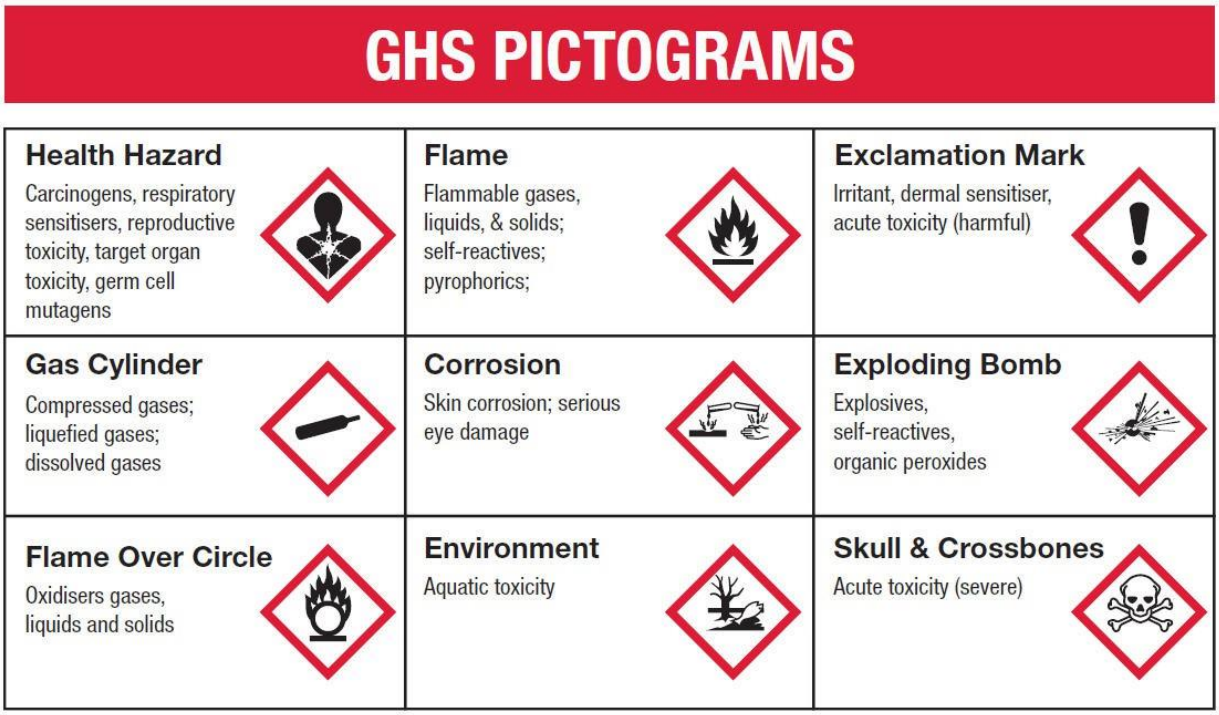
Communication

MJVD shall inform contractors and other employers about our hazardous chemicals If employees of other employer(s) may be exposed to hazardous chemicals at our workplace. It is the responsibility of the Project Manager or Site Safety Office on project sites to provide contractors and their employees with the following information:

- The identity of the chemicals, how to review our Safety Data Sheets, and an explanation of the container labeling system.
- Safe work practices to prevent exposure.

The Safety Department shall obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace.

GHS Pictograms



Hazard Communication Safety Data Sheets

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients, trade secret claims.

Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment, chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures, protective equipment, proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); ACGIH Threshold Limit Values (TLVs); and any other exposure limit used or recommended by the chemical manufacturer, importer, or employer preparing the SDS where available as well as appropriate engineering controls; personal protective equipment (PPE).

Section 9, Physical and chemical properties list the chemical's characteristics.

Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.

Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.

Section 12, Ecological information*
Section 13, Disposal considerations*
Section 14, Transport information*
Section 15, Regulatory information*

Section 16, Other information, includes the date of preparation or last revision.

*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15 (29 CFR 1910.1200(g)(2)).

See Appendix D of 1910.1200 for a detailed description of SDS contents.

HEARING CONSERVATION PROGRAM

M.J. VanDamme Trucking, Inc.
301 Avenue A
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(906) 346-2641

Revision Date	Initials	Approved By (Initials)
01-24-2024	MMM	MMM

Contents

Purpose

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. Each M.J. Vandamme Trucking, Inc. "MJVD" site/project will implement a comprehensive Hearing Conservation Program in accordance with the guidelines herewith.

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.

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.

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.
Representative Exposure	Measurements of an employee's noise dose or 8-hour TWA sound level that the employers deem to be representative of the exposures of other employees in the workplace.
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 Hz 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.

Overview

1. Permanent hearing loss may result from prolonged exposure to excessive noise.
2. There are occupations within MJVD's operations where the noise exposures are such that occupational hearing loss could result.
3. 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.
4. Noise induced hearing loss can also result from acoustic trauma (e.g., an explosion).
5. With this type of exposure, the eardrum may be ruptured and the middle and inner ear damaged.
6. 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.
7. 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.

Program Administration

The Safety Director and Management are responsible for the overall administration of the hearing conservation program. Such administration involves coordinating the cooperative efforts of the disciplines within the organization, as well as the day-to-day implementation and evaluation of the program. A professional audiologist will be utilized to provide surveillance/oversight of the hearing conservation program as required.

Program Elements

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. Recordkeeping
8. Access to Information and Records

Each of the program elements is discussed separately.

Noise Monitoring

The client's established noise areas will be reviewed, and proper hearing protection will be selected. In suspected high noise areas, noise monitoring will be conducted. Qualified industrial hygienists will conduct the noise level surveys and any additional studies that may be required.

Monitoring results will be maintained on file. Recommendations for feasible engineering and administrative controls, including the utilization of appropriate hearing protection, will be made as a result of these surveys. All efforts toward compliance with these recommendations will be documented and maintained on file. Affected employees or their representatives are to be provided the opportunity to observe any noise measurements conducted in their workplace.

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. OSHA - 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. MSHA – All employees exposed to the 85-decibel action level during any work shift is required to be enrolled in the hearing conservation program and comply with 62.150 by monitoring, using hearing protection, audiometric testing, training, and recordkeeping.
4. All baselines, annual, and confirmation audio grams will be preceded by at least 14 hours without exposure to workplace noise.
    a. Hearing protectors may be used as a substitute for this requirement.
5. The audiometric testing will be conducted at the clinic as part of the annual physicals.
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 evaluating 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. A deviation of 10 decibels or greater requires 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 hygienist performs this activity on an annual basis.
11. Documentation shall be maintained.

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. Computerized consulting audiologists will do this comparison.
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. 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, and 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.

Use of Hearing Protection

1. 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. Such protectors will be replaced, as necessary.
2. 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.
3. 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.
4. A variety of suitable hearing protectors will be provided for employees to select from. This would include at least one type of muff and two types of plugs.

5. The company will evaluate hearing protector attenuation for the specific noise environment in which the protector will be used.
6. Hearing protectors must attenuate employee exposure at least to an 8-hour time-weighted average of 90 decibels.
7. 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.
8. 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.

Education and Training

A training program will be instituted for all employees included in the Hearing Conservation Program and will be repeated annually. The training program will be updated to be consistent with changes in protective equipment and work process. 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.

Recordkeeping

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.

Access to Information and Records

Copies of the OSHA noise standard will be made available upon request to affected employees or their designated representative. A copy of the standard will also be posted in the workplace.

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.

LOCKOUT / TAGOUT

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6-21-24	MMM	MMM

Contents

Policy

It is the policy of M.J. VanDamme Trucking, Inc. "MJVD" to maintain, insofar as is reasonably possible, a work environment for our employees that will not adversely affect their health and safety nor subject them to avoidable risks of accidental injury or illness. MJVD has an obligation to safeguard employees from hazardous energy while they are performing service or maintenance on machines and equipment.

Purpose

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. This procedure applies to all employees performing any of the aforementioned tasks. All company employees are authorized employees under this standard. Sub-contractors are listed as affected employees.

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 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.

"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.

"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 to install connections or appurtenances.

"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.

"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.

"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.

Regulatory Standards

- OSHA, Construction - 1926 Subpart K - Electrical, 1926.417 - Lockout and tagging of circuits
- OSHA, General Industry – 1910.147. The control of hazardous energy (lockout/tagout)
- MIOSHA, General Industry - Part 85. The Control of Hazardous Energy Sources
- MIOSHA, Construction and MIOSHA Construction General Rules, Rule 127

Supervisor Responsibilities

1. Ensure the employee performing the task is an authorized employee.
2. Enforce compliance of the lockout procedure.
3. Assure that locks, tags, and lockout devices required for compliance are provided for employees.
4. Prior to any servicing or maintenance work, 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.

Equipment that may Require Lockout/Tagout

On Site Systems

- Electrical Systems
- Pump Systems
- Valves
- Pipe systems
- Tanks.

Site Equipment

- Heavy equipment
- Lift equipment
- Power tools.

Requirements

1. 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.
2. 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.
3. Safety locks are for the personal protection of the employees and are to be used for locking out the equipment.
    a. These may be obtained from the office.
    b. Locks will be case hardened steel locks manufactured by American Lock or Master Lock with a 2" shank.
4. Personal locks will be tagged with the employee's name and number.
    a. 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.
5. 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.
6. Employees will request assistance from their supervisor if they do not know how or where to lockout equipment and direct any questions to t.

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:

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.

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.

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).

Lockout / Tagout Device Application

1. Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
2. Lockout devices, where used shall be affixed in a manner to that will hold the energy isolating devices in a “safe” or “off” position.
3. 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.

Stored energy

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.

If there is a possibility of re-accumulation 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.

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 de-energization of the machine or equipment have been accomplished.

Preparation for Lockout

The supervisor will 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. More than one energy source may be involved. All affected employees shall be notified that a lockout/tagout system is going to be utilized and the reason.

Authorized employees will know:

1. The type and magnitude of the energy and hazards
2. The type and location of energy isolating means
3. Methods of isolation - locks, tags, other
4. Types of stored energy and methods to dissipate or restrain
5. Release methods for stored energy and possibility of re-accumulation.

Lockout/Tagout Procedures

1. If the machine, equipment, or process is operating, shut it down by normal stopping procedures.
    a. The main disconnect switches will be turned off and locked in the off position.
    b. 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.

2. 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.
3. **BE SURE TO RETURN OPERATING CONTROLS TO NEUTRAL OR OFF AFTER THE TEST**.
4. The equipment is now locked out.

Removal of Locks and Restoring Power

1. Power may be turned on when it is required to perform tests or adjustments. 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.
        i. Notify all authorized and affected employees working on the system.
        ii. Remove lockout/tagout devices and locks.
        iii. Energize and proceed with testing.
        iv. De-energize and reapply lockout/tagout controls on system.
    b. The machine, equipment or process will again be locked out if it is necessary to continue work after the test or adjustment is complete.
    c. The project foreman or lead man will verify that all locks and tags are applied to the system prior to work continuing.
2. When work continues to the next shift, the employee on the outgoing shift removes his/her lock and the employee on the new shift places his/her lock on the device.
3. Upon completion of the work, each employee will remove his/her lock, rendering the machine operable when the last lock is removed.
4. 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.

Re-energization procedure

Rules pertaining to removing locks and restoring power will be followed.

1. Clear away all tools and equipment from within the system.
2. Notify all authorized and affected employees working on the system.
3. Remove lockout/tagout devices and locks.
4. Operate the energy isolating device to restore energy.

Multiple Lockout/Tagout (Group Lockout)

1. If more than one individual is required to lockout equipment, each will place his/her own personal lockout device on the energy isolating device. When an energy isolating device cannot accept multiple locks, a multiple lockout device (hasp) may be used.
2. 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. After inspection of the system and lockouts by the project foremen or lead man (authorized employees).
    a. Each employee will then use his/her lock to secure the box or cabinet.
    b. As each employee no longer needs to maintain his/her lockout protection, that employee removes his/her lock from the box or cabinet.

Shift Change

During shift change the following procedure will be used to ensure the continuity of the lockout/tagout procedures.

1. The on-coming shift of authorized employees will place their locks and tags on the lockout devise, lock box or lockout cabinet.
2. Then the off going shift of authorized employees will remove their locks and tags on the lockout devise, lock box or lockout cabinet.
3. The oncoming sift will verify that the system is locked out prior to working on the system.

Emergency Lock Removal

1. 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.
2. Verify that the authorized employee is not in the facility.
3. Every attempt must be made to contact the authorized employee prior to removal of the device.
4. The authorized employee must be informed of the removal before his/her next work shift.

Outside Personnel

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.

The on-site employer will ensure that his/her personnel understand and comply with the restrictions and prohibitions of the outside employer's energy control procedures.

Training and Communications

All supervisors will be trained regarding the requirements and provisions of this lockout procedure. Each supervisor is responsible to train the employees under his/her supervision regarding the requirements and provisions of this lockout procedure.

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. 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.

Employee Retraining

1. 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.
2. 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.
3. The retraining will re-establish employee's proficiency and introduce new or revised control methods and procedures.
4. A record of employee retraining including employee name and date of retraining will be kept when any of the above conditions exist.

Periodic Inspections

1. 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.
2. The inspection will be performed by an authorized employee other than the one utilizing the procedure.
3. The inspection will be designed to correct any deviations of inadequacies observed.
4. Where lockout is used, the inspection will include a review with each authorized and each affected employee of his/her responsibility under the energy control procedure being inspected.
5. Where tagout is used, the inspection will include a review with each authorized and each affected employee of his/her responsibility under the energy control procedure being inspected and the elements contained in the TRAINING AND COMMUNICATION section regarding tagout systems.
6. The supervisor will certify that the periodic inspection has been made. 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.

LIFTING – MOBILE EQUIPMENT

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6-21-24	MMM	MMM

Contents

Scope

This policy sets the standards for operations of Aerial Platforms and Man lifts.

Regulatory Standards

OSHA, Construction - 1926.453. Aerial Lifts
OSHA, General Industry, 1910 Subpart F. Powered Platforms, Manlifts, and Vehicle-Mounted Work Platforms
MIOSHA, Construction – Part 32. Aerial Work Platforms
MIOSHA, General Industry – Part 58. Aerial Work Platforms

Operations

1. Only authorized trained personnel are to operate any lifts.
2. All regulatory standards shall be reviewed prior to use for general industry or construction, depending on the job at hand.
3. 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. The fall protection system used shall be connected to the boom or the basket prior to use.
4. Fall protection may or may not be worn when using a scissor lift. See manufacturers operating procedures to see if fall protection is required when using a scissor lift.
5. Modifications to the equipment shall not be made without written approval from the manufacturer.
6. Lift controls shall be tested and/or equipment is inspected before use.
7. Load limits shall not be exceeded.
8. Lift equipment will have a working back-up alarm, or a spotter utilized when backing.
9. Stay clear of power lines. Minimum clearance between electrical lines and any part of the equipment is at least 10 feet.
10. Operators shall stand firmly on the floor and shall not climb on the rails or the edge of the basket.

Operators

1. Know the lift, how to operate it, the purpose of all controls, the location and normal readings of gauges and dials. Know the rated workload, safe speed ranges, braking, steering, turning radius, and operating clearances.
2. Read and understand the DANGER, WARNING, CAUTION, and other signs on the machine. Read and understand the Operator's Manual before using the machine. If there is no manual with the machine, get one.
3. Prior to starting the workday, inspect the machine and report all deficiencies. Do not operate the machine until deficiencies are corrected and all systems are in good operational condition.
4. 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.
5. Check overhead prior to raising the platform. Be especially careful around power lines.
6. If using a lift with a combustion engine, make sure there is enough ventilation.

7. Never allow an unqualified individual to operate the lift.
8. Never position a lift over the top of another individual.
9. Always tie-off inside the basket, not to adjacent structures.
    a. **YOU MUST TIE-OFF METAL TO METAL**.
    b. 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.
    c. Always keep both feet flat on the floor of the platform - **DO NOT CLIMB ON THE RAILING**.
10. When traveling in the raised position use extreme caution. Always keep your attention in the direction of travel.
11. Ensure that all outriggers, stabilizers, etc. are extended prior to raising the platform.
12. When lowering the platform, make sure that all personnel are clear below.
13. Never use ladders, planks, steps, or other devices to provide additional reach.

Standard Operating Procedures

1. Manufactures operator's manual for each lift unit operated will be incorporated into this policy.
2. Each operator is to review the manufactures operating procedures and safety area prior to operating the lift equipment.
3. Daily, weekly, and annual inspection will be conducted in accordance with manufactures guideline and documented.

Training

MJVD shall provide each employee who will operate an aerial work platform with instruction and training regarding the equipment before a permit is issued or reissued. Instruction and training shall include:

1. Instruction by a qualified person in the intended purpose and function of each of the controls.
2. Training by a qualified person or reading and understanding the manufacturer’s or owner’s operating instructions and safety rules.
3. Understanding by reading or by having a qualified person explain, all decals, warnings, and instructions displayed on the aerial work platform.
4. Reading and understanding the provisions of this subrule and subrules (1) to (9) of this rule or be trained by a qualified person on their content.

An employer shall provide the operator of an aerial work platform with an aerial work platform permit. The permit shall be carried by the operator or be available at the job site/workplace and shall be displayed upon request by a department of licensing and regulatory affairs representative. The permit shall indicate the type of aerial work platforms an operator has been trained on and is qualified to operate. The permit to operate an aerial work platform is valid only when performing work for MJVD. A permit shall be issued for a period of not more than 3 years. The permit shall contain all the following information:

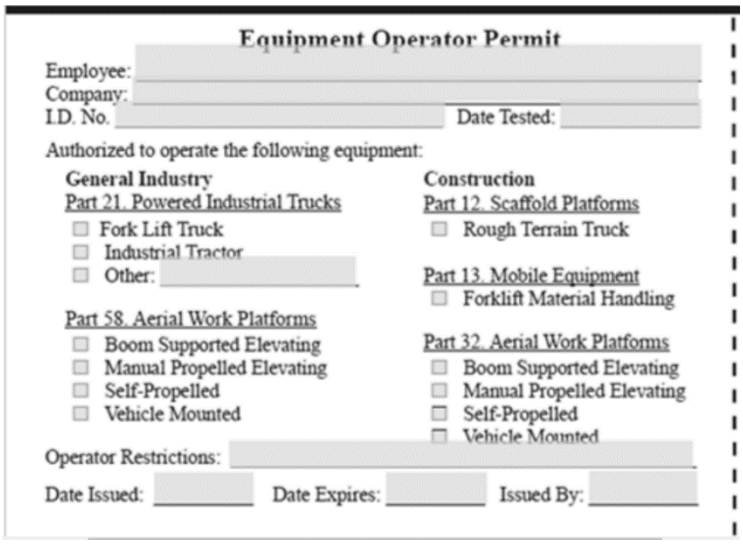
1. Firm name - MJVD.
2. Operator’s name.
3. Name of issuing authority, same as ‘Authorized by.’
4. The following are types of aerial work platforms the operator is authorized to operate:
    a. Vehicle-mounted elevating work platform such as the following:
        i. Extensible boom aerial devices.

ii. Aerial ladders.
iii. Articulating boom aerial devices.
iv. Vertical towers.

b. Manually propelled elevating work platforms.
c. Boom-supported elevating work platforms.
d. Self-propelled elevating work platforms.

5. Date issued.
6. Expiration date.

An example of this permit shall look like:



Equipment Operator Permit

Employee: _____
Company: _____
I.D. No. _____ Date Tested: _____

Authorized to operate the following equipment:

General Industry

Part 21. Powered Industrial Trucks
- ☐ Fork Lift Truck
- ☐ Industrial Tractor
- ☐ Other: _____

Part 58. Aerial Work Platforms
- ☐ Boom Supported Elevating
- ☐ Manual Propelled Elevating
- ☐ Self-Propelled
- ☐ Vehicle Mounted

Construction

Part 12. Scaffold Platforms
- ☐ Rough Terrain Truck

Part 13. Mobile Equipment
- ☐ Forklift Material Handling

Part 32. Aerial Work Platforms
- ☐ Boom Supported Elevating
- ☐ Manual Propelled Elevating
- ☐ Self-Propelled
- ☐ Vehicle Mounted

Operator Restrictions: _____

Date Issued: _____ Date Expires: _____ Issued By: _____

Training Certification / Equipment Operator Permit

DETACH

EMPLOYER FILE

Employee: _____

I.D. No. _____ Shift: _____

Date Tested: _____ Date Permit Issued: _____

Expiration Date: _____ Issued By: _____

Restrictions: _____

Michigan Department of Labor and Economic Opportunity
MIOSHA • Consultation Education & Training Division
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MIOSHA/CET #0116C (Rev. 08/19)

Manufacturers Standard Operating Procedures

Manufacturers Standard Operating Procedures are incorporated by reference for each lift used or operated by the company.

SCAFFOLDING (USER) POLICY

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6/20/2024	MMM	MMM

Contents

Policy

The Scaffolding Users Program has been established to provide guidelines for the safe use of scaffolding by all employees. M.J. VanDamme Trucking, Inc. "MJVD" does not own nor assemble any scaffolding equipment. For work sites where work cannot be done safely from the ground or from solid construction, a scaffolding subcontractor will be employed.

The construction and maintenance of the scaffolding structure by the subcontractor will be in compliance with the appropriate regulatory standard (see below). 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.

Purpose

To eliminate or minimize the potential for injury to personnel and/or damage to property as a result of scaffolding usage and to comply with insurance and regulatory agency requirements.

Regulatory Standards

OSHA, Construction - 1926.451. Scaffolds
OSHA and MIOSHA, General Industry - 1910.27. Scaffolds and Rope Descent Systems
MIOSHA, Construction – Part 12. Scaffolds and Scaffold Platforms

Procedures

1. The Company will utilize only scaffolding rented from reputable scaffolding companies who will erect and certify their scaffolding for all projects requiring scaffolding construction.
2. The Operations Manager and all supervisors will be trained as Competent Persons
3. All employees will receive proper training from the Operations Manager or site supervisor regarding hazards associated with scaffolding use.

Training

Training will be provided at each new job site where scaffolding is used.

Training will include hazards such as:

- Safe access
- Material handling
- Falls, falling objects, and fall protection
- Electrical
- Load capacity and load balance.

Retraining

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.

Inspections

1. A Competent Person will conduct inspections of all scaffolding systems.
2. The inspections will take place prior to use of the scaffolding and be repeated on a daily basis.
3. When an inspection reveals unsafe equipment or conditions the equipment (or condition) will be tagged.
    a. Employees must not use tagged equipment.
    b. Use of tagged equipment will result in disciplinary action.
4. The tag will identify the unsafe equipment or condition via a written description of the observed problem and will be physically attached.
5. Employees will not use scaffolding that has been tagged due to an unsafe condition until the condition is corrected.
6. Employees will be instructed to comply with all instructions provided on the tag.
    a. If employees do not comply with tagged out equipment, etc. they will be disciplined accordingly.
7. Modifications to a scaffolding system will only be performed by a Qualified Competent Person.
    a. Only scaffolding erection and rental company personnel are considered are Qualified to erect alter or modify scaffolding systems.
    b. Disciplinary action for unqualified modifications to scaffolding will be in accordance with the company Disciplinary Program.
8. The competent person will inspect the scaffolding to assure:
    a. Ground has not settled, base plates are centered on sills, and screw jacks are in contact with each frame leg.
    b. Scaffold was not dangerously modified.
    c. All bracing is in place.
    d. Scaffold is plumb.
    e. Scaffold members are properly installed and fastened.
        i. The scaffold is properly tied if required.
        ii. All platform units are in place and fastened if required.
        iii. Guardrail components are in place on all ends and open sides of the scaffold.
        iv. Safe access to scaffold and to platform has not been removed or obstructed.
        v. Platform gates close freely and are not wired open.
        vi. Overhead protection is available if workers are above the work platform.
        vii. Energized electrical power lines have not been placed within the allowable distance from the scaffold assembly.
        viii. Any missing or defects corrected, prior to employee use.

HOT WORK POLICY
&
HOT WORK PERMIT

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6-21-24	MMM	MMM

Contents

Policy

To provide guidelines for control of hot work (cutting, welding, heating, etc.) in critical fire areas.

Purpose

1. To eliminate or minimize the potential for injury to personnel and/or damage to property as a result of fire or explosion.
2. To identify critical fire areas requiring a permit prior to the performance of hot work.
3. To comply with insurance and regulatory agency requirements.

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. A permit is not usually required for hot work in these areas (e.g., maintenance shop, outdoor grounds, etc.).

Procedure

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 identify all critical fire areas and develop a listing of their location.
    b. Typical examples of some critical fire areas are:
        - Fuel Storage Areas and Pumping Islands
        - Hydraulic Oil Systems (Flammable)
        - Electronic Equipment Rooms
        - Flammable Process Materials
        - Service Stations
        - Underground Tanks and Vaults

Hot Work Permit Procedure

Supervision involved with hot work will:

1. Review scope of the hot work with affected parties.
2. Assure that a permit has been issued in critical fire areas.
    a. If a supervisor is uncertain whether or not a hazardous condition exists, a permit should be issued.
3. It is supervisions responsibility to ensure that fire or health hazards which may develop during 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).
    a. Should this occur, the responsible supervisor must notify all concerned and work will not continue until a new or revised permit is issued.
4. 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.

Individual responsible for issuing permit will:

1. Visually inspect the proposed work area.
2. Ensure that all combustible materials and flammable liquids are at least 30 feet away from the hot works project.
3. Record all potential fire and safety hazards observed.
4. Determine whether toxic and/or explosive vapors, fumes, dusts, etc., are present in a quantity sufficient to create a fire or safety hazard.
    a. Where entry into a confined space is involved, refer to appropriate local procedures.
5. Specify measures required to control potential hazards and review these requirements with person(s) requesting the permit.
6. After the necessary requirements have been met, sign, date and post the permit in or near the work area.
7. The hot work permit will be valid for only one (1) work shift.
    a. At the start of a new work period, the area will be reevaluated, and a new permit will be issued and posted.
8. Conduct a final inspection of the area approximately thirty (30) minutes after completion of the work.
    a. When the area is considered "fire safe", remove the permit form.
9. Maintain a file of completed permits from the preceding 12 months for review by insurance, regulatory agency and other authorized person(s).

Hot Work Permit Form:

MJVD Hot work Permit Form will be used on all projects except where the client facility requires the use of their form.

Hot Work Monitoring:

Hot works area will be monitored for Lower Explosive Limit (LEL) to ensure that the flammable gases (vapors) are below 10% of the LEL.

1. Monitoring equipment will be calibrated in accordance with manufactures specifications.
2. Only employees trained on monitoring equipment will take LEL readings.
3. All LEL monitoring results will be recorded on the hot works permit.

Any changes to the hot works area not allowed in the permit requires the immediate revoking of the permit.

Non-company Hot Work Permits

Hot work performed by non-company employees (contractors, service representatives, etc.) must be performed in accordance with this procedure. 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.

Fire Watch

Fire watch is a dedicated employee whose sole responsibility is to provide early warning and fire protection during the hot works procedure. Fire Watch Procedures:

1. Monitor hot works operation for any signs of uncontrolled fire.
2. Know where all the 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 the 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.

Education and Training

The Hot Work Permit Control System policy will be reviewed with all supervision annually. This procedure will be reviewed annually with employees who perform tasks involving hot work.

Management Controls

The Facility Hot Work Permit Control procedure will contain provision for specific audits of actual work in progress to assure its effectiveness. Audit(s) will be conducted to ensure that annual reviews are held, and training of employees is effective.

Site Specific Hot Works Procedures

"Hot Work" is any work that can produce a source of ignition, such as heat or sparks. Some examples are:

- Welding, brazing, cutting, grinding, chipping, and use of any power tools or open flame.
- Concrete saw cutting, and use of any internal combustion engine, such as a generator, compressor, car, or truck.

1. Extreme caution should be used while performing "Hot Work" to prevent fires or explosions.
2. Follow all instructions for proper use of the equipment.
    a. Maintain a clean work environment to minimize the chances of combustion.

    b. Follow standard good housekeeping procedures, and place 2 fire extinguishers on opposite sides of the work area.
    c. Wear appropriate Personal Protective Equipment for the procedure, such as goggles and gloves.
    d. Eliminate any source of flammable vapors, such open vent, vapor, or fill pipes.
    e. Close all manhole covers, lids, and caps.
3. "Hot Work" should only be conducted in a safe atmosphere.
    a. The locations near the pumps, dispensers, and vents of tanks have a potential hazardous atmosphere.
    b. 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).
4. While testing the atmosphere, first the Oxygen level must be within 19.5% and 23.5%.
    a. Then the LEL reading must be confirmed less than 10%.
    b. Continuous fresh air ventilation may be used to ensure that a safe atmosphere exists.
    c. Beware that other considerations such as confined space entry may also apply.
5. Do not conduct "Hot Work" if flammable liquids are present, either free-standing liquid or saturated soil.
    a. Instruct the Operations Manager of the condition and wait for the flammable liquids to be properly cleaned up.
6. 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 utilized.)

Fire Extinguisher

1. All extinguishers will be UL/Factory Mutual/NFPA approved appliances.
2. Extinguishers will be at least 20 lb. units for the class of fires expected at the site.
3. Extinguishers will be inspected and services in accordance with current OSHA regulations.
    a. Serviced annually.
    b. Inspected monthly or prior to placement on hot works project.
4. 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.

MJVD 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 a 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

PERSONAL PROTECTIVE EQUIPMENT (PPE)

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

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Contents

Introduction

The purpose of this Personal Protective Equipment Policy is to protect M.J. VanDamme Trucking, Inc. "MJVD" employees from exposure to workplace hazards and the risk of injury using Personal Protective Equipment (PPE). PPE is not a substitute for more effective control methods and its use will be considered only when other means of protection against hazards are not adequate or feasible. The hierarchy of controls shall be utilized to determine mitigation methods and PPE shall be used in conjunction with these methods unless no other means of hazard control exist.

Personal protective equipment will be provided, used, and maintained when it has been determined that its use is required to ensure the safety and health of our employees and that such use will lessen the likelihood of occupational injury and/or illness.

This section addresses general PPE requirements, including eye and face, head, foot and leg, hand and arm, body (torso) protection, and protection from drowning. Separate programs exist for respiratory protection and hearing protection as the need for participation in these programs is established through industrial hygiene monitoring.

Regulations

MJVD shall follow appropriate federal or state regulations governing the use, selection, and maintenance of personal protective and lifesaving equipment. This policy describes Occupational Safety and Health Administration (OSHA) and Michigan OSHA (MIOSHA) regulatory standards.

MIOSHA Construction Part 6. Personal Protective Equipment
MIOSHA General Industry Part 33. Personal Protective Equipment
OSHA General Industry 1910 Subpart I - Personal Protective Equipment
OSHA Construction 1926.28 – Personal Protective Equipment and 1926 Subpart E

Responsibilities

Safety Director / MJVD Management

The Safety Director and MJVD Management are all responsible for the development, implementation, and administration of MJVD's PPE policies. This involves:

1. Conducting workplace hazard assessments and worksite analyses, such as Field Level Hazard Assessment (FLHA), Worksite Exam, Pre-Task Hazard Assessment (PTHA), and/or Job Hazards Analyses (JHAs) to determine the presence of hazards which necessitate the use of PPE.
2. Selecting and purchasing PPE.
3. Reviewing, updating, and conducting PPE hazard assessments whenever:
    - a job changes.
    - new equipment is used.
    - there has been an accident.
    - a supervisor or employee requests it.
    - or at least every year.
4. Maintaining records on hazard assessments.
5. Maintaining records on PPE assignments and training.

6. Providing training, guidance, and assistance to employees on the proper use, care, and cleaning of approved PPE.
7. Periodically re-evaluating the suitability of previously selected PPE.
8. Reviewing, updating, and evaluating the overall effectiveness of PPE use, training, and policies.

Project Manager, Site Supervisor, Site Safety Officer

Project specific Project Managers, Site Supervisors, Site Safety Officers have the primary responsibility for implementing and enforcing PPE use and policies in their work area. This involves:

1. Select the appropriate PPE required for each project and communicate PPE selection to employees.
2. Providing appropriate PPE and making it available to employees.
3. Ensuring that employees are trained on the proper use, care, and cleaning of PPE.
4. Ensuring that PPE training certification and evaluation forms are signed and given to the Safety Department.
5. Ensuring that employees properly use and maintain their PPE and follow MJVD PPE policies and procedures.
6. Notifying MJVD management and the Safety Department when new hazards are introduced or when processes are added or changed.
7. Ensuring that defective or damaged PPE is immediately disposed of and replaced.

Employees

The PPE user is responsible for following the requirements of the PPE policies. This involves:

1. Properly wearing PPE as required.
2. Attending required training sessions.
3. Properly caring for, cleaning, maintaining, and inspecting PPE as required.
4. Following MJVD PPE policies and procedures.
5. Informing the supervisor of the need to repair or replace PPE.

MJVD has the right to impose disciplinary actions for employees who repeatedly disregard and do not follow PPE policies and procedures.

Types of Hazards

Hazards exist in every workplace in many different forms. Some examples of hazards include:

- Moving machinery, moving parts, moving tools
- Noise
- Falling objects or potential for dropping objects
- Sharp objects which might pierce the feet or cut the hands
- Electrical hazards
- High temperatures
- Chemical exposures
- Working near water
- Harmful dust that could result in scratches or burns to eyes or lungs
- Light radiation that could cause burns to skin and eyes (i.e., welding, brazing, cutting).

Procedures

Hazard Assessment for PPE

MJVD shall conduct hazard assessments of each workplace and job site to determine the type, level of risk, and seriousness of potential injury for the job task to determine what PPE shall be required.

The general procedure to determine appropriate PPE shall be followed:

- Identify the potential hazards and the type of protective equipment that is available, and what protection it provides (i.e., splash protection, impact protection, etc.).
- Compare the capabilities of various types of PPE with the hazards associated with the environment (e.g., impact velocities, masses, projectile shape, and radiation intensities).
- Select the PPE which provides a level of protection greater than the minimum required to protect employees from the hazards.
- Select PPE that will fit each employee properly and provides protection from the hazard.

The hazard assessment shall be reviewed and updated when:

- The job changes.
- New equipment or process is being used.
- There has been an accident.
- If an employee or management requests it.
- At least every year.

Selection of PPE

Once the hazards of a workplace or job site have been identified, mitigation controls shall be implemented to try and eliminate or reduce the hazard other than PPE. When such methods are not adequate or feasible, appropriate PPE shall be determined. Affected employees whose jobs require the use of PPE will be informed of the PPE selection and will be provided PPE by MJVD at no charge. Careful consideration will be given to the comfort and proper fit of PPE to ensure that the right size is selected and that it will be used.

All personal protective clothing and equipment will be of safe design and construction for the work to be performed and will be maintained in a sanitary and reliable condition. Only those items of protective clothing and equipment that meet NIOSH or ANSI (American National Standards Institute) standards will be procured or accepted for use. Newly purchased PPE must conform to the updated ANSI standards which have been incorporated into the PPE regulations, as follows:

Eye and Face Protection - ANSI Z87.1-1989

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids, or caustic liquids, chemical gases or vapors, or potentially injurious light radiation. Requirements for side protection, prescription lenses, filter lenses, and identification of the manufacturer are outlined in the standard. Protective eye and face devices purchased after July 5, 1994 must comply with ANSI Z87.1-1989 or be demonstrated to be equally effective. Devices purchased before that date must comply with ANSI Z87.1-1968 or be equally effective. Occupations/activities that may be exposed to these types of hazards include sheet metal fabrication, wood shops, welders, grinders, and parts cleaning.

Head Protection - ANSI Z89.1-1986

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects. Protective helmets designed to reduce electrical shock hazards shall be worn by each such affected employee when near exposed electrical conductors which could contact the head. Protective helmets purchased after July 5, 1994 shall comply with ANSI Z89.1-1986 or be equally effective. Occupations/activities that may be exposed to these types of hazards include crane operations, overhead work areas and low clearance work areas.

Foot Protection – ASTM F2413-18

Employees must wear protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, or where employees' feet are exposed to electrical hazards. Protective footwear purchased after July 5, 1994 must comply with ANSI Z41-1991 or be equally effective. Occupations/activities that may be exposed to these types of hazards include steel fabrication, compressed gas cylinder distribution, recycling centers and warehousing.

Hand Protection - No ANSI standard

Appropriate hand protection shall be selected when hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns and harmful temperature extremes. The selection of the appropriate hand protection shall be based on evaluation of the performance characteristics of the hand protection relative to the tasks to be performed, conditions present, duration of use and the hazards and potential hazards identified. Occupations/activities that may be exposed to these types of hazards include sheet metal fabrication, painters, welders, electricians, parts cleaning, and food preparation.

Respiratory Protection – MJVD Program, ANSI Z88.2-1969

Employers must select and require the use of appropriate respirators in areas where employees are exposed to inhalation hazards in excess of the established exposure limits. Inhalation hazards may consist of exposure to gases, vapors, dusts, mists, fumes, or fibers. All respirator usage shall be in accordance with the employer's Respiratory Protection Program and ANSI Z88.2-1969 (Standard Practice for Respiratory Protection). Occupations/activities that may be exposed to these types of hazards include abrasive blasting, spray painting, welding, chemical related activities, and asbestos maintenance.

Working Over or Near Water – 1926.106

- Employees working over or near water, where the danger of drowning exists, shall be provided with U.S. Coast Guard-approved life jacket or buoyant work vests.
- Prior to and after each use, the buoyant work vests or life preservers shall be inspected for defects which would alter their strength or buoyancy. Defective units shall not be used.
- Ring buoys with at least 90 feet of line shall be provided and readily available for emergency rescue operations. Distance between ring buoys shall not exceed 200 feet.
- At least one lifesaving skiff shall be immediately available at locations where employees are working over or adjacent to water.

Training

All MJVD employees required to wear PPE will receive training in the proper use and care of PPE before being allowed to perform work requiring the use of PPE. Periodic retraining will be offered to PPE users as needed. The training will include, but not necessarily be limited to, the following subjects:

- When PPE is necessary
- What PPE is necessary
- How to properly don (put on), doff (take off), adjust, and wear PPE
- The limitations of the PPE
- How to determine if PPE is no longer effective or damaged
- How to get replacement PPE
- The proper care, maintenance, useful life, and disposal of the PPE

After the training employees will demonstrate that they understand how to use PPE properly and periodic assessment of the process/equipment should be conducted to ensure that the PPE is adequate, and training is appropriate.

Retraining

Retraining of employees may be performed whenever:

- New equipment is used.
- Changes in the workplace make previous training obsolete.
- Changes in the types of PPE to be used make previous training obsolete.
- When a supervisor observes inadequacies in the employees' understanding, knowledge, or use of assigned PPE that indicates the employee has not retained the necessary skills to use the PPE.

Training Documentation

Training of each employee will be documented and provided to the Safety Department on file. The document certifies that the employee has received and understood the required training on the specific PPE he/she will be using.

Employee-Owned Equipment

1. All required PPE will be supplied by the company at no cost to the employee, except for steel toe boots (see MIOSHA Part 6, R408.40617a(6)).
2. Employee-owned PPE will not be used without the consent of the Project Manager, Site Safety Officer, or other project management.
3. 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.
4. If employee-owned equipment is permitted, all MJVD project management personnel will be held responsible for the adequacy of the PPE and the proper inspection, cleaning, maintenance, and storage.
5. The employee will be held jointly responsible for the proper use, storage, cleaning, and maintenance of the PPE.
6. Improper use of PPE by employees, subjects them to the company disciplinary program, which could lead to discharge.

PERSONAL PROTECTIVE EQUIPMENT

EMPLOYEE TRAINING CERTIFICATION

PERSON(S) PERFORMING TRAINING SESSION: _____

DATE(S) OF TRAINING: _____

TYPES OF PPE TRAINED ON: _____

_____

_____

_____

Employee Name (print legibly)	Employee Signature

RESPIRATORY PROTECTION

M.J. VanDamme Trucking, Inc.
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(906) 346-2641

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Purpose

When it is not feasible to render the atmospheric environment acceptable, it may be necessary to protect employees from contact with airborne contaminants. Personal protective equipment will be provided and used:

- Where it is not possible to enclose or isolate the process or equipment, provide ventilation, or use other control measures; or
- Where there are short exposures to hazardous airborne concentrations of contaminants.

Policy

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.

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.

Responsibilities

Safety Director

Safety Director is responsible for the overall administration of the Respiratory Protection Program. Assistance shall be sought from the Corporate Staff as needed.

Corporate Staff/Management

1. Formulating and making necessary changes in the Respiratory Protection Program.
2. Acting in an advisory capacity on all matters pertaining to this program.
3. Making certain the program complies with federal, state and local regulations and ordinances.
4. Periodic monitoring and advising appropriate projects of potential hazards arising out of any current or proposed process or operation.
5. Specifying controls necessary to minimize employee exposure to potentially harmful air contaminants and specifying the design and quality of the respiratory protective equipment.
6. Periodically measuring program effectiveness by conducting frequent random inspections to assure that respirators are properly selected, used, cleaned, and maintained.
7. Making a copy of this program and the OSHA standard available for employee review.

Supervisors

1. Supervisors are responsible for compliance to the Respiratory Protection Program as follows:
2. Supervisors shall maintain a work environment that insures the maximum safety and health for their employees.
3. Shall furnish their employees with the proper personal respiratory protective equipment, instruct them in its proper use, and enforce the wearing of such equipment.

4. When filter / cartridge changes are necessary (as indicated by ESLI) supervisors will ensure that changes are made in clean, uncontaminated areas and atmospheres.
5. Employees are responsible for compliance to the Respiratory Protection Program as follows:
6. Shall make maximum use of all prescribed respiratory protective equipment and follow established practices and procedures.
7. The employees are responsible for maintaining the respirators in optimal condition.
8. The company will send employees to an Occupational Medical Specialist (MD) to provide surveillance and oversight of the Respiratory Protection Program as required.
9. The hospital will provide and retain the questionnaires filled out by the employees, in accordance with the OSHA standard.
10. Subsequent to the medical evaluation the employee will have the opportunity to discuss any findings regarding the medical review with the health care practitioner.

Program Elements

The basic elements of the Respiratory Protection Program shall be discussed separately and 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

Industrial Hygiene Monitoring

1. In areas of established or suspected respiratory hazards/air contaminants, industrial hygiene surveys will be conducted.
2. 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.
3. When there are substantial changes in processes or materials used, additional industrial hygiene monitoring will be conducted.
4. Monitoring results shall be maintained on file, by job.
5. Recommendations for feasible engineering and administrative controls, including the utilization of appropriate respiratory protection, shall be made as a result of these surveys.
6. Affected employees or their representatives are to be provided the opportunity to observe any respiratory measurements conducted in their work place.

Selection and Issuance of Respirators

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. Current respiratory selection is as follows:

- MSA Fullface Respirator, 7700 series.

- Organic Vapor Cartridge/w P100 Particulate prefilter.

In IDLH Conditions the following respiratory system will be used:

- SCBA.
- IDLH Conditions are noted in section 15.0.

Medical Aspects of Respirator Usage

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.

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.

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.

Termination Medical Procedures

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.

Medical Evaluations

1. All medical evaluations will occur during normal working hours.
2. 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.
3. All results, data, or information obtained from the medical exams will be treated as strictly confidential.

4. The medical records will be maintained in secure areas.
5. Information in the medical records will not be released without the signed consent of the employee.
6. The consent form will be maintained in the employee's medical file.

Training

Minimum training for both respirator user and supervisor shall include the following:

1. 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.
2. 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.
3. A discussion of why this is the proper type of respirator for the particular purpose.
4. A discussion of the respirator's capabilities and limitations.
5. Instruction and training in actual use of the respirator. This is to include having the respirator fitted properly, testing the face-piece-to-face seal and cleaning.
6. Special training (such as field training to recognize and cope with emergency situations.).
7. Respirators shall not be worn when conditions prevent a good face seal. Conditions such as growth of beard, sideburns and eyeglasses are examples.
8. Training shall be reviewed and repeated annually, and thoroughly documented.

Fit Testing

1. It is essential that respiratory protection equipment be properly fitted to the user.
2. Fit testing for each respirator user will be administered during the employee training sessions, and thoroughly documented.
3. Qualitative Fit Test:
    - 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.
4. Quantitative Fit Testing:
    - Quantitative fit testing measures the difference from the outside air verses the air inside the respirator.
    - 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.

Maintenance and Care of Respirators

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. These inspections will be documented.
7. Requirement if supplied air or airline respirators are used. These include the following:
   a. Compressed breathing air must meet the requirements of for Type 1- D breathing air. Grade D air has the following characteristics:

Oxygen content	19.5 - 23.5%
Hydrocarbon (condensed)	≤ 5 mg/m^3
Carbon dioxide (CO_2)	≤ 1000 ppm
Carbon monoxide (CO)	≤ 10 ppm
Lack of noticeable odor	

   Notes: ppm = parts per million mg/m^3 = milligrams per cubic meter of air

   b. The air intakes must be situated to prevent the entry of contaminated air.
   c. The system must have suitable in-line air purifying sorbet beds and filters.
   d. 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.
   e. Compressors must be equipped with a carbon monoxide alarm.
   f. The monitor must alarm if carbon monoxide concentrations exceed 10 ppm.

g. The alarm should be calibrated at regular intervals. The manufacture should be consulted to determine how often the equipment should be calibrated.
h. Calibrations should be documented; a signed/dated tag or label be used.
i. The airline couplings for the breathing air must be incompatible with the other air or gas systems in use at the site.
j. Supplied air components, including self-contained breathing apparatus (SCBA) should be inspected quarterly.
k. In-line filters and monitors should be replaced and/or calibrated according to the manufacturer's specifications

Cleaning and Disinfection

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.
6. Inspect valves, head-straps, and other parts; replace with new parts if defective.
7. Insert new filters, cartridges, or canisters (prior to use); make sure seal is tight.
8. Place in plastic bag or container for storage.
9. If different from above, manufacturer's recommendations should be followed.

Repair

- Only experienced person shall do replacement or repairs with parts designed for the respirator.
- No attempt shall be made to replace components or to make adjustments or repairs beyond the manufacturer's recommendations.

Storage

- After inspection, cleaning, and necessary repair, respirators shall be stored to protect against dust, sunlight, heat, extreme cold, excessive moisture, or damaging chemicals.
- 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.
- 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.

Enforcement and Monitoring

1. It should be carefully explained to the respirator user that he/she must wear the respiratory equipment when exposed to hazardous contaminants.
2. Wearing this equipment is a condition of employment, and failure to do so will result in discipline, up to and including discharge.
3. The Respiratory Protection Program shall be evaluated at least annually with program adjustments made as appropriate to reflect the evaluation results.
4. This evaluation should be documented.

Non-routine Use

1. As stated previously, respirators can be worn when responding to a non-routine task.
2. The program administrator will evaluate the potential exposures prior to issuing respirators.
3. The exposures and the use of respirators will be reviewed with each potential wearer prior to assignment.
4. All workers will be fit tested subsequent to the assignment.

Potential IDLH Atmospheres

A confined space gas monitor will be used to ascertain the oxygen, carbon monoxide, hydrogen sulfide, and LEL concentrations. 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

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.

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.

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.

MJ VanDamme Trucking, Inc.
Respiratory Medical Questionnaire

Appendix C **to 1910.134:** OSHA **Respirator Medical Evaluation Questionnaire (Mandatory)**

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: _____ ft. _____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): 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:	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

M.J. VanDamme Trucking, Inc.
301 Avenue A
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(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6/20/2024	MMM	MMM

Contents

Purpose

M.J. VanDamme Trucking, Inc. "MJVD" has established this medical surveillance program to monitor worker health and safety 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:

1. Prior to job assignment and annually thereafter (or every 2 years if a physician determines that is sufficient).
2. At the termination of employment.
3. Before reassignment to an area where medical examinations are not required.
4. If the examining physician believes that a periodic follow-up is medically necessary.
5. 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.
- 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.

Recordkeeping

MJVD keeps 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.

HAND AND POWER TOOLS

M.J. VanDamme Trucking, Inc.
301 Avenue A
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(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6-21-2024	MMM	MMM

Contents

Purpose

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:

- Create an awareness of the hazards associated with hand and power tools.
- Standardize procedures for use and care of hand and power tools.
- Minimize the possibility of injury or harm to our employees.
- Demonstrate compliance with 29CFR1926.300/29CFR1910.242

Procedures

1. All hand and power tools and similar equipment, whether furnished by the employer or the employee, shall be maintained in a safe condition.

2. 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.

3. 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 required PPE to protect them from the hazard.

4. 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.

5. 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.

6. Never use power cords and air hoses to raise or lower power tools.

7. When working on small items they shall be clamped to a solid working surface to prevent slipping.

8. 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.

9. Do not overload tools.

10. 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 manufacturer's recommendations.

11. Hand tools in poor condition that renders them unsafe shall be replaced or removed from service.

12. Pneumatic tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.

13. Fuel powered tools used in an enclosed space require monitoring of toxic gases and/or use of PPE. Use of fuel powered tools in an enclosed space should be avoided.

14. Use of powder actuated tools is prohibited. Additional training is required for employees preparing to engage in powder actuated tool use.

15. Any tool found to be in non-compliance shall be repaired, replaced, destroyed, or rendered inoperable.

Training

Training will be conducted upon hire and as needed to include:

- Proper use and care of Hand & Power Tools.
- Recognition and avoidance of unsafe conditions.

Retraining will be conducted whenever:

- There are changes or modifications to Hand & Power Tool program.
- New equipment is introduced to the workplace or jobsite.
- Employee conduct dictates additional training is required.

Inspections

1. Inspections of hand and power tools will be completed on a periodic basis and following incidents that could affect their use.
2. When an inspection reveals unsafe equipment, the equipment will be tagged "Do not use".
    - Employees must not use tagged equipment.
    - Use of tagged equipment will result in disciplinary action.
3. At no time are employees authorized to repair power tools.

LADDER SAFETY

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Revision Date	Initials	Approved By (Initials)
6-21-2024	MMM	MMM

Contents

Purpose

The 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:

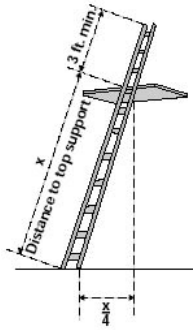
- Create an awareness of the hazards associated with ladders.
- Standardize procedures for use and care of ladders.
- Minimize the possibility of injury or harm to our employees.
- Demonstrate compliance with 29CFR1926.1053.

Portable Ladder Safety Procedures

1. Read and follow all labels/markings on the ladder.
2. Avoid electrical hazards! – Look for overhead power lines before handling a ladder. Avoid using a metal ladder near power lines or exposed energized electrical equipment.
3. Always inspect the ladder prior to using it. If the ladder is damaged, it must be removed from service and tagged until repaired or discarded.
4. Always maintain a 3-point (two hands and a foot, or two feet and a hand) contact on the ladder when climbing. Keep your body near the middle of the step and always face the ladder while climbing (see diagram).

5. Only use ladders and appropriate accessories (ladder levelers, jacks, or hooks) for their designed purposes.
6. Ladders must be free of any slippery material on the rungs, steps, or feet.
7. Do not use a self-supporting ladder (e.g., step ladder) as a single ladder or in a partially closed position.
8. Do not use the top step/rung of a ladder as a step/rung unless it was designed for that purpose.
9. Use a ladder only on a stable and level surface unless it has been secured (top or bottom) to prevent displacement.
10. Do not place a ladder on boxes, barrels, or other unstable bases to obtain additional height.

11. Do not move or shift a ladder while a person or equipment is on the ladder.
12. A ladder placed in any location where it can be displaced by other work activities must be secured to prevent displacement or a barricade must be erected to keep traffic away from the ladder.
13. Be sure that all locks on an extension ladder are properly engaged.
14. Do not exceed the maximum load rating of a ladder. Be aware of the ladder's load rating and of the weight it is supporting, including the weight of any tools or equipment.
15. An extension or straight ladder used to access an elevated surface must extend at least 3 feet above the point of support (see diagram). Do not stand on the three top rungs of a straight, single or extension ladder.
16. The proper angle for setting up a ladder is to place its base a quarter of the working length of the ladder from the wall or other vertical surface (see diagram).



Training

Training shall enable each employee to recognize hazards related to ladders and stairways, and the procedures to be followed to minimize these hazards. Training shall include:

1. Portable ladder safety procedures.
2. The nature of fall hazards in the work area.
3. The proper construction, use, placement, and care in handling of ladders.
4. The maximum intended load-carrying capacities of ladders.

Retraining shall be provided when:

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.

Inspections

1. A Competent Person will conduct inspections of portable ladders on a periodic basis and following incidents that could affect their use.
2. Employees shall inspect ladders prior to each use.
3. Portable ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components, shall either be immediately marked in a manner that readily identifies them as defective, or be tagged with "Do Not Use" or similar language, and shall be withdrawn from service until repaired.
    a. Employees must not use tagged equipment.
    b. Use of tagged equipment will result in disciplinary action.
4. At no time are employees authorized to repair portable ladders.

PROCESS SAFETY MANAGEMENT

M.J. VanDamme Trucking, Inc.
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Revision Date	Initials	Approved By (Initials)
6-21-24	MMM	MMM

Contents

Purpose

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.

Scope

This section applies to all employees, worksites, and subcontractors working within a host employer's facility with covered processes.

Responsibilities

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:

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.

Employees

1. Report incidents, concerns, or deficiencies immediately.
2. Do not work in host employer's covered processes unless authorized and trained.

Host Employer

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.

Definitions

Atmospheric tank	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).
Boiling point	The boiling point of a liquid at a pressure of 14.7 pounds per square inch absolute (p.s.i.a.) (760 mm.).
Catastrophic release	A major uncontrolled emission, fire, or explosion, involving one or more highly hazardous chemicals, that presents serious danger to employees in the workplace.
Facility	The buildings, containers or equipment which contain a process.

Highly hazardous chemical	A substance possessing toxic, reactive, flammable, or explosive properties and specified in 29 CFR 1910.119 Appendix A.
Hot work	Work involving electric or gas welding, cutting, brazing, or similar flame or spark-producing operations.
Normally unoccupied remote facility	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.
Process	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.
Replacement in kind	A replacement which satisfies the design specification.
Trade secret	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.

PSM Summary

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.

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.

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.

General Information

1. 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:
    a. Toxicity
    b. Permissible exposure limits
    c. Physical data
    d. Reactivity data
    e. Corrosivity data
    f. Thermal and chemical stability data and hazardous effects of inadvertent mixing of different materials.

2. Information on the technology of the process must include at least the following:
    a. A block flow diagram or simplified process flow diagram
    b. Process chemistry
    c. Maximum intended inventory
    d. Safe upper and lower limits for such items as temperatures, pressures, flows, or compositions
    e. An evaluation of the consequences of deviations, including those affecting the safety and health of employees.

3. 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.

4. Information on the equipment in the process must include the following:
    a. Materials of construction,
    b. Piping and instrument diagrams (P & lD's),
    c. Electrical classification,
    d. Relief system design and design basis,
    e. Ventilation system design,
    f. Design codes and standards employed,
    g. Material and energy balances for processes built after May 26, 1992, and
    h. Safety systems (e.g., interlocks, detection, or suppression systems)

5. 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.

6. 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.

Process Hazard Analysis

1. 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.

2. 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.

3. 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:
    a. What-if,
    b. Checklist,
    c. What-lf/checklist,
    d. Hazard and operability study (HAZOP),
    e. Failure mode and effects analysis (FMEA),
    f. Fault tree analysis, or
    g. An appropriate equivalent methodology.

4. Whichever method(s) are used, the process hazard analysis must address the following:
    a. The hazards of the process.
    b. The identification of any previous incident that had a potential for catastrophic consequences in the workplace.
    c. 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.
        - Consequences of failure of engineering and administrative controls.
        - Facility siting.
        - Human factors.
        - 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.
    d. 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.

5. 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.

6. 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.

Operating Procedures

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:

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.
7. Startup following a turnaround, or after an emergency shutdown.

Operating Limits:

1. Consequences of deviation, and steps required to correct or avoid deviations.
2. Safety and health considerations:
    a. Properties of, and hazards presented by, the chemicals used in the process.
    b. Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment.
    c. Control measures to be taken if physical contact or airborne exposure occurs.
    d. Quality control for raw materials and control of hazardous chemical inventory levels.
    e. Any special or unique hazards.
3. Safety systems (e.g., interlocks, detection or suppression systems) and their functions.

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.

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.

Employee Participation

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.

Training

Initial Training

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.

Refresher Training

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.

Training Documentation

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.

Contractors Application

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.

Host Employer Responsibilities

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.

Contract Employer Responsibilities

The contract employer must:

1. Ensure that contract employees are trained in the work practices necessary to perform their job safely.

2. 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.
3. 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.
4. 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.
5. Advise the host employer of any unique hazards presented by the contract employer's work.

Pre-Startup Safety Review

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:

1. Construction and equipment are in accordance with design specifications.
2. Safety, operating, maintenance, and emergency procedures are in place and are adequate.
3. 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.

Mechanical Integrity

1. 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:
    a. Pressure vessels and storage tanks.
    b. Piping systems (including piping components such as valves).
    c. Relief and vent systems and devices.
    d. Emergency shutdown systems.
    e. Controls (including monitoring devices and sensors, alarms, and interlocks).
    f. Pumps.

2. 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.

3. 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.

4. 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.

5. 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.

Hot Work Permit

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.

Management of Change

1. 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:
    a. The technical basis for the proposed change.
    b. Impact of the change on employee safety and health.
    c. Modifications to operating procedures.
    d. Necessary time period for the change.
    e. Authorization requirements for the proposed change.

2. 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.

Incident Investigation

1. 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.

2. 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:
    a. Date of incident
    b. Date investigation began
    c. Description of the incident
    d. Factors that contributed to the incident
    e. Recommendations resulting from the investigation.

3. 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.

Emergency Planning and Response

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)].

Compliance Audits

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.

Trade Secrets

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.

PREVENTATIVE MAINTENANCE

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Revision Date	Initials	Approved By (Initials)
6-21-24	MMM	MMM

Contents

Purpose

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.

Scope

This section applies to all employees, worksites, and subcontractors.

Responsibilities

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:

Management

- Provide training for individuals responsible for Preventive Maintenance.
- Conduct inspections to identify deficiencies in the Preventive Maintenance program.
- Provide appropriate and adequate supplies on all sites.
- Assure documentation of the program is current and accurate.

Employees

- Report all incidents immediately
- Report equipment malfunctions to supervision.
- Follow the Preventive Maintenance rules and requirements.

Host Employer

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.

Elements of Preventive Maintenance

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:

1. Scheduling and performing periodic maintenance functions
2. Keeping records of service and repairs
3. Repairing and replacing equipment and equipment parts
4. Providing spare parts control or inventory.

Scheduling and Performing Periodic Maintenance

Maintenance schedules can be set up on either a time or use basis, whichever comes first. Factors to be considered include:

- Age of the equipment
- Number of hours per day in use
- Past experience
- Manufacturers' recommendations
    - The manufacturers' recommendations provide standards that need to be maintained for the safe and economical use of the equipment.

Records and Documentation

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.

Repairs and Replacements

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.

Spare Parts Inventory

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.

Equipment Inventory

Some, but not all, of the various items falling under the Preventive Maintenance program are PPE, trucks and vehicles, construction equipment, and hand and power tools.

Inspection and Maintenance

The inspection, maintenance and associated documentation are identified in the applicable procedures for the specific equipment or materials. The supervisor will assure that all employees who are assigned to perform work in the field are trained in accordance with these guidelines.

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.

Equipment or materials that cannot be repaired will be destroyed and discarded.

FLEET SAFETY PROGRAM

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Revision Date	Initials	Approved By (Initials)
6/20/2024		
3/6/2025	JD	JJW

Contents

Motor Vehicle Safety 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:

1. Assigning responsibilities at all levels of employment.
2. Vehicle use and insurance requirements.
3. Employee driver's license checks and identification of high-risk drivers.
4. Accident reporting and investigation.
5. Company Accident Review Board.
6. Vehicle selection and maintenance.
7. Training standards.
8. Safety regulations.

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.

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

General Manager/Safety Director:

Responsible for directing an aggressive vehicle safety program.

Management will:

- Implement the Motor Vehicle Safety Program in their areas of responsibility.
- Establish measurement objectives to ensure compliance with the program.
- Provide assistance and the resources necessary to implement and maintain the program.

Supervisors will:

- Investigate and report all accidents involving a motor vehicle used in performing company business. Forward all accident reports to the Safety Director.
- Be responsible for taking appropriate action to manage high risk drivers as defined by this program.
- Provide driver training either internally or through external means for high-risk drivers.

Safety Director:

- Issue periodic reports of losses for the General Manager's review.
- Review motor vehicle accident reports as part of the Company Accident Review Board.
- Revise and distribute changes to the Motor Vehicle Safety Program to managers, supervisors, and drivers, as necessary.
- Maintain appropriate records.

Drivers will:

- Always operate a motor vehicle in a safe manner as explained under the section titled, "Driver Safety Regulations".
- Maintain a valid driver's license and minimum insurance requirements on personal vehicles used in company business.
- Maintain assigned vehicles according to established maintenance standards.

VEHICLE USE

Company Owned Vehicles

Passenger Cars and Light Trucks

Employees authorized by their supervisors will be permitted to operate a passenger car. The vehicle will not be driven for personal use, and only the employee(s) will be permitted to operate the vehicle. No one under the age of 21 will be permitted to operate the vehicle.

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.

Personal Vehicles on Company Business

Employees who drive their personal vehicles on company business are subject to the requirements of this program including:

- Maintaining auto liability insurance with minimum limits of $50000 for bodily injury and $50000 for property damage with combined single limit of $100000.
- Maintain current state vehicle inspections when required.
- Maintain their own vehicle in a safe operating condition when driven on company business.
- Proof of insurance (copy of declaration page) will be sent to the Safety Director.
- Acceptable Motor Vehicle Report (MVR).
- No ‘business use’ exclusion on personal insurance policy.
- Pre-Trip Inspection required and documented using standard MJVD Inspection form. Maintain inspection documents in vehicle.

Rental Vehicles

- Rental vehicles will be leased from a national provider (Example; Hertz, Avis, Enterprise).
- Collision damage waiver will be refused.

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

Driver Evaluation:

Employees will be evaluated and selected based on their driving ability. To evaluate employees as drivers, management will:

1. Review past driving performance and work experience through previous employer's 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".
2. Review the employee's Motor Vehicle Record (MVR) annually (more frequently if reasons warrant).
3. Ensure the employee has a valid driver's license.
4. Ensure the employee is qualified to operate the type of vehicle he/she will drive.

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.

The company has implemented three levels of driver qualification criteria. Use of any or all 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:
    - Application for employment
    - Copy of the drivers MVR (annual)
    - Annual review of driving record
    - Violation History/Record
    - Medical Certificate.

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. Exemptions may be determined on a case-by-case basis.

1. Driving under the influence of alcohol or drugs (DWI).
2. Hit and run.
3. Failure to report an accident.

4. Operating during a period of suspension or revocation.
5. Using a motor vehicle for the commission of a felony.
6. Operating a motor vehicle without the owner's authority.
7. Permitting an unlicensed person to drive.
8. Reckless driving.
9. Speeding (3 or more in a 3-year period).
10. 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

MJVD 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:

1. A more intensive driver training and/or remedial training.
2. Improved driver selection procedures.
3. Improve vehicle inspection and/or maintenance activities.
4. Changes in traffic routes.

Motor vehicle accident recordkeeping procedures consist of the following components:

1. Documentation of causes and corrective action.
2. Management review to expedite corrective action.
3. Analysis of accidents to determine trends, recurring problems, and the need for further control measures.

Responsibility:

Implementation of these procedures remains the responsibility of both the driver and manager.

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.

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.

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.).

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.

Preventable/Non-Preventable Accidents:

The following definitions relate to motor vehicle accidents:

1. 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".

2. 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 are 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.

3. 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 Safety 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

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.

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.

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 vehicle 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:

1. Driver's License
2. Medical Examinees Certificate and Waiver (if applicable)
3. Alcohol and Drugs
4. Driver's Record of Duty Status as required
5. Hours of Service
6. Seat Belt
7. Vehicle Inspection Report
8. Brake System
9. Coupling Devices
10. Exhaust System
11. Frame
12. Fuel System
13. Turn Signals
14. Brake Lamps
15. Tail Lamps
16. Head Lamps
17. Lamps on Projecting Loads
18. Safe Loading
19. Steering Mechanism
20. Suspension
21. Tires
22. Van and Open-Top Trailer Bodies
23. Wheels and Rims
24. Windshield Wipers
25. Emergency Exits on Buses
26. 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:

1. Driver's License
2. Medical Examinees Certificate and Waiver (if applicable)
3. Alcohol and Drugs
4. Driver's Record of Duty Status as required
5. Hours of Service
6. Seat Belt
7. Vehicle Inspection Report
8. Brake System
9. Coupling Devices
10. Exhaust System
11. Frame
12. Fuel System
13. Turn Signals
14. Brake Lamps

15. Tail Lamps
16. Head Lamps
17. Lamps on Projecting Loads
18. Safe Loading
19. Steering Mechanism
20. Suspension
21. Tires
22. Van and Open-Top Trailer Bodies
23. Wheels and Rims
24. Windshield Wipers
25. Emergency Exits on Buses
26. HM Requirements (as applicable)

LEVEL III - Driver-Only Inspection

Level III is a driver-only inspection which will include examination of the following:

1. Driver's License
2. Medical Certification and Waiver, (if applicable)
3. Driver's Record of Duty Status as Required
4. Hours of Service
5. Seat Belt
6. Vehicle Inspection Report
7. 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:

1. Inspection Procedures
2. Enhancements to The Level I Inspection
3. Radiological Requirements
4. Enhanced Out-Of-Service Criteria

What Happens After the Inspection?

1. 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.
2. 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.

3. The data collected from the inspection will be input into the Safety Measurement System. 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.

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.

1. 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.

2. Demand maintenance is performed only when the need arises. Some vehicle parts are replaced only when they 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 be classified within the PM program. Indicate the need for maintenance on the pre-trip inspection form. Turn form in to Shop Manager or contact your supervisor.

3. 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.

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

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.

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:

1. Understand, review and given a copy of the Fleet Safety Program.
2. Understand and sign the Vehicle Assignment Agreement.
3. Review individual Motor Vehicle Report (MVR).
4. Understand accident reporting & emergency procedures.
5. Review operation and controls of vehicle being assigned.
6. Inspect vehicle using Vehicle Inspection Form.
7. Road Test as required.

License Suspension

Drivers must notify the Human Resources Director if their license is suspended or revoked.

Remedial Training

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:

1. One or more violation convictions within any one-year period, or
2. 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

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.

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.

Traffic Laws

Drivers must abide by the federal, state, and local motor vehicle regulations, laws, and ordinances.

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.

Cellular Telephones and Pagers

The following procedures apply to employees driving on company business who wish to use cellular telephones in the vehicle.

1. External speaker and microphone must be included to allow hands-free operation.
2. Phone number memory and programming capabilities are to be included.
3. Drivers are to refrain from placing outgoing calls or responding to texts while the vehicle is in motion.
4. Incoming calls should be limited.
5. 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.
6. Employees are prohibited from using any handheld device while operating a motor vehicle.
7. All texting while driving is prohibited.

Motorcycles

Employees are prohibited from using motorcycles when traveling on company business.

General Safety Rules

Employees are not permitted to:

1. Pick up hitchhikers.
2. Accept payment for carrying passengers or materials.
3. Use any radar detector, laser detector or similar devices.
4. Push or pull another vehicle.

5. Transport flammable liquids or gases unless a DOT or Underwriters' Laboratories approved container is used, and only then in limited quantities.
6. Use of burning flares will be discouraged. The preferred method is the use of reflective triangles.
7. 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.

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.

HOURS OF SERVICE LOG POLICY

Purpose

A driver's hours of service are regulated by Federal, State, and Local agencies and are part of the Federal Motor Carrier Safety Administration, (FMCSA) regulations, specifically contained in 49 CFR Part 395.1 thru 395.38.

M.J. VanDamme Trucking, Inc. is strongly committed to being in full compliance with the current Federal Hours of Service, (HOS) Regulations. All company operations personnel, company-employed drivers, or any other individuals whose main duty is operating commercial motor vehicles under the authority of the company are subject to this Hours of Service Log Policy.

Per FMCSA CFR Part 395.3

No motor carrier shall permit or require any driver used by it to drive a property-carrying commercial motor vehicle, nor shall any such driver drive a property-carrying commercial motor vehicle, regardless of the number of motor carriers using the driver's services, if the driver is in violation of the hours of service regulations.

All drivers that have a working ELD Unit installed in their assigned vehicle, SHALL log in, and are required to use the Hours of Service (E-LOG) portion of the system. If the ELD unit is inoperable, drivers are required to use the forms provided by M.J. VanDamme Trucking Inc. to keep track of their HOS (i.e. timecards, trip sheets, and a paper log if the driver operates a CMV vehicle outside of short haul parameters).

No log* is required if you meet the following criteria:

*If you are operating a truck equipped with an ELD M.J. VanDamme Trucking, Inc. requires those drivers to log in and use the ELD system whether "short" or "long" haul.

There are 5 key components required to meet the FMCSA definition for short haul.

You must:

- Start and return to same location within 14 hours of duty time
- Drive no more than 11 hours
- Have 10 consecutive hours off between shifts
- Not exceed a 150 air mile radius from your starting location
- Maintain a timecard

To fall under the short haul definition all 5 of the components must be met.

No break of any length is required for short haul drivers

An Hours of Service (HOS) Log is required when:

You fail to meet any of the short haul criteria.

Federal Requirements

11-Hour Driving Rule

A driver may drive a total of 11 hours during a 14-hour period. All time spent behind the wheel is considered driving time. After 11 hours of driving time, you must have 10 consecutive hours off duty or in the sleeper berth before you can drive again.

14-Hour Rule

A driver may drive only during a period of 14 consecutive hours after coming on duty following 10 consecutive hours off duty. The driver may not drive after the end of the 14th consecutive-hour period without first taking 10 consecutive hours off duty.

The 14 hours are consecutive from the time you start your shift. Any off duty time less than 10 hours will count against the 14-hour rule.

On duty time is defined as all time from the time you begin work or are required to be ready for work until you are relieved from work and all responsibility for doing work if:

- Waiting to be dispatched
- Inspecting, servicing, or conditioning a commercial motor vehicle
- Driving (at the controls of your vehicle)
- In your vehicle (except time spent in the sleeper berth)
- Loading or unloading your vehicle
- Repairing, obtaining assistance, or attending to a disabled vehicle
- Performing any other work for a motor carrier
- Complying with drug or alcohol testing requirements
- Performing compensated work for any other employer

30 Minute Rest-Break Rule

Except for drivers who qualify for either of the short-haul exceptions in §395.1(e)(1) or (2), driving is not permitted if more than 8 cumulative hours of driving time have passed without at least a consecutive 30-minute interruption in driving status. A consecutive 30-minute interruption of driving status may be satisfied either by off-duty, sleeper berth or on-duty not driving time or by a combination of off-duty, sleeper berth and on-duty not driving time.

Sleeper Berth Provision

The sleeper berth provision allows drivers to split their 10-hour off-duty period in different ways (e.g., 7/3, 8/2, 7.5/2.5), provided one off-duty period (whether in or out of the sleeper berth) is at least 2 hours long, and the other involves at least 7 consecutive hours spent in the sleeper berth. The periods must add up to 10 hours, and when used together, neither time period counts against the maximum 14-hour driving window.

The sleeper berth provision (§395.1(g)) allows property-carrying drivers to split their 10-hour off-duty period when the following requirements are met:

- One off-duty period (whether in or out of the sleeper berth) is at least 2 hours long, and
- The other involves at least 7 consecutive hours in the sleeper berth
- Both periods added together must equal at least 10 hours
- When paired, neither time period counts against the 14-hour driving window
- 8-hour sleeper berth period by itself can no longer be excluded from the 14-hour driving window

70 Hours of Service Rule

M.J. VanDamme Trucking, Inc. operates every day of the week, and runs under the 70 hours/8 days hours of service ruleset. Which means no driver shall drive or be allowed to drive after accumulating 70 hours on-duty time in any 8 consecutive days. On-duty time includes all time you are working for a motor carrier and all time you are doing paid work for anyone else, such as a part-time job at a local restaurant.

34-Hour Restart

As of June 30, 2013, any period of 70 hours of being on duty in 8 consecutive days will reset after taking 34 or more consecutive hours off duty.

HOS Logging Form and Manner

The following information must be included on the driver HOS logs in addition to the change of duty status noted on the on the grid:

- Date
- Total miles driving
- Truck or Tractor and Trailer number
- Name of Carrier & Main office address
- Driver's signature
- Remarks
- For each change of duty status (e.g. the place of reporting for work, starting to drive, on-duty not driving and where released from work) the name of the city, town, village, or nearest intersecting main roads and the State abbreviation shall be recorded in the remarks section of the log.
- Name of Co-Driver (where applicable)
- Shipping document number(s) or name of shipper and commodity
- Annotation of fuel stops, pre-trip inspection, post-trip inspection, and any D.O.T roadside inspections or traffic stops
- Paper/Electronic Logs (those produced by using a Log App e.g., Keep Truckin, TruckX, EzLogz etc.) shall be signed at the time of completion. ELD logs (at minimum) shall be verified each day at the end of the driver's shift.

Failure to complete the record of duty activities, failure to preserve a record of such duty activities, or making a false report in connection with such duty activities shall make the driver and/or the carrier liable for prosecution.

Recordkeeping

M.J. VanDamme Trucking, Inc. maintains and retains for a period of 6 months accurate and true time records showing:

- The time the driver reports for duty each day.
- The total number of hours the driver is on duty each day.
- The time the driver is released from duty each day.
- The total time for the preceding 7 days in accordance with § 395.8(j)(2) for drivers used for the first time or intermittently.

Pre and Post Trip Inspections:

Both must be recorded on the HOS log as "on-duty not driving" and must be shown for each inspection. Pre and Post trip inspections need to be reflected on your RODS even if you are only completing a timecard or trip sheet. Any defects found during a Pre / Post Trip inspection must be documented using the provided Paper DVIR. The DVIR must then be turned into the Maintenance Department. You are required to submit in writing any findings of damage or mechanical problems found during both the Pre-trip and Post-trip inspections.

Violations

Violations of M.J. VanDamme Trucking, Inc. Hours of Service Policy:

The following disciplinary policy has been put in place as part of the ongoing audit process for Record of Duty Status (RODS) and Hours of Service (HOS) Violations found on GPS, time records, and logs submitted by drivers.

1. Drivers shall receive 5 written warnings outlining the violation and shall sign off acknowledging receipt of each warning.
    a. One signed copy shall be kept by the driver and the other will be kept by the driver's supervisor.
    b. Signed warnings kept by the supervisor will be provided to Human Resources and kept in the employee's personnel file.
2. After receiving 5 warnings (within a 6-month timeframe) the driver will be put on 30 calendar days probation.
    a. If during the 30 days any additional RODS or HOS violations take place the driver will receive 3 days of unpaid time off from work.
    b. After 3 unpaid days from work any subsequent RODS or HOS violations during the 30 calendar day probation period will be addressed from a disciplinary stand point on a case by case basis.
    c. Warnings stay applicable toward the 30 calendar day probation for a driver for a 6 month timeframe. The same timeframe the D.O.T requires carriers to keep Record of Duty Status (RODS) and Hours of Service (HOS) records on file for review and audit purposes.
3. After the 30 calendar days probation period (with no additional violations) has passed; warnings re-set and subsequent warnings received by the driver will start counting up again from warning #1.
    a. As stated above if additional violations took place during the 30 calendar day probationary period different steps will be taken on a case by case basis. These steps may affect the timing of the driver's warning re-set or potentially extend the probationary time.

By signing below the driver acknowledges that he/she has read, understands, and agrees to comply with M.J. VanDamme Trucking, Inc.' s Hours of Service Log Policy:

_____ _____

Driver Signature Date

APPENDIX

Forms/Attachments

- Vehicle Assignment Agreement
- Application Addendum for Employment Requiring Driving
- Guide for Preventable and Nonpreventable Accidents
- Vehicle Inspection Report
- Defensive Driving – Mobile Use Policy

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 only be used for MJVD related business and is not to be used for personal use. 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 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:_____

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 MJVD 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 rear-ends 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 considered. The company must take responsibility for the work environment and recognize that drivers cannot control some aspects. It is critical that drivers can 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

1. When judging or discussing preventable accidents, these are some questions to consider:

2. 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?

3. 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.

4. 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?

5. 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.

6. 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 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 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.

Non-collision 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:

Flashlight:	Yes	No
Horn working:	Yes	No
Safety belts:	Working	Non-working
Windshield scraper: (if applicable)	Yes	No
Rear window defroster:	Working	Non-working
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:_____

Distracted Driving - Mobile Device Use Policy

Purpose

THIS COMPANY DISTRACTED DRIVING POLICY, effective October 1, 2020, sets forth MJ VanDamme Trucking, Inc. (herein after referred as the Company) policies about cell phone usage and other distractions while driving.

Applicability

This policy applies to all the Company employees. Company employees include full-time or part-time, independent contractors, interns, and consultants. All employees are required to sign this agreement confirming their understanding and acceptance of this policy. The Company reserves the right to modify or update this policy at any time.

DISTRACTED DRIVING POLICY

Operators of any motor vehicle should be aware of any and all driving hazards around them. This means that any distractions while driving should be eliminated, including use of cell phones, earbuds or headphones. For the safety of all employees, their families and others sharing the road, each driver's attention must be dedicated to operating their vehicle.

Driving Distractions

The National Highway Traffic Safety Administration estimates that 80 percent of vehicle crashes involve some form of driver inattention within 3 seconds of the event. Your primary responsibility, while operating a vehicle, is driving the vehicle safely. For your safety, and the safety of others, it is our policy that you not engage in activities that cause you to become distracted from this responsibility.

The following policies apply:

1. Cell phones shall not be used while driving on company business. If you receive a call while you are driving, allow the call to go to voicemail and return the call when you have stopped driving.
2. If you need to place a call, pull over to a safe location before placing the call. Placing a call while driving a vehicle on company business is strictly forbidden.
3. Sending or reading text messages while driving a vehicle on company business is strictly forbidden.
4. Checking email, checking social networks, using the Internet, using smartphone apps, or reading printed materials while driving on company business is strictly forbidden.
5. GPS navigation devices may be used while driving on company business as long as they are set up in a manner that does not obscure your view. Always select your destination on a GPS navigation device before beginning a trip and do not attempt to enter a new destination into the device while driving.

a. Cell phones may be used as navigation devices if the phone is placed in a support device so that the driver does not need to hold or unlock the phone while driving in order to receive directions.

6. Eating while driving a vehicle on company business is strictly forbidden.
7. Activities such as drinking beverages, adjusting radio controls or adjusting climate controls should only be done if traffic conditions permit and when you can do them without taking your attention away from driving.
8. Any accident the driver is involved in while using a wireless communication device will be deemed avoidable. If you are involved in an accident while operating a vehicle on company business, and you are conducting a call, texting, or accessing and using internet transmissions, you may be subject to corrective actions, up to and including termination.

MOBILE DEVICE USE POLICY

Use of Cell Phones or Similar Devices in the Workplace:

General Use at Work

While at work, employees are expected to exercise the same discretion in using personal cell phones as they use with company phones. Excessive personal calls during the workday, regardless of the phone used, can interfere with employee productivity and be distracting to other employees. Employees should restrict personal calls during worktime and make such calls only during scheduled break or lunch periods in non-working areas. Other personal calls should be made during non-work time whenever possible, and employees should ensure that their friends and family members are instructed of this policy.

To ensure the effectiveness of meetings, employees are asked to leave all cell phones at their desk. On the unusual occasion of an emergency or anticipated emergency that requires immediate attention, the cell phone may be carried to the meeting on vibrate mode.

Unsafe work situation

The Company prohibits employee use of cell phone or similar devices while at any work site at which the operation of such device would be a distraction to the user and/or could create an unsafe work environment. Such work sites must be secured, or the device used only by an employee who is out of harm's way at such work environments.

Use while Driving or Operating Equipment

An employee who uses company-provided equipment or a company-provided vehicle is prohibited from using a cell phone, hands on or hands free, or similar device while driving, whether the business conducted is personal or company-related. This prohibition includes receiving or placing calls, text messaging, accessing the Internet, receiving or responding to email, checking for phone messages, or any other purpose related to your employment; the business; our customers; our vendors; volunteer activities, meetings, or civic responsibilities performed for or attended in the name of the company; or any other company or personally related activities not named here while driving.

To offer further clarification, Company employees may not use cellular phones or mobile electronic devices while operating a motor vehicle or operating mobile equipment under any of the following situations, regardless of whether a hands-free device is used:

- When employee is operating a vehicle owned, leased or rented by the Company.
- When employee is operating any mobile equipment owned, leased or rented by the Company.
- When the employee is operating a personal motor vehicle in connection with Company business.
- When the vehicle is on Company property.

Special Responsibilities of Managerial Staff

It is important for management to provide a good example of mobile/cellular phone use and to guard against excessive or inappropriate use of personal mobile/cellular phones and other devices by their officers.

Acknowledgement

Effect of Policy

Violations of the foregoing rules will be considered a serious offense and may result in the imposition of discipline up to and including termination.

Reminder

The use of cell phones and other wireless devices while driving leads to distractions that can result in traffic accidents. So, while we cannot force you to adhere to these rules when you are not on duty, we strongly urge you to do so for your own safety and well-being and that of family, friends and third parties on the roadways.

I have read and will abide by the conditions of the Company Distracted Driving/Mobile Device Use Policy as defined herein:

_____

Print Name

_____ _____

Employee Signature Date

HOURS OF SERVICE LOG POLICY –2024

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)

Contents

Purpose

A driver's hours of service are regulated by Federal, State, and Local agencies and are part of the Federal Motor Carrier Safety Administration, (FMCSA) regulations, specifically contained in 49 CFR Part 395.1 thru 395.38.

M.J. VanDamme Trucking, Inc. is strongly committed to being in full compliance with the current Federal Hours of Service, (HOS) Regulations. All company operations personnel, company-employed drivers, or any other individuals whose main duty is operating commercial motor vehicles under the authority of the company are subject to this Hours of Service Log Policy.

Per FMCSA CFR Part 395.3

No motor carrier shall permit or require any driver used by it to drive a property-carrying commercial motor vehicle, nor shall any such driver drive a property-carrying commercial motor vehicle, regardless of the number of motor carriers using the driver's services, if the driver is in violation of the hours of service regulations.

All drivers that have a working ELD Unit installed in their assigned vehicle, SHALL log in, and are required to use the Hours of Service (E-LOG) portion of the system. If the ELD unit is inoperable, drivers are required to use the forms provided by M.J. VanDamme Trucking Inc. to keep track of their HOS (i.e. timecards, trip sheets, and a paper log if the driver operates a CMV vehicle outside of short haul parameters).

No log* is required if you meet the following criteria:

*If you are operating a truck equipped with an ELD M.J. VanDamme Trucking, Inc. requires those drivers to log in and use the ELD system whether "short" or "long" haul.

There are 5 key components required to meet the FMCSA definition for short haul.

You must:

- Start and return to same location within 14 hours of duty time
- Drive no more than 11 hours
- Have 10 consecutive hours off between shifts
- Not exceed a 150 air mile radius from your starting location
- Maintain a timecard

To fall under the short haul definition all 5 of the components must be met.

No break of any length is required for short haul drivers

An Hours of Service (HOS) Log is required when:

You fail to meet any of the short haul criteria

Federal Requirements

11-Hour Driving Rule

A driver may drive a total of 11 hours during a 14-hour period. All time spent behind the wheel is considered driving time. After 11 hours of driving time, you must have 10 consecutive hours off duty or in the sleeper berth before you can drive again.

14-Hour Rule

A driver may drive only during a period of 14 consecutive hours after coming on duty following 10 consecutive hours off duty. The driver may not drive after the end of the 14th consecutive-hour period without first taking 10 consecutive hours off duty.

The 14 hours are consecutive from the time you start your shift. Any off duty time less than 10 hours will count against the 14-hour rule.

On duty time is defined as all time from the time you begin work or are required to be ready for work until you are relieved from work and all responsibility for doing work if:

- Waiting to be dispatched
- Inspecting, servicing, or conditioning a commercial motor vehicle
- Driving (at the controls of your vehicle)
- In your vehicle (except time spent in the sleeper berth)
- Loading or unloading your vehicle
- Repairing, obtaining assistance, or attending to a disabled vehicle
- Performing any other work for a motor carrier
- Complying with drug or alcohol testing requirements
- Performing compensated work for any other employer

30 Minute Rest-Break Rule

Except for drivers who qualify for either of the short-haul exceptions in §395.1(e)(1) or (2), driving is not permitted if more than 8 cumulative hours of driving time have passed without at least a consecutive 30-minute interruption in driving status. A consecutive 30-minute interruption of driving status may be satisfied either by off-duty, sleeper berth or on-duty not driving time or by a combination of off-duty, sleeper berth and on-duty not driving time.

Sleeper Berth Provision

The sleeper berth provision allows drivers to split their 10-hour off-duty period in different ways (e.g., 7/3, 8/2, 7.5/2.5), provided one off-duty period (whether in or out of the sleeper berth) is at least 2 hours long, and the other involves at least 7 consecutive hours spent in the sleeper berth. The periods must add up to 10 hours, and when used together, neither time period counts against the maximum 14-hour driving window.

The sleeper berth provision (§395.1(g)) allows property-carrying drivers to split their 10-hour off-duty period when the following requirements are met:

- One off-duty period (whether in or out of the sleeper berth) is at least 2 hours long, and
- The other involves at least 7 consecutive hours in the sleeper berth
- Both periods added together must equal at least 10 hours
- When paired, neither time period counts against the 14-hour driving window
- 8-hour sleeper berth period by itself can no longer be excluded from the 14-hour driving window

70 Hours of Service Rule

M.J. VanDamme Trucking, Inc. operates every day of the week, and runs under the 70 hours/8 days hours of service ruleset. Which means no driver shall drive or be allowed to drive after accumulating 70 hours on-duty time in any 8 consecutive days. On-duty time includes all time you are working for a motor carrier and all time you are doing paid work for anyone else, such as a part-time job at a local restaurant.

34-Hour Restart

As of June 30, 2013, any period of 70 hours of being on duty in 8 consecutive days will reset after taking 34 or more consecutive hours off duty.

HOS Logging Form and Manner

The following information must be included on the driver HOS logs in addition to the change of duty status noted on the on the grid:

- Date
- Total miles driving
- Truck or Tractor and Trailer number
- Name of Carrier & Main office address
- Driver's signature
- Remarks
- For each change of duty status (e.g. the place of reporting for work, starting to drive, on-duty not driving and where released from work) the name of the city, town, village, or nearest intersecting main roads and the State abbreviation shall be recorded in the remarks section of the log.
- Name of Co-Driver (where applicable)
- Shipping document number(s) or name of shipper and commodity
- Annotation of fuel stops, pre-trip inspection, post-trip inspection, and any D.O.T roadside inspections or traffic stops
- Paper/Electronic Logs (those produced by using a Log App e.g., Keep Truckin, TruckX, EzLogz etc.) shall be signed at the time of completion. ELD logs (at minimum) shall be verified each day at the end of the driver's shift.

Failure to complete the record of duty activities, failure to preserve a record of such duty activities, or making a false report in connection with such duty activities shall make the driver and/or the carrier liable for prosecution.

Recordkeeping

M.J. VanDamme Trucking, Inc. maintains and retains for a period of 6 months accurate and true time records showing:

- The time the driver reports for duty each day.
- The total number of hours the driver is on duty each day.
- The time the driver is released from duty each day.
- The total time for the preceding 7 days in accordance with § 395.8(j)(2) for drivers used for the first time or intermittently.

Pre and Post Trip Inspections:

Both must be recorded on the HOS log as "on-duty not driving" and must be shown for each inspection. Pre and Post trip inspections need to be reflected on your RODS even if you are only completing a timecard or trip sheet. Any defects found during a Pre / Post Trip inspection must be documented using the provided Paper DVIR. The DVIR must then be turned into the Maintenance Department. You are required to submit in writing any findings of damage or mechanical problems found during both the Pre-trip and Post-trip inspections.

Violations

Violations of M.J. VanDamme Trucking, Inc. Hours of Service Policy:

The following disciplinary policy has been put in place as part of the ongoing audit process for Record of Duty Status (RODS) and Hours of Service (HOS) Violations found on GPS, time records, and logs submitted by drivers.

1. Drivers shall receive 5 written warnings outlining the violation and shall sign off acknowledging receipt of each warning.
    a. One signed copy shall be kept by the driver and the other will be kept by the driver's supervisor.
    b. Signed warnings kept by the supervisor will be provided to Human Resources and kept in the employee's personnel file.
2. After receiving 5 warnings (within a 6-month timeframe) the driver will be put on 30 calendar days probation.
    a. If during the 30 days any additional RODS or HOS violations take place the driver will receive 3 days of unpaid time off from work.
    b. After 3 unpaid days from work any subsequent RODS or HOS violations during the 30 calendar day probation period will be addressed from a disciplinary stand point on a case by case basis.
    c. Warnings stay applicable toward the 30 calendar day probation for a driver for a 6 month timeframe. The same timeframe the D.O.T requires carriers to keep Record of Duty Status (RODS) and Hours of Service (HOS) records on file for review and audit purposes.
3. After the 30 calendar days probation period (with no additional violations) has passed; warnings re-set and subsequent warnings received by the driver will start counting up again from warning #1.
    a. As stated above if additional violations took place during the 30 calendar day probationary period different steps will be taken on a case by case basis. These steps may affect the timing of the driver's warning re-set or potentially extend the probationary time.

By signing below the driver acknowledges that he/she has read, understands, and agrees to comply with M.J. VanDamme Trucking, Inc.' s Hours of Service Log Policy:

_____ _____

Driver Signature Date

_____ _____

Trainer Signature Date

RISK HAZARD ASSESSMENT PLAN

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6-21-2024	MMM	MMM

Contents

Overview

This section covers the development and requirements for risk and hazard assessments. All employees shall be trained in this procedure prior to working on any MJVD worksite. A worksite hazard assessment shall be performed prior to working each shift and can include a Field Level Hazard Assessment (FLHA), Pre-Task Hazard Assessment (PTHA) or workplace exam, Job Hazard Analysis (JHA), and any Standard Operating Procedures (SOPs) for tasks at hand.

Purpose

1. To provide a consistent methodology for conducting pre-job safety analysis.
2. To identify all potential hazards on a worksite and what corrective measures should be implemented to prevent injuries.
3. To promote employee participation in the development of the safety plans for jobs and tasks.
4. Ensure all MJVD employees go home safely after each workday.

Procedure

1. Select the job or task to be analyzed.
2. Separate the job or task into its basic steps.
3. Identify the hazards associated with each step.
4. Use mitigation control methods to reduce the hazard potential.

Job Selection

All jobs require a hazard assessment to be performed prior to each work shift and throughout the day if conditions change. There are some jobs which require additional analysis. The following list may be useful in determining when to apply additional analysis.

1. Jobs or tasks which have produced higher accident frequency.
2. Jobs or tasks which have resulted in higher accident severity.
3. Jobs or tasks which have a higher potential for accidents.
4. Jobs or tasks which are new.
5. Jobs or tasks which are non-routine.
6. Jobs or tasks which have had changes to personnel, materials, or procedures.
7. Routine jobs or tasks which have been overlooked.

Worksite Analyses

Each worksite shall have a detailed Accident Prevention Plan (APP) on site, which discusses hazard identification and worksite hazard analyses. The APP defines toolbox talks, FLHAs, PTHAs, and JHAs and goes into detail on how to perform these types of analyses. All incorporate breaking down the task into steps, identifying hazards with each step, and what mitigation controls shall be used to reduce the hazard.

Break Down Jobs

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 analysis 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.

Identify Hazards

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:

1. Can the worker come in **CONTACT WITH** any energy source or hazardous material?
    - Electricity
    - Chemicals
    - Heat / Cold
    - Radiation
    - Gases or fumes
    - Water or steam
    - Poor Air
2. Can the worker be **STRUCK BY** anything?
    - Moving or flying objects
    - Falling material
3. Can the worker **STRIKE AGAINST** anything?
    - Stationary or moving objects
    - Protruding objects
    - Sharp or jagged edges
4. Can the worker be **CAUGHT IN, ON**, or **BETWEEN** anything?
    - Pinch Points
    - Protruding objects
    - Moving and / or stationary objects
5. Can the worker slip, trip, or **FALL**?
    - To the same level
    - To lower level
6. Is there a possibility of **OVEREXERTION**?
    - Lifting
    - Pulling
    - Pushing
7. Can the worker be **EXPOSED** to anything?
    - Noise
    - Sun

Control the Hazard

The next part of the process is to develop mitigation controls to eliminate or reduce potential accidents or hazards that have been identified. The following points should be considered for each hazard identified:

1. Can the job be performed in a less hazardous way?
2. Can the physical conditions that created the hazard be changed?
3. If the hazards cannot be engineered out of the job, can the job procedure be changed?
4. Can the necessity of doing the job or the frequency of performing the job be reduced?
5. Can personal protective equipment be used?

Responsibilities

All MJVD employee are responsible for ensuring a hazard assessment is conducted prior to the start of a work shift and to communicate these findings to all employees on site. All employees have the responsibility to ensure that JHAs are current and up to date.

On Site Supervisor

1. Perform a worksite analysis/hazard assessment of every job and task prior to the start of a work shift and throughout the day if conditions change.
2. Discuss hazards with all employees on site.
3. Document results of the hazard assessment with employee signatures provided.
4. Provide documentation to the Safety Department following the end of the project.

Employees

1. Know all hazards present prior to performing work.
2. Look for any potential hazards throughout the day. Stop work and notify a supervisor if a hazard is detected.
3. Follow all MJVD health and safety protocols.
4. Every employee working on that job must have documented and dated proof of having reviewed communication regarding worksite analyses.

Additional Inspections/Observations

1. Safety and employee interactions and/or observations shall be performed regularly on MJVD jobsites and locations by MJVD management and the Safety Department. Safety interaction forms shall be used to document these safety and employee interactions. These shall be provided to the Safety Department once completed.
2. Interactions will be performed at a regular bais throughout the year for all MJVD employees. At a minimum, each employee shall receive an Interaction at least twice per year. Additional observations will be made as needed in direct response to incident or near-miss follow-ups. Observations will also be a tool when converting SSE to full service employees.
3. Interactions shall be performed as project needs arise, upon request, and unannouced at random at any time.

4. The goal of each observation is to observe how MJVD interacts with the general public and to observe the work of an employee. The goal of an employee interaction is to determine if the work is being performed in a safe manner, if the employee understands the hazards at hand, if the employee has been task trained, and to talk with the employee to see if the work can be performed differently or to obtain information on any safety concerns or issues. During the interaction, all safe observations will be checked on the form. Unsafe observations will be noted as well. The safety interaction shall be performed by:
    a. Obtain the safety interaction form.
    b. Complete the header section of form as appropriate.
    c. Engage employee(s) in their work environment. Explain the purpose/goals of the interaction prior to beginning the interaction.
    d. 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.
    e. 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.
    f. Complete comment section, sign the form when completed.
    g. Discuss findings with observed employee. Allow employee to comment by completed employee comment section. Observed employee signs form, completing the observation.
    h. Observer submits completed interaction form for distribution.
    i. 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.
5. The Safety Director shall train all personnel on proper completion of these forms including proper assessment of the severity of the identified hazards.
6. Analysis of unsafe and safe observations and interactions shall be discussed with management on a monthly basis.

Appendix A – Safety Interaction Form

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:

Facilitator Signature/Date:

Employee Comments:

Employee Signature/Date:

SHORT SERVICE EMPLOYEE POLICY

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6-21-2024	MMM	MMM

Contents

Purpose

It is the mission of MJ VanDamme Trucking, Inc. "MJVD" to keep our employees safe at all times and in all conditions and to keep all job sites safe and incident free. The purpose of the Short Service Employee Policy is to eliminate incidents and accidents, improve teamwork, and reinforce safety. The following procedures will be implemented to accomplish this objective.

Scope

This procedure applies to all MJVD facilities and worksites. It is important to ensure that newly placed employees work under the direction of experienced personnel.

Short Service Employee

1. 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.
2. 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.
3. Prior to starting a project, it is the responsibility of MJVD's Project Managers/Foreman to notify the client's site coordinator for the project that there is a short service employee working on the site.
4. Short service employees will be visibly identifiable by the use of an orange vest with a badge indicating training. MJVD's Project Managers/Foreman will make the client aware as to how they are able to identify these employees.
5. The short service employee will be monitored and mentored. When they have attained the correct knowledge of the Safety and Health Management System (SHMS), the Health and Safety Policy (HASP), general operating procedures, and MJVD health and safety measures, the hi-visibility identifiers will be removed, the client will be notified, and documentation will be sent to the office for files.
6. 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.
7. Subcontractors must manage their short service employees in accordance with the requirements of the MJVD's short service employee procedures.
8. A short service employee who is involved in an incident within the first 30 days of employment will be subject to disciplinary action up to and including termination.
9. The supervisor of a short service employee requiring termination will have a reprimand submitted to their personnel file.
10. A supervisor who has received a reprimand may not serve as a supervisor to a short service employee for 30 days after an incident.

Annual Training

Annual training certification for all equipment that is used in the normal day to day operation will be completed (this is to include equipment owned & rented by MJVD).

Safe Driver Training

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:

- Cell phone practices
- Parking procedures
- Safe driving knowledge.

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.

- Minimum qualification requirements are identified for each position and all tasks involving operation of mobile equipment.
- The HR Manager will verify prospective employees meet these minimum qualifications before hire.

Employees will be instructed to advise their Project Managers/Foreman or supervisor 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, coaching and mentoring shall be provided, and the following procedure will be followed:

1. Project Managers/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. Project Managers/Foreman will observe the employee for a period of time until it is felt that the employee has complete understanding and control of the equipment or situation.
3. Project Managers/Foreman will make scheduled observations for the first week the employee operates new equipment or performs a new task.
4. Project Managers/Foreman will certify that the employee has completed training and can operate without observation. (Certification to be sent to MJVD office)
5. Project Managers/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. Project Managers/Foreman will do weekly discussions with employee after certification to be sure the employee has ample opportunities to ask questions about equipment and job tasks.
7. MJVD employees onsite will be made aware that employee is new to this operation/task so as to observe and mentor the employee for successful operation and safety for all.

Subcontractor Employees

1. When issuing a Contract to a Subcontractor, a list of equipment/tasks anticipated at job location will be included.
2. Contractor will be required to include training details for employees or notify MJVD that training is needed.
3. 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 and tasks may change once arriving at the site location.
4. 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.
5. Employees will be instructed to advise Project Managers/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 for Coaching/Mentoring:
    a. Project Managers/Foreman will proceed with a training overview of equipment operation and/or task to include detailed operation as well as hazards when performing tasks.
    b. Project Managers/Foreman will observe employee for a period of time until it is felt that the employee has complete understanding and control of the equipment or situation.
    c. Project Managers/Foreman will make scheduled observations for the first week the employee operates new equipment or performs a new task.
    d. Project Managers/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)
    e. Project Managers/Foreman will do weekly discussions with employee after certification to be sure employee has ample opportunities to ask questions about equipment/task.
    f. All MJVD employees onsite will be made aware that the employee is new to this operation/task so as to observe and mentor employee for successful operation and safety for all.

ERGONOMICS

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6-21-2024	MMM	MMM

Contents

Purpose

M.J. VanDamme Trucking, Inc. "MJVD" takes all reasonable precautions to protect the health and safety of our employees. As part of this commitment, we have implemented the Ergonomics Program, whose primary objective is to prevent injuries and illnesses in the workplace.

Responsibilities

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:

Management

- Provide training for individuals responsible for ergonomic assessments and program implementation.
- Conduct inspections to identify deficiencies in the Ergonomics program.
- Provide appropriate supplies on all sites.

Employees

- Report all incidents immediately.
- Report personal health conditions to supervision.
- Follow the Ergonomics program rules.

Definitions

Ergonomics	Designing the workplace and tasks to fit the capabilities of the working population.
Administrative Controls	Procedures and methods that significantly reduce daily exposure by altering the way in which work is performed.
Engineering Controls	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.
Physicians or other Licensed Health Care Professionals (PHLCP)	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.
Job Factors	Workplace conditions and physical work activities that must be considered when conducting an ergonomic assessment.
Work Related Musculoskeletal Disorder (WMSD)	Injuries or illnesses to the muscles, joints, tendons, or nerves (Soft Tissues).
Musculoskeletal Disorders (MSD)	Injuries and disorders of the muscles, nerves, tendons, ligaments, joints, cartilage, and spinal disks.
Signs (of WMSDs)	Objective, observable physical findings of MSDs.
Symptoms (of WMSDs)	Physical reports (not observable) of physical pain or discomfort.
Manual Handling Operations	a. Lifting/lowering, pushing/pulling, or carrying b. Exertion of considerable force due to a heavy load or the cumulative totals of the loads during the workday is heavy c. Manual handling work activities which are a significant portion of the employee's regular job duties.

Ergonomics Assessment

If an employee would like an ergonomic assessment, they can request one from the Safety Department. Site management will conduct an Ergonomics Assessment as requested.

Management Leadership and Employee Involvement

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.

Workers who experience fatigue/tiredness while at work are to report their condition to their supervisor immediately.

Hazard Identification

Hazards are identified through worksite analyses on project specific sites. Hazards can be identified in office locations through:

- Routine safety audits, inspections, and observations.
- Review of Supervisors Incident Reports.
- Employee reports of hazards or concerns.
- Ergonomic Assessments.

These hazards are used to determine potential WMSD hazard elements. When WMSD hazards are identified, a full assessment shall be conducted, and control measures implemented to eliminate or control the hazards to the extent feasible.

Employee Information

For current and new employees in positions with the potential for WMSDs, the following information will be provided:

1. How to recognize signs and symptoms of WMSDs and the importance of early reporting
2. Hazards that are reasonably likely to be causing or contributing to WMSDs
3. How to report hazards / concerns and how to make recommendations.
4. Information methods may include video presentations and PowerPoint slide presentations and handouts.
5. Employees receive Ergonomics awareness through new employee orientation and toolbox talks.

Control Measure Process

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:

1. 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.

2. Tracking progress in controlling the WMSD hazards, particularly if prioritizing is necessary.
3. Communication of results of the ergonomic assessment to other areas of the workplace whose assistance may be needed to successfully control the WMSD hazard.
4. Identification of hazards when equipment is changed, redesigned, or purchased and when change occurs in processes or facilities.

Control Methods

To control worker fatigue, limiting work hours and controlling work schedules (staff/work balance) should be practiced. Additionally, the following steps in the hierarchy of controls will be considered in the following sequence:

- Elimination
- Substitution
- Engineering Controls
- Administrative Controls
- PPE

Training

Training will be provided MJVD management, 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. 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.

Office Ergonomics

It is important that the design of equipment, work layouts, and work environment provides a positive working environment by reducing potential injury and soreness. Three primary ergonomic risk factors that cause MSDs are awkward posture, high force, or long frequency. Combinations of postures, forces and frequencies increase the chance of developing an MSD.

The MJVD Safety Department can assist employees on the basic elements to identify ergonomic issues at a workstation.

ASBESTOS AWARENESS

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6/20/2024	MMM	MMM

Contents

Purpose

This procedure was developed to provide guidance for those who are about to undertake work in the vicinity of an asbestos abatement project. The procedures and practices detailed in these pages incorporate current technology at the time of publishing. The reader should be reminded that as technology evolves, so do the methods for conducting asbestos abatement. Therefore, the company emphasizes the need to obtain the most up-to-date information available.

Scope

This section applies to all employees, and subcontractors.

Responsibilities

Management at all levels is responsible for the anticipation, identification, application, coordination, and execution of this procedure. All employees shall be instructed in safe work practices. To accomplish this requirement the additional roles and responsibilities for management are:

1. Provide training and equipment for employees.
2. Conduct inspections to identify deficiencies in the training program.
3. Guard against and correct all deficiencies promptly.
4. Ensure all new covered operations meet codes and regulations.
5. Report deficiencies immediately.
6. Not work unless authorized and trained.
7. Properly inspect all operations and equipment prior to use.
8. Assure correct PPE is used as intended.

Host Employer

Host employer's policies and procedures will be adopted provided those procedures meet or exceed these requirements or where mandated. If the Host Employer's program is to be adopted then a copy must be available for review and consultation. In those cases, all site personnel must be trained in the specifics of the host employer's program. Additionally, federal, state, or local requirements may be more stringent than these and will be adopted. **IN ALL CASES THE MOST STRINGENT STANDARDS MUST BE APPLIED TO THE WORK**.

Definitions

Asbestos	Mineral that separates into long flexible fibers that can cause asbestosis, mesothelioma, and cancer, which have been used to make incombustible or fireproofing material. Includes chrysotile, amosite, crocidolite, tremolite, anthophyllite, and actinolite.
Asbestos-Containing Material (ACM)	Any material containing more than 1% asbestos.
Authorized Person	Any person authorized by the employer and required by work duties to be present in regulated areas.

Class I asbestos work	Activities involving the removal of TSI and surfacing ACM and PACM.
Class II asbestos work	Activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.
Class III asbestos work	Repair and maintenance operations, where "ACM", including TSI and surfacing ACM and PACM, is likely to be disturbed.
Class IV asbestos work	Maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.
Competent Person (CP)	One who is capable of identifying existing and predictable hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate these hazards.
Employee Exposure	Exposure to airborne asbestos that would occur if the employee were not using respiratory protective equipment.
Fiber	A particulate form of asbestos 5 micrometers or longer, with a length-to-diameter ratio of at least 3 to 1.
Friable ACM	Friable asbestos is more prone to damage and can easily be broken, and that will release inhalable asbestos fibers into the air as a result. Friable asbestos contains more than 1% asbestos by weight and can be damaged easily by hand.
High-Efficiency Particulate Air (HEPA) filter	Filter capable of trapping and retaining at least 99.97 percent of 0.3 micrometer diameter monodisperse particles.
Non-friable ACM	More resistant to damage and abrasion, less likely to release harmful fibers into the air, cannot be damaged by the human hand or easily disturbed.
Presumed Asbestos Containing Material (PACM)	Thermal system insulation, surfacing material, or other material found in buildings that may be ACM.
Surfacing Material	Material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, and other purposes).
Thermal System Insulation (TSI)	ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.

General

All asbestos abatement work being performed on a Host Site will be performed in accordance with OSHA 1926.1101, 1910.1001, EPA, AHERA, and the appropriate ANSI standards. All federal, state, and local requirements of working near asbestos abatement areas must be researched and then followed. Basic OSHA safety requirements are outlined in the body of this safe work procedure and are to be complied with. Specifically, all employees must remain outside of the regulated work areas on all sites including multi-contractor sites unless authorized to be protected from exposure. MJVD employees shall not perform any asbestos-related work unless trained and certified to do so, depending on the type of work being performed. All PACM shall be collected and analyzed prior to work being performed by any MJVD employee.

Area Air Sampling

When air sampling is required on a project, a third-party shall perform the air sampling and monitoring based on regulatory requirements. Sampling locations and the number of samples to be collected may be specified. This shall be left to the discretion of the air sampling professional.

Baseline air samples shall be collected prior to the start of the project. During abatement, samples shall be obtained inside of an abatement/containment area as well as outside of the area. Clearance air samples shall be collected following abatement to confirm it is safe for occupancy or that there is no longer ACM present.

Sampling methods (aggressive or non-aggressive), analytical techniques (PLM or TEM), and length of the tests will be specified according to applicable regulations. The specs should also state very clearly what will be considered “clean” in regard to airborne fiber levels. Additionally, specifications should include requirements that a complete and thorough visual examination of the work area be conducted by the Host Employer Representative prior to final air clearance testing.

Personal Protective Equipment

Employees working on the jobsite will be issued PPE in accordance with their specific job duties and requirements of the Host Facility. At no time will any company employee enter a Regulated Area or disturb any material which may contain airborne producing asbestos material.

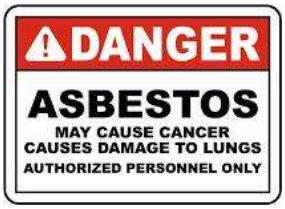
Respiratory Program

Respirators are required to be worn during asbestos abatement work unless an exposure assessment has been performed showing it is safe to do the work without a respirator. All MJVD shall adhere to the Respiratory Protection Program. Respirators will be provided to employees at no cost when performing asbestos abatement work.

Asbestos Signs and Labels

Warning signs that demarcate the regulated area shall be provided and displayed at each location where a regulated area is required to be established. Signs shall be posted at such a distance from such a location that an employee may read the signs and take necessary protective steps before entering the area marked by the signs.

Warning signs shall bear the following information:



If respirators and other protective clothing is required in the area, the sign shall state the following:

MJVD shall affix a label to all products containing asbestos and to all containers containing such products, including waste containers of protective clothing and equipment, scrap, and waste and shall include the following information:

Employee Training and Information

Any MJVD employee who is likely to be exposed to asbestos in excess of a PEL, and who performs Class I through IV asbestos operations shall receive training at no cost in adherence to 1926.1101(k)(9). Training shall be in accordance with the class of work. Training shall be conducted by an EPA-approved or state-approved training provider.

Training shall also include:

1. Methods of recognizing asbestos and building materials that are presumed asbestos containing materials.
2. The health effects associated with asbestos exposure.
3. The relationship between smoking and asbestos in producing lung cancer.
4. The nature of operations that could result in exposure to asbestos, the importance of necessary protective controls to minimize exposure including, as applicable, engineering controls, work practices, respirators, housekeeping procedures, hygiene facilities, protective clothing, decontamination procedures, emergency procedures, and waste disposal procedures, and any necessary instruction in the use of these controls and procedures.
5. The purpose, proper use, fitting instructions, and limitations of respirators.
6. The appropriate work practices for performing the asbestos job.
7. Medical surveillance program requirements.

8. The content of regulatory standards.
9. The names, addresses, and phone numbers of public health organizations which provide information, materials and/or conduct programs concerning smoking cessation.
10. The requirements for posting signs and affixing labels and the meaning of the required legends for such signs and labels.

Employees who are hired to perform non-asbestos duties on an asbestos project, but are not trained in accordance with 29 CFR 1926.1101 or 1910.1001, shall at the time of initial assignment receive at least the Training Requirements of Class IV. (40 CFR 763.92 (A)). Training course shall be at least 2 hours in length (Asbestos Awareness).

Annual refreshers shall be provided at no cost to the employee and documentation maintained by Human Resources. Training materials shall be available upon request.

Effects of Airborne Asbestos Exposure

1. "Asbestos" is a commercial name, not a mineralogical definition, given to a variety of six naturally occurring fibrous minerals. These minerals possess high tensile strength, flexibility, resistance to chemical and thermal degradation, and electrical resistance. These minerals have been used for decades in thousands of commercial products, such as insulation and fireproofing materials, automotive brakes and textile products, and cement and wallboard materials.
2. When handled, asbestos can separate into microscopic-size particles that remain in the air and are easily inhaled. Persons occupationally exposed to asbestos have developed several types of life-threatening diseases, including asbestosis, lung cancer, and mesothelioma.
3. Although the use of asbestos and asbestos products has dramatically decreased in recent years, they are still found in many residential and commercial settings and continue to pose a health risk to workers and others.
4. Over time, asbestos fibers accumulate in the lungs and cause scarring and inflammation. This makes breathing increasingly difficult and can even lead to cancer and other illnesses. Symptoms of these diseases may not appear until 10 to 50 years after the initial exposure occurred.
5. Workers will likely not encounter asbestos in the course of their normal job duties. In the event that work is to be performed at a work site where active asbestos abatement is being performed, procedures as provided by the host employer will be followed as outlined herein.
6. When working on multi-contractor worksites, employees will be protected from exposure. The host employer shall provide procedures and program to protect employees while working on multi-contractor worksites.

How Exposure Happens

Asbestos exposure occurs when someone inhales or swallows asbestos fibers. Natural asbestos fibers are in outside air in trace amounts. While no level of asbestos exposure is considered safe, most asbestos-related illnesses arise after heavy, repeated exposures to friable asbestos in occupational settings, such as construction work and home renovations. When friable asbestos is disturbed, fibers can remain airborne for hours, placing anyone nearby in danger. Once inhaled, they become trapped in the respiratory tract and lungs, where they may stay for life.

STOP WORK AUTHORITY

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6/20/2024	MMM	MMM

Contents

PURPOSE

This program provides an outline of site and project Stop Work Authority (SWA) for all employees, contractors, and visitors to foster a culture in which it is accepted and expected to have a questioning attitude.

SCOPE

This program applies to all employee and contractor personnel at sites.

PROGRAM OVERVIEW

This program formally establishes the SWA of all employees and contractors. The SWA empowers employees and contractors to stop individual tasks or group operations when the control of health, safety, and environmental (HSE) risk is not clearly established or understood.

- All employees and contractors have the authority and obligation to stop any task or operation where concerns or questions regarding the control of HSE risk exist.
- No work will resume until all stop-work issues and concerns have been adequately addressed. Any form of retribution or intimidation directed at any individual or company for exercising their authority as outlined in this program will not be tolerated.

ROLES AND RESPONSIBILITIES

Persons in the following roles have responsibilities in support of this program:

1. Company employees and contractors are responsible for initiating a Stop Work intervention when warranted, supporting the intervention of others, and properly reporting all Stop Work actions.
2. Foremen and supervisors are responsible for creating a culture where SWA is exercised freely, honoring a Stop Work request, working to resolve issues before operations resume, recognizing proactive participation, and ensuring all Stop Work actions are properly reported with required follow-up completed.
3. Site managers are responsible for establishing the clear expectation to exercise SWA, creating a culture where SWA is exercised freely, resolving SWA conflicts when they arise, and holding those accountable who choose not to comply with established SWA policies.
4. Site safety program staff is responsible for monitoring compliance with the requirements of this program; maintaining associated documents, processes, and training materials; identifying trends; and sharing lessons learned.

INTERVENTION PROTOCOL

An established intervention protocol creates an environment where people know how to act and respond. In general, the SWA process takes a stop, notify, correct, and resume approach to resolve a perceived unsafe work action or condition. These steps should be the framework for all Stop Work interventions.

As we know from experience with behavior-based safety processes, a workforce that clearly understands how to initiate, receive, and respond to a Stop Work intervention is more likely to participate.

TRAINING

Training for the SWA program shall be conducted as part of all new employee and contractor site orientation. A review of the SWA shall be included as part of all field location safety briefings, and in regular safety meetings.

Stop Work Authority document can be obtained by contacting site management.

Protocol Instruction - Steps

1. When a person identifies a perceived unsafe condition or act, error, omission, or lack of understanding that could result in an undesirable event, that person shall immediately initiate a Stop Work intervention with the person(s) potentially at risk.
2. If the supervisor is readily available and the affected person(s) is not in immediate risk, coordinate the Stop Work action through the supervisor. If the supervisor is not readily available or the affected person(s) is in immediate risk, initiate the Stop Work intervention directly with those at risk.
3. Initiate Stop Work interventions in a positive manner. Briefly introduce yourself and start the conversation with the phrase, "I am using my Stop Work Authority because…." Using this phrase will clarify the initiator's intent and set expectations.
4. Notify all affected personnel and supervision of the stop work issue. If necessary, stop associated work activities, remove person(s) from the area, stabilize the situation, and make the area as safe as possible.
5. All involved parties discuss the stop work issue and agree on how to proceed.
6. If it is determined and agreed the task or operation can proceed as-is (for example, the stop work initiator was unaware of certain facts or procedures), the affected persons should thank the initiator for their concern and proceed with the work.
7. If it is determined and agreed that the stop work issue is valid, then every attempt should be made to resolve the issue to the satisfaction of all affected persons before work is restarted.
8. If the stop work issue cannot be resolved immediately, suspend work until proper resolution is achieved. When opinions differ as to the validity of the stop work issue or adequacy of the resolution actions, site management makes the final determination.
9. Positive feedback should be given to all affected employees regarding resolution of the stop work issue. Under no circumstances should retribution be directed at anyone who exercises their SWA in good faith.

FOLLOW-UP

The desired outcome of any Stop Work intervention is to address identified concerns to the satisfaction of all involved persons prior to resuming work. Although most issues can be adequately resolved in a timely fashion at the job site, additional investigation and corrective actions may be required occasionally to identify and address root causes.

Stop Work interventions that require additional investigation or follow-up will use existing protocols and procedures for incident investigation and follow-up.

Stop Work reports will be reviewed by a supervisor/manager.

RECOGNITION

To build and reinforce a culture in which SWA and a questioning attitude are freely exercised and accepted, line supervisors are encouraged to positively recognize employee and contractor participation in the program.

At a minimum, each first-line supervisor should informally recognize individuals when they exercise their authority to stop work or demonstrate constructive participation in a stop-work intervention. This informal recognition could be the expression of appreciation for a job well done; an award of an item such as a hat, gloves, or flashlight; or a similar recognition.

Additionally, formal recognition of selected examples of Stop Work interventions and those responsible should be made during regularly scheduled safety meetings.

Documentation of each SWA should be made on a simple interaction form and submitted.

Stop Work reports will be reviewed by a supervisor/manager.

SILICA EXPOSURE CONTROL PLAN

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
6/20/2024	MMM	MMM

Contents

Purpose

This M.J. VanDamme Trucking, Inc. (MJVD) written Crystalline Silica Exposure Control Plan is designed to prevent health effects from respirable crystalline silica exposures. MJVD employees may be involved in activities that are covered under both federal and state health and safety standards relative to potential crystalline silica exposures and shall follow the requirements of the following standards:

- MIOSHA General Industry Standard (Part 590. Silica in General Industry)
- MIOSHA Construction Standard (Part 690. Silica in Construction)
- OSHA General Industry Rule (29 CFR 1910.1053)
- OSHA Construction Rule (29 CFR 1926.1153)
- MSHA Respirable Silica (Federal Register Summary for 30 CFR 56, 57, 70, 71, 72, 90).
- Table 1: Specified Exposure Control Methods When Working With Materials Containing Crystalline Silica

The requirements in this plan apply to all MJVD employees who are exposed to respirable crystalline silica at or above the action level or permissible exposure limit or perform construction-related tasks which are identified in Table 1 of the standard.

This written silica exposure control plan will be readily available for examination and copying, upon request, to each employee covered by this section, their designated representatives, and federal or state workplace safety representatives/compliance officers. This plan will be reviewed and evaluated for effectiveness at least annually and updated as needed.

Introduction

Silica is the compound formed from the elements silicon (Si) and oxygen (O) and has a molecular form of SiO_2. Silica is the second most common mineral on earth, found in the common form as "sand" and "rock." The three main forms or 'polymorphs' of silica are alpha quartz, cristobalite, and tridymite. The polymer most abundant and most hazardous to human health is alpha quartz and is commonly referred to as crystalline silica. Crystalline silica is a common mineral that is found in materials that we see every day in roads, buildings, and sidewalks. It is a common component of sand, stone, rock, concrete, brick, block, and mortar.

Definitions

Action level - A concentration of airborne respirable crystalline silica of 25 µg/m3, calculated as an 8-hour TWA, that initiates exposure monitoring and surveillance.

Competent person - An individual who can identify existing and foreseeable respirable crystalline silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them.

High-Efficiency Particulate air [HEPA] filter - A filter that is at least 99.97 percent efficient in removing monodispersed particles of 0.3 micrometers in diameter.

Permissible Exposure Limit (PEL) - The maximum amount or concentration of a chemical that a worker may be exposed to under OSHA regulations. The PEL MSHA uses is the same as OSHA, which is the OSHA PEL of 0.05 mg/m^3 or 50 $\mu g/m^3$.

Time Weight Average (TWA) – Average value of exposure concentration over an 8-hour (or 10 hour) work shift.

µg/m³ = micrograms per cubic meter

mg/m³ = milligram per cubic meter

1 µg = 0.001 mg; 25 µg = 0.025 mg; 50 µg = 0.05 mg

Health Hazards Associated with Silica Exposure

The health hazards of silica come from breathing in the dust. If crystalline silica becomes airborne through industrial activities, exposures to fine crystalline silica dust (specifically exposure to the size fraction that is respirable) can lead to disabling, sometimes fatal disease called silicosis and other non-malignant respiratory diseases, such as chronic bronchitis, Lung Cancer, kidney disease including nephritis & end-stage renal disease (kidneys). It may be associated with auto-immune disorders & cardiovascular disease.

Responsibilities

Due to the risk posed by respirable silica, personnel involved in activities that could potentially create silica dust take specific actions to ensure that, as much as practicable, a hazard is not created. In recognition of this, the following Silica related responsibilities have been established.

Project Manager

- Serve as the silica competent person and be responsible for the implementation of this written control plan to all employees that have the potential to be exposed to silica.
- Inspecting job sites, materials, and equipment on a regular and frequent basis.
- Identifying existing and foreseeable respirable crystalline silica hazards and taking prompt corrective action to minimize or eliminate these hazards.
- Being familiar with the Silica Exposure Control Plan.
- Notifying employees when problems arise, there is a change in engineering controls and work practices, or in situations of uncontrolled releases of visible dust in occupied buildings.
- Supplying appropriate equipment and personal protective equipment (PPE) to affected employees free-of-charge.
- Requiring affected employees to wear personal protective equipment as outlined in the plan.

Safety Director / Safety Specialist:

- Providing program oversight and consultation to MJVD employees regarding potential risks, exposure prevention, and training relating to potential crystalline silica dust exposures.
- Designating a “competent person” and defining/assigning appropriate responsibilities.
- Ensuring project and/or task specific Exposure Control Plans (ECPs) are developed, communicated, and effectively implemented as appropriate.
- Ensuring that all affected employees and their managers or supervisors receive the necessary training related to this plan, as well as task specific ECPs.
- Notifying Human Resources of any employee/job category that meets any of the criteria for inclusion in this plan.
- Conducting a review of this plan annually and updating it, as necessary.

- Inspecting job sites, materials, and equipment on a regular and frequent basis.
- Identifying existing and foreseeable respirable crystalline silica hazards and taking prompt corrective action to minimize or eliminate these hazards.
- Being familiar with the Silica Exposure Control Plan.
- Providing affected new employees with informal on-the-job training about this plan.
- Making information and training materials available to potentially affected employees.
- Supplying appropriate equipment and personal protective equipment (PPE) to affected employees free-of-charge.
- Requiring affected employees to wear personal protective equipment as outlined in the plan.
- Ensuring that affected employees receive medical surveillance and attend required training.

Human Resources

- Implementing a suitable respirable crystalline silica exposure monitoring program, or otherwise ensuring representative exposure monitoring results are available if applicable.
- Conducting medical surveillance in accordance with federal and/or state standards.
- Maintaining applicable records, i.e., exposure sampling, respirator fit tests, training, etc. in accordance MIOSHA/OSHA/MSHA regulations.
- Providing the PHLCP's Written Medical Opinion, as required under the standard.
- Maintaining records of the physical examinations, x-rays, and tests.

Employees

- Observing the procedures and requirements outlined in this plan.
- Knowing the hazards of silica dust exposure.
- Reporting immediately to their supervisor, any hazards (i.e., unsafe conditions, unsafe acts, improperly operating equipment, PPE issues/needs etc.).
- Attending training sessions.
- Complying with medical surveillance requirements.
- Wearing respiratory protection, and other PPE, as required.
- Notifying supervisors of changes in the workplace that could cause an increase in exposures to respirable crystalline silica.

Specified Exposure Control Methods

Potential silica-containing substrates and materials encountered at this facility include brick, cement, concrete, concrete block, drywall, grout, mortar, paints containing silica, plasters, roof tile, and various types of tile. Activities impacting these materials also vary, including cutting/sawing, demolishing/disturbing, drilling/coring, grinding, jackhammering, milling, mixing/pouring, sanding, scraping, and even clean-up activities such as sweeping and vacuuming.

The tasks MJVD employees may perform on silica-containing materials are represented in the Table 1. Engineering and work practice controls methods shall be utilized, and respiratory protection shall be required, as necessary. Employee exposure monitoring may also be conducted.

Risk Control

Control Methods

When determining measures to reduce or eliminate worker exposure to silica dust, MJVD will generally select a combination of controls, listed in order of preference:

- Elimination and/or Substitution
- Engineering
- Administrative
- Personnel Protection Equipment (PPE)

Elimination and/or Substitution

There may be times MJVD can substitute products containing silica with products that do not contain (or contain a lower percentage of) crystalline silica. When substitution is not feasible, during the planning process, MJVD will make efforts to reduce the need and/or duration of activities that produce exposures to respirable silica.

Engineering Controls

Engineering controls are those controls which aim to control or otherwise minimize the release of crystalline silica. Two "common" engineering control options available are Local Exhaust Ventilation (LEV) and Wet Dust Suppression (WDS) systems. MJVD tasks shall use wet methods to minimize the release of crystalline silica. Water shall be applied at flow rates sufficient to minimize the release of visible dust.

During demolition activities of silica-containing materials, MJVD operators shall operate equipment from inside the enclosed cab and those employees outside of the cab shall apply water and/or dust suppressants as needed to minimize dust emissions.

During excavation or grading (not demolition or fracturing silica containing materials), water and/or dust suppressants shall be utilized. If the operator is the only employee on the project, the operator shall operate from within the enclosed cab.

During crushing tasks, water shall be applied to minimize dust emissions, or a ventilated booth shall be used that provides fresh, climate-controlled air to the operator.

Employees shall ensure the enclosed cab:

- Is maintained as free as practicable from settled dust.
- Has door seals and closing mechanisms that work properly.
- Has gaskets and seals that are in good condition and working properly.
- Is under positive pressure maintained through continuous delivery of fresh air.
- Has intake air that is filtered through a filter that is 95% efficient in the 0.3-10.0 µm range (e.g., MERV-16 or better)
- Has heating and cooling capabilities.

Administrative Controls

Administrative controls are those that aim to control or otherwise minimize the release of silica using work procedure and work methods, rather than by affecting the actual physical work. Common examples of administrative controls include, but are not limited to:

- Rescheduling of work as to avoid the activities of others.
- Relocating unprotected workers away from dusty areas.
- Avoid using compressed air to clean and dry sweeping of silica containing material. Wet sweep whenever feasible.
- When administrative controls are used, MJVD shall employ the following systems and safe work practices:
    - As able, work activities will be scheduled to minimize the silica related effect on, and from, others.
    - Suitable housekeeping, restricted work area, hygiene practices, training and supervision procedures/standards will be determined and implemented.

Personal Protective Equipment Controls

When engineering and administrative controls are not effective in reducing exposures below the PEL, use of respiratory protective equipment will be required.

If an employee performs more than one task on Table 1 (link) during a shift:

- Total duration of all tasks combined is 4 or more hours -
    - The required respiratory protection for each task is the respiratory protection specified for more than four hours per shift.
- Total duration of all tasks combined is less than 4 hours -
    - The required respiratory protection for each task is the respiratory protection specified for less than four hours per shift.

Exposure Limits and Considerations

The Permissible Exposure Limit (PEL) for respirable crystalline silica (including quartz) for MIOSHA and OSHA is 50 micrograms per cubic meter of air (µg/m3) with the Action Level of 25 µg/m3. The PEL is a concentration to which nearly all workers could be exposed for eight hours a day, five days a week, without adverse health effects.

Regulatory Agency	PEL – 8-hour TWA	AL – 8-hour TWA
MIOSHA GI Part 590	50 µg/m3	25 µg/m3
MIOSHA Construction Part 690	50 µg/m3	25 µg/m3
OSHA GI 1910.1053	50 µg/m3	25 µg/m3
OSHA Construction 1926.1153	50 µg/m3	25 µg/m3
MSHA 30 CFR 70	50 µg/m3	25 µg/m3

Exposure Assessment

MJVD shall assess the exposure of each employee who is or may reasonably be expected to be exposed to respirable crystalline silica at or above the action level in accordance with scheduled monitoring option.

Scheduled Monitoring Option

MJVD will perform initial monitoring to assess the 8-hour TWA exposure for each employee based on one or more personal breathing zone air samples that reflect the exposures of employees on each shift, for each job classification, in each work area. Where several employees perform the same tasks on the same shift and in the same work area, the employer may sample a representative fraction of these employees to meet this requirement. In representative sampling, the employer shall sample the employee(s) who are expected to have the highest exposure to respirable crystalline silica.

- If initial monitoring indicates that employee exposures are below the action level, the employer may discontinue monitoring for those employees whose exposures are represented by such monitoring.
- Where the most recent exposure monitoring indicates that employee exposures are at or above the action level but at or below the PEL, the employer shall repeat such monitoring within six months of the most recent monitoring.
- Where the most recent exposure monitoring indicates that employee exposures are above the PEL, the employer shall repeat such monitoring within three months of the most recent monitoring.
- Where the most recent (non-initial) exposure monitoring indicates that employee exposures are below the action level, the employer shall repeat such monitoring within six months of the most recent monitoring until two consecutive measurements, taken 7 or more days apart, are below the action level, at which time the employer may discontinue monitoring for those employees whose exposures are represented by such monitoring.

Housekeeping

- Dry sweeping or dry brushing of dust containing respirable crystalline silica is **prohibited**. Use of a HEPA filtered vacuum cleaner, followed by wet mopping, or wet sweeping, as necessary. Wet sweeping compounds can be an acceptable dust suppression housekeeping method provided that the compounds are non-grit, oil, or wax based. If HEPA vacuuming or wet mopping/sweeping is not feasible because doing so may cause damage to equipment or create a greater hazard, then management or competent person must be contacted to discuss alternative cleaning methods.
- Do not use compressed air to clean an employee's clothes that have become soiled with dust containing respirable crystalline silica or use compressed air to clean skin and clothing at any time. A HEPA filtered vacuum should be used to remove dust followed by laundering. Coveralls can be used to minimize the transfer of dust to other areas such as an office, break room, vehicle, or home environment. Vacuum the coveralls with a HEPA filtered vacuum before removing to launder or, if disposable, place in the normal trash. Vacuum filters can also be placed in the normal trash.

Regulated and Restricted Areas

A regulated area will be established where work exposures at a fixed location are known to be at or above the PEL. A regulated area must be separated from other areas in a way that will minimize the number of employees exposed. The following sign will be posted at each entrance to the regulated area:

DANGER, RESPIRABLE CRYSTALLINE SILICA, MAY CAUSE CANCER, CAUSES DAMAGE TO LUNGS, WEAR RESPIRATORY PROTECTION IN THIS AREA AUTHORIZED PERSONNEL ONLY

Only employees who have work to perform are allowed to enter a regulated area. All employees entering the regulated area must wear a respirator, regardless of the amount of time spent in the area.

Respiratory Protection

Respiratory protection is required during certain activities identified in Table 1 of this plan. It may also be required if other tasks are identified where employee exposures exceed the PEL and work practice or engineering controls are not feasible or effective enough to reduce exposures. All respirator use will comply with MIOSHA Part 451. Respiratory Protection standard and MJVD Respiratory Protection Program.

The following table provides recommended respiratory protection levels based on the measured or anticipated exposure levels:

Respirator	Protection Factor	Typical Silica Activity
N95	Less than 50 µg/m³	- Used on voluntary basis to control low exposures
Half-face with HEPA filters	50 – 500 µg/m³	- Housekeeping (wet method) - Saw cutting (wet method) - Drilling (wet method) - Power tools with dust collection
Full-face with HEPA filters	500 – 5,000 µg/m³	- Mixing grout in bulk - Vacuum abrasive blasting
SCBA / CABA	Above 5,000 µg/m³	- Abrasive Blasting

Medical Surveillance

Medical surveillance shall be required for any employee who meets any of the following criteria:

- Exposure to respirable crystalline silica above the permissible exposure limit.
- Exposure to respirable crystalline silica at/above the action level for 30 or more days per year.
- Required to wear a respirator for 30 or more days a year (per Table 1).
- Work with crystalline silica and develop signs/symptoms of excessive exposure to respirable crystalline silica.

Recordkeeping

MJVD Human Resources shall maintain employee exposure information for at least 30 years. Medical surveillance records will be kept for the duration of the employee's employment, plus 30 years.

Education and Training

Prior to performing activities or working on project sites where personnel could be exposed to silica dust, employees shall receive suitable education and training. While not necessarily an exhaustive list, education and training may include:

- The health hazards and risks associated with exposure to silica dust.
- The specific tasks that could result in silica exposure.
- General and specific silica exposure reduction methods/strategies (i.e., as detailed in the general/specific exposure control plans).
- The use of specific pieces of equipment and control systems (i.e., LEV and WDS systems).
- The use and care of respiratory (and other) personal protective equipment.
- The general provisions of the MIOSHA/OSHA/MSHA silica standard.
- The employee identified as the competent person for the Silica Exposure Control Plan.

The education and training detailed will be delivered through a variety of forums, including but not necessarily limited to:

- New Employee Orientations.
- Project/Site Orientations.
- Equipment/task specific training.
- Pre-Task Hazard Assessments (PTHA)
- Field Level Hazard Assessments (FLHA)
- Toolbox Talks

Project-Specific Training

If there is a potential for silica exposure on a job site, this will be included in the Accident Prevention Plan. Training is required upon initial assignment to a job where silica-containing materials will be impacted and may result in exposures above the AL or where tasks in Table 1 are performed. This training will cover the following topics:

- Health hazards associated with respirable crystalline silica.
- Specific tasks in the workplace that could result in exposure to respirable crystalline silica.
- Specific measures the employer has implemented to protect employees from exposure, including engineering and work practice controls as well as respiratory protection.
- The contents and availability of the Construction and General Industry OSHA Silica Standards, as applicable.
- The identity of the competent person (for the construction related activities).
- The purpose and description of the medical surveillance program.

Retraining

Retraining will be conducted annually or any time a supervisor feels the employee needs additional training.

Emergency Response Plan

(ERP)

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Revision Date	Initials	Approved By (Initials)
June 20, 2024	MMM	MMM

CONTENTS

M.J. VanDamme, Inc.

EMERGENCY PERSONNEL NAMES AND PHONE NUMBERS

DESIGNATED RESPONSIBLE OFFICIAL(S)

Name: Jim Delmont — Work Phone: (906) 346-2641

Position: Vice President — Cell Phone: (906) 361-8104

Name: Rod Wells — Work Phone: (906) 346-2641

Position: General Manager — Cell Phone: (906) 630-1936

EMERGENCY COORDINATOR(S)

Name: Art Sodermark — Work Phone: (352) 267-8440

Position: Safety Director — Cell Phone: (352) 267-8440

Name: Jennifer Delmont — Work Phone: (906) 346-2641

Position: Human Resources — Cell Phone: (906) 869-5886

Name: Click or tap here to enter text. — Work Phone: (906) 346-2641

Position: Click or tap here to enter text. — Cell Phone: Click or tap here to enter text.

Name: Rebecca Wells — Work Phone: (906) 346-2641

Position: Maintenance Coordinator — Cell Phone: (906) 202-3658

EVACUATION

Stop all work

In all emergencies, employees should immediately stop whatever they are doing and quickly, yet safely, exit the building using the nearest exit. All doors should be closed behind employees, but not locked. Check restrooms on the way out to ensure everyone gets out.

Pull fire alarm

Pull the fire alarm while exiting the building if there is a fire. All employees shall know where fire extinguishers are located. Fire extinguishers are only to be used for very small fires. The main goal is to get out of the building and call 911.

Leave the building

Exit the building and quickly proceed away from the building. All employees shall know at least two evacuation routes. Gather in the muster points described below. Ensure all visitors are out of the building. All streets must be kept clear at all times, so as not to hamper the movement of emergency vehicles into the area.

Muster Points:

- Gwinn Office – Northeast corner of parking lot across the street (see red X)

- BPG Automotive Garage – South side of parking lot

- BPG Equipment Maintenance/Repair Garage – Southeast corner parking lot

- Camp – Northwest corner of parking lot

Call 911

Provide as much detail on the emergency and calmly answer any questions.

Check-in with your supervisor

The designated supervisor is responsible to see that all employees leave the building promptly and safely, including employees with disabilities who may need assistance during an evacuation. Supervisor shall notify the designated responsible people if any employee is missing.

Wait for further instruction

The designated responsible people shall report any missing persons to emergency responders. Staff members trained in CPR and rescue breathing should survey the individuals outside to determine if anyone needs first aid. Appropriate aid should then be given. Employees may not re-enter the building until it is declared safe by the fire department and the designated responsible person has authorized re-entry.

Evacuation routes

Every employee shall know at least two evacuation routes.

Every employee shall know the locations of the fire extinguishers.

EMERGENCY PHONE NUMBERS

	Name of Contact	Phone Number	Address
EMERGENCY RESPONSE		**911**	
FIRE DEPARTMENT	**Forsyth Township Fire Department**	**(906) 346-6641**	**47 E Johnson Lake Rd Gwinn, MI, MI 49841**
FIRE DEPARTMENT	**Skandia-West Branch Fire Department**	**(906) 942-7200**	**150 Town Hall Road Skandia, MI. 49885**
FIRE DEPARTMENT	**Powell Township Fire/EMS Hall**	**(906) 345-9345**	**103 Bensinger St. Big Bay, MI. 49808**
POLICE	**Forsyth Township Police Department**	**(906) 346-9224**	**99 N Pine St, Gwinn, MI 49841**
NEAREST HOSPITAL	**UP Health System - Marquette**	**(906) 449-3000**	**850 W Baraga Ave, Marquette, MI 49855**
ELECTRIC	**UPPCO**	**1-800-562-7680**	**1002 Harbor Hills, Marquette, MI 49855**
WATER	**County of Marquette**	**(906) 346-3137**	**125 Avenue G Gwinn, MI. 49841**
GAS	**SEMCO**	**1-800-624-2019**	**34 East US-41 Negaunee, MI. 49866**
TELEPHONE COMPANY	**Charter/Spectrum**	**1-866-874-2389**	**359 US-41 East Negaunee, MI. 49866**

TriMedia Env. & Eng. (Spill Response)	**Tom Anthos, President**	**(906) 228-5125**	**830 W. Washington St Marquette, MI. 49855**
U.P. Environmental Services Inc. (Spill Response)	**Wayne Stenberg, Director of Operations wayne@stenbergs.us**	**(906) 466-9900 1-800-624-6086**	**P.O. Box 127 Bark River, MI. 49807**

EMERGENCY REPORTING AND EVACUATION PROCEDURES

Types of emergencies to be reported by site personnel are:

MEDICAL

FIRE

EXTENDED POWER LOSS

ACTIVE SHOOTER

CHEMICAL SPILL

BOMB THREAT

SEVERE WEATHER

MEDICAL EMERGENCY

At least one person shall be on site to assist in minor workplace injuries/cardiac arrest. Employees are only allowed to assist with injuries after donning appropriate Personal Protective Equipment (PPE) and ensuring the scene is safe. Under no circumstances are employees allowed to exceed their level of training. This could endanger the person they are trying to help. Advanced medical care shall be left to trained Emergency Medical Services (EMS) personnel.

Medical Emergency Phone Numbers

All medical emergency phone numbers are indicated above on Page 8.

Information Provided to Emergency Personnel:

- Nature of medical emergency.
- Location of the emergency (address, building, room number).
- Your name and phone number from which you are calling.
- Any information you can provide.
- Stay on the phone.
- Send someone to meet emergency personnel if possible.
- Do not move victim unless necessary.

Personnel Trained in CPR/First Aid

Shop supervisors may be trained in CPR and First Aid to provide the required assistance prior to the arrival of the professional medical help. If CPR/First Aid is needed prior to obtaining medical help, only those trained can assist. All others shall call 9-1-1.

PPE

If personnel trained in First Aid are not available, as a minimum, attempt to provide the following assistance – wear appropriate Personal Protective Equipment (PPE) prior to helping the victim and only provide assistance if you are appropriately trained.

- Stop the bleeding with firm pressure on the wounds (note: avoid contact with blood or other bodily fluids).
- Clear the air passages using the Heimlich Maneuver in case of choking.

In case of rendering assistance to personnel exposed to hazardous materials, consult the Safety Data Sheet (SDS) and wear the appropriate PPE. Attempt first aid ONLY if trained and qualified.

FIRE EMERGENCY

When fire is discovered:

- Notify the local Fire Department by calling 9-1-1 or the number provided above.
- Leave the area immediately.
- Notify the site personnel about the fire emergency by the following means (check applicable):

X	Voice Communication
X	Phone Texting
X	Radio

Fight the fire ONLY if:

- The Fire Department has been notified.
- The fire is small and is not spreading to other areas.
- Escaping the area is possible by backing up to the nearest exit.
- The fire extinguisher is in working condition and personnel are trained to use it.

Upon being notified about the fire emergency, occupants must:

- Leave the building using the designated escape routes.
- Ensure all visitors and guests leave the building
- Assemble at the muster point(s).
- Report to your supervisor to make sure someone knows you are safe.
- Remain outside until the designated person or emergency response announces that it is safe to reenter.

Reporting Fire and Workplace Emergencies

All fires or workplace emergencies shall be reported to a supervisor as soon as possible, who is authorized to contact emergency services. If a supervisor is not available, any employee with information regarding the workplace emergency may contact emergency services.

Under no circumstances may any employee fight a fire that has grown to where it cannot be immediately put out with a portable fire extinguisher. No employee shall enter a burning structure in an attempt to rescue others as this puts the employee and others in extreme danger.

Designated Official, Emergency Coordinator, or Supervisors:

- Disconnect utilities and equipment unless doing so jeopardizes his/her safety.
- Coordinate an orderly evacuation of personnel.
- Perform an accurate head count of personnel reported to the designated area.
- Determine a rescue method to locate missing personnel.
- Provide the Fire Department personnel with the necessary information about the facility.
- Perform assessment and coordinate weather forecast office emergency closing procedures.
- Ensure that all employees have evacuated the area/floor.
- Report any problems to the Emergency Coordinator at the assembly area.
- Assist all physically challenged employees, guests, and visitors in emergency evacuation.

EXTENDED POWER LOSS

In the event of extended power loss to a facility certain precautionary measures should be taken.

- Unnecessary electrical equipment and appliances should be turned off in the event that power restoration would surge causing damage to electronics and effecting sensitive equipment.
- Facilities with freezing temperatures should turn off and drain the following lines in the event of a long-term power loss.
  - Fire sprinkler system
  - Standpipes
  - Potable water lines
  - Toilets
- Add propylene-glycol to drains to prevent traps from freezing.
- Equipment that contains fluids that may freeze due to long term exposure to freezing temperatures should be moved to heated areas, drained of liquids, or provided with auxiliary heat sources.

Upon Restoration of heat and power:

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming on circuitry.
- Fire and potable water piping should be checked for leaks from freeze damage after the heat has been restored to the facility and water turned back on.

ACTIVE SHOOTER

RECOGNIZING POTENTIAL WORKPLACE VIOLENCE

An active shooter in the workplace may be a current or former employee, or an acquaintance of a current or former employee. Managers and coworkers may notice characteristics of potentially violent behavior in an employee. Alert Human Resources if you believe an employee or coworker exhibits potentially violent behavior.

Indicators of Potential Violence by an Employee

Employees typically do not just "snap," but display indicators of potentially violent behavior over time.

Potentially violent behaviors may include one or more of the following:

- Increased use of alcohol and/or illegal drugs.
- Unexplained increase in absenteeism; vague physical complaints.
- Noticeable decrease in attention to appearance and hygiene.
- Depression / withdrawal.
- Resistance and overreaction to changes in policy and procedures.
- Repeated violations of company policies.
- Increased severe mood swings.
- Noticeably unstable, emotional responses.
- Explosive outbursts of anger or rage without provocation.
- Suicidal; comments about "putting things in order".
- Behavior which is suspect of paranoia, ("everybody is against me").
- Increasingly talks of problems at home.
- Escalation of domestic problems into the workplace; talk of severe financial problems.
- Talk of previous incidents of violence.
- Empathy with individuals committing violence.
- Increase in unsolicited comments about firearms, other dangerous weapons and violent crimes.

HOW TO RESPOND TO AN ACTIVE SHOOTER IN THE WORKPLACE

Manager/Supervisor Responsibilities

Employees are likely to follow the lead of managers during an emergency situation. During an emergency, managers should be familiar with this ERP, and be prepared to:

- Take immediate action.
- Remain calm.
- Lock and barricade doors.
- Evacuate staff and customers via a preplanned evacuation route to a safe area.

MJVD Employee Responsibilities

Quickly determine the most reasonable way to protect your own life.

Evacuate

If there is an accessible escape path, attempt to evacuate the premises. Be sure to:

- Have an escape route and plan in mind.
- Evacuate regardless of whether others agree to follow.
- Leave your belongings behind.
- Help others escape, if possible.
- Prevent individuals from entering an area where the active shooter may be.
- Keep your hands visible.
- Follow the instructions of any police officers.
- Do not attempt to move wounded people.
- Call 911 when you are safe.

Hide out

If evacuation is not possible, find a place to hide where the active shooter is less likely to find you.

Your hiding place should:

- Be out of the active shooter's view.
- Provide protection if shots are fired in your direction (i.e., an office with a closed and locked door).
- Not trap you or restrict your options for movement.

To prevent an active shooter from entering your hiding place:

- Lock the door.
- Blockade the door with heavy furniture.

If the active shooter is nearby:

- Lock the door.
- Silence your cell phone and/or pager.
- Turn off any source of noise (i.e., radios, televisions).
- Hide behind large items (i.e., cabinets, desks).
- Remain quiet.

If evacuation and hiding out are not possible:

- Remain calm.
- Dial 911, if possible, to alert police to the active shooter's location.
- If you cannot speak, leave the line open and allow the dispatcher to listen.

Take action against the active shooter

As a last resort, and only when your life is in imminent danger, attempt to disrupt and/or incapacitate the active shooter by:

- Acting as aggressively as possible against him/her.
- Throwing items and improvising weapons.
- Yelling.
- Committing to your actions.

HOW TO RESPOND WHEN LAW ENFORCEMENT ARRIVES

Law enforcement's purpose is to stop the active shooter as soon as possible. Officers will proceed directly to the area in which the last shots were heard.

- Officers usually arrive in teams of four (4).
- Officers may wear regular patrol uniforms or external bulletproof vests, Kevlar helmets, and other tactical equipment.
- Officers may be armed with rifles, shotguns, handguns.
- Officers may use pepper spray or tear gas to control the situation.
- Officers may shout commands and may push individuals to the ground for their safety.

How to react when law enforcement arrives:

- Remain calm and follow officers' instructions.
- Put down any items in your hands (i.e., bags, jackets).
- Immediately raise hands and spread fingers.
- Keep hands visible at all times.
- Avoid making quick movements toward officers such as holding on to them for safety.
- Avoid pointing, screaming and/or yelling.
- Do not stop to ask officers for help or direction when evacuating, just proceed in the direction from which officers are entering the premises.

Information to provide to law enforcement or 911 operator:

- Location of the active shooter.
- Number of shooters, if more than one.
- Physical description of shooter/s.
- Number and type of weapons held by the shooter/s.
- Number of potential victims at the location.

The first officers to arrive to the scene will not stop to help injured persons. Expect rescue teams comprised of additional officers and emergency medical personnel to follow the initial officers. These rescue teams will treat and remove any injured persons. They may also call upon able-bodied individuals to assist in removing the wounded from the premises.

Once you have reached a safe location or an assembly point, you will likely be held in that area by law enforcement until the situation is under control, and all witnesses have been identified and questioned. Do not leave until law enforcement authorities have instructed you to do so.

TRAINING

- Train all employees on the ERP.
- Recognizing the sound of gunshots.
- Reacting quickly when gunshots are heard and/or when a shooting is witnessed:
  - Evacuating the area
  - Hiding out
  - Acting against the shooter as a last resort.
- Calling 911.
- Reacting when law enforcement arrives.
- Adopting the survival mind set during times of crisis.

PROCEDURE FOLLOWING AN ACTIVE SHOOTER

After the active shooter has been incapacitated and is no longer a threat, human resources and/or management should engage in post-event assessments and activities, including:

- An accounting of all individuals at the muster points to determine who, if anyone, is missing and potentially injured.
- Determining a method for notifying families of individuals affected by the active shooter, including notification of any casualties.
- Assessing the psychological state of individuals at the scene, and referring them to health care specialists accordingly.
- Identifying and filling any critical personnel or operational gaps left in the organization as a result of the active shooter.

CHEMICAL / HAZARDOUS SUBSTANCE SPILL

When a Large Chemical Spill has occurred:

- Immediately notify the designated official and Emergency Coordinator.
- If the spill is too large, call TriMedia Environmental & Engineering Services or U.P. Environmental Services at the contact information provided above.
- Call the Fire Department if the spill is too large to contain.
- Do not attempt to clean the spill unless trained to do so.
- Contain the spill with available equipment appropriate for the type of spill (e.g., pads, booms, absorbent powder, etc.).
- Secure the area and alert other site personnel.
- Attend to any injured personnel and call the medical emergency number, if required.
- Evacuate the building as necessary.

When a Small Chemical Spill has occurred:

- Notify the Emergency Coordinator and/or supervisor (select one).
- If toxic fumes are present, secure the area (with caution tapes or cones) to prevent other personnel from entering.
    - Contact TriMedia Environmental & Engineering Services for exposure monitoring if needed.
- Deal with the spill in accordance with the instructions described in the SDS.
- Small spills must be handled in a safe manner, while wearing the proper PPE.
- Review the general spill cleanup procedures.

TELEPHONE BOMB THREAT CHECKLIST

INSTRUCTIONS:

BE CALM, BE COURTEOUS. LISTEN. DO NOT INTERRUPT THE CALLER.

Fill out the following information:

YOUR NAME: _____ TIME: _____ DATE: _____

CALLER'S IDENTITY SEX: Male _____ Female ____ Adult ____ Juvenile ____ APPROXIMATE AGE: _____

ORIGIN OF CALL: Local _____ Long Distance _____ Cell Phone _____ Other _____

VOICE CHARACTERISTICS		**SPEECH**		**LANGUAGE**	
___ Loud ___ High Pitch ___ Raspy ___ Intoxicated	___ Soft ___ Deep ___ Pleasant ___ Other _____	___ Fast ___ Distinct ___ Stutter ___ Slurred	___ Slow ___ Distorted ___ Nasal ___ Other _____	___ Excellent ___ Fair ___ Foul	___ Good ___ Poor ___ Other _____
ACCENT		**MANNER**		**BACKGROUND NOISES**	
___ Local ___ Foreign ___ Race	___ Not Local ___ Region	___ Calm ___ Rational ___ Coherent ___ Deliberate ___ Righteous	___ Angry ___ Irrational ___ Incoherent ___ Emotional ___ Laughing	___ Factory ___ Machines ___ Music ___ Office ___ Machines ___ Street ___ Traffic	___ Trains ___ Animals ___ Quiet ___ Voices ___ Airplanes ___ Party ___ Atmosphere

BOMB FACTS

PRETEND DIFFICULTY HEARING - KEEP CALLER TALKING - IF CALLER SEEMS AGREEABLE TO FURTHER CONVERSATION, ASK QUESTIONS LIKE:

When will it go off? Certain Hour _____ Time Remaining _____
Where is it located? Building Area _____
What kind of bomb? _____
What kind of package?_____
How do you know so much about the bomb?_____
What is your name and address? _____

If building is occupied, inform caller that detonation could cause injury or death.

Activate malicious call trace: Hang up phone and do not answer another line. Choose same line and dial *57 (if your phone system has this capability). Listen for the confirmation announcement and hang up.
Call Security at _____ and relay information about call.

Did the caller appear familiar with plant or building (by his/her description of the bomb location)? Write out the message in its entirety and any other comments on a separate sheet of paper and attach to this checklist. Notify your supervisor immediately.

SEVERE WEATHER AND NATURAL DISASTERS

Blizzard

If indoors

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Stay indoors!
- If there is no heat:
  - Close off unneeded rooms or areas.
  - Stuff towels or rags in cracks under doors.
  - Cover windows at night.
- Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
- Wear layers of loose-fitting, lightweight, warm clothing, if available.

If outdoors

- Find a dry shelter. Cover all exposed parts of the body.
- If shelter is not available:
  - Prepare a lean-to, wind break, or snow cave for protection from the wind.
  - Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.
  - Do not eat snow. It will lower your body temperature. Melt it first.

If stranded in a car or truck

- Stay in the vehicle!
- Run the motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
- Make yourself visible to rescuers.
  - Turn on the dome light at night when running the engine.
  - Tie a colored cloth to your antenna or door.
  - Raise the hood after the snow stops falling.
- Exercise to keep blood circulating and to keep warm.

Tornado

When a warning is issued seek inside shelter and consider the following:

- Small interior rooms on the lowest floor and without windows.
- Hallways on the lowest floor away from doors and windows.
- Rooms constructed with reinforced concrete, brick, or block with no windows.
- Stay away from outside walls and windows.
- Use arms to protect head and neck.
- Remain sheltered until the tornado threat is announced to be over.

Earthquake

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Keep away from overhead fixtures, windows, filing cabinets, and electrical power.
- Assist people with disabilities in finding a safe place.
- Evacuate as instructed by the Emergency Coordinator and/or the designated official.

Flood

If indoors

- Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
- Follow the recommended primary or secondary evacuation routes.

If outdoors

- Climb to high ground and stay there.
- Avoid walking or driving through flood water.
- If car stalls, abandon it immediately and climb to a higher ground.

Hurricane

The nature of a hurricane provides for more warning than other natural and weather disasters. A hurricane warning is issued when hurricane winds of 74 mph or higher, or a combination of dangerously high water and rough seas, are expected in the area within 24 hours.

Once a hurricane watch has been issued

- Stay calm and await instructions from the Emergency Coordinator or the designated official.
- Moor any boats securely or move to a safe place if time allows.
- Continue to monitor local TV and radio stations for instructions.
- Move early out of low-lying areas or from the coast, at the request of officials.
- If you are on high ground, away from the coast and plan to stay, secure the building, moving all loose items indoors and boarding up windows and openings.
- Collect drinking water in appropriate containers.

Once a hurricane warning has been issued

- Be ready to evacuate as directed by the Emergency Coordinator and/or the designated official.
- Leave areas that might be affected by storm tide or stream flooding.

During a hurricane

- Remain indoors and consider the following:
  - Small interior rooms on the lowest floor and without windows.
  - Hallways on the lowest floor away from doors and windows.
  - Rooms constructed with reinforced concrete, brick, or block with no windows.

TRAINING

MJVD shall train employees on the emergency response plan when:

- The plan is developed, or the employee is assigned initially to a job.
- The employee's responsibilities under the plan change.
- The ERP is changed.
- Annually.

Topics for training include:

- Job Site Housekeeping
- Fire Prevention
- Fire Extinguisher Use, Location
- Expected Job Hazards
- Proper Reporting of Workplace Emergencies
- Names and Contact Information of MJVD emergency response personnel and local emergency response
- Employee Responsibilities
- Evacuation Procedures
- Employee Accounting Procedures
- Severe Weather Procedures
- Emergency Response Plan Availability
- Company alarm system.

Records of ERP training shall be documented and will be maintained on the S: Drive under safety training.

INCIDENT REPORTING

All emergencies and incidents shall be reported to the supervisor while still on shift, and follow the call tree depending on the emergency. All incident reports shall be provided to Human Resources within 24 hours of the incident.

The supervisor is responsible for contacting management and safety depending on the incident. If there is an immediate safety concern for further injuries, the safety department shall be notified immediately. If the incident involves any of the following described below, the safety department is responsible for notifying MIOSHA within the timeframe described:

Death	Notify within 8 hours (1-800-858-0397)
In-patient Hospitalization	Notify within 24 hours (1-844-464-6742 / MIOSHA Website)
Loss of an Eye	Notify within 24 hours (1-844-464-6742 / MIOSHA Website)
Amputation	Notify within 24 hours (1-844-464-6742 / MIOSHA Website)

Incident report that are part of workers' compensation are maintained by Human Resources.

Lead Safe Work Practices

A. Purpose

a. The following safety procedure has been outlined to assure that employees who are working lead coated surfaces, and in the area of lead emissions, from blasting, grinding, cutting, welding, or otherwise causing lead to be disturbed are provided with the safety equipment and procedures for working in this environment.

b. All work will be conducted in total compliance with 29 CFR 1910.1025 and 29 CFR 1926.62 of the Occupational Safety and Health Administration. Although written specifically for Lead exposures, the same elements within this plan are required for other Heavy Metals. Consult your safety department for specific requirements.

B. Scope

a. This section applies to employees, worksites, and subcontractors.

C. 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 Lead and other heavy metals prevention program and its elements. To accomplish this requirement the additional roles and responsibilities are:

i. Management

1. Provide training for individuals responsible for Lead and Heavy Metals
2. Protection and Prevention.

3. Conduct inspections to identify deficiencies in the Lead and Heavy Metals Protection and Prevention program.

4. Provide appropriate supplies on all sites.

5. Assign a Competent Person and provide the resources, responsibility, and authority for this individual.

ii. Employees

1. Report all incidents immediately
2. Report personal health conditions to supervision.
3. Follow the Lead and Heavy Metals Protection and Prevention rules.
4. Wear all personal protective equipment as required.

iii. Host Employer

1. The host employer's Lead and Heavy Metals Protection and Prevention practices will be adopted and adhered to where they are more stringent than 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. The most current standards and regulations must be available on site.

D. Definitions

a. **Action level** - means employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 µg/m(3)) calculated as an 8-hour time-weighted average (TWA).

b. **Blood Lead Level (BLL)** - A blood sampling and analysis for lead levels.

c. **Competent person** - means one who is capable of identifying existing and predictable lead hazards in the surroundings or working conditions and who has authorization to take prompt corrective measures to eliminate them.

d. **Historical Data** – Air monitoring data collected within the past 12 months under circumstances that closely resemble the removal process, work site conditions, type of material control methods, work practices and environmental conditions of a different project to be performed.

e. **Objective Data** – quantitative data, demonstrating that a particular product or material containing lead or a specific process, operation or activity involving lead cannot result in employee exposure to lead at or above the action level during processing, use, or handling.

f. **Lead** - means metallic lead, all inorganic lead compounds, and organic lead soaps.

Excluded from this definition are all other organic lead compounds.

g. **Permissible exposure limit** – means employee exposure, without regard to the use of respirators, to lead at concentrations greater than fifty micrograms per cubic meter of air (50 µg/m(3)) averaged over an 8-hour period.

h. **Zinc Protoporphyrin (ZPP)** - A blood sampling and analysis for zinc protoporphyrin levels.

E. Work Guidelines

a. Twelve (12) basic items are listed, and compliance will be mandatory with the rules and regulations so outlined. These items include:

i. Biological Monitoring & Medical Surveillance
ii. Training
iii. Hazard Communication
iv. Air Monitoring
v. Respiratory Protection
vi. Personal Protective Equipment
vii. Hygiene Practices & Facilities
viii. Housekeeping & Maintenance
ix. Documentation & Retention of Records
x. Waste Disposal
xi. Job Work Procedure
xii. Pre-Job Safety Planning

xiii. **NOTE:** To assure compliance with the rules and regulations, a Competent Person will be assigned to assure that all safety rules are enforced, and all documentation is completed and retained. The Operating Company Safety Department will determine the necessary qualifications for the Competent Person and will assure the person assigned to this position is qualified. In addition, a back-up Competent Person must be assigned to the project to assure a Competent Person is always available when the project is being worked.

F. Biological Sampling

a. Biological sampling is the analysis of materials (blood, urine, or exhaled air) which can provide information about the impact of absorption of hazardous materials into the body. Sampling will be provided at no cost to the employees and at a reasonable time and place.

b. Employees will be provided with baseline biological sampling consisting of Blood Lead Level (BLL) and Zinc Protoporphyrin (ZPP) levels prior to assignment for the first time to an area in which airborne concentrations of lead are expected.

c. Employees on projects which will not meet the requirement of 30 or more days a year above the action level of 30Φg/m3 will have a BLL/ZPP test conducted prior to initial assignment and at the conclusion of the job or project.

G. Medical Surveillance

a. Medical surveillance places individuals in a regular sampling pattern for the purpose of early detection of disease or conditions for which treatment or removal from the hazardous environment can prevent further illness.

b. **Medical Surveillance -** In areas where employee lead exposure is at or above 30 µg/m3 for 30 or more days within a twelve-month period, the employee will be placed in a medical surveillance program consisting of BLL/ZPP testing. This testing will be conducted initially prior to first exposure and at 2, 4, and 6 months and then every six (6) months thereafter.

c. In the event air monitoring data confirms that an employee was exposed above the PEL, with modifier for respiratory protection worn, the employee will receive a blood lead and ZPP test (ideally conducted between 48 and 72 hours of exposure).

d. The Human Resources Coordinator shall notify employees of their BLL and ZPP levels, in writing, within five working days after the receipt of laboratory results.

e. Exit Testing - Any employee BLL/ZPP tested during their tenure with the company will be offered an exit BLL/ZPP test upon their leaving our employment. This testing will be scheduled and paid for by the operating company. Each employee is entitled to an exit BLL/ZPP test upon leaving our employment. If an employee leaves without taking the exit BLL/ZPP test, the Human Resources Coordinator will send a certified letter to their last known address advising them they are entitled to have a BLL/ZPP test provided by the Company at no expense to them. They are to be directed to contact the operating company to make arrangements.

f. All biological sampling results will be entered into the BLL/ZPP tracking system by the Human Resources Coordinator.

g. It is imperative that all results from the biological sampling be handled with the utmost care for the medical privacy of the employee.

H. Elevated Blood Lead Levels

a. After an examination reveals that an employee is at or above 40 µg/dl, the employee shall:

   i. Be removed from the lead exposure area and reassigned to other duties.

   ii. Be given a follow-up examination within a two-week period.

   iii. Be given a follow-up examination every two months until two (2) consecutive blood samples indicate a blood level below 40 µg/dl of whole blood.

   iv. Be provided with a medical examination per requirements of 29 CFR 1926.62 (j) (3).

b. After an initial and follow-up examination reveals that an employee is above the allowable lead level of 50 µg/dl, the employee shall be referred to a physician for evaluation per the requirements of 29 CFR 1926.62 (j) (3). Should it require, the employee shall be provided with medical removal protection benefits as described in 29 CFR 1926.62 (k). The employee may return to his/her former job status when:

   i. Two (2) consecutive blood sampling results indicate that the employee's blood level is at or below 40µg/dl

   ii. Medical opinion that the employee no longer has a detected medical condition which places the employee at increased risk of material impairment to health from exposure to lead.

   iii. NOTE: Any employee leaving our employment, for any reason, who has been monitored for lead and who has performed lead work since their last medical evaluation will be offered a blood lead test as soon after leaving as is practical. See above for Exit Testing requirements.

I. Training

a. Prior to beginning of work on a lead removal project, each employee will be trained in this work procedure. All employees must understand the correct methods of worker protection to assure their Safety and Health are not jeopardized. Training is conducted in accordance with 29 CFR 1910.1025, Appendix B (X) and 29 CFR 1926.62 (l) (2). All employees will receive training on the hazards of working in a lead environment prior to the start of work and at least annually thereafter. The training will be documented.

J. **Hazard Communication (HazCom)**

a. Lead pigment in paint has been used as a rust inhibitor for years and from an occupational health standpoint, dry paint containing lead if it is intact, poses little if any hazard. The hazard arises when the lead coating is disturbed in some way. This disturbance may occur when welding, grinding, burning, or when abrasive blasting is performed on painted steel. The high temperature generated during burning and welding processes melts the lead and converts it into a fume. Abrasive blasting pulverizes coatings into very fine particles. These airborne forms of lead present a serious hazard to workers. The hazard arises when workers are exposed to lead in one of two (2) ways:

   i. Airborne lead can be inhaled.

   ii. Lead can be ingested if employees fail to wash lead off their hands before eating or smoking lead contaminated cigarettes.

b. Lead accumulates in the body and lead poisoning in large doses can cause death. Exposure to smaller doses over long periods of time can cause damage to the blood forming, nervous, urinary, and reproductive systems. The most severe forms of lead poisoning cause damage to the central nervous system and to the brain. To assure that employees are not exposed to lead either throμgh inhalation or ingestion the following safety equipment must be utilized on the jobsite:

   i. Respiratory Protection

   ii. Protective Clothing

   iii. Shower & Wash Facilities

   iv. Warning Signs: Warning! Lead Work Area. Poison! No Eating, Drinking or Smoking

   v. Barricaded Area

K. **Air Monitoring**

a. Air monitoring will be conducted as described in 29 CFR 1910.1025 (d) and 29 CFR 1926.62 (d).

b. The company must be provided with monitoring results within five (5) days from the air monitoring firm.

c. Personnel air monitoring results will be provided to all employees

immediately upon receipt from the air monitoring company.

i. Each employee will sign on the appropriate form acknowledging they have been notified of the results.

ii. If they have any questions regarding the air monitoring results, they should see their foreman or contact the Company Safety Director.

d. It is recommended to have the air monitoring company pull paint chip samples if we do not have quantitative results for the lead content.

e. It is important that all employees receive the results of the sampling. Those employees wearing the pumps are representative of the employees not wearing pumps potential exposures.

f. Historical data can be utilized to validate the level of protective measures being planned for the job. However, it is critical that quantitative samples be taken to verify the level of lead contained in the coating being removed for future use of the sampling.

L. Respiratory Protection

a. Each employee, prior to working in a lead contaminated area, will be issued respiratory protective equipment applicable to their specific job assignment per the company's Respiratory Protection Program.

M. Initial Determination

a. The current OSHA lead standard for construction (29 CFR 1926.62) is unique in that it groups tasks presumed to create employee exposures above the PEL of 50 µg/m3 as an 8-hour TWA. Until the employer performs an employee exposure assessment and determines actual employee exposure, the employer must assume that employees performing one of these tasks are exposed to the levels of lead indicated for that task in this table. For all three groups of tasks, employers are required to provide respiratory protection appropriate to the task's presumed exposure level, protective work clothing and equipment, change areas,
hand-washing facilities, training, and initial medical surveillance as prescribed by paragraph (d)(2)(v) of the standard. The only difference in the provisions applying to these groups is in the degree of respiratory protection required.

i. LEAD-RELATED TASKS AND PRESUMED 8-HOUR TWA EXPOSURE LEVELS.

> 50 to 500µg/m3	>500µg/m3 to 2500µg/m3	2,500 µg/m3
Manual demolition	Using lead-containing mortar	Abrasive blasting
Dry manual scraping	Lead burning	Welding
Dry manual sanding	Rivet busting	Torch cutting
Heat gun use	Power tool cleaning without dust collection systems	Torch burning
Power tool cleaning with dust collection systems	Cleanup of dry expendable abrasive blasting jobs	
Spray painting with lead paint	Abrasive blasting enclosure movement and removal	

N. Exposure Assessment Phase

a. All work, identified as having *potential* employee exposures to lead, will be performed in total accordance with 29 CFR 1926.62 until an Exposure Assessment is completed. The Exposure Assessment will be performed as per 29 CFR 1926.62 (d). The Assessment Phase utilizes data, either initial air monitoring, historical air monitoring, or objective data to determine the employee exposures or expected exposures for the job being performed. Once the Initial Exposure Assessment is complete, the Company shall make any necessary changes to protect the workers. The Operating Company Safety Department will review the air monitoring data to assure that the Company is in full compliance. Should changes be necessary to the Site Compliance Plan, site management will consult the Operating Company Safety Manager. The site manager is responsible for review and implementation of the Site Compliance Plan.

O. Positive Initial Determination

a. Where an exposure assessment determination shows the possibility of any employee exposure at or above the action level the worksite shall conduct monitoring which is representative of the exposure for each employee in the workplace who is exposed to lead.

b. Where the worksite has previously monitored for lead exposure, and the data were obtained within the past 12 months during work operations conducted under workplace conditions closely resembling the processes, type of material, control methods, work practices, and environmental conditions used and

prevailing in the employer's current operations, the worksite may rely on such earlier monitoring results.

P. Negative Initial Determination

a. Where an exposure assessment determination is made that no employee is exposed to airborne concentrations of lead at or above the action level the employer shall make a written record of such determination.

Q. Personal Protective Equipment

a. Employees shall wear disposable coveralls or will be issued washable coveralls on a daily basis.

b. Each employee will be issued a pair of shoe covers, rubber boots, or similar foot covers, and will be responsible for their cleanliness at the end of each shift. Employees will not be allowed to wear contaminated footwear off of the jobsite.

c. Each employee will be issued a pair of impervious gloves (Rubber or rubber material combination).

d. Employees working in a high concentration of airborne dust will wear a head cover such as a hood, under their hard hats.

e. All equipment issued will be documented daily.

f. **NOTE:** Employees shall be prohibited from wearing personal clothing (other than underwear and socks) while working in a lead contaminated environment.

g. Disposable coveralls and separate shoe covers may be used, if appropriate, to avoid the need for laundering.

h. Non-disposable coveralls shall be replaced daily.

i. If an employee leaves the work area wearing protective clothing, the clothing should be cleaned with high-efficiency particulate air (HEPA) filter vacuum equipment to remove loose particle contamination; or as an alternative, the coveralls should be removed.

    i. Before respirators are removed, HEPA vacuuming or other suitable method, such as damp wiping, shall be used to remove loose particle contamination on the respirator and at the facemask seal.

j. Use work garments of appropriate size, and use duct tape to reinforce their seams (e.g., underarm, crotch, and back).

k. Contaminated clothing that is to be cleaned, laundered or disposed of shall be placed in closed containers. Containers shall be labeled with the following warning:

   i. **CAUTION: Clothing contaminated with lead. Do not remove dust by blowing or shaking. Dispose of lead- contaminated wash water in accordance with applicable local, state, or federal regulations.**

l. Persons responsible for handling contaminated clothing shall be informed of the potential hazard in writing.

m. At no time shall lead be removed from protective clothing or equipment by any means that disperses lead into the work area, such as brushing, shaking, or blowing.

n. At no time shall workers be allowed to leave the worksite wearing lead contaminated clothing or equipment, e.g. shoes, coveralls, or head gear.

o. All contaminated clothing and equipment shall be prevented from reaching the worker's home or vehicle. This is an essential step in reducing the movement of lead contamination from the workplace into a worker's home and provides added protection to employees and their families.

p. Gloves and protective clothing should be appropriate for the specific chemical exposure (e.g., solvents and caustics). Cotton gloves provide some protection against the contamination of hands and cuticles with lead dust.

q. Workers should wear clothing that is appropriate for existing weather and temperature conditions under the protective clothing.

R. Hygiene Practices

a. A good program of personal hygiene must be followed to assure employees do not take lead containing dust home. Competent Person will inspect the Decontamination and change out facilities daily for cleanliness.

b. To minimize exposure to lead, special attention should be given to workers' personal hygiene. The employer must provide and ensure that workers use

washing facilities. Clean change areas, and separate non-contaminated eating areas must also be provided.

c. Cars should be parked where they will not be contaminated with lead.

d. These measures will reduce the worker's period of exposure to lead and the ingestion of lead, ensure that the duration of lead exposure does not extend beyond the work-shift, significantly reduce the movement of lead from the worksite, and provide added protection to employees and their families.

S. Change Areas

a. The employer must provide a clean change area equipped with storage facilities for street clothes and a separate area with facilities for the removal and storage of lead-contaminated protective work clothing and equipment. This separation is essential in preventing cross contamination of the employee's clothing.

b. Clean change areas are to be used for taking off street clothes, suiting up in clean working clothes (protective clothing), donning respirators prior to beginning work, and dressing in street clothes after work. No lead contaminated items should enter this area.

c. Work clothing must not be worn away from the job site. Under no circumstances shall lead-contaminated work clothes be laundered at home or taken from the worksite, except to be laundered professionally or properly disposed of following applicable Federal, state, and local regulations.

T. Showers

a. Shower facilities must be provided, when and where feasible, in areas of high contamination (abrasive blasting). Showers are required when exposure levels are above the PEL, so that exposed employees can wash lead from their skin and hair prior to leaving the worksite.

b. Where showers are provided the employer must provide soap, shampoo, and clean towels.

c. Employees must change out of their work clothes and shower before changing into their street clothes and leaving the worksite.

d. Workers who do not change into clean clothing before leaving the worksite may contaminate their homes and automobiles with lead dust. Other members of the household may then be exposed to harmful amounts of lead.

U. Personal Practices (eating, drinking, etc.)

a. The employer must ensure that employees who work with lead either clean or remove their protective clothing and wash their hands and face prior to eating, drinking, smoking or applying cosmetics and that these latter practices are never permitted while in the work area or in areas subject to the accumulation of lead.

b. HEPA vacuuming must be used to remove loose contamination from the work clothing prior to eating.

V. Washing Facilities

a. Adequate washing facilities shall be provided for employees. Such facilities shall be in close proximity to the worksite and provided with water, soap, and clean towels to enable employees to remove lead contamination from their skin.

b. Contaminated water from washing facilities and showers must be disposed of in accordance with applicable local, state, or federal regulations.

W. End-of-Day Procedures

a. Workers who are exposed to lead should follow these procedures upon finishing work for the day:

   i. Place disposable coveralls and shoe covers with the lead waste

   ii. Place lead-contaminated clothes, including work shoes, and personal protective equipment for laundering/cleaning (by the employer) in a closed container

   iii. Take a shower and wash hair

   iv. Change into street clothes.

X. Housekeeping and Maintenance

a. Lead is a cumulative and persistent toxic substance that poses a serious health risk. A rigorous housekeeping program will minimize employee exposure to lead. In addition, these two elements of the worker protection program will help to prevent taking lead- contaminated dust out of the worksite and home to the workers' families, thus ensuring that the duration of lead exposure does not

extend beyond the work-shift and providing added protection to employees and their families.

i. Areas of work which may be contaminated with lead dust must be kept clean and materials collected and kept in appropriate containers.

ii. Contaminated clothing must be placed in closed top containers prior to washing or removal from the job site. If these are to be washed by an outside company a letter documenting that the clothing contains lead must be provided for the company receiving the contaminated clothing.

iii. All protective clothing and equipment must be stored in a designated contaminated area.

iv. Compressed air shall not be used for cleaning of the work area.

v. Any materials which are observed leaking from shrouded power tools or from containments will facilitate shutting down the process until leaks are stopped.

b. An effective housekeeping program involves at least daily removal of accumulations of lead dust and lead-containing debris. Vacuuming lead dust with high-efficiency particulate air (HEPA) filtered equipment or wetting it with water before sweeping are effective control measures. Such cleaning operations should be conducted, whenever possible, at the end of the day, after normal operations cease. Furthermore, all persons doing the cleanup should be provided with suitable respiratory protection and personal protective clothing to prevent contact with lead.

c. In addition, all lead-containing debris and contaminated items accumulated for disposal should be collected and put into sealed impermeable bags or other closed impermeable containers. Bags and containers should be appropriately labeled as lead-containing waste. These measures are especially important as they minimize additional sources of exposure that engineering controls generally are not designed to control.

Y. Documentation and Retention of Records

a. Documentation of this procedure will be done by the Competent Person on the job. This person will see that all forms contained/required by this procedure are signed and completed as outlined. Monthly or upon completion of the project, these documents will be placed in the Records.

i. Records shall be maintained for a period of not less than 40 years or 20 years plus duration of employment, whichever is longer.

ii. Jobsite will keep the records on a monthly basis. The Competent Person will be responsible for maintaining these records.

iii. Operating company will audit the records at the jobsite periodically.

Z. Waste Handling

a. Containers of contaminated protective clothing and equipment shall be labeled as follows:

i. **CAUTION:** CLOTHING CONTAMINATED WITH LEAD. DO NOT REMOVE DUST BY BLOWING OR SHAKING. DISPOSE OF LEAD CONTAMINATED WASH WATER IN ACCORDANCE WITH APPLICABLE LOCAL, STATE OR FEDERAL REGULATIONS.

b. Disposal of lead contaminated abrasives, contaminated water and other contaminated debris will be handled in accordance with local, state, and federal regulations and in accordance with specific guidelines as established by Host Employer.

c. Contaminated abrasives will be collected and placed in containers provided by Host Employer. These containers will be placed in the storage area established by the Host Employer.

d. When water washing or water blasting, containment dikes will be lined to collect the contaminated water. The collected water will be transferred to the storage container provided by Host Employer.

e. Any other contaminated debris will be placed in containers provided by Host Employer. These containers will be placed in the established waste storage area.

f. Should there be an accidental release of contaminated material to the ground, we will immediately notify the Host Employer.

g. Any containers used for waste materials must be correctly labeled prior to utilization.

AA. Job Work Procedures

a. The most effective way to protect workers is to minimize exposure through the

use of engineering controls and good work practices. It is OSHA policy that respirators are not to be used in lieu of engineering and work practices to reduce employee exposures to below the PEL. Respirators can only be used in combination with engineering controls and work practices to control employee exposures.

b. Before Work Starts

i. All employees shall comply with the medical examination section of this safety procedure prior to beginning any work in a lead environment. The supervisor and competent person are responsible to assure that this section is in compliance.

ii. A pre-work safety meeting shall be conducted to assure that all employees understand the safety requirements of this job and the hazards relating to exposure to lead contaminated dust and fumes. This safety meeting will inform the employees of their responsibilities and impress compliance to the safety procedures so outlined.

iii. Employees shall report to their foreman for issuance of the safety equipment.

iv. Employees will be issued their safety equipment by the foreman or Competent Person who assures that employees comply with the proper dress code of coveralls, gloves, hard hats, safety glasses, head covers as required, and foot covers.

v. Following issuance of all pertinent safety clothing, the employees will report to work.

vi. Street clothing will be left in the clean area of the shack or trailer.

c. **Lunch/Breaks**

i. Employees will be brushed off or vacuumed off as they leave the work site for the area in which they will take their break or lunch. A HEPA vacuum is the preferred method of removing the lead contamination.

ii. Employees shall remove their respiratory equipment and gloves and place them in their respective storage area.

iii. Employees shall wash their face and hands in the lavatory or wash basin provided.

iv. Employees shall take their break or lunch and secure their safety equipment and then return for work.

d. End of Shift:

i. Employee will be brushed off or vacuumed off as he leaves the work site by a co-worker or Competent Person. A HEPA vacuum is the preferred method of removing the lead contamination. Employees will go to their respective safety equipment storage areas and after cleaning the equipment, shall store it in the area and or seal it in containers provided for that purpose.

ii. Blast hoods shall be hung up in an upright position where contaminated equipment/material is stored.

iii. Employees will enter the shower area and discard their contaminate coveralls in a covered top container, properly labeled as a lead contaminated container. The employee will shower. Each employee will be issued a clean towel, either washable or disposable. The employee will then discard the towel in a covered top container, properly labeled.

iv. Employees will dress into street clothes and leave the area.

v. Employees will take their soiled underwear and socks home on a daily basis.

BB. Employee / Crew Responsibilities

a. All employees will comply with the safety requirements outlined in the lead safety work procedure.

b. Employees will provide a change of underwear and clean socks on a daily basis. Soiled underwear and socks will be taken home on a daily basis.

c. Employees will shower at the end of the shift after cleaning their respective safety gear and storing it in its proper location.

d. If the employee is an abrasive blaster, he will see that his air fed hood, after being cleaned, is hung upright in the shack in which boots, hoods, and other contaminated equipment may be stored. This area may be in the dirty room of the decontamination facility or in a storage shack which has been designated for dirty storage.

e. When an employee takes a break from the job, either for the purpose of

restroom activities, smoke or such, he shall be brushed off at the work site or vacuumed off, and then may proceed to the wash facility where he will wash his face and hands prior to smoking or drinking.

f. Employees will wear protective devices including respirators while working in areas which require them. They shall not remove the devices until they remove themselves from the areas of contamination.

g. Employees shall inspect their safety equipment daily and assure that it is in good condition prior to entering the work areas. Anytime any safety equipment is in need of repair, it shall be brought to the attention of the foreman for immediate action to be taken.

h. Anytime that the scope of the work changes, there is the possibility that additional safety requirements shall be required. In this case, an additional safety meeting may be held to discuss these changes/additions to the responsibilities of the foreman/hourly employee.

CC. Competent Person Responsibilities

a. Compliance to the lead work safety procedure is enforced and documented by the Competent Person. This person is charged with the responsibility to maintain Safety and comply with Company rules regarding lead removal and maintain compliance with 29 CFR 1926.62. He/she has the authority to stop work on any project considered unsafe or out of compliance. Additional responsibilities may be added as the job requires, based on written instructions from the Safety Director. Basic responsibilities are outlined below.

   i. Prior to the start-up of any lead work, a pre-work safety meeting shall be held with the crew. All safety procedures and regulations will be explained in detail in this meeting.

   ii. Will see that the "Notification of Personnel Working in Close Proximity" form is signed by contractor representative for all work taking place in close proximity to lead removal activities.

   iii. Issues safety equipment and assures that all employees are trained in its proper usage, and then enforces its use on the job. He/she documents the training and issuance on the proper forms.

   iv. Will tend to the shower and change facilities and assure that adequate supplies are available for showering and storage of personnel equipment.

v. See that adequate shower supplies, soaps and such are maintained. He assures that the respiratory protection equipment cleaning station is properly maintained and supplies for cleaning, rinsing and storage, of respiratory equipment, is available.

vi. He/she enforces cleanup at breaks and lunch time and assures that the shower procedure is followed.

vii. He/she assures that all contaminated clothing is enclosed in covered top drums/cans designated for that purpose.

viii. He/she sees that all employees clean their respective gear and store it properly at the end of the shift.

ix. He/she sees that all employees are brushed off or vacuumed before they leave the work site for the shower or break area.

x. He/she sees that all employees wash their face and hands prior to their break.

xi. He/she assures that all employees have had their pre-work medical surveillance.

xii. He/she monitors the work site to assure that all safety procedures are being complied with and that all protective equipment is used in a proper manner.

xiii. The Competent Person is responsible for seeing that all safety signs/barricades and warning devices are positioned prior to work beginning. (NOTE: All signs outlined in standard are to be complied with).

xiv. The Competent Person will oversee the air monitoring activities on the project.

xv. When air monitoring results are received, he/she shall fill in the results on the "Air Monitoring Results" form and have each employee sign acknowledging their notification of the air monitoring results.

xvi. The Competent Person will also complete a Daily Activity Report.

xvii. The Competent Person will be responsible to look for potential hazards and take corrective action as needed.

DD. Site Compliance Plan

a. A Lead Site Compliance Plan must be developed for each lead removal job prior to commencement of the removal activities. The Plan must give a detailed listing of the hazards involved, review any applicable historical assessment data, review applicable engineering controls, review housekeeping controls and detail method of lead removal. After the Lead Site Compliance Plan is complete, it must be reviewed and documented with all employees assigned to the project.

LEAD REMOVAL PROJECTS

Records Checklist for Job Number:_____

Dates Covered: From:_____ **To:**_____

Field Generated Records

	OK	NO
1.1. Competent Person Responsibilities	☐	☐
1.2. Notification of Personnel Working in Close Proximity	☐	☐
1.3. Respirator Training and Fit Testing Acknowledgment Form	☐	☐
1.4. Daily Safety Equipment Issuance Form	☐	☐
1.5. Regulated Area Log	☐	☐
1.6. Training Acknowledgment Form	☐	☐
1.7. Shower Forms	☐	☐
1.8. Air Monitoring Results	☐	☐
1.9. Acknowledgment Air Monitoring Results	☐	☐
1.10. Lead Compliance Plan	☐	☐
1.11. Decontamination Facility Daily Maintenance Checklist	☐	☐
1.12. Acknowledgment of Blood Lead Testing	☐	☐
1.13. Daily Activity Report	☐	☐

Comments:_____

I have reviewed the above records maintained for this project and believe they have been properly prepared and compiled as required.

Competent Person	_____	_____	_____
	Print	**Signature**	**Date**
Field Supervisor	_____	_____	_____
	Print	**Signature**	**Date**
Records Secretary	_____	_____	_____
	Print	**Signature**	**Date**
Safety Director	_____	_____	_____
	Print	**Signature**	**Date**

COMPETENT PERSON RESPONSIBILITIES

Compliance to the lead work safety procedure is enforced and documented by the Competent Person. This person is charged with the responsibility to maintain Safety and comply with Company rules regarding lead removal and maintain compliance with 29 CFR 1926.62. The Competent Person has the authority to stop work on any project considered unsafe or out of compliance. Basic responsibilities are outlined below. Additional responsibilities may be added as the job requires, based on written instructions from the Operating Company Safety Manager.

1. Prior to the start-up of any lead work, a pre-work safety meeting shall be held with the crew. All safety procedures and regulations will be explained in detail in this meeting.

2. Will see that the "Notification of Personnel Working in Close Proximity" form is signed by contractor representative for all work taking place in close proximity to lead removal activities.

3. Issues safety equipment and assures that all employees are trained in its proper usage, and then enforces its use on the job. Documents the training and issuance on the proper forms.

4. Will tend to the shower and change facilities and assure that adequate supplies are available for showering and storage of personnel equipment.

5. See that adequate shower supplies, soaps and such are maintained. He assures that the respiratory protection equipment cleaning station is properly maintained and supplies for cleaning, rinsing and storage, of respiratory equipment is available.

6. Enforces cleanup at breaks and lunch time, and assures that the shower procedure is followed.

7. Assures that all contaminated clothing is enclosed in covered top drums/cans designated for that purpose.

8. Sees that all employees clean their respective gear and store it properly at the end of the shift.

9. Sees that all employees are vacuumed off before they leave the work site for the shower or break area.

10. Sees that all employees wash their face and hands prior to their break.

11. Assures that all employees have had their pre-work medical surveillance.

12. Monitor the work site to assure that all safety procedures are being complied with and that all protective equipment is used in a proper manner.

13. Responsible for seeing that all safety signs/barricades and warning devices are positioned prior to work beginning. (NOTE: All signs outlined in standard are to be complied with).

14. Oversee the air monitoring activities on the project.

15. When air monitoring results are received, fills in the results on the "Air Monitoring Results" form and has each employee sign acknowledging their notification of the air monitoring results.

16. Completes a Daily Activity Report.

17. Responsible to look for potential hazards and take corrective action as needed.

Competent Person: _____ _____ _____

Print **Signature** **Date**

Notification of Personnel Working in Close Proximity

It is imperative that other Contractor personnel and Host Employer personnel are made aware of Lead abatement work being done in close proximity to their work areas.

When this is the case, the following form must be completed, and a copy placed in field record box. A copy should be offered to the person signing for their company.

Project		Area	
Abatement Contractor			
Date of Work		Time	am/pm
Expected Completion Date		Competent Person on Site	

**Lead abatement is being performed in the area listed above. Please advise your employees of this work. They must not enter the regulated area. (These areas are designated by barrier tape and signs.)

CONTRACTOR OR HOST EMPLOYER

Signature:_____ Date:_____

Company Represented:_____

Competent Person Signature:_____Date:_____

Job Number:_____

Regulated Area Log

Time Employee enters Regulated Area and Exits through Decontamination Facility.

Name Printed	Signature	SSN	Time-In am/pm	Time-Out am/pm

Competent Person: _____ _____ _____
Printed Signature Date

Job Number: _____

DECON FACILITY DAILY MAINTENANCE CHECKLIST

Equipment (Dirty) Room	**YES**	**NO**
Vacuum or Wet Mop Floor	☐	☐
Dispose of Contaminated Clothing Daily	☐	☐
Disinfect Room	☐	☐
Check Airlocks	☐	☐
Check Negative Air Filters Negative	☐	☐
Air Running Properly	☐	☐
Showers		
Soap Available	☐	☐
Shampoo Available	☐	☐
Shower Flaps in Good Condition	☐	☐
Showers Disinfected	☐	☐
Airlocks Checked	☐	☐
Warm Water Available	☐	☐
Water Filters Checked	☐	☐
Clean Room		
Towels Available	☐	☐
Clean Coveralls Available	☐	☐
Floors Clean and Wet Mopped	☐	☐
Room Disinfected	☐	☐
Airlocks Checked	☐	☐
Fire Extinguisher Available	☐	☐
Lights Functioning	☐	☐
Room Free of Debris	☐	☐
Lockers Clean and Neat	☐	☐
Respirators Correctly Stored	☐	☐

Comments: _____

_____

_____

_____

_____

_____

Competent Person: _____ _____ _____
Printed Signature Date

Job Number: _____

DAILY ACTIVITY REPORT

Date:_____ **Location:**_____

Job Number:_____ **Competent Person:**_____

1. Scope of Work (Be Specific):_____

2. Method of Removal:_____

3. Containment Used? Yes ☐ No ☐ Explain:_____

4. Engineering Controls Used:_____

5. Air Sampling? Yes ☐ No ☐ Historical Data:_____
Laboratory:_____ Technician:_____

6.Respirators Used; Air Purifying_____ Supplied Air_____
Have all workers been medically qualified, fit tested, and is documentation on-site? Yes ☐ No ☐

7. Barriers and Warning Signs in Place? Yes ☐ No ☐

8. Incidents and Significant Events:_____

9. Describe in detail the work being performed. Identify area, elevation, unit, issues encountered, unusual conditions, etc._____

10. Comments:_____

Competent Person:_____ _____
Signature **Date**

Heavy Equipment Mobile Equipment Policy

M.J. VanDamme Trucking, Inc.
301 Avenue A
Gwinn, MI. 49841
(906) 346-2641

Mobile/Heavy Equipment Policy Revision Date	Initials	Approved By (Initials)

Contents

Introduction

M.J. VanDamme Trucking, Inc. “MJVD” strives to provide a workplace free from recognized hazards that may cause or are likely to cause death or serious physical harm, and to establish a system to prevent lost time and lost resources due to employee injuries. Personnel safety is the primary goal of MJVD, and our policy is to maintain the most protective environment possible for all employees.

MJVD personnel will follow all applicable Federal and/or State Occupational Safety and Health Administration (OSHA) standards for General Industry (29 CFR Part 1910) and Construction (29 CFR Part 1926) and all standards for Mine Safety and Health Administration (MSHA).

Purpose

The purpose of this heavy equipment/mobile equipment policy is to establish safe practices and procedures to be used by MJVD employees during work activities and at project sites to minimize the risk of injuries. The use of heavy equipment/mobile equipment is a common part of many jobs conducted by MJVD employees. MJVD recognizes the hazards associated with the operation of heavy equipment/mobile equipment and has developed this policy to establish guidelines in an attempt to eliminate injuries or fatalities related to this type of equipment.

This policy applies to all free moving mobile equipment that may be propelled by gasoline, propane, diesel, or electricity. However, the policy is not intended for operators of licensed and registered (by the Department of Motor Vehicles) automobiles and similar motor vehicles intended for use by licensed motor vehicle operators on public roads and highways. Examples of Heavy Equipment/Mobile Equipment covered by this policy include but are not limited to:

- Backhoes
- Loaders
- Dump Trucks
- Dozers
- Tractors
- Bucket Truck
- Rollers
- Sweepers
- Excavators
- Skid-Steers
- Mini-Skid Steer
- Compact Tractor
- Mower
- All-Terrain Vehicles
- Graders
- Mini-Excavator
- Boom Trucks
- Forklifts
- Haul Truck
- Sand/salt spreader
- Snowplow

Only authorized personnel may operate heavy equipment/mobile equipment. An individual’s competency must be demonstrated by successful completion of the training and evaluation process specified in this policy. This policy establishes requirements to work in or around all types of mobile equipment.

The requirements defined in this policy describe the minimum required by MVJD. In addition, the operation of some equipment may require the operator to possess other licenses (i.e., Commercial Driver’s License, Forklift License, Aerial Lift) or specialty training required by the State or other regulatory agency.

Responsibilities

Responsibilities for providing a safe working environment rest at all levels within MJVD. We acknowledge the importance of creating a positive safety culture through employee involvement and effective policies and procedures.

Duties and responsibilities of personnel under this policy are as follows:

Management

Management at MJVD leads safety efforts to continuously provide resources needed to implement an effective safety and health program for the corporation and for each project. This requires strong leadership and a solid commitment from upper management.

Project Managers, Supervisors, Safety Director, Safety Specialist, and Project Site Safety Officers will be responsible for training and enforcement of all safety activities, and documentation of heavy/mobile equipment training.

Corporate Health and Safety Director/Safety Specialist

- Ensure Federal, State and Local laws, regulations, codes, and ordinances are followed.
- Develop policies, accident prevention plans, procedures, and programs.
- Conduct periodic safety inspections of all work locations.
- Assure that accidents and hazardous conditions are investigated and corrective actions are implemented.
- Provide/Arrange for assistance with the policy to requesting departments.

Project Managers/Supervisors

- Identify specific jobs or individuals to whom this policy applies.
- Identify all heavy equipment and mobile equipment in their area.
- Ensure that a qualified person is available for heavy equipment/mobile equipment training and evaluations.
- Ensure that operators of heavy equipment/mobile equipment are trained, evaluated, observed, and given skills needed to operate the equipment safely.
- Assure that Operator's manuals and manufacturer's safety information is available for all equipment and vehicles identified in the department. Operator's manuals shall be in each piece of equipment.
- Ensure that safety procedures presented in this and other MJVD policies, as well as in Manufacturer's Operator's and Safety Manuals are implemented and enforced.
- Maintaining training and certification records for all operators of heavy equipment/mobile equipment.

Take a primary role in the prevention of accidents and the safety of employees under their supervision.

- Observe and evaluate the use of heavy equipment/mobile equipment by employees and correct any unsafe conditions or practices.
- Ensure that heavy equipment/mobile equipment is properly maintained and in safe operating condition.
- Remove from service any heavy equipment/mobile equipment that is not safe.

- Promptly investigate all accidents and complete required reports.
- Encourage employees to report all unsafe conditions and practices.
- Enforce all safety procedures and practices applicable to work done by employees.

MJVD Employees

- Read, understand, and follow the procedures and practices outlined in this policy.
- Read, understand, and comply with owner's manuals and manufacturer-provided safety information before using heavy equipment/mobile equipment.
- Complete the Daily Equipment Inspection and Repair Report before and after use.
- Report any inspection deficiencies with equipment to their immediate supervisor for maintenance or further action prior to operation of the equipment
- Use all appropriate safety equipment and devices, including but not limited to seatbelts.
- Immediately report all work-related incidents, fuel spills, fires, and injuries to the supervisor(s).
- Obey traffic signs and signals and audible or visual warning devices.
- Immediately report all unsafe conditions and practices to their supervisors and/or the Safety Department.
- Attend appropriate training as recommended by their supervisors.

Qualified Person (Equipment Trainer):

- Train and evaluate equipment operators in classroom, hands-on training process and refreshers.
- Be knowledgeable and experienced in the particular equipment operation and how-to train.
- Document evaluations and training and provide training documentation to the Safety Department.

Definitions

Competent Person	Person who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.
Free Moving Mobile Equipment	Operator controlled mobile equipment not constrained by Fixed Rails and can include Industrial Fork Trucks, Aerial Lifts, Buggies, Sweepers, and Backhoes.
Mobile Equipment	Free moving equipment propelled/powered by gasoline, propane, natural gas, diesel, or electricity used to haul, transport, excavate, move, maneuver, or hoist materials, equipment, products, or personnel.
Pre-use Inspection	Required inspection of a piece of mobile equipment completed when the facility has not operated the mobile equipment for each shift.
Qualified Person	A trained person possessing a recognized degree or certificate of professional standing or who, by extensive knowledge, training, and experience, has demonstrated the ability to solve or resolve problems relating to the subject matter and work.

Heavy/Mobile Equipment Operations - General Requirements

- All vehicles must have a service brake system, an emergency brake system, and a parking brake system. These systems may use common components and must be maintained in operable condition.
- Whenever visibility conditions warrant additional light, all vehicles in use must be equipped with at least two headlights and two taillights in operable condition.
- All vehicles, or combination of vehicles, must have brake lights in operable condition regardless of light conditions.
- All vehicles must be equipped with an adequate audible warning device at the operator's station (horn) in an operable condition.
- No employer may use any motor vehicle equipment having an obstructed view to the rear unless:
    - The vehicle has a reverse signal audible above surrounding noise level.
    - The vehicle backs up only when an observer signals it is safe to do so.
    - All vehicles with cabs must be equipped with windshields and powered wipers. Cracked and broken glass must be replaced. Vehicles operating in areas or under conditions that cause fogging or frosting of the windshields must be equipped with operable defrosting devices.
- All haulage vehicles, whose pay load is loaded by means of cranes, power shovels, loaders, or similar equipment, must have a cab shield and/or canopy adequate to protect the operator from shifting or falling materials.
- Tools and material will be secured to prevent movement when transported in the same compartment with employees.
- Vehicles used to transport employees must have seats firmly secured and adequate for the number of employees to be carried.
- Seat belts and anchorages meeting the requirements of 49 CFR Part 571 (Department of Transportation, Federal Motor Vehicle Safety Standards) must be installed in all motor vehicles and used by the operator.
- Trucks with dump bodies must be equipped with positive means of support, permanently attached, and capable of being locked in position to prevent accidental lowering of the body while maintenance or inspection work is being done.
- Operating levers controlling hoisting or dumping devices on haulage bodies must be equipped with a latch or other device which will prevent accidental starting or tripping of the mechanism.
- Trip handles for tailgates of dump trucks will be so arranged that, in dumping, the operator will be in the clear.
- All rubber-tired motor vehicle equipment manufactured on or after May 1, 1972, must be equipped with fenders.
    - Mud flaps may be used in lieu of fenders whenever motor vehicle equipment is not designed for fenders (such as dump trucks where the dump bed forms an effective fender).
- All vehicles in use must be checked at the beginning of each shift using the pre-trip inspection form to assure that parts, equipment, and accessories are in safe operating condition and free of apparent damage that could cause failure while in use.
- Operators will complete the Daily Equipment Safety Inspection & Repair Report **(Appendix A)** every day that a piece of equipment is used, prior to using that equipment.
- All defects will be corrected before the vehicle is placed in service. These requirements

also apply to equipment such as lights, reflectors, windshield wipers, defrosters, fire extinguishers, a., where such equipment is necessary.

General Safety Requirements for Earthmoving Equipment

These OSHA/MSHA rules apply to the following types of earthmoving equipment: scrapers, loaders, crawler (track) or wheel tractors, bulldozers, off-highway trucks, graders, agricultural and industrial tractors, and similar equipment. Following are OSHA/MSHA general requirements for earth moving equipment:

Seat Belts

Seat belts must be provided on all equipment listed above and must meet the requirements of the Society of Automotive Engineers (SAE).

Tractors listed above must have seat belts as required for the operators when seated in the normal seating arrangement for tractor operation, even though back-hoes, breakers, or other similar attachments are used on these machines for excavating or other work.

Access Roadways and Grades

No employer may move or cause to be moved construction equipment or vehicles upon any access roadway or grade unless the access roadway or grade is constructed and maintained to accommodate safely the movement of the equipment and vehicles involved.

Every emergency access ramp and berm used by an employer will be constructed to restrain and control runaway vehicles.

Brakes

All earthmoving equipment must have a service braking system capable of stopping and holding the equipment fully loaded.

Fenders

Pneumatic-tired earth-moving haulage equipment (trucks, scrapers, tractors, and trailing units) whose maximum speed exceeds 15 miles per hour must be equipped with fenders on all wheels.

Rollover Protective Structures (ROPS)

Rollover protective structures must meet the requirements of 29 CFR 1926.1001 Minimum performance criteria for rollover protective structures for designated scrapers, loaders, dozers, graders, and crawler tractors.

Audible Alarms

All bidirectional machines, such as rollers, compacters, front-end loaders, bulldozers, and similar equipment, must be equipped with a horn, distinguishable from the surrounding noise level, which can be operated as needed when the machine is moving in either direction. The horn must be maintained in an operating condition.

Earthmoving equipment with an obstructed view to the rear will not be used in reverse gear unless 1) the equipment has in operation a reverse signal alarm distinguishable from the surrounding noise level, or 2) a signal person signals that it is safe to do so.

Scissor Points

Scissor points on all front-end loaders or articulating equipment, which constitute a hazard to the operator during normal operation, must be guarded.

Lift trucks, Stackers

Equipment of this type must have a rated capacity clearly posted on the vehicle so as to be clearly visible to the operator. When auxiliary removable counterweights are provided by the manufacturer, corresponding alternate rated capacities also must be clearly shown on the vehicle. These ratings will not be exceeded.

Modifications or Additions

No modifications or additions which affect the capacity or safe operation of the equipment may be made without the manufacturer's written approval. If such modifications or changes are made, the capacity, operation, and maintenance instruction plates, tags, or decals will be changed accordingly. In no case will the original safety factor of the equipment be reduced.

Steering or Spinner Knobs

Steering or spinner knobs must not be attached to the steering wheel unless the steering mechanism is of a type that prevents road reactions from causing the steering wheel to spin. The steering knob must be mounted within the periphery of the wheel.

Training Program Implementation

Trainees may operate heavy equipment/mobile equipment only:

- Under the direct supervision of persons who have the knowledge, training, and experience to train operators and evaluate their competence.
- Where such operation does not endanger the trainee or other employees.

Training will consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance on the job site.

All operator training and evaluation will be conducted by qualified employees who have the knowledge, training, and experience to train heavy equipment/mobile equipment operators and evaluate their competence.

Training Program Content

Heavy equipment/mobile equipment operators must receive initial training in the following topics, except in topics which the employer can demonstrate are not applicable to safe operation of the equipment in the employer's workplace. Training will be documented using the MJVD Training Checklist, MSHA 5000-23 form, or an acceptable form indicating the proper training has been performed. The Safety Department will maintain all training documentation.

Equipment-Related Topics

- Operating instructions, warnings, and precautions for the types of equipment the operator will be authorized to operate.
  - Employees will read and understand the Owners/Operators Manual and any other safety information provided by the manufacturer of the equipment.
  - Trainers will review this information with the trainee and should incorporate additional information about specific equipment based on previous experience with the equipment.
  - Operating manuals must be in each piece of equipment
- Differences between the equipment and an automobile (e.g., turn radius, braking ability, visibility of surroundings, blind spots)
- Equipment controls and instrumentation; where they are located, what they do, and how they work.
- Engine or motor operation.
- Steering and maneuvering.
- Visibility (including restrictions due to loading).
- Implement and attachment adaptation, operation, and use limitations.
- Equipment capacity.
- Vehicle stability.
- Any equipment inspection and maintenance that the operator will be required to perform.
  - Daily Equipment Safety Inspection & Repair Report (See **Appendix A**)
- Refueling and/or charging and recharging of batteries.
- Operating limitations.
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of equipment that the employee is being trained to operate.

Workplace-Related Topics

- Surface conditions where the equipment will be operated.
- Composition of loads to be carried and load stability.
- Load maneuvering, loading, and unloading (includes trucks, hoppers).
- Pedestrian traffic in areas where the equipment will be operated.
- Confined areas and other restricted places where equipment will be operated.
- Hazardous (classified) locations where the equipment will be operated.
- Ramps and other sloped surfaces which could affect the vehicle's stability.
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause buildup of carbon monoxide or diesel exhaust.
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

Refresher Training and Evaluation

Refresher training, including an evaluation of the effectiveness of that training, must be conducted as required below to ensure that the operator has the knowledge and skills needed to operate the heavy equipment. Refresher training in relevant topics will be provided to the operator when:

- The operator has been observed to operate the equipment in an unsafe manner.

- The operator has been involved in an accident or near-miss incident.
- The operator has received an evaluation that reveals that the operator is not operating the equipment safely.
- The operator is assigned to operate a different type of equipment.
- The condition on the job-site changes in a manner that could affect safe operation of the equipment.

An evaluation of each heavy equipment operator's performance will be conducted at least once every three years.

Avoidance of Duplicative Training

If an operator has previously received training in a topic specified in this section, and such training is appropriate to the equipment and working conditions encountered, additional training in that topic is not required if the operator has been evaluated and found competent to operate the equipment safely.

Certification

The employer will certify that each operator has been trained and evaluated as required by this section. The certification will include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training or evaluation. Refresher training shall be performed at a minimum frequency every three years thereafter.

Equipment Operations

OSHA has listed safety rules for the operation of equipment. These rules are general in nature and are not intended as a comprehensive guide to the safe operations of specific pieces of heavy equipment:

- Equipment will not be driven up to anyone standing in front of an excavation or a fixed object.
- No person will be allowed to stand or pass under the elevated portion of any equipment, whether loaded or empty.
- Unauthorized personnel will not be permitted to ride on heavy equipment/mobile equipment.
- Arms or legs shall not be placed between the moving parts of the equipment, or outside the running lines of the vehicle.
- When heavy equipment/mobile equipment is left unattended, implements will be fully lowered, controls will be neutralized, power will be shut off, and brakes set. Wheels will be blocked if the vehicle is parked on an incline. If on an MSHA site, the wheel will be blocked at all times whether it is parked on an incline or on a level surface.
- Heavy equipment/mobile equipment is considered unattended when the operator is 25 ft. or more away from the vehicle which remains in his view, or whenever the operator leaves the vehicle, and it is not in his view.
- When the equipment operator is dismounted and within 25 ft. of the machine still in his view, the implements will be fully lowered, controls neutralized, and the brakes set to prevent movement.
- A safe distance will be maintained from the edge of ramps or platforms while on any elevated surface, and from the edge of any excavation.

- Brakes will be set, and wheel blocks will be in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading. Fixed jacks may be necessary to support a semi-trailer during loading or unloading when the trailer is not coupled to a tractor. The flooring of trucks, trailers, and railroad cars will be checked for breaks and weakness before they are driven onto.
- There must be sufficient headroom under overhead installations, lights, pipes, and sprinkler system for the safe passage of equipment.
- An overhead guard will be used as protection against falling objects. It should be noted that an overhead guard is intended to offer protection from the impact of small objects, representative of the job application, but not to withstand the impact of a falling capacity load.
- A load backrest extension will be used whenever necessary to minimize the possibility of the load or part of it falling rearward.
- Only approved heavy equipment/mobile equipment will be used in hazardous locations.

Traveling (Roading) Heavy/Mobile Equipment

- All traffic regulations must be observed, including authorized site speed limits. A safe distance must be maintained approximately three vehicle lengths from the vehicle ahead, and the equipment must be kept under control at all times.
- The right of way will be yielded to ambulances, fire trucks, or other vehicles in emergency situations.
- Other vehicles traveling in the same direction at intersections, blind spots, or other dangerous locations may not be passed.
- The operator will be required to slow down and sound the horn at cross intersections of roadways, paths, and other locations where vision is obstructed. If the load being carried obstructs forward view, the operator will be required to travel with the load trailing (to the rear).
- Railroad tracks must be crossed diagonally wherever possible. Parking closer than 8 feet from the center of railroad tracks is prohibited.
- The operator is required to look in the direction of, and keep a clear view of, the path of travel.
- Grades must be ascended or descended slowly.
- When ascending or descending grades in excess of 10 percent, loaded equipment will be driven with the load upgrade.
- On all grades the load and load carrying implement must be tilted back if applicable and raised only as far as necessary to clear the road surface.
- Under all travel conditions the equipment must be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay will not be permitted.
- The operator will be required to slow down for wet and slippery surfaces.
- Ramps or bridge plates will be properly secured before they are driven over. Ramps or bridge plates will be driven over carefully and slowly, and their rated capacity never exceeded.
- Running over loose objects on the roadway surface will be avoided.
- While negotiating turns, speed will be reduced to a safe level by means of turning the hand steering wheel in a smooth, sweeping motion. Except when maneuvering at a very low speed, the hand steering wheel will be turned at a moderate, even rate.

Loading

- Only stable or safely arranged loads will be handled. Caution will be exercised when handling off-center loads which cannot be centered. The bucket should be struck to avoid scattering loads before traveling with equipment.
- Only loads within the rated capacity of the equipment will be handled.
- Long or high (including multiple-tiered) loads which may affect capacity will be adjusted.
- A load must be secured within the bucket or hopper as far as possible; the bucket must be carefully tilted backward to stabilize the load.
- Extreme care must be used when tilting the load forward or backward when the load is elevated. Tilting forward with the bucket elevated will be prohibited except to pick up a load. An elevated load will not be tilted forward except when the load is in a deposit position over a hopper or stack.
- All personnel not within a guarded enclosure must stay clear of loading operations. Drivers of trucks being loaded must remain in the cab, if it is equipped with overhead protection, or remain well clear of the operation.

Servicing and Maintenance of Heavy/Mobile Equipment

If at any time heavy/mobile equipment is found to need repair, defective, or in any way unsafe, the machine will be taken out of service until it has been restored to safe operating condition.

- Fuel tanks must not be filled while the engine is running.
- Spillage of oil or fuel must be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.
- No equipment will be operated with a leak in the fuel system until the leak has been repaired.
- Open flames must not be used for checking electrolyte level in storage batteries or gasoline level in fuel tanks.
- Authorized personnel will make all repairs.
- No repairs will be made in Class I, II, and III locations.

Class I locations	Class II locations	Class III locations
Locations in which flammable gasses or vapors are, or may be present in the air in quantities sufficient to produce explosive or ignitable mixtures	Locations which are hazardous because of the presence of combustible dust.	Locations where easily ignitable fibers are present but not likely to be in suspension in quantities sufficient to produce ignitable mixtures.

- Repairs to the fuel and ignition systems of equipment which involve fire hazards will be conducted only in locations designated for such repairs.
- Equipment in need of repairs to the electrical system will have the battery disconnected prior to such repairs.
- All parts of any heavy/mobile equipment requiring replacement will be replaced only by parts equivalent as to safety with those used in the original design.

- Equipment will not be altered so that the relative positions of the various parts are different from what they were when originally received from the manufacturer, nor will they be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts, except for fuel system conversions.
- Equipment will be examined before being placed in service and will not be placed in service if the examination shows any condition adversely affecting the safety of the vehicle. Inspections will be made at least daily.
- Where heavy/mobile equipment is used on a round-the-clock basis, it will be examined after each shift. Defects when found will be immediately reported and corrected.
- Water mufflers must be filled daily or as frequently as is necessary to prevent depletion of the supply of water below 75 percent of the filled capacity. Vehicles with mufflers having screens or other parts that may become clogged will not be operated while such screens or parts are clogged. Any vehicle that emits hazardous sparks or flames from the exhaust system will immediately be removed from service and not returned to service until the cause for the emission of such sparks and flames has been eliminated.
- When the temperature of any part of any equipment is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the equipment will be removed from service and not returned to service until the cause for such overheating has been eliminated.
- Heavy/mobile equipment will be kept in a clean condition, free excess oil, and grease.
- Noncombustible agents should be used for cleaning equipment. Low flash point (below 100 F.) solvents must not be used. High flash point (at or above 100 F.) solvents may be used. Precautions will be made regarding toxicity, ventilation, and fire hazard for the agent or solvent used.
- Heavy/mobile equipment originally approved for the use of gasoline for fuel may be converted to liquefied petroleum gas fuel provided the complete conversion results in a vehicle which embodies the features specified for LP or LPS designated equipment. Such conversion equipment will be approved.

OSHA/MSHA General Requirements for Heavy Equipment Use

- All equipment left unattended at night, adjacent to a highway in normal use, or adjacent to construction areas where work is in progress, will have appropriate lights or reflectors, or barricades equipped with appropriate lights or reflectors, to identify the location of the equipment.
- A safety tire rack, cage, or equivalent protection will be provided and used when inflating, mounting, or dismounting tires installed on split rims, or rims equipped with locking rings or similar devices.
- Heavy machinery, equipment, or parts thereof, which are suspended or held aloft by use of slings, hoists, or jacks will be blocked or cribbed to prevent falling or shifting before employees are permitted to work under or between them.
- Bulldozer and scraper blades, end-loader buckets, dump bodies, etc., will be either fully lowered or blocked when being repaired or when not in use. All controls will be in a neutral position, with motors stopped, and brakes set unless work being performed requires otherwise.
- Whenever the equipment is parked, the parking brake will be set. Equipment parked on inclines will have the wheels chocked and the parking brake set. Wheels shall be chocked and parking brake set at all times when on an MSHA site.

- The use, care and charging of all batteries will conform to the following:
  - Ventilation will be provided to ensure diffusion of the gases from the battery and to prevent the accumulation of an explosive mixture.
  - Face shields, aprons, and rubber gloves will be provided for workers handling acids or batteries.
  - Facilities for quick drenching of the eyes and body will be provided within 25 feet of battery handling areas.
  - Facilities will be provided for flushing and neutralizing spilled electrolyte and for fire protection.
- All cab glass will be safety glass, or equivalent, that introduces no visible distortion affecting the safe operation of any machine covered by this section.
- All equipment will comply with the OSHA/MSHA requirements when working or being moved in the vicinity of power lines or energized transmitters.

General Requirements for Site Clearing

- Employees engaged in site clearing will be protected from hazards of irritant and toxic plants and suitably instructed in the first aid treatment available.
- All equipment used in site clearing operations must be equipped with rollover guards. In addition, rider-operated equipment will be equipped with an overhead and rear canopy guard meeting the following requirements:
  - The overhead covering on this canopy structure will be of not less than 1/8-inch steel plate or ¼-inch woven wire mesh with openings no greater than 1 inch, or equivalent.
  - The opening in the rear of the canopy structure will be covered with not less than ¼-inch woven wire mesh with openings no greater than 1 inch.

Additional Heavy/Mobile Equipment Safety Guidelines

Many injuries involving heavy/mobile equipment do not occur to the operator but are inflicted on ground personnel working in or around the vicinity of moving machines.

Always be aware of the location of personnel working near your machine. Heavy/mobile equipment operations frequently require the aid of ground personnel who should be thoroughly familiar with the procedures of your operation and the capabilities of the machine; usual operating procedures should not be changed without first notifying ground personnel.

Never assume that your assigned ground workers will watch out for themselves. Always know your ground personnel's location, if they are not visible to you, **DO NOT MOVE THE MACHINE OR ANY IMPLEMENTS!** When working in conjunction with ground personnel, never operate equipment at speeds which would necessitate ground personnel to work in a careless manner. **REMEMBER,** they depend on your skill and judgment, as are all personnel in your immediate work area.

- Read the operator’s manual and operate the machine only if trained and considered competent to do so.
- Wear appropriate clothing and personal protective equipment for the job. Hearing protection is recommended for operating many types of heavy/mobile equipment.
- Do a walk around to make sure the area is clear before moving the machine.
- Do not climb on the machine where hand and foot holds have not been provided. Use a three-point climbing technique whenever entering, exiting, or servicing the machine.

- Start the machine only while sitting in the operator's seat and all personnel are clear.
- Ensure all controls are in the neutral position before starting the machine.
- Keep tires properly inflated. Improper inflation may cause the machine to tip over under load.
- Heavy/mobile equipment machines are required to have a seat belt and rollover protection (ROPS).
- Always use the seat belt. OSHA takes the position that seat belts are personal protective equipment, and failure to use them is grounds for a citation.
- Keep the load as low as possible while traveling; always reduce speed when making a turn. Keep speeds low on rough terrain. Bouncing, bucking, or side hopping because of excessive speed may cause loss of control of the machine.
- Check for overhead lines or obstructions before raising any overhead implement.
- Do not allow the tires to spin when picking up or pushing a load.
- Do not walk, work, or allow personnel under any raised part of heavy/mobile equipment.
- Do not use heavy/mobile equipment for demolition of structures which are taller than the machine without overhead protection sufficient to withstand the debris likely to impact the cab.
- Do not undercut a bank which is higher than the machine.
- Use extreme caution when approaching or operating near excavations, the weight of the machine or vibration may cause the edges to collapse.
- Dust suppression and control is required where dust seriously limits visibility. Wear respiratory protection when needed.
- Pre-wet soil to make loading easier and to aid in dust control.
- Rip tight soil before scraping or excavating to improve speed and efficiency.
- Always load buckets or hoppers downgrade to increase the speed of operation, lessen wear on equipment, and reduce the need for a push tractor.
- Do not use heavy/mobile equipment as a battering ram.
- In tight turns, make sure the machine has clearance in front and rear if equipped with rear implements.
- Do not place any part of your body under any raised implement at any time unless it is properly blocked.
- Keep the operator’s compartment free of clutter and all controls free of oil and grease. Personal tools or equipment must be secured.
- All underground utilities in the work area must be located prior to digging. Utility companies must be notified of your intention to excavate within established, or customary, response times. (Check local codes).
- When excavations approach the estimated location of underground utilities, the exact location must be determined and marked.
- Wherever equipment operations encroach on a public thoroughfare, a system of traffic controls must be used.
- Flaggers are required at all locations where barricades or warning signs cannot control moving traffic.
- Never use an elevating part of heavy equipment as a man-lift.

The productivity and safety of heavy equipment operations are increased by using well-trained employees, along with properly maintained and serviced equipment. A well laid-out worksite and work-plan always improves efficiency and safety on the jobsite.

APPENDIX A
MJ VanDamme Inc.
Equipment Safety Inspection & Repair Report

Equipment Safety Inspection & Repair Report

Company _____ Date _____

Location _____ Shift _____

Job # _____ Job Name _____

Equipment # _____ Type _____

Hour Meter _____ Mileage _____

N/A = NOT APPLICABLE OK = NO REPAIRS NEEDED RR = REQUIRES REPAIR

Outside

NA	OK	RR	
☐	☐	☐	Lights
☐	☐	☐	Steps/Hand Rails
☐	☐	☐	Tires/Tracks
☐	☐	☐	Exhaust
☐	☐	☐	Fenders
☐	☐	☐	Bucket
☐	☐	☐	Cutting Edge/Teeth
☐	☐	☐	Lifting Mechanism
☐	☐	☐	Hoses
☐	☐	☐	Fittings Greased
☐	☐	☐	Hitch/Coupler
☐	☐	☐	Wipers

Engine Compartment

NA	OK	RR	
☐	☐	☐	Battery Cable
☐	☐	☐	Fan Belt
☐	☐	☐	Hoses
☐	☐	☐	Air Filter
☐	☐	☐	Guards

Inside Cab

☐	☐	☐	Brakes, Service
☐	☐	☐	Brakes, Parking
☐	☐	☐	Backup Alarm
☐	☐	☐	Fire Extinguisher
☐	☐	☐	Gauges
☐	☐	☐	Horn
☐	☐	☐	Hydraulic Controls

Inside Cab (continued)

NA	OK	RR	
☐	☐	☐	Glass (all sides)
☐	☐	☐	Mirror
☐	☐	☐	Roll Over Protection
☐	☐	☐	Seat Belt/Seat
☐	☐	☐	Steering

Fluids

☐	☐	☐	Visible Leaks
☐	☐	☐	Oil Level/Pressure
☐	☐	☐	Coolant Level (check only when equipment is COLD)
☐	☐	☐	Hydraulic Oil Level
☐	☐	☐	Transmission Fluid Level
☐	☐	☐	Fuel Level

Explanation of Defects _____

_____

_____

_____

____ Repairs or adjustments needed ____ Repairs or adjustments NOT needed for safe equipment operation

Operator's Signature _____

____ Repairs or adjustments if needed COMPLETED by

Mechanic's Signature _____ Date _____

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