Built on trust

Safety 1ST

SAFETY & HEALTH MANUAL

TABLE OF CONTENTS

Robert B. Our Co., Inc.

HEALTH AND SAFETY POLICY STATEMENT

It is the Company's stated objective to provide a safe, healthy, and productive work environment for all employees. To ensure that objective, we must make all reasonable efforts for the prevention of occupational incidents that may result in injuries, illness, or property damage. We as a Company therefore consider no phase of job, operation, or administration as being of greater importance than accomplishing that while protecting worker and public health and safety.

The Company recognizes that the responsibility for employee health and safety is a team effort and partnership made up of the Company, its employees, subcontractors, their employees, the project owner/general contractor and their employees.

The Company accepts the responsibility for leadership of its health and safety program. The Company will abide by all legally mandated and generally accepted work practices to protect the health and safety of employees and others in addition to adhering to all safety standards and/or job work rules. Incident free work is the result of careful attention to our operations by those who are directly and indirectly involved. Employees at all levels are required to work diligently to implement the Company's Health and Incident Prevention Policy so that we can achieve the highest standards of occupational health and safety.

Complete endorsement, active participation and enthusiastic cooperation with this vital commitment is expected of everyone.

_____ _____

Chris Our, President John Our, Vice-President

_____ _____

Robbie B. Our III Hope Our Cleary, Treasurer

ROBERT B. OUR CO., INC.

HEALTH AND INCIDENT PREVENTION POLICY

Our employees are our most valuable asset. It is this belief that drives our strong safety culture. This results in a shared responsibility between the Company and the employees at all levels to provide a healthy and safe working environment.

Our mutual success depends not only on sales, production, and quality of work, but how efficiently those jobs are performed. Efficiency in our Company encompasses quality, timeliness, safety, and cost effectiveness. No one element is more important than the other. There is no task so important, or service so urgent, that we will not perform it safely.

Construction projects by their nature pose a hazardous environment where incidents can cause injury and property damage. Incidents can be prevented, and we expect all our employees to consistently practice safety awareness.

Please read this manual, and your handbook, and refer to them when needed. If we comply with the rules, practices, behaviors presented, follow supervisor's instructions, and engage in SAFE WORK HABITS while performing our tasks, then we will have a safe and productive work environment.

Our safety program has the full support of Ownership, management, employees and our trade partners. All are expected to comply with its provisions, support our health and safety efforts, and respect the health and safety of all workers.

This manual is intended as a guide to assist with the safe performance of our tasks. In no way is this meant to replace, cover, or substitute for any federal, state, or local safety laws, rules, and regulations that may affect the performance of our tasks.

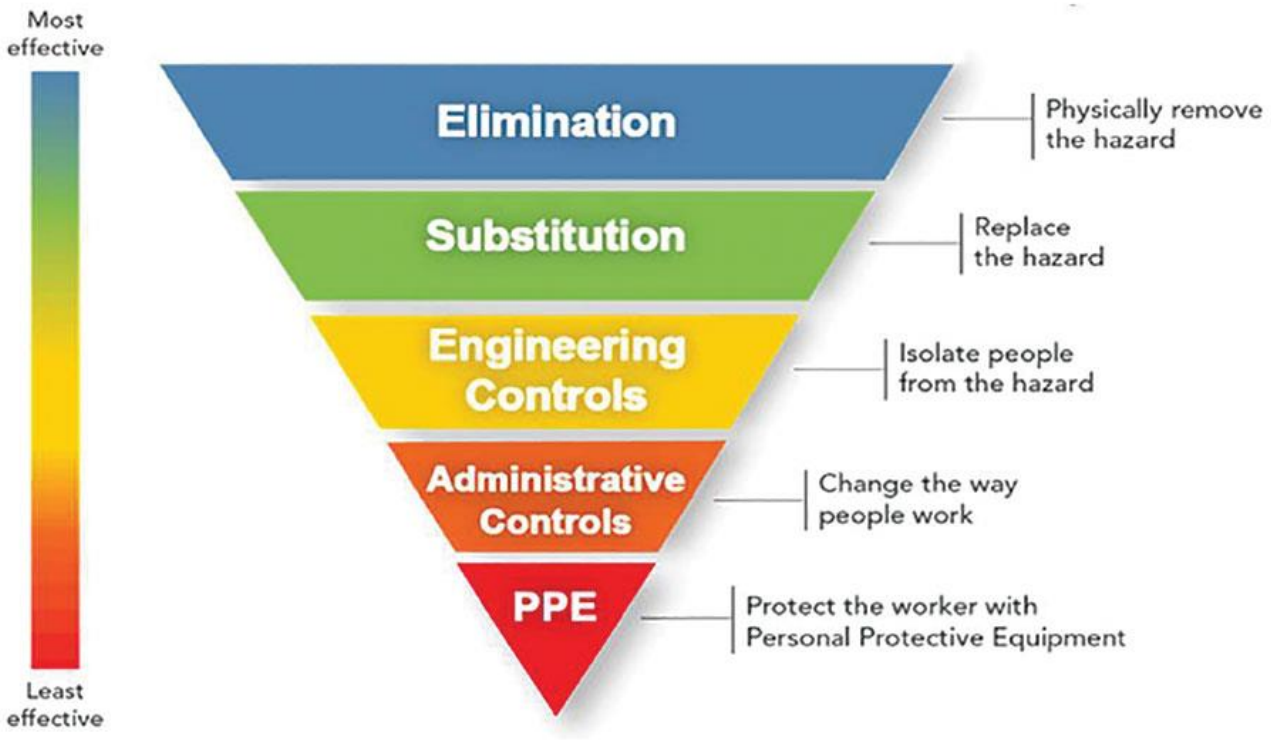
It is the policy of Robert B. Our Co., Inc. to provide a healthful and safe place to work always. The Robert B. Our Co., Inc. employees, and all others employed on the projects, are expected to conduct their work in a safe manner consistent with good construction practices. We know this is the most efficient method.

All Robert B. Our Co., Inc. employees are totally responsible and accountable for the safe performance of our work. Each employee is empowered to act when they observe an unsafe act or condition to correct the situation or refer to appropriate party to rectify the problem.

The results of our health and safety efforts will have a positive effect on our overall success in construction.

Our goal is incident-free work with the traditional Robert B. Our Co., Inc. quality.

When planning our work, we utilize job hazard analysis and pre-task planning, with emphasis on the Hierarchy of Controls as graphically presented below. This ensures that we plan for the most effective and safe means to conduct our work.



Personal protective equipment is the lowest level of control as it does nothing to eliminate or reduce the hazard. It merely provides protection whereas the other methods can eliminate or reduce the hazard that a worker may encounter.

Examples:

Elimination: In lieu of installing a piece of equipment on the roof, install it at ground level.

Substitution: Use latex paint versus oil-based paint.

Engineering Controls: Erect guard rails instead of using a personal fall arrest system.

Administrative Controls (also called work practice controls): If a worker is limited in amount of time he/she can be exposed to a substance without a type of personal protective equipment, then you can rotate another worker in when the exposure time is reached.

HARASSMENT POLICY

This harassment policy reflects requirements of Federal and state laws. All Robert B. Our Co., Inc. employees will comply with the laws and this policy. We will not tolerate any form of harassment against protected classes. It is against the law to engage in harassment of a protected class of employee.

Robert B. Our Co., Inc. will maintain a workplace free of harassment of any kind and from any source be it management, supervision, co-workers, vendors, or subcontractors while treating any and all complaints with equal fairness and timeliness in order to prevent frivolous or malicious accusations.

A complete description of our policy and procedures for violations is found in your Robert B. Our Co., Inc. Employment Policies and Procedures Manual.

DRUGS, ALCOHOL AND OTHER PROHIBITED ARTICLES

PURPOSE

Robert B. Our Co., Inc. has a commitment to protect people and property and to provide a safe working environment.

The purpose of this policy is to establish a drug-free, alcohol-free, healthy and safe work environment for each employee.

POLICY

Robert B. Our Co., Inc. prohibits the use, possession, distribution, or sale on its premises, facilities, or workplaces of any of the following: alcoholic beverages, intoxicants, illegal drugs and related drug paraphernalia. A complete description of Company substance and alcohol abuse policy is found in your Employment Policies and Procedures Manual as well as procedures for handling violations

Company employees must not report for duty or perform work while under the influence of any drug, alcoholic beverage, or intoxicant.

Employees, subcontractors, and subcontractors' employees on company premises may be subject to search provided herein if there is reasonable suspicion that banned substances may be present.

Employees will undergo drug/ alcohol testing as provided at those projects or workplaces where Project Owner, General Contractor or Controlling Entity requires such testing.

Employees will be subject to the terms and conditions of that program. If one fails the drug test, s/he will face suspension, termination, or voluntary leave of absence and be required to participate in a treatment program before her/his return to regular employment.

PRESCRIPTION DRUGS

For the safety of all employees, the Company reserves the right to place persons using such drugs on temporary medical leave or modified duty until released as fit to perform regular duty by the prescribing physician. See complete policy in Employment Policies and Procedures Manual.

TOBACCO USE

Robert B. Our Co., Inc. encourages a smoke free workplace and work site. It is Company policy that there is no smoking, e-cigarettes or chewing tobacco on Company sites except designated areas. On work sites, this policy also applies to subcontractor personnel.

Cell Phone Policy

The use of cell phone and phone camera use is limited to emergency, company or project related business. The possibility of an incident is greatly increased when personnel are texting, talking, or using cell phone apps while working or walking on the site or Company premises. No radios, earbuds, iPod or similar devices that restrict a worker's hearing are allowed. You may use personal devices during authorized work breaks. If a family emergency develops and you must use the phone, then notify Supervisor and go to a safe place to take the communication.

Do not walk, drive, operate equipment, or machinery while using a cell phone.

ENFORCEMENT

All Employees, trade subcontractors, and suppliers shall participate in the HASP as well as comply with all statutory health and safety requirements. Should an imminent dangerous condition be discovered, all work in the area of danger will be stopped until corrections are in place.

Unsafe Work Practices Consequences

Should Robert B. Our Co., Inc. find an employee, subcontractor, or supplier in the work area being, or acting, in non-compliance with statutory safety regulations or the HASP, the Robert B. Our Co., Inc. Project Manager, Supervisor, or Safety Manager shall have the authority to stop the work and order immediate correction of the non-compliant occurrence.

Disciplinary action involving a Company employee will be in accordance with the Corporate Disciplinary Policy found in the Company Employment Policies and Procedures Manual.

Corrective action involving a subcontractor employee or representative shall be in accordance with the subcontractor disciplinary policy found in the Subcontractor Requirements section of this HASP.

"Immediate removal from the Project" will result when:

- Any employee, supervisor, manager or trade subcontractor exposes themselves, other workers and/or the public to imminently dangerous to life and health situation.
- Any employee, supervisor, manager, or trade subcontractor openly exhibits disregard, defiance or disrespect for the HASP.
- Any employee, supervisor, manager, or trade subcontractor knowingly falsifies any investigative document or testimony involved in an incident investigation.
- Violent physical encounters (fighting) occur. All individuals involved in the incident are subject to removal.
- Threats are made against any safety, project or Company personnel performing their duties.
- Theft or destruction of property occurs.
- Any employee, supervisor, manager, or trade subcontractor consumes, possesses, distributes or is under the influence of alcohol/drugs while working, whether legal or not.

ENVIRONMENTAL POLICY

Robert B. Our Co., Inc. is committed to protecting the environment by identifying and complying with all local, state, federal, and client regulations and requirements. It is the responsibility of the Company, subcontractors, vendors, or other third-party individuals and entities to help identify and analyze Environmental Safety and Health (ESH) regulations and work with the Company Project Managers to coordinate any concerns. Outside legal representation may assist with regulatory interpretations as needed. It will be the responsibility of all subcontractors to comply with the regulations. Prior to commencement of construction activities, a comprehensive search that identifies relevant federal, state, and local regulations will be conducted. Any regulation that apply to the operation will be identified and a specific plan of compliance will be developed.

Non-Hazardous Materials
All non-hazardous materials and trash will be put in the contractor provided trash containers. Housekeeping will be done daily without exception.

Hazardous Materials
In the event of a spill of one quart or more of petroleum type and/or other hazardous substance, the Company Project Manager will coordinate containment with the subcontractor. Once the spill is contained, the Company will coordinate clean up and disposal with the owner. All work will actively stop in the immediate area of the hazardous material spill and will not resume until the area has been cleaned and released by the regulatory authority(s) and Company Project Manager.

Water
To prevent the contamination of water, the Storm Water Pollution Prevention Plan (SWPPP), if required, will be developed by a Qualified Person. Before site work commences, best water management practices will be installed in accordance with the SWPPP plan.

Spill Prevention Control Plan

When required by the Regulatory Authority(s) or Project Owner, a Spill Prevention Control Plan (SPCP) will be developed per federal 40CFR112 and Massachusetts Chapter 21E Sections 1 to 12. Forms are available at the agency web site.

SECTION II - RESPONSIBILITIES

EXECUTIVE MANAGEMENT

Health & Incident Prevention must be an integral part of all functions within a company's management systems, in order to ensure success of implementation. It is well recognized that health & safety performance is controllable, just as the standards of production, costs, and quality. The duties and responsibilities of Executive Management shall include, but not be limited to, demonstrate personal support for health & safety - lead by example, action, behavior and attitude. Impress upon all the responsibility and accountability of everyone to maintain a safe place to work. Provide resources to project management in the form of advance planning for all projects in order to maximize the use of engineering and administrative controls.

- Ensure that Health and Safety is incorporated in each project/job based on the expected and specific hazard prevention that will be needed.
- Ensure that all personnel have adequate time to fulfill their health & safety responsibilities.
- Participate in health & safety activities.
- Promote all corporate health & safety awareness and incentive programs.
- Review and participate in all inspections made by insurance or government inspectors.
- Attend Corporate Health & Safety Committee meetings, as invited.
- Work with the Corporate Health & Safety Committee to coordinate health & safety requirements with owners.
- Actively support the Corporate Health & Safety Program in conversations, written communication, training, meetings, and inspections.
- Promote the future development and continuous improvement of the Health & Safety Program.
- Appointment of a competent person or field health & safety representative from the staff to assist in the management and execution of the site health & safety program. If a Field Health & Safety Officer is not assigned full-time to the project, the Project Supervisor will assume these duties.

CORPORATE HEALTH & SAFETY DIRECTOR

Incident prevention is an integral part of proper and efficient management. It is well recognized that safety performance is controllable just as the standards of production, costs and quality. It is towards this end that the following responsibilities are directed:

- Impress upon all supervisory personnel the responsibility and accountability of everyone to maintain a safe workplace.
- Provide employees the necessary safety training in all facets of their work.
- Distribute relevant reports, incident data, and changes in regulations or codes that pertain to company operations.

- Provide all supervisors with copies of appropriate rules and regulations.
- Participate in advance planning for all projects in order to maximize the use of engineering and administrative controls which contribute to the overall company loss reduction effort.
- Continually monitor all aspects of the program for effectiveness, necessary assistance to field personnel, and compliance.
- Conduct periodic inspections of job sites.

FIELD OPERATIONS MANAGER/SUPERINTENDENT

The Field Operations Manager is responsible for supervising and monitoring the Safety Program on all projects under his/her supervision, along with addressing site safety, production and quality issues during job site tours.

PROJECT MANAGER

The Project Manager is responsible for the active administration and control of all aspects of the project job site including the safety program. It is acknowledged that the manager can most effectively reduce incidents and improve safety when he or she actively supports the program. Support is demonstrated by including safety as a part of job planning and by giving positive support for the development and use of safe work practices by all levels of employees. Some responsibilities of the Project Manager include:

- Planning and requiring that work be done in compliance with the established health and safety regulations as well as plans and specifications.
- Ensure that all injuries are promptly cared for, investigated and reported to the office immediately. All written incident forms will be turned in at once.
- Ensuring the availability of all necessary personal protective equipment, job safety materials, and first aid facilities.
- Ensuring that all new employees are properly instructed in safe work practices, prior to their assignment in the field.
- Ensuring all necessary documentation is maintained. This includes incident reports, weekly “toolbox” safety minutes, safety inspections, employee instruction and OSHA record keeping.
- Instruct all foremen regarding their health and safety responsibilities prior to initial project activities.
- Review all project injury and property damage reports with foremen.
- Ensuring to the greatest extent possible, subcontractors’ compliance with Company policy and applicable local, state, and federal safety standards/regulations.
- Ensuring that all safety related information, such as owner requirements, correspondence, and changing site conditions are communicated to the field supervisory and craft personnel.

PROJECT SUPERVISOR/FOREPERSON

It cannot be overemphasized that the attitude and behaviors developed by employees towards health and safety is a direct reflection of the attitude and behavior of the foreperson. Therefore, prompt attention to employee suggestions, unsafe conditions and practices is essential.

The following responsibilities have been established to address these objectives:

- Formulate with crew, the Job Hazard Analysis and/or Pre-task plan for tasks to be performed.
- Ensure all workers participate, review and acknowledge the pre-task plan.
- Ensure that all employees understand their safety responsibilities.
- Ensure all injuries are cared for immediately and all incidents are reported promptly to Company Health & Safety Director and to the Project Manager.
- Make sure all work is performed in a safe manner and no unsafe conditions or equipment is present.
- Ensure the availability of all necessary personal protective equipment (PPE) and assure that all such PPE are properly used.
- Act without delay on all hazards, both unsafe acts and conditions, which are within the scope of the position's authority.
- Review all incidents with employees. Ensure a thorough investigation and see that immediate corrective actions are taken.
- Inform the Project Manager or Health & Safety Director of problems which lie beyond the foreperson's authority.

EMPLOYEE RESPONSIBILITIES

The primary employee responsibilities, outlined below, are mandatory:

- Constantly observe work conditions, co-worker behavior, inspect equipment and tools for the purpose of preventing incidents.
- Comply with all job safety instructions. Request help when unsure of how to perform any task safely.
- Use all safety equipment which is required on the job. Employee will request safety equipment if not initially provided.
- Actively participate in formulation and implementation of job hazard analysis and pre-task plans related to the work.
- Correct unsafe acts or conditions within the scope of their immediate work. Report any unsafe acts to supervisors.
- Advise supervisors of any faulty tools or equipment. Stop use and tag out of service.
- Stop work if conditions are such that there is immediate danger to life, limb or property.
- Employee shall request proper protection when working with hazardous chemicals.

- Employee must be well versed in the Hazard Communication Program.
- Employee will have required licenses, certifications, and designations for use of equipment, tools and machinery that require same.

In addition, the employee should avail himself/herself of company and industry sponsored safety programs. The responsible employee also provides fellow employees help with safety requirements.

Each employee is responsible for learning and abiding by those rules and regulations, which are applicable to the assigned tasks and for reporting, observed or anticipated hazards to their immediate Supervisor. If the hazard is not immediately corrected, the affected employee will report the hazard to Robert B. Our Co., Inc. Safety Department.

SAFETY COMMITTEE

POLICY

Robert B. Our Co., Inc. is committed to constant improvement of our safety culture. We encourage employees to contribute to that culture by participating in job planning and having workers on our Company Safety Committee. The committee shall have enough members to represent the various trades the Company employs as well as field and executive management. Any full-time employee is eligible to serve on the committee and may volunteer at any time.

PURPOSE

1. To promote and maintain the interest of employees in health and safety issues.

2. To educate managers, supervisors, and employees through awareness and training activities that they are primarily responsible for the prevention of workplace accidents.

3. To help make health and safety activities an integral part of the organization's operating procedures, culture and programs.

4. To provide an opportunity for the free discussion of health and safety problems and possible solutions.

5. To inform and educate employees and supervisors about health and safety issues, new standards, research findings, etc.

6. To help reduce the risk of workplace injuries and illnesses.

7. To help ensure compliance with federal and state health and safety standards.

ORGANIZATION

The committee shall meet at least monthly. It shall consist of a Chairperson, Secretary and Vice Chairperson. These positions will be selected by committee members annually. An agenda will be published by the Secretary or Chairperson a week before the meeting with input sought from all members. The committee will follow Robert's Rules of Order for conducting the meetings.

RESPONSIBILITIES

Chairperson:

The primary duties of this position are to:

- Develop meeting agendas.
- Coordinate and conduct orderly meetings.
- Establish necessary deadlines and subcommittee assignments.
- Provide appropriate and timely follow-up on issues developed by the committee.
- Serve as a communication liaison between management and the committee.
- Promote health and safety by personal example.

Vice Chairperson:

The primary duties of this position are to:

- Take leadership of the committee when the chairperson is unavailable, on a short-term basis, or resigns from the committee.
- Serve on subcommittee(s) or task force and take an active role in other committee activities.
- Be visibly enthusiastic about his/her organization's health and safety program

Secretary:

The primary duties of this position are:

- To maintain, record and disseminate minutes of each meeting.
- Actively promote health and safety by personal example and communication with employees and supervisors.

Members shall actively participate in committee proceedings and be prepared to discuss topics presented in the agenda. Members may propose topics or discussion items for the agenda.

ACTIVITIES

- Assessing and controlling hazards.
- Assessing safety training and awareness topics.
- Communication with employees regarding safety committee activities.
- Developing safety rules, policies and procedures.
- Educating employees on safety-related topics.
- Evaluating the safety program on a regular basis.
- Inspecting the workplace.
- Keeping job-specific training current.
- Motivating employees to create a safety culture in the workplace.
- Reviewing incidents of workplace accidents, injuries and illnesses.

SUBCONTRACTOR/TRADE CONTRACTORS

A safety representative shall be assigned by each subcontractor to assure the health and safety of the personnel employed by their company. This representative will have a minimum OSHA 10-hour construction outreach training.

The name of each subcontractor's project-site safety representative and/or Competent Person as designated will be provided to Robert B. Our CO., INC. prior to the subcontractor starting work at the project site. (see Form in Forms Appendix)

Each safety representative shall have the right and authority to stop all unsafe work being performed by their employees.

Subcontractor will formulate and submit a Site-Specific Safety Plan for its operations on the project. This plan will comply with all applicable health and safety regulations.

Subcontractors shall provide and maintain a first aid kit for use by their personnel. They shall also have at least one person trained in first aid and shall notify Robert B. Our Co., Inc. of that person's identity.

Conduct regular and frequent inspections for their work areas in accordance with OSHA regulation 29CFR 1926.20(b)(2).

Attend all safety meetings.

Take immediate action to eliminate unsafe acts and/or unsafe conditions.

Ensure that prior to the start of any work activity; every foreperson has reviewed each task assignment with every affected employee to assure an understanding of the safety requirements and precautions to be taken while performing this work.

Each safety representative shall participate in incident and incident investigation involving their work, employees, and those of their lower tier subcontractors.

Each subcontractor and subcontractor employee will comply with Robert B. Our Co., Inc. Drug and Alcohol Policy while on the project.

Subcontractor shall instruct each employee on project site in the recognition and avoidance of unsafe acts and/or substandard conditions applicable to its work environment to control or eliminate injury or illness.

Subcontractor is responsible for providing and requiring the use of appropriate personal protective equipment in all operations where there is an exposure that requires its use.

Subcontractor is responsible for notifying Robert B. Our Co., Inc. of any hazardous chemicals or substances that are brought or cause to have been brought on project site. Subcontractor shall provide Robert B. Our Co., Inc. with a copy of its Hazardous Communication Program, Chemical information list, and Safety Data Sheet(s) (SDS) for the chemical(s) or substance(s) intended for use on the site. Robert B. Our Co., Inc. will provide a centrally located place for this information. Subcontractor is responsible for maintaining a copy of its Hazard Communication Program, Chemical Information List, and Safety data Sheets (SDS) on site for subcontractor's own reference and employee training. The proper storage use and disposal of wastes of any hazardous chemicals or substances are the responsibility of the subcontractor.

Subcontractor is responsible for conforming to OSHA, NFPA and local codes of fire protection and prevention practices. Subcontractor shall also comply with all fire and life safety rules and regulations established on the project.

Compliance with Federal, State, Local Laws and regulations is the contractual obligation of subcontractors working on our project(s). Conflicts between current laws or contractual requirements shall be resolved by adhering to the more stringent requirement. Any project site safety regulations, which exceed the minimum standards established by OSHA, shall be incorporated in subcontractor's site safety program. If subcontractor fails to correct safety violations, Robert B. Our Co., Inc. will issue the subcontractor written notification, outlining safety violations. Failure of the subcontractor to abate may result in the removal of the subcontractor from the project site, and Robert B. Our Co., Inc.'s approved bidders list, or other appropriate measures.

- All costs of correction shall be borne by the subcontractor deemed responsible.
- If more than one subcontractor is deemed responsible, Robert B. Our Co., Inc.'s Project Manager will assign degree of liability and his/her division of liability shall be final.
- Nothing contained herein, however, shall serve to relieve the subcontractor, or our Company employees, of their liabilities and/or obligations under OSHA as well as other applicable Federal, State and local requirements as well as the HASP.
- Robert B. Our Co., Inc. may withhold payment of any sums due to subcontractors for failure to follow the safety regulations, HASP policies and procedures.
- The Robert B. Our Co., Inc. Project Manager will issue a written, 24-hour notice in this regard requiring immediate response by the subcontractor.

Repeated violations or lack of cooperation with regard to the HASP by employees of a subcontractor, or any sub-tier subcontractors, will indicate non-compliance with provisions included in the contract and may be reason for that employee being barred from the project site and/or for termination of the subcontractor's contract.

At orientation, workers are given their first warning: These are the rules; if you fail to follow them you will receive additional warning.

The subcontractor shall ensure that its supervisors are aware of their responsibilities, which include:

- Know the requirements of all incident prevention standards and safety rules pertaining to their operations.
- Be responsible for carrying out the procedures required by the Site-Specific HASP.
- Ensure that each employee, under his supervision, has received the initial project safety orientation, as required by HASP or Project requirements.
- Instruct all employees in the applicable safe practice rules and regulations under their direct supervision.
- Supervise the instruction and training of new employees either personally or through delegated experienced persons until the new employee satisfactorily demonstrates his/her ability to perform the work in a safe and efficient manner.

- Be responsible for housekeeping in their area and for the use and maintenance of all personal protective devices, equipment, and safeguards.
- Notify their direct supervisor and/or the contractor's safety representative concerning work areas where they believe protective devices are required.
- Report to their own direct supervisor all cases of employees who, in their opinion, are not qualified for the work to which they have been assigned or who engages in unsafe practices.
- Attend and participate in all project supervisors' safety meetings.
- Conduct or arrange for weekly "toolbox" safety meetings in a relevant topic for the project, for all employees under their supervision as required. Minutes of Toolbox Talks are to be maintained and a copy of each Talk is to be given to Robert B. Our Co., Inc. before end-of -shift the day given.
- Report immediately all incidents in which personal injury, property damage, or a near-hit occurs.
- Cooperate in incident investigation and submit a report promptly on required forms.
- Periodically analyze work methods in detail for the purpose of job simplification and for the establishment of safe work methods.
- Conduct site inspections at least weekly.
- Formulate and submit a detailed Job Hazard Analysis (JHA) for any/all high hazard operations including crane lifts, work on the roof, confined space, work on live electric, work off scaffolds, lock out/tag out, and hazardous material removal. Robert B. Our Co., Inc. may require JHA's for other work not delineated here if it poses a high hazard.

SECTION III – PROJECT SAFETY PLANNING

JOB START-UP PROCEDURES

Activities to be done at project start up when mobilizing for work. This list is not all-inclusive. Make additions to this list as the conditions dictate. (see sample checklist in Forms Appendix)

Confirm all contracts and subcontracts are properly executed and required insurance is in place.

Obtain key contacts for Project, Owner, Site Supervision, emergency, etc.

Prior to the start of construction, a survey should be made of surrounding building, roads, walkways, lots, and utilities to record preexisting damage. This survey is to provide a level of legal protection for Robert B. Our Co., Inc. in the event of claims for damage after start of construction. It may be required to hire the services of a professional engineer and/or photographer to document the results in the event of legal action. Keep the results of the survey in a safe location and store them at the completion of the project.

Develop a site-specific HASP if project is of enough size and complexity or Controlling Entity requires one. Contact Safety Department for assistance. Distribute to applicable entities.

Schedule a pre-job meeting with crew. Items to be discussed include pre-task plan and/or JHA, the jobsite safety program, any special conditions of the site or Controlling Entity, the time of the safety meetings, progress meetings including employee toolbox training talks.

Provisions must be considered for protecting the public from construction operations. This includes site fencing, traffic control, pedestrian control, signs, guardrails, lighting, maintenance of access for emergency services, and items unique to that jobsite. These shall be detailed in the site-specific HASP.

Include a First Aid Kit, fire extinguisher(s) for the work area, and applicable warning signs e.g. no trespassing signs, etc.

Locate and post all emergency phone numbers.

Know legal address of site for emergency planning.

Determine location of nearest clinic and/or hospital for treatment of injured. Post with route map.

If applicable, post OSHA poster, Workers' Compensation posting notice, and all required legal postings.

Notify all workers of their duties under the OSHA Hazard Communication standard. This includes obtaining Safety Data Sheets on all chemicals that will be used on the project (providing a copy to Robert B. Our Co., Inc.),

Arrange for temporary toilets and dumpster service.

Obtain copies of subcontractors' safety programs and insurance certificates.

Provide Competent Person letter of designation if requested. Obtain competent person letter from subcontractors.

SAFETY ORIENTATION

Employees of Robert B. Our Co., Inc. and all Subcontractors will receive Safety Orientation. Robert B. Our Co., Inc. employees will receive a copy of the Employee Safety Handbook, sign the acknowledgement, and return the acknowledgement to the Safety Department.

Subcontractors will receive a copy of the Site-Specific HASP. Subcontractors shall conduct their own orientation for workers on the site incorporating the site HASP and any Owner/General Contractor specific requirements

FIRST AID

Robert B. Our Co., Inc. shall be responsible for providing a First Aid Kit for Robert B. Our Co., Inc. employees.

A minimum of one Robert B. Our Co., Inc. employee shall be certified in first aid and CPR on a project.

Subcontractor(s) will provide one employee, on site, who is certified in first aid and CPR.

REQUIRED TRAINING

EACH EMPLOYEE SHALL RECEIVE INSTRUCTION IN OR DEMONSTRATE KNOWLEDGE:

Field personnel shall have a card certifying training in the OSHA 10 Hour Construction Outreach program dated within 5 years of current employment. Project Managers, Superintendents and Field Supervision (foreperson) shall have evidence of training in the OSHA 30 Hour Construction Outreach Program.

The recognition and avoidance of unsafe conditions; the regulations applicable to his/her work environment regarding the safe handling and use of poisons, caustics, and other harmful substances when the employee is required to handle or use them. See Hazcomm program. Addendum C.

Employees who are required to handle or use flammable gasses, liquids or toxic materials shall be instructed in the safe handling and use of these materials.

Employees required to enter confined or enclosed spaces shall be instructed as to the nature of the hazards involved, the necessary precautions to be taken, and the use of protective and emergency equipment required. A task specific JHA must be developed for any confined space work. Evidence of training required.

All employees are to be trained in the recognition, selection and use of proper fire extinguishers to be used in the event of fires.

Employees who are exposed to harmful mists, dusts, vapors, or gases shall be trained in the selection, care, use, and maintenance of respirators. See Respiratory program, Addendum A.

Employees required to use powder-actuated tools are to be trained and certified on use, maintenance, and repair by authorized training agency. Evidence of training required.

Employees assigned to operate, or direct cranes shall be designated as “qualified” in the proper method of operation and giving signals. Evidence of training required i.e. state license and third-party certification.

Employees who operate heavy equipment including lulls shall have proper licensing and training per OSHA standards and Massachusetts licensing requirements.

Employees who rig loads must be deemed “qualified”. Evidence of training required.

Employees who perform excavation and trenching work shall be trained in hazards of the work, protective systems, and soil analysis. Evidence of training required in Competent Person-Excavation as defined by Subpart P of the OSHA Regulations.

Employees who use scaffolds shall have training with one designated as a “Competent Person”. Evidence of training required in accordance with Subpart L of the OSHA Regulations.

Employees who operate Mobile Elevated Work Platforms (MEWP) shall have training in safe operation and use. Evidence of training required in accordance with Subpart L and ANSI A92.2.

Employees who utilize personal fall arrest equipment shall have training in proper use, inspection, and maintenance of such equipment.

Employees who perform hot work as defined by 527CMR 1.41 shall have their Massachusetts Hot Work Certification card.

Company will provide evidence of training for any other task, function, or assignment where it is required per the applicable federal, state, or local statute. Evidence includes copy of license, certificate of training or training card.

Toolbox training talks will be held weekly by the supervisor on a safety topic relevant to the work performed. A sign-in sheet will be submitted documenting the attendees.

SITE SPECIFIC HASP

The Site-Specific HASP is for a specific project and may need to be changed to meet unique requirements mandated by the Controlling Entity or the project location.

The Site-Specific HASP is considered as an Addendum to the Corporate HASP.

JOB HAZARD ANALYSIS

A key tool in planning for efficient operations is use of job hazard analysis. This is a more detailed plan than the site-specific developed for each project. The JHA form is attached with instructions on how to formulate one. A JHA shall be developed for all high hazard operations performed on the project. It is imperative that our employees are directly involved in formulating the JHA. Protocols and form are attached as Addendum E.

PRE-TASK CHECKLIST

The Company utilizes a pre-task checklist to assist in planning the day’s tasks on the project. The checklist is included in Appendix A. The crew will hold a task huddle before starting work each day to formulate the list and confirm that necessary materials, tools, equipment, and safety items are in place. All crew members are to participate. This list notes safety equipment and procedures to conduct inspections of the site.

SITE INSPECTIONS

Periodic inspections of the job site will be conducted. The Company will utilize our insurance carrier, broker, and outside consultant to conduct independent audits.

It is expected that the site Supervisor and Project Manager, when on site, will conduct safety inspections as well as Corporate Health and Safety Director. The Health & Safety Director will document his/her inspections and refer to Project Manager for corrective action.

Immediate correction of an unsafe act or condition shall be taken and reviewed with appropriate site personnel including subcontractors.

OSHA INSPECTION PROTOCOLS

What Is OSHA

The Occupational Safety and Health Administration (OSHA) is a bureau of the U.S. Department of Labor formed to administer the Occupational Safety and Health Act of 1970. This Federal law was promulgated to afford a safe and healthful workplace for all employees. The standards under which the construction industry falls are contained in Section 29 of the Code of Federal Regulations, Part 1926. Copies of these standards are available from www.OSHA.gov

Robert B. Our Co., Inc. is fully committed to complying with OSHA standards.

Warrants and Right of Entry

It is the policy of Robert B. Our Co., Inc. to admit any lawfully delegated inspector who, upon presentation of credentials, requests entry to conduct a site inspection.
This policy is not intended to abridge the constitutional rights of our trade contractors or subcontractors who have the right to request a warrant prior to the inspection of their work areas.
Each subcontractor or trade contractor must be questioned as to their desire for a warrant prior to inspection. If they wish one, the OSHA Compliance Officer must be informed.
Federal compliance officers, state inspectors, or similar personnel are not to be harassed, intimidated, or abused. Federal and State safety agencies may impose severe penalties against persons and/or companies who fail to abide with this section. Penalties may include monetary fines and jail terms.

Inspection Classifications

- There are several classes of inspections: a general scheduled inspection, a focus inspection, post-incident, and a complaint inspection.
- For general scheduled inspections, companies are randomly selected, with inspectors then scheduling the inspections. Once entry to the site is obtained by either permission or warrant, the inspector may move freely about the site.
- A focus inspection may be of considerable shorter duration than a general scheduled inspection as the OSHA officer may be focused on four types of hazards: falls, electrical, struck by and caught between as well as any emphasis programs promulgated by national and local OSHA entities.
- Inspectors wishing to conduct a complaint inspection need not obtain a warrant but must inform the contractor either a properly executed copy of the complaint form or the nature of the complaint.
- The inspector may enlarge the inspection into other areas, nor may s/he concern himself/herself with non-serious conditions observed en route to the complaint area. However, should a serious condition be observed en route, the inspector may involve himself/herself, should s/he desire. (A "serious condition" is one likely to result in death or permanent physical damage.)
- Disaster incidents involving death or multiple injuries fall within parameters of a complaint inspection. Fatal injuries and complaint inspections are given priority. Persons initiating complaint inspections need not be named on the complaint form and may remain anonymous.
- Death, hospitalization, or amputation require notification to OSHA via phone or web.

Rights and Privileges

Employer:

- The employer has the right of representation during the inspection. The representative may question the acts and comments of the inspector and may also request clarifications where the actions of the inspector appear to be contrary to the rules of inspection.
- The employee(s) has the right of representation during the inspection. S/he may also answer questions regarding the inspection without fear of punitive actions by the employer.

Inspector:

The inspector has the right to take photographs, samples of material and measurements as they relate to the inspection. S/he may also privately interview employees for the purposes of enforcing the law. However, s/he may not unduly disrupt work unless an IDLH situation presents itself.

Citations

Inspections may result in citations and notices of monetary penalty.

- Post copies of citations near the area cited. Postings must remain for three (3) working days or until corrections have been made.
- Each citation provides for the removal of assessed penalty figures. This section is to be cut away before citations are copied and posted.
- Each citation also requires abatement action. This must be completed within the citation deadline and documented to OSHA.
- Failure to post a citation is punishable by fine.
- Failure to abate may also result in additional monetary penalties.

OSHA - WHAT TO DO DURING AN INSPECTION

This procedure is to assist you in the event of an inspection of our site by an Occupational Safety and Health Administration Compliance Officer. Its purpose is to provide a guide for the recording of information and evidence to support an affirmative defense.

- Notify Safety Department immediately upon notice of an inspection.
- Attend opening conference and inform compliance officer that Safety is on the way. Get business card and contact information of compliance officer.
- Note the reason for the inspection, i.e. program, focus, complaint, etc.
- Ensure that you have a camera and ability to take notes.
- If the inspector points out a potential hazard, address it immediately. Take a picture if s/he takes one from the same location. Ensure correction taken meets requirements.
- Company representative will attend closing conference. Note any potential citations.
- It is extremely important that all information be accurate, that pictures are clear, and that measurements be accurate as the information may be introduced into evidence under oath at a formal court hearing.

Emergency Planning and Response

Emergency planning is a necessary part of the site-specific HASP. All SSSP's shall have specific emergency protocols that include:

- Control and stabilize situation as soon as possible. Render aid to injured.
- Determine the resources necessary to manage and control the emergency.
- Get muster reports from all supervisors and subcontractors, if applicable to note any missing workers.
- Coordinate command-and-control responsibilities between police and fire departments, hospitals and other medical service providers, government agencies, and on-site responders.
- Establish and maintain communication with on-scene emergency responders and other emergency service providers.
- Provide for the safety of victims, other employees, and emergency personnel on the jobsite.
- Provide information on hazardous materials and products if these are involved in the emergency including Safety Data Sheets.
- Notify those identified in the SSSP of the emergency.
- Make equipment, tools, and materials available to responders.
- Do not speak to the media directly. Refer all questions to Company representative.

Incident Reporting/Emergency

Purpose

This Incident Reporting and Investigation Plan prescribe methods and practices for reporting and investigating incidents. No matter how conscientious the health and safety effort at a company, incidents happen occasionally due to human or system error. Therefore, this written plan is intended to provide a means to deal with all workplace incidents in a standardized way and demonstrate our company's compliance with the reporting requirements of 29 CFR 1904. In addition, it is the policy of the company to comply with all workers' compensation laws and regulations.

Administrative Duties

Health & Safety Director is responsible for developing and maintaining this written Incident Reporting and Investigation Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan.
Health & Safety Director is also qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer or oversee our Incident Reporting and Investigation Plan and conduct investigations.

Incident Reporting Procedures

Any employee may render first aid to the extent of his/her ability but should summon a supervisor to assist.

1) Secure the scene and render any first aid required. Arrange transport to local clinic identified in SSSP. Notify emergency personnel if warranted.
2) Employees injured on the job are to report the injury to the job foreperson as soon as possible after an incident. "Near miss" incidents should be reported as well, i.e., when an employee nearly has an incident but is able to avoid an injury or property damage.
3) The foreperson is to immediately notify Health & Safety Director and/or Human Resources manager by phone; complete the company Incident Report Form (see the Appendices for a sample form) with the employee, identify any witnesses, and/or other relevant people; and send a copy of the written Incident Report Form to the office as soon as possible after the incident.
4) Any employee witnessing an incident involving a third party at work is to call for emergency help or whatever assistance appears to be necessary. In addition, the employee is immediately to report the incident to the job foreperson and take part in answering questions related to the Incident Report and Investigation Form.
5) Any notification of an injury or job-related illness by an employee shall be reported regardless of whether medical treatment is sought. Initial report is by telephone to the Health & Safety Director or Human Resources Manager.
6) Report all utility strikes to utility, secure the area, photograph scene, and complete Utility Hit Incident Form (see Forms).

Incident Investigation Procedures

Thorough incident investigations will help the company determine why incidents occur, where they happen, and any trends that might be developing. Such identification is critical to preventing and controlling hazards and potential incidents. For all incident investigations, the Supervisor with Safety Office assistance will perform the following duties:

1) Conduct the incident investigation at the scene of the event as soon after the injury/property damage as is reasonably safe..
2) Take pictures and secure any contributing equipment, material or tools.
3) Ask the employee involved in the incident and any witnesses, in separate interviews, to tell him/her in their own words exactly what happened. He/she does not interrupt or ask for more details at that time; he/she just lets the employee describe it in his/her own style.
4) Repeats the employee's version of the event back to the employee or witness and allows him/her to make any corrections or additions. If acceptable to witness, have them write a statement of what they saw/heard/sensed.
5) After the employee or witness has given their description of the event, asks appropriate questions that focus on causes.
6) Remind the employees that the investigation is to determine the cause so that possible corrective action can eliminate the cause(s) of future incident.

RECORD KEEPING

Corporate Health & Safety Director and/or Human Resources Manager is responsible for maintaining the following records and documentation:

- Injury and Illness Log; OSHA 300 and 300A
- Training documentation
- Incident investigations
- Health and HASP
- Employee Safety Handbooks

Human Resources manager is responsible for maintaining the following records and documentation:

- Disciplinary action records
- Medical records required by OSHA regulations
- Employee licenses

Requests for copies of records shall be in accordance with the Company Policy found in the Employment Policies and Procedures Manual

This plan is an internal document guiding the action and behaviors of employees, so they need to know about it. Health & Safety Director thoroughly explains to all employees why the Incident Reporting and Investigation Plan is prepared and how employees may be affected by it. Employees are informed in how to report an injury or illness. All injuries and illnesses are investigated to determine cause and corrective action to prevent future incidents.
Our company does not discriminate against employees for:

- Reporting a work-related fatality, injury, or illness.
- Filing a health and safety complaint.
- Asking for access to occupational injury and illness records; or
- Exercising any rights afforded by the Occupational Safety and Health Act.

The Company Employment Policies and Procedures Manual has the procedure on requesting occupational injury and illness records.

RETURN TO WORK

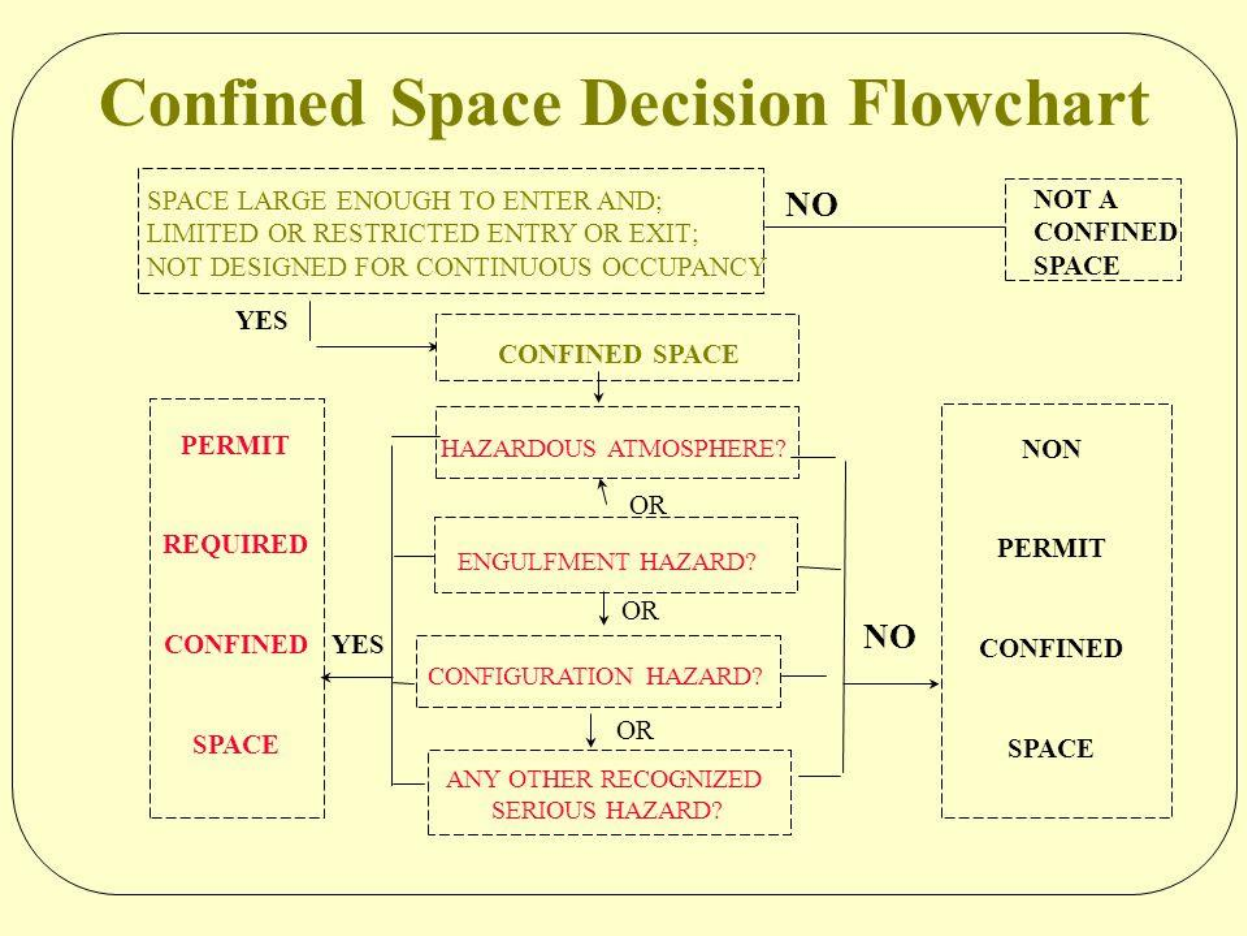
It is Company policy to provide a worker who has been injured and cannot resume normal duties, transitional duty to assist his smooth transition ack into the work force. The Employment Policies and Procedures Manual details the complete, Company Return to Work Program Policy and Procedures.

Section III- SAFETY PROGRAM ELEMENTS

CONFINED SPACE

The Company recognizes that working in a confined space poses significant hazards to workers. Any work in a confined space will require a detailed job hazard analysis and daily pre-task plan. **All work will be in accordance with applicable regulations, CFR 1926.1200-.1213 inclusive. It is the policy of the Company that continuous ventilation and continuous monitoring shall be conducted no matter the space.**

Our confined space program recognizes that these spaces can be a non-permit or permit required based on the pre-job analysis completed by the competent person utilizing attached checklist. **A job hazard analysis is required for either type of confined space.**



A confined space has distinct characteristics:

- Limited access and egress
- Not designed/intended for continuous human occupancy
- Of sufficient size and configuration that a worker can enter and work in it.

In addition, a permit required confined space may have atmospheric hazards, engulfment hazards, energy hazards, internal or external hazards that can affect the space.

Competent Person

Responsible for initial evaluation of the space as to hazards present or that may be introduced by the work process. This evaluation will determine permit required versus non-permit required. Based on this assessment, a job hazard analysis will be formulated with crew participation.

The Job Hazard Analysis will address the:

- Entry hazards and protections
- Existing space hazards and protections
- Identify duties of supervisor, attendant and entrant(s)
- Work to be performed in the space with hazards and protections
- Emergency procedures for evacuating the space
- Egress from the space
- Non-entry rescue if applicable

If a non-entry rescue is not feasible, then a rescue plan is required with input from the rescue team certified in confined space rescue. **Contact local rescue service to verify capability.**

Supervisor, Attendant and Entrant(s)

Personnel designated to work in the space will have one of three designations: supervisor, attendant and entrant. These are interchangeable provided employee has demonstrated competency for each function.

Supervisor:

- Fills out permit indicating hazards present and recognition of exposures
- Arranges rescue service and sets communication system for all.
- Conducts initial air monitoring using multi-gas detector. Must be competent in calibrating, using and reading results for action.
- Inspects the operation for compliance with permit requirements
- Terminates the permit and entry.
- Determines means to prevent unauthorized entry.

Attendant:

- Knows hazards present in the space and the signs and symptoms of overexposure.
- Remains outside space and does not break the plane of the space opening.
- Verifies that entrants do not show signs of overexposure to hazards by using verbal communication with entrants to verify that they are not affected. (slurred speech, slow response time, confused answers, etc.)
- Summon rescue service if needed or performs non-entry rescue if feasible. **Ensure that attendant can physically perform non-entry rescue such as using a tripod winch.**
- Monitors activity outside space for anything that creates a hazard endangering the entrants.

- Cannot perform any other duty and stays outside the space, remaining by entry until all entrants have left the space.
- Periodically tests the atmosphere in the space using a multi-gas detector for which s/he has received training in its calibration, use and reading.

Entrant:

- Understands the hazards in the space and consequences of exposure.
- Uses any tools and equipment in the space properly and safely.
- Respond to attendant whenever contacted.
- Evacuate immediately upon notification by attendant, hazard changes in the space, prohibited condition exists, unauthorized person enters space and warning sign of overexposure is detected.

Rescue Plan

All rescue plans are developed on a site-specific basis with input from workers and rescue service. Non-entry rescue devices must be tested before any entry. Attendant and Supervisor who may perform non-entry rescue must have training and demonstrate proficiency and ability to use the equipment.

Confined Space Permit

Permit attached in Appendix, meets all requirements of 29CFR1926.1206. Company policy requires that any employee listed on permit have required training, full name on permit, and sign permit.

Copies of the permits will be maintained for one year and an audit conducted.

CRANE SAFETY

Cranes may be used as a part of our operations. To assure that they handle the loads properly, safely and with greatest efficiency, the following procedures are necessary.

All crane operations shall have a lift plan that incorporates load weight, maximum radius, and maximum capacity at furthest radius, crane location, annual inspection, and operator qualifications. Requirements set forth in OSHA 29CFR 1926. 1400-1448 provides planning tools to aid in our planning. Range chart for crane is to be used to assist in planning the lift and placement of the crane. A lift plan sample is found in Appendix

Subcontractors shall submit a lift plan for their activities on our projects. Subcontract crane operators shall possess required state license and federal certification per Subpart CC. Subcontract crane operations will comply with federal regulations and Company requirements. Use their form or Company form found in Appendix.

Where Robert B. Our Co., Inc. is self-performing the work with Robert B. Our Co., Inc. controlled/hired cranes, the following items as detailed below must be done.

MOBILE CRANE

Operator

- Have the proper license and third party certification for the style of crane.
- Operate the crane in accordance with manufacturer's instructions.
- Proper placement of the crane related to the load to be handled and the landing area to obtain the best-rated capacity.
- Level the crane to manufacturer's specifications and rechecking the level if any change in conditions.
- Proper placement and use of outriggers for all lifts ensuring they are level and extended to manufacturer's specifications.
- The installation and maintenance of crane swing radius protection.
- Obey emergency stop signal when given.
- Follow instructions of certified signal person only unless emergency. Review signals with him/her before start of operations.
- Ensure that no one other than the operator shall be in or on the crane during operations. Exceptions are oilers or supervisors whose duties may require their presence and only with knowledge of the operator. If that is necessary, then all crane operations shall halt until those duties are completed.

Load Weight

Know the weight of the load plus the weight of all auxiliary handling devices such as hoist block, headache balls, hooks and rigging etc. shall be considered as part of the total load.

Additionally, the weight of all items added to the load must be determined and added to the total weight.

NOTE: Some manufacturers require that the load cable also be considered as part of the total load weight.

The operator shall be provided with the item weight. This will be used to determine total load weight and capacity.

CRANE INSPECTION

All inspections will be in accordance with provisions of OSHA Subpart CC and latest ASME B30.5.

- A visual inspection of the crane shall be conducted before commencing daily operations.
- Cranes will have an annual third-party inspection within the time frame of the operation.
- Lattice boom cranes that are re-assembled on site will have an independent third-party inspection before commencing operations.
- Inspection performed by operator after setting up and prior to initial lift.
- Monthly documented inspection conducted per manufacturer's instructions. See Form in Appendix.

CRANE OPERATION

Ground Stability

One of the critical factors of proper crane setup is a "firm-supporting surface". For maximum capacity, the crane must be level. However, to maintain a level condition, the ground surface must be adequate to support the dynamic load on a crane.

It is the statutory requirement that the Controlling Entity certify that the ground can support the total weight of the crane, attachments, rigging and maximum load. This must be obtained before crane arrives on site.

Operating Procedures

All personnel involved in crane operations shall have the required training, certification, and qualification for the function performed. Documented evidence is required.

Operator shall accept signals from designated, qualified personnel only and not respond to any signal, which is unclear or is given by anyone other than appointed signalperson.

Exception: The Operator shall respond to emergency "stop" signal given by anyone.

All signals shall comply with Subpart CC; 29CFR1926.1419 inclusive.

Operator has final responsibility and control over the crane operations. Whenever there is any doubt as to safety, the operator shall have the authority to stop and refuse to handle loads until safety has been assured.

Operator shall not lift any load which exceeds crane's capacity based on load chart or mechanical load indicators.

No loads shall be swung over other workers, occupied structures, or public conveyances.

Critical Lift

A critical lift is declared when any of the following criteria are met:

- Lift exceeds 75% of crane capacity per load chart
- Load has lead time greater than 30 days.

- Load value exceeds $50,000.
- Personnel are lifted
- Dangerous environments e.g. near occupied schools, heavily trafficked areas, etc.
- Required by project Owner.

The critical lift plan shall be used. See Form attached in Appendix.

CRANE OR DERRICK SUSPENDED PERSONNEL PLATFORMS

This section applies to the use of personnel platforms on the load lines of cranes or derricks.

GENERAL REQUIREMENTS

CRANES OR DERRICKS SHALL NOT BE USED TO HOIST PERSONNEL, except when the erection, use and dismantling of conventional access means; i.e., ladder, elevating work platform scaffold, etc., would be more hazardous, or is not possible due to structural design or job site conditions.

A Site-Specific Job Hazard Analysis shall be developed, reviewed, and implemented before any use of a suspended personnel platform.

Use of a suspended personnel platform requires approval of the Company President and Corporate Health & Safety Director.

The Federal Aviation Administration (FAA) requires a permit on construction cranes any time they will exceed 200 feet in height, OR when they are placed within 20,000 feet (3.79 miles) of an airport regardless of height. The FAA required **FAA Form 7460-1** to be submitted at least 30 days before the date the proposed construction is to begin, the date the application for a construction permit is to be filed, the FAA requires that four (4) copies of the FAA Form 7460-1 be sent to the local/regional FAA Director. In addition to the FAA, other local statues may require additional notification.

Demolition

The Company performs demolition activities that include removal of old structures, remove old insulation, remove underlayment (wood, metal, composite material). When included as part of scope of work, a Job Hazard Analysis will be developed. A structural analysis is required to ensure that working surface is safe and can support weight of men, equipment, and debris.

- A pre-demolition survey shall be conducted to determine if hazardous materials are present. These materials include asbestos, asbestos containing materials, lead coated materials, lead piping, and presence of chemicals in tanks, pipes drains.
- If this old material contains ACM or lead. A project specific asbestos and/or lead removal plan is required. Only trained, certified employees will remove asbestos, ACM, and/or lead. Chemical tainted material will be removed by trained hazardous waste technicians.
- Removal of old insulation may create a dust posing a respiratory hazard. The Company respiratory protection program will be implemented if such dust poses a hazard.
- This dust may also be laden with respirable crystalline silica. A silica exposure control plan and dust control for the site will be generated based on scope of work and materials contained in the demolition such as brick, concrete, stone, and cement.
- Prior to start of any demolition work, the Company must ensure a Competent Person has performed an engineering survey of the building or area to be demolished to determine the condition and location of utilities, whether hazardous materials exist, means and methods of performing the work, and sequencing.
- No work will commence until a written engineering survey has been completed and submitted to the Company.
- Debris and material will not be dropped through walls, floor holes, windows, or other elevated work areas without the area below being barricaded and properly signed.
- Under no circumstances will materials be dropped more than 20 feet without using a chute. Debris chutes will have a substantial gate at all elevated openings.
- If demolition of a building will involve implosions, the demolition contractor will submit to the Company a detailed HASP to specifically address site preparation, installation of explosives, debris/dust control and blaster qualifications.
- All operating equipment will have protective cages for the operator.

Electric Safety

POLICY

It is Company policy that employees shall not work on live electric unless they have proper training and personal protective equipment as outlined in NFPA 70E. Only qualified personnel shall perform electrical work.

Employees shall use electric outlets that are protected with a Ground Fault Circuit Interrupter (GFCI). Outlets are tested periodically to ensure that GFCI is functioning. If outlet lacks a GFCI, then a GFCI outlet device shall be attached to the outlet.

HAZARDS

The hazards associated with electrical exposure include:

- Shock from contact with live electrically charged object.
- Fire from overheated circuits or arcing.
- Arc flash and arc blast

PROTECTIVE SYSTEMS

Protection from electrical hazards is obtained by using safe electrical work practices and appropriate protective equipment. Protections include:

- Isolation- putting wires in conduit, bury wires, elevate wires, and enclosures
- Guarding- placement in locked vaults, electric rooms
- Grounding- using grounded circuits, tools, cords
- Protective devices- GFCI, circuit breakers, fuses
- Safe work practices- shut off power, housekeeping, wear non-conductive apparel etc.
- Do not enter panel boxes or electric rooms without checking with electrician first.
- Ensure all electric panels are labelled as to voltage, current, etc. on panel door.

Cords

- Always inspect cords before use. Damaged cords remove from service by cutting off plug (male) end. Return all damaged cords to warehouse.
- All extension cords shall be rated for hard or extra hard use (S, ST, SO, STO) and a minimum of 14 gauge. This information is on the cord near the male (plug) end.
- All cords and electric tools are plugged into GFCI protected outlet only.
- If using a GFCI outlet device, plug it into nearest power outlet if outlet lacks the protection. Test GFCI periodically.
- Extension cords and tool cords shall not be tied with wire or attached to metal objects rails etc.
- Extension cords are not connected. Obtain length of cord needed based on chart below.
- Cords are not to be used as “rigging” to raise or lower tools or materials.

- Keep cords out of doorways, passageways, and aisles.

On this cord, SJTW indicates the jacket type and AWG 18/3 indicates the gauge rating.

Extension cords should be a minimum of 16 AWG and be rated for the equipment in use. The following is a guide that might be helpful in selecting the cord:

Extension Cord Ampere Rating		
Wire Size (Copper)	Single Phase Two and Three Conductor Cords	Three Phase Cords
16AWG	13 amps	10 amps
14AWG	18 amps	15 amps
12AWG	25 amps	20 amps
10AWG	30 amps	25 amps
8AWG	40 amps	35 amps
6AWG	55 amps	45 amps
4AWG	70 amps	60 amps
2AWG	95 amps	80 amps

RECOMMENDED WIRE SIZE MAXIMUM LENGTH
AWG #16 — 25 Feet
AWG #14 — 50 Feet
AWG #12 — 75 Feet
AWG #10 — 100 Feet

EPCOG Electrical Improvement Project

Generators

Generators shall be inspected prior to use to ensure no loose wires, improper ground, or damaged components.

- Generators shall be grounded per manufacturer's instructions.
- Generators shall be fueled only when engine is off.
- GFCI on outlets shall be tested periodically by a qualified person.

TRAINING

All employees will receive training on the hazards of electricity and protective systems to reduce and/or eliminate the hazard.

EXCAVATION OPERATIONS

Robert B. Our Co., Inc. recognizes the hazards associated with excavations including collapse, undermining, hazardous atmosphere, utility strikes, falls, and falling objects. The following policies and procedures were formed to reduce the potential risk from the exposure to excavation operations being performed.

General Requirements

- Determine the type of excavation, support needed, and equipment to be used.
- Contact Dig Safe prior to commencing operations. Get permit number. Do not proceed until utility locations are marked out. Scan the area for any evidence of unmarked lines.
- Obtain any information from local utilities and property owner as to location of underground pipes, wires, conduit, etc.
- Conduct survey of excavation site to determine if any structures will be affected by operation and if support for those structures will be needed.
- Obtain all required permits for excavation operation from local permitting authority.
- Complete Excavation Checklist (Appendix F).
- Each employee in an excavation shall be protected from cave-ins by shoring or protective systems. Company uses several different systems determined by task to be performed and excavation needed. No benching of Class C soil.
- A designated competent person shall always be on-site during which excavation activities are conducted.
- Soil classification shall be made by the competent person or a registered professional engineer trained in soil classification. Unclassified soil shall be designated to be Class C.
- All excavations over 5 feet deep shall be shored or sloped as required. Excavations and the work scheduled to be performed in the excavation shall be evaluated by the competent person to determine if the shoring or sloping needs to begin at a depth less than 5 feet. Class C soil will be sloped to 1 ½ to 1 or shored.
- All shoring for excavations over 20 feet deep shall be designed by a registered professional engineer and all shoring installed shall be approved and signed off by a registered professional engineer.
- All spoils shall be placed a minimum of 2 feet from the edge of the excavation. Loose soil or rock shall be removed from the sides of excavation wall and top of any shoring.
- Heavy equipment shall maintain a safe distance from edge of excavation. This is a minimum of 3 feet from edge.
- Excavations 4 feet in depth or greater shall have a stairway, ladder, ramp, or other safe means of access/egress every 25 feet of travel.
- All excavations shall be inspected by a competent person before entry:
    - At the start of each shift.

  - After rain or snowfall.
  - After freezing and/or thawing temperatures occur.
  - After any condition that can change the integrity of the soil.
- During rainy weather, work in excavations shall be suspended until the excavation competent person has evaluated the excavation and the effect the rain is having. The excavation competent person shall maintain a regular inspection schedule during the rain if employees continue to work in the excavation. Depending on the amount of rain falling, the duration of the rainfall and the soil type, the competent person may need to maintain continuous observation of the excavation condition.
- For all excavations 4 feet in depth or greater, the potential for hazardous atmosphere shall be evaluated. If potential atmospheric hazards exist, then the atmosphere in the excavation shall be tested. Indications of the potential for a hazardous atmosphere include, but are not limited to gas lines, sewer lines, proximity to emissions sources for H2S, Co2, CO and other gases that are heavier than air.
- Excavations shall be evaluated for hazards in addition to cave-in potential. Electrical sources energized (pressurized) pipes, underground tanks, etc. may present a hazard to employees who are required to enter the excavation.
- The competent person responsible for the crew working in the excavation shall inspect the excavation throughout the work period and stop operations when unsafe conditions exist. The Excavation and Trenching Check List shall be used to document the daily inspections.
- The number of workers in the excavation shall be limited to the number needed to perform the work.
- Water shall not be allowed to accumulate in excavations at any time. Pumps, drains, or other means shall be used to remove water constantly. If pumping is needed, verify compliance with any discharge requirements.
- Stability of adjacent structures shall be evaluated before starting an excavation and monitored daily thereafter.
- Exposed utilities shall be properly supported to prevent collapse and damage.
- When mobile equipment is operated adjacent to an excavation, or when such equipment is required to approach the edge of an excavation, and the operator does not have a clear and direct view of the edge of the excavation, a warning system will be utilized such as barricades, hand or mechanical signals, or stop logs. If possible, the grade should be away from the excavation.
- No loads shall be swung over the workers in the excavation.
- Installation of underground utilities shall comply with project specifications, local utility requirements and Massachusetts Blue Book.

Training

- Each employee who works in or around an excavation shall be trained to recognize potential hazards associated with excavations: cave-in potential, fall hazards, safe entry and exit, proximity to excavating equipment, air quality, back-filling and compacting activities, protective systems, and provisions of Subpart P.
- Everyone assigned as an excavation competent person shall demonstrate knowledge in soil classification, hazards associated with excavations, protective systems, required inspection criteria and requirements set forth in Subpart P of the OSHA regulations.

FALL SAFETY SYSTEMS

Policy

It is the Policy of Robert B. Our Co., Inc. Co., Inc. that all employees exposed to a fall hazard of six feet or greater shall be protected by a system of prevention or protection. The Company mandates use of fall prevention, restraint and/or protection for all activity above 6 feet from a lower surface. Company policy is to assess for use of guard rails or other engineering control first then if infeasible to use a personal fall arrest system (PFAS). Requirements set forth in 29CFR1926.500-503 plus exhibits will assist in our planning efforts to eliminate/minimize fall hazards.

Robert B. Our Co., Inc. does not use Safety Monitors as part of any fall prevention system.

There is a no tolerance policy for violations of our fall protection requirements.

Before start of work, Project Manager will confirm that any working surface can support our personnel, materials, tools, and equipment or obtain any loading restrictions.

Scope of work shall be reviewed to determine if the work or portions of it can be performed at ground level or if the fall hazard can be eliminated.

Engineering Controls

Engineering controls take various forms including parapets, guardrails, covers, and nets. The Company utilizes several systems but encourages Project Owners to consider adding parapets of enough height for fall prevention or a permanent rail system.

Guardrails

The Company may use one of several guardrail systems. The type and style will depend on the nature of the project and the fall hazard. All systems however must meet OSHA requirements for guardrail height of 42” +/- 3 inches for top rail, 21” +/- 2” for mid-rail and toe board of 3.5” from work surface.

Covers

Covers are used where there is an opening in the work area such as skylights. Covers are used over openings greater than 2” in diameter. All covers are secured from displacement and must support at least 2 times the expected load that may be placed on the cover.

Skylights create a possible fall hazard as many do not meet requirements as “covers”. OSHA regulation mandates fall prevention around skylights. This can be a guardrail, cover, or net. ***Warning line system does not meet requirements and is not to be used as fall prevention for a skylight or other openings that present a fall hazard.***

Personal Fall Arrest Systems (PFAS)

PFAS is used only after determination that a prevention or restraint system is not feasible.

PFAS consists of an anchor point, connector, and body harness. Robert B. Our Co., Inc. employs several types of each depending on fall hazard conditions. All units are inspected prior to use.

Use of PFAS requires a rescue plan for an employee hanging from a harness after a fall.

Harnesses:

A full body harness will be used as part of a PFAS. Harness shall be sized to fit worker and inspected before use. Worker must receive training on proper wear and inspection of harness. Except for position harness, all lanyards shall attach to rear dorsal ring.

Anchors: Anchors must be capable of supporting 5,000 pounds of force for each worker attached. It must also be of sufficient height to prevent worker from striking a lower level.

The Company uses various anchors depending on conditions.

- Engineered: Roof stanchions/anchors provided by Project that will be permanent and used after construction is completed. Project Manager will confirm that they are available as PFAS anchor for construction.
- Manufactured: Anchors purchased that meet OSHA requirements. There are several that can be utilized.
    - Anchor rings: Attached to deck serving as anchor for one worker. Unit attached per manufacturer's requirements and used on metal, concrete and wood decking.
    - Cross arm straps: Nylon or metal strap that wraps around a structural building member such as an HVAC unit, rafter, etc. that is capable of meeting 5,000-pound requirement.
    - Anchor carts: Mobile carts that offer anchorage for 2-5 workers. All carts are set up and used in accordance with manufacturer's specifications.
    - Lifelines: These can be purchased or fabricated based on need. Lines must support 5,000 pounds per person attached. If fabricated, line must be tested to 2 times rated load. Lanyards shall not be directly connected to a lifeline. Carabiners or anchor rings must be used.

Lanyards:

Lanyards shall be compatible with harness. All are inspected before use. There are several types of lanyards available:

- Pack style which has a 3-foot decelerator. This usually comes in 3-foot and 6-foot configurations.
- Bungi style which comes in 6-foot length predominantly. It has an accordion style decelerator.
- Self-retracting lanyards (SRL). This comes in various lengths from 9 to 75 feet. It is a reel style lanyard which locks when a sudden force acts on it.
- Rope grab: This utilizes a rope with a grab device designed to lock when the ring is pulled down in a fall. These ropes run 25 to 200 feet long. Worker must be mindful of adjusting the grab along the rope so there is not excess slack.

Component	What to check for	
Full-body harness	❑ **Webbing** frayed, cut, burned ❑ **Stitching** loose, ripped ❑ **Metal buckle** bent, cracked	❑ **Grommets** damaged, missing ❑ **Strap keepers** broken, missing ❑ **D-ring** worn, bent, cracked
Locking snap hooks	❑ **Hook** bent, cracked, twisted ❑ **Lock** not working properly	❑ **Springs** weak, broken, missing
Lanyard with shock absorber	❑ **Webbing** frayed, cut, burned, damaged by chemicals ❑ **Stitching** loose or ripped ❑ **Jacket** cut, torn, burned; signs of shock loading	❑ **End loops** cut, torn, burned, or stretched ❑ **Stretching** from shock loading ❑ **Connection** to snap hook ❑ **Knots** in rope lanyard
Rope grab	❑ **Fails** hand test ❑ **Not** used with appropriate diameter and type of rope ❑ **Springs** broken, missing	❑ **Gate** can't close fully ❑ **Locking pin** not working ❑ **Safety latch** broken ❑ **Teeth** on cams worn
Lifeline	❑ **Diameter** must match that of rope grab ❑ **Polypropylene** or equivalent ❑ **Length** reaches the ground ❑ **Rope** frayed, rotted, cut, weakened by knots	❑ **Discoloration** from sun, chemicals ❑ **Attachment** to anchor secure ❑ **Stretching** from shock load ❑ **Protection** where lifeline runs over roof edge
Anchor	❑ **Capacity** 16 kilonewtons (3,600 pounds) or more	❑ **One anchor** per lifeline ❑ **Signs** of deformation

Fall Restraint System

Fall restraint systems are designed to prevent employees from reaching a fall hazard. These systems keep worker from reaching the fall hazard. Manufacturers of PFAS have specifications to utilize them as part of a restraint system. The anchor point of a restraint system must withstand 1,000 pounds of force pulled against it.

FIRE PREVENTION

The following fire safety written program and employee emergency action plans have been developed in accordance with OSHA Safety Standards 29CFR1926.150, 29CFR1926.35 and Massachusetts 527 CMR 1

RESPONSIBILITY

The Project Manager will ensure that the SSSP will incorporate a fire prevention plan for the duration of the project.

Each subcontractor shall be responsible for obtaining any and all permits required for hot work operations and provide copies to the Project Manager. The names and evidence of certification shall be supplied prior to the start of work.

FIRE PREVENTION PLAN

The SSSP shall contain provisions for fire prevention in accordance with NFPA 241 and local fire regulations.

Hot work operations as defined by Massachusetts 527CMR 1.00 Chapter 41 and NFPA 241 shall only be performed by workers having the appropriate certification per the regulation. This includes subcontractors.

- Hot Work includes
  - Welding and allied processes
  - Heat treating
  - Grinding
  - Thawing pipes
  - Powder driven fasteners
  - Hot riveting
  - Torch-applied roofing
  - Similar applications using a spark, flame, or heat

The Company and subcontractors shall consider alternatives to hot work before commencing operations.

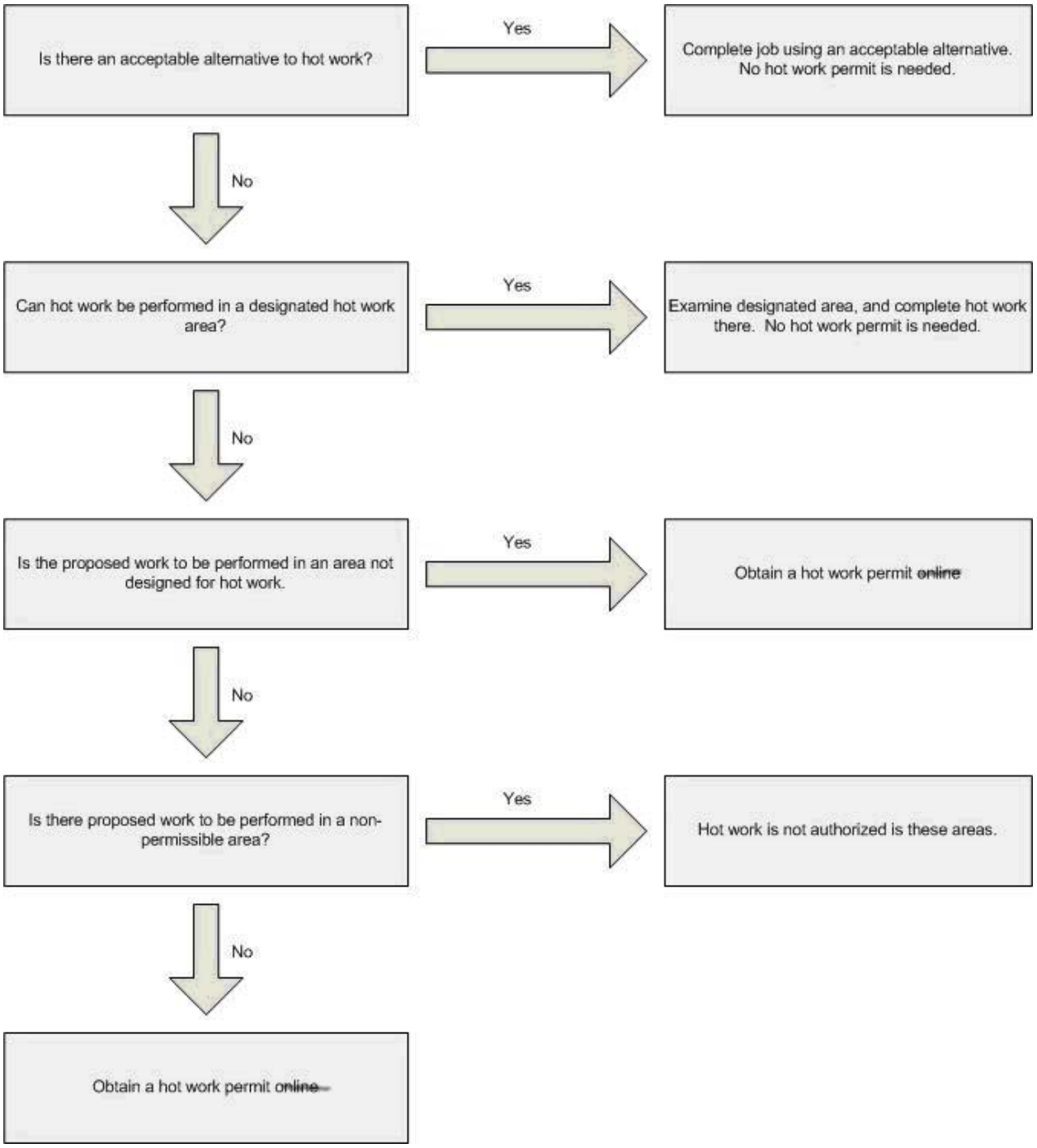
The Company will obtain Hot Work Permit from local AHJ (Fire Chief or designee) prior to commencing such operations.

Subcontractors will obtain Hot Work Permit from local AHJ for its/their hot work operations.

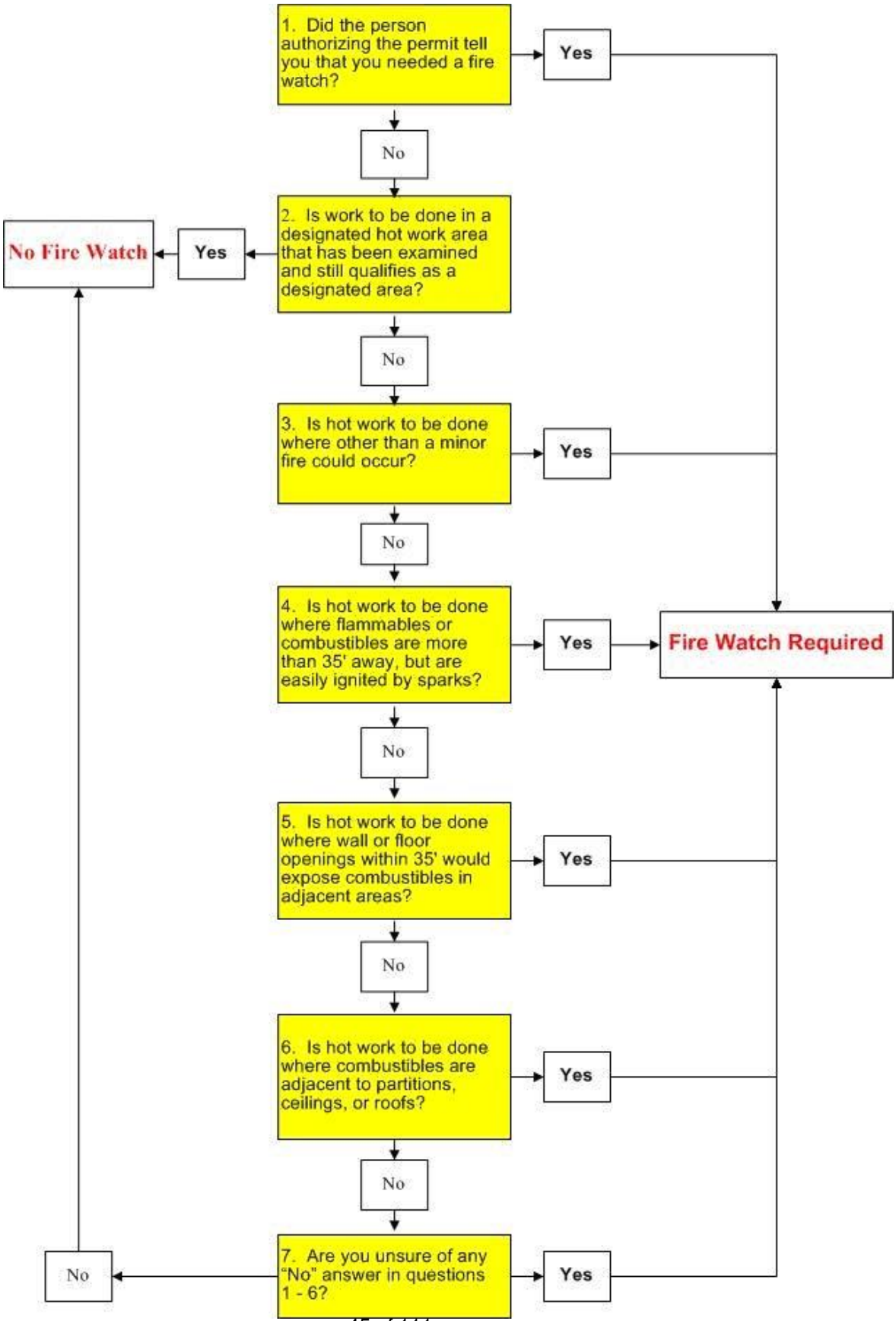
Hot work performed other than in a designated area will require a local Hot Work Permit program from the subcontractor. A copy of the permit from the AHJ as well as the local permit shall be submitted to the Company prior to commencing work on site.

Utilize the decision tree as to requirement for local hot work permitting.

Company local hot work permit is in the Forms Appendix.



A designated PIA will assess the operation and ensure that it is safe to go forward including selection of a fire watch. See decision tree for selection.


1. Did the person authorizing the permit tell you that you needed a fire watch?
Yes
No
2. Is work to be done in a designated hot work area that has been examined and still qualifies as a designated area?
Yes
No Fire Watch
No
3. Is hot work to be done where other than a minor fire could occur?
Yes
No
4. Is hot work to be done where flammables or combustibles are more than 35' away, but are easily ignited by sparks?
Yes
Fire Watch Required
No
5. Is hot work to be done where wall or floor openings within 35' would expose combustibles in adjacent areas?
Yes
No
6. Is hot work to be done where combustibles are adjacent to partitions, ceilings, or roofs?
Yes
No
7. Are you unsure of any "No" answer in questions 1 - 6?
Yes
No

Area Fire extinguishers are to be provided for each 3000 square feet of the protected building area, or major fraction thereof. Travel distance from any point of the protected area to the nearest fire extinguisher shall not exceed 100 feet (OSHA §1926.150 C1.i). Fire Extinguishers are to be used only in the event of a fire emergency by trained personnel.

Any Subcontractor performing "hot work" or "spark producing work" in the work area or performing work that may present any fire hazard are required to provide the appropriate fire extinguisher(s) in the appropriate number(s) or an approved source of continuous running water per the OSHA requirements at the site of the fire exposure, with appropriately trained personnel. Subcontractor may not rely on any "area" fire extinguisher(s) located in the workplace building(s) for such fire protection.

Every fire that is extinguished shall be immediately reported to the Robert B. Our Co., Inc. Safety Department. Any fire extinguisher that has been activated and/or discharged will immediately be removed from the work area and replaced with a fully charged unit.

Company and any Subcontractor performing work that results in the accumulation of combustible/flammable materials within the project site is responsible for the prompt removal and proper disposal of such materials.

Company and any Subcontractor storing combustible/flammable materials on the project site will be responsible for proper storage. Each storage area will be properly labeled and adequately protected. All potential ignition and heat sources are to be identified and protected. Combustible/flammable materials are not to be stored in near proximity to such heat and/or ignition sources. Materials will not be stored in excess of regulations and will only be stored in authorized areas and/or approved containers. Provisions will be made to ensure that proper ventilation is maintained. Combustible/flammable materials are not to be stored in hallways, corridors, or exit ways.

Combustible/flammable storage areas will be properly identified with conspicuously posted informational and precautionary/warning signs including "No Smoking" and "No Open Flames" signs. Appropriate fire extinguishing systems will be conspicuously placed in the immediate vicinity. Bulk containers will have NFPA markings.

Company and any Subcontractor will be responsible for the prompt removal and proper disposal of all used containers of combustible/flammable materials and waste.

No fire detection or suppression systems are to be deactivated. Area alarms and sprinklers may be “bagged” to prevent accidental activation.

Area fire extinguishers shall have a documented monthly inspection and annual third party inspection.

Employees shall be trained in proper operation of a fire extinguisher.

FLEET SAFETY

The Company has a comprehensive fleet management and safety program that is incorporated here by reference.

Subcontractors and their employees shall only bring properly registered and inspected vehicles on site.

All vehicles entering site shall have current registrations and statutory inspections.

All CDL vehicles owned or subcontracted, shall have proper signage on vehicle. Company will run FMCSA statistics on subcontractor heavy vehicles. Poor safety performance and poor FMCSA score may result in vehicle and driver not allowed on site.

Parking will be in designated areas only. The Company bears no liability for vehicles parked on site either legally or illegally.

All drivers will have current CDL's and be enrolled in the FMCSA program for drug and alcohol reporting.

Hired trucks shall have audible back up alarms, cover tarpaulins in good condition, mud flaps on all fenders and drivers with required personal protective equipment. PPE shall include hard hat, safety glasses, traffic vest, and work boots.

HEAVY EARTH MOVING AND HANDLING EQUIPMENT

The safe operation of heavy equipment involves very important areas:

Selection and training of operators

Only able-bodied, trained, and qualified employees will be permitted to operate any piece of heavy equipment. Training will include a thorough review of hazards, safe and un-safe procedures, and a good working knowledge of the machine itself. All operators shall read the operators manual including all warnings and precautions. Robert B. Our Co., Inc. always requires all equipment operators to wear seatbelts when operating heavy equipment. Project foremen will see that proper supervision is exercised over an operator until assurance is established that the employee can be left on his own.

Operators shall have evidence of required State and/or federal licensing/training for the machine to be operated.

Maintenance

Maintenance programs will be thorough, workable and consistent with the manufacturer's specifications. Many injuries and considerable equipment damage can be averted through proper attention to such items as motors, blades, tracks, drives, wire ropes and sheaves, hydraulic and braking systems, and other vital parts. A systematic preventative maintenance program will be established, and records will be kept by Maintenance Supervisor.

Safe Operating Procedures

The condition of equipment will be checked prior to operation. This will include brakes, clutches, steering mechanisms, and hydraulic and electrical systems. Any defects shall be reported to project Foreperson immediately for correction. All equipment operated by Robert B. Our Co., Inc. shall have a Roll Over Protective Structure (ROPS). At the end of the day, all heavy equipment shall be stored with zero stored energy in the hydraulic system (blades, buckets, etc. on the ground).

Seat belts will always be worn while machinery is in operation.

Bulldozers and Tractors

- Canopies/rollover devices must be in place to protect operators from falling material and rollovers.
- Before starting down a hill, the blade should be lowered to secure the load of earth in front of it and maintain the load all the way down the hill. If the load is lost, the blade should not be lowered or jammed into the ground, as this may cause overturning. The bulldozer blade must never be used as a brake on a downhill grade.
- Filling operations can be extremely dangerous. The material should be pushed over the edge, only as far as necessary. This could prevent the possible overturning of machine.
- When coupling a tractor to other equipment, workers should stand clear of the space between units. The machine should be stopped, transmission placed in neutral, and the brakes set before a person can couple the equipment.
- At the end of work shifts, or when leaving the machine, the power will be shut off,

brakes set, blade landed, key removed, and the shift level placed in neutral.

Excavators and Loaders

- All workers will remain clear of the bucket swing and the cab rotation. Never swing the bucket over other workers.
- When soil is soft, make sure the equipment is on solid foundation, such as mats or heavy planking, before starting to operate.
- Before operating on a bank next to an excavation, a check shall be made with the Foreperson to determine whether shoring or bracing is necessary.
- Never operate closer than 10 feet from overhead electric lines (for lines under 50 kV) or see that power is temporarily shut off or wires relocated. Always contact the power company to determine the voltage in the overhead lines and calculate the MSAD.
- No one is permitted in the cab with the operator.
- Make sure the bucket and all appendages are kept on the ground, or on blocking when not being operated. Never leave the cab while master clutch is engaged.
- Secure machine by placing bucket on the ground, controls in neutral, key removed, and cab locked.

Motor Trucks

- No person is permitted to remain in or on a truck being loaded by excavating equipment or crane, unless cab is adequately protected against heavy impact.
- Material loaded should be within safe limits for the truck and should not project beyond the truck body in such a manner as to present a hazard to other vehicles, pedestrians, or structures.
- Never carry a load in excess of the rated capacity of the vehicle. When necessary to operate on public highways, do not exceed the legal, gross vehicle weight limits. Be sure proper permits have been secured before carrying any heavy load over a public highway.
- Trucks regularly used for transporting personnel should be provided with side and end protection and safe seating to prevent falls. Some convenient means of mounting and dismounting the trucks should be provided.
- Workers should not be permitted to get on or off a moving truck at any time.
- Personnel should be required to ride only on approved passenger seats with available seatbelts. Personnel should never ride on running boards, fenders, bumpers, pickup beds, atop cabs or elsewhere unless it is designated in the operator's manual.
- Dump trucks must not be used to carry personnel.
- Tail gates and body sides shall be inspected for any loose rocks, dirt, and/or debris before leaving work zone. Tail gates shall be fully secured while in motion.

- Never elevate dump body to work underneath unless a positive stop is put on the body in case of hydraulic failure.
- All loads shall be covered and tail gate secured when travelling on public ways.

INDUSTRIAL HYGIENE

ASBESTOS

Asbestos is a naturally occurring mineral that has been widely used for many applications, both inside and outside buildings. Strong medical evidence points to the unique characteristics of Asbestos causing various forms of cancer. This cancer may not show itself until 10-30 years after the individual was exposed. While there is no safe level of exposure, OSHA has stated that only as much as 0.2 fibers (over five microns in size) per cubic centimeter may be in the air over an 8-hour workday. This material can be hazardous if the precautions called for in OSHA, EPA and State regulations are not followed. Robert B. Our Co., Inc. Company policy calls for strict adherence to these regulations.

Asbestos Policy

Asbestos presents both a severe health and monetary risk to Robert B. Our Co., Inc. and its employees, unless all procedures established by corporate directive and by appropriate federal, state and local regulations are followed.

New Contracts

For contracts, the following shall include:

"The Owner shall be responsible for the removal, encapsulation, transportation and disposal of any friable asbestos or friable asbestos related products as may be required in connection with the project."

Discussions with Prospective Clients

If the proposed work will involve construction, demolition, or renovation in, on, or near an existing structure, thorough investigation must be done by the Project Manager to determine if there is a possibility of friable asbestos being present. This should include questioning the client as to their knowledge. If there is a belief that asbestos is present, then the client must be informed, which may change the scope of their work.

The client will contract directly with an approved asbestos removal contractor and asbestos removal consultant. Robert B. Our Co., Inc. may assist in providing listings of contractors and consultants knowledgeable in this procedure. Advisory monitoring of proposals, written plans and removal procedures will be done to assist the client, but in no case will asbestos-related activity be undertaken.

The client shall obtain such insurance, as necessary, to protect his interests and shall name Robert B. Our Co., Inc. as an additional insured.

Client Refuses to Contract to Remove the Asbestos Material

Immediately notify corporate. Do this as soon as possible. A decision will be made as to whether Robert B. Our Co., Inc. wishes to assume the risk and to continue to pursue the contract or not.

If the decision is to remove the friable asbestos under contract to Robert B. Our Co., Inc., the following shall be done:

Contract with a competent asbestos removal consultant, who will be charged with preparing a written program detailing all aspects of the removal process, testing and disposal, inclusive of

monitoring the performance of the asbestos removal contractor. The consultant shall have adequate bonding and insurance, specific for asbestos.

Once the program is prepared, it will be reviewed by corporate safety for compliance with appropriate law and regulation.

Bids shall be solicited from competent asbestos removal contractors, who shall be fully bondable and have insurance meeting the current requirements of Robert B. Our Co., Inc..

Corporate safety will monitor the performance of the consultant and the removal contractor for compliance with appropriate laws and regulations.

Prior to start of any asbestos removal work, an air test shall be done to determine the amount of asbestos present in ambient air. Once all asbestos has been removed, a final air test shall be performed by the consultant with results below the amounts mandated by law or regulation.

All work, other than asbestos removal activity, shall be suspended until the work area is declared free of asbestos by the consultant.

If asbestos is discovered once a contract has been signed, immediately cease work in the exposed area.

Friable asbestos Will Not Be Removed by Robert B. Our Co., Inc. Employees Under Any Circumstances.

Asbestos Removal Procedures

When asbestos is to be removed, the procedures set forth in OSHA Part 1926.58 will be followed as well as all state mandated procedures, permits and approvals.

Asbestos Removal by Non-Robert B. Our Co., Inc. Contract

Contract where asbestos is to be removed by others who do not have a contractual relationship with Robert B. Our Co., Inc., but are directly contracting with our client, the following is recommended:

Consultant

A competent independent consultant shall be obtained to sample suspected asbestos-contaminated material, provide laboratory analysis of the material, develop an asbestos abatement and removal plan, obtain necessary governmental approvals, provide necessary personal and air monitoring and assure an adequate job is done by the asbestos removal contractor.

Removal Program

The independent consultant shall prepare an asbestos removal program that will meet all federal, state, and local regulations and requirements. The program will include descriptions or prestart air sampling, setup of work areas, personal protective equipment, and procedures, monitoring of work activities, disposal, and final cleanup along with final sampling.

Monitoring

Area air sampling shall be done prior to start of any work, at periodic intervals (or continuously, if required by contract) during the work and upon completion of final cleanup.

Disposal

All asbestos-contaminated material shall be disposed of in double bags, sealed and labeled. Disposal shall be at an EPA authorized dump with proper receipt obtained.

Legal Package

Upon the completion of the asbestos removal package, a package of documents shall be collected by the staff and sent to Corporate.

This Shall Include the Following:

- The Asbestos Removal or Abatement Plan,
- Copies of insurance certificate for all involved parties,
- Documentation of medical examination and training,
- Copies of laboratory sample results,
- Copies of disposal receipts,
- Other documentation as required by statute or as deemed necessary.

Resumption of Work

Upon completion of friable asbestos removal activities and receipt of authorization by the consultant that the air samples are below OSHA levels of O.1 f/cc, work may resume in the area.

LEAD

Should a Robert B. Our Co., Inc. employee encounter or be exposed to lead the following procedures will be followed:

Initial Determination

All employees shall be removed from the area where lead may be present.

The level of exposure must be determined. Employee exposure shall be determined by testing the air, material, or environment to ascertain exposure levels.

Monitoring will be performed by a Certified Industrial Hygienist.

The initial determination of exposure made from this monitoring and on any information, observation, or calculations, which would indicate employee exposure and any previous measurements of airborne lead and any employee complaints of symptoms which may be attributable to exposure to lead. Monitoring may be limited to a representative sample of employees who could be exposed to the greatest lead concentrations.

Where the determination is negative (no employee exposure to lead at or above the action level), a written record will be made. This record will contain the date, location within the workplace and the name and social security number of each employee monitored.

If the initial determination or subsequent determinations show exposure at or below the action level, then further testing need not be conducted unless changes in the operation occur.

If the initial determination shows exposure above action levels, then no further work will be performed in the area. All employees so exposed will undergo medical testing in accordance with regulatory requirements.

Robert B. Our Co., Inc. employees will not return to the affected area until a certificate by a licensed lead removal/abatement company is received stating that the exposure has been eliminated.

SILICA

Company employees may be exposed to the hazards posed by respirable crystalline silica (RCS) during operations involving demolition, grinding, cutting, sanding, and coring of concrete/masonry structures. Employees may also be exposed during housekeeping involving sweeping dust, dirt, and construction debris.

The hazards posed by exposure include respiratory problems, kidney problems, and lung cancer.

A review of Company tasks involving exposure to RCS demonstrate that the hazard can be reduced and eliminated by utilizing protections set forth in Table 1 of 29CFR1926.1153 or with the objective data supplied by manufacturers of tools and equipment so designed to comply with the regulations. The Job Hazard Analysis and pre-task plan will determine the applicable protection based on the hazard identified.

Robert B. Our Co., Inc. has purchased compliant tools to use in performing tasks where RCS can be generated.

Where respiratory protection is required, employees will comply with the requirements set forth in Company Respiratory Protection Program.

Those employees who wear respiratory protection to protect against RCS will be offered medical surveillance as specified in Exhibit B of 29CFR1926.1153.

The Silica Program is attached as an Addendum C.

HEAT STRESS

The purpose of this policy is to establish guidelines to be followed when working in high temperatures--high humidity environment.

Heat Stress – It is a combination of environmental conditions; work demands and clothing requirements that tend to increase body temperature. Heat stress can diminish work performance and adversely affect worker health and safety.

Note: Environment conditions include high temperature/high humidity, solar radiation, and radiant heat from hot surfaces.

Responsibility

Supervisors shall insure that all affected employees comply with all provisions contained in the Heat Stress Policy.

Supervisor Shall:

Check local weather forecasts, including temperature, humidity, and heat index. **Utilize OSHA Heat Index Tool (app) to assist with assessment and prevention methods.**

Symbol for OSHA Heat Index Tool

- Plan work tasks to reduce heat stress problems,
- Emphasize the safe work practices in the Heat Stress Policy.

- Conduct a training talk on heat stress hazards. Utilize the OSHA heat stress tool.
- Monitor workers for signs and symptoms of heat stress.
- Establish a “cooling” area for workers.

Employees Shall:

Inform their supervisor of any medication that may preclude the employee from working in a heat stress area. These medications include:

Diuretics, Vasodilators, Central nervous system inhibitors, Anticholinergic medications, Antihistamines, Muscle relaxants, Tranquilizers, Sedatives, Amphetamines and Atropine

Inform their supervisor of recent sunburns or any illness involving fever, vomiting or diarrhea as these conditions may dehydrate a person.

Immediately notify the person in charge and leave the area when feeling discomfort from heat stress, e.g. Dizziness, Headache, Nausea, Fainting

Follow these directions to reduce the potential of heat stress problems:

- Increase fluid intake
- Do not skip meals
- Avoid alcohol use

Description of Heat Stress

Under heat stress conditions, the body produces heat faster than it can be shed to the surrounding environment or when the body absorbs heat from the surrounding environment. The body must maintain itself between 98 - 100 degrees F. To do this, the body increases blood flow to take heat from the muscles to the skin and increase perspiration to cool by evaporation.

Recognition and Treatment of Heat Illness

Illness	Symptoms.	Treatment
Heat Rash	Red rash with blister- like bumps; prickling sensation during heat exposure	Intermittent relief from heat; maintain dry skin; prevent secondary infection
Heat Cramps	Painful spasms of muscles used during work; onset during or after work hours	Drink more water; eat salty foods, avoid salt tablets
Heat Syncope	Fainting while standing erect and immobile in heat	Remove to cooler area; rest in recumbent position; drink water.
Heat Exhaustion	Fatigue; nausea; skin clammy and moist; may faint with rapid pulse and	Remove to cooler area; rest in recumbent position; administer fluids

Illness	Symptoms.	Treatment
	low blood pressure.	by mouth
Heat Stroke	Dry skin, usually red; mottled or cyanotic; confusion; loss of consciousness; convulsions –Fatal if treatment delayed.	Immediate and rapid cooling by immersion in chilled water with massage or by wrapping in a wet sheet, or equivalent, with vigorous fanning with cool dry air.

Safe Work Practices

Emphasis on Fluid Replacement - the employee should be encouraged to drink one pint of fluid per hour of scheduled work before entering the work area and to increase fluid consumption afterwards to help maintain fluid balance. Avoid alcohol use.

Acclimation - A person acclimates to a given level of heat stress with repeated exposures. After five days, they are 90% acclimated. Increasing exposure time from a short period the first day will improve performance.

Rest Periods - When working outside in the sun or hot humid days take frequent rest periods in a shady area.

Scheduling (Work/Rest) Periods - Assigned tasks requiring protective clothing should have rest periods built into them.

Such heat conditions include wearing semipermeable or impermeable clothing. Clothing with SPF ratings can be obtained and should be considered by employees.

Cold Stress

All employees who are exposed to cold environments are at risk for cold stress, which can lead to serious health problems. Robert B. Our Co., Inc. is committed to providing a safe workplace for employees that is free from hazards, including cold stress.

This Cold Stress Prevention Program establishes controls to protect employees from cold stress, including hazard assessments, engineering controls, administrative controls, personal protective equipment including proper clothing, and employee training.

Cold stress: When cold exposure is severe enough to cause cold-related illnesses**,** including the following:

- **Hypothermia:** An abnormally low body temperature caused by the body losing heat faster than it can be produced, eventually using up the body's stored energy
- **Frostbite:** Freezing of body tissue exposed to low temperatures, which can lead to permanent damage or amputation
- **Trench foot (also called immersion foot):** Damage to the skin on the feet caused by lack of blood flow in prolonged wet and cold conditions

Supervisor Shall:

- Check local weather forecasts, including temperature, wind, and wind chill factor.

- Plan work tasks to reduce cold stress problems,
- Emphasize the safe work practices in the Cold Stress Policy.
- Conduct a training talk on cold stress hazards.
- Monitor workers for signs and symptoms of cold stress.
- Establish a “warming” area for workers.
- Check wind chill advisory chart for adjusted temperature.

Employees shall:

- Complete training programs for cold stress awareness and prevention as provided by the Company.
- Know the hazards and controls associated with your job as defined in the respective job hazard analysis (JHA).
- Follow the guidelines in this policy, including proper work practices, wearing proper clothing, and taking the recommended breaks.
- Stay covered up, including your extremities, and never touch cold metal surfaces with your bare skin.
- Take breaks in the warm break areas or environments, and drink warm liquids. Never drink alcohol to stay warm, as it will increase your risk of cold stress.
- Remember to stay hydrated by drinking plenty of water, particularly if you also drink caffeinated beverages.
- Be able to recognize the symptoms of cold stress, and immediately report them to management.
- Carry an extra change of clothes and change out clothing if it becomes wet.

CHEMICALS

Robert B. Our Co., Inc. has a detailed Hazard Communication Program attached as **Addendum C.**

All employees will be trained in the requirements of this program and location of Safety Data Sheets.

LADDERS

The purpose is to outline the proper use and care of portable ladders on site.

RESPONSIBILITY

Training in ladder safety will be given and documented before personnel are allowed to utilize a ladder on a job site.

All ladders will meet the applicable standard as indicated in 29 CFR 1926 Subpart X. Company and any Subcontractor is responsible for ensuring the portable ladders used by their employees are in good working condition.

GENERAL REQUIREMENTS

Consider other means of accomplishing the task other than a ladder e.g. use MEWP, staging, assemble on ground etc.

- Select the proper ladder for the task; extension, step, multi, vertical, etc.
- A stair or ladder properly constructed shall be used/installed at all points where there is an elevation of 19 inches or more between surfaces.
- Employee shall inspect ladders prior to use. The inspection will include the rungs, feet, lanyard (for extension ladders), side rails, and rivets.
- Ladders with broken or missing steps, rungs or cleats, broken side rails or other faulty parts will not be used. A "DANGER, DO NOT USE" tag must be attached and remove from service.
- All personnel shall face the ladder while ascending or descending and maintain three points of contact.
- All personnel shall have their hands free of material while climbing ladders. Handlines shall be used to raise, or lower materials as needed.
- Fiberglass ladders will be used where there is danger of electrical shock. No ladder shall be placed within 10 feet of a power line.
- Portable ladders shall be classified as:
    - Portable Ladders: can be either straight (fixed heights, not taller than 12 feet), or extension (two sections or more combined to reach maximum height).
    - Stepladders: scissors-type opening ladders those are self-supporting.
- All portable ladders will be identified by owner, properly stored at their assigned location when not in use, and kept in good, clean condition.
- All ladders shall be equipped with safety feet and both feet of the extension ladder and the feet of a stepladder shall rest on solid support and be at the same level.
- Ladders shall not be placed in front of doors unless the door is locked, roped off, or guarded.
- All portable ladders, other than stepladders, will be placed on the ground or other support so that the distance from the base of the ladder to a line dropped vertically from the top support is approximately one-fourth of the length of the ladder. Example: A 16-foot ladder shall be placed so that the bottom is four feet away from the wall.
- All portable ladders shall be secured before starting a job. Another employee shall hold the bottom of the extension ladder while the ladder is being tied off or secured.
- All extension ladders used for access to another level shall be long enough so that the top is at least 3 feet above the upper landing. **Company prefers use of a ladder extension for this purpose.**
- Stepladders are NOT to be used as transition between levels.

- Ladders shall rest on solid support and the feet shall be level. Boxes, barrels or other unstable bases will not be used to obtain additional height.
- Stepladders (folding ladders) shall not be used as straight ladders. When using a stepladder, make sure the spreader braces are locked to prevent collapse.
- Only one employee shall be on a ladder at a time, except in extreme emergency.
- Rungs of ladders shall be kept free of any material that creates a slippery condition.
- Do not lean to outside with a shoulder being more than 12 inches beyond the side rail while on a ladder. Rule is to keep your “belt buckle” within the side rails of the ladder.
- When it is necessary to do work requiring the release of both hands from an extension ladder, fall protection shall be used. Fall protection shall be secured to a structure of adequate strength for the purpose. Do not secure to the ladder.
- Tools shall not be used in a position that will transmit an extensive downward force to the ladder, causing rung or step failure.
- Adjustment of extension ladders shall only be made by the user when standing at the base of the ladder.
- The top two steps of any ladder are not to be utilized.
- All ladders shall have a duty rating of 1A or 1AA.
- At the end of the workday, ladders shall be moved from the work areas so as not to create a tripping or bumping hazard. Return the ladders to proper storage areas.

JOB-BUILT LADDERS

1. Use other means such as stairways, scaffold stair towers, or extension ladders before building job ladder if possible.

2. Job built ladders shall be constructed in accordance with ANSI A14.4 "American National Standard Safety Requirements for Job-Made Wooden Ladders."

Vertical Ladders

Any fixed vertical ladder where the length of climb is less than twenty-four feet, but the top of the ladder is greater than twenty-four feet above the lower level must have cages, wells, ladder safety devices or self-retracting lifelines.

Fixed vertical ladders where the length of climb equals or exceeds twenty-four feet shall have at least one of the following:

1. Ladder Safety devices
2. Self-retracting lifelines and rest platforms not to exceed one hundred fifty feet; or
3. A cage or well and multiple ladder sections, each section not to exceed fifty feet in length. At the maximum interval of fifty feet, ladder sections shall be offset on landing platforms.

Material Handling

Storage

- Materials stored shall not be within 10 feet of edge of floor opening or roof nor outside guard rail.
- Store materials to prevent sliding, falling, or collapse of piles.
- No material shall be stacked in a manner that creates an unstable pile or requires employees to climb on top to reach material.
- Store materials in a manner to prevent blocking aisles, access/egress, passageways, or emergency equipment.
- All material stacks shall be secured by weighting or tie down when wind is expected.
- All material that can be damaged by weather shall be properly covered with plastic or tarpaulins.

Manual Lifting:

- Get assistance for any object over 50 lbs., bulky, or lengthy. This may be a co-worker or material moving device.
- Plan your route of travel.
- Protect hands, arms, and fingers from rough edges, sharp corners/edges, and straps.
- Keep hands, fingers, and arms out of pinch points between load and other objects.
- Get a good grip. Decide best way to hold object.
- Lift with your legs not your back.
- Hold the load close to center of your body. Avoid lifting above your head or below knee level.
- Move your feet; do not twist your torso and back. Shoveling is a form of material handling and this doing this will reduce likelihood of an injury.

MOBILE ELEVATED WORK PLATFORMS (MEWP)

POLICY

Operations using MEWP must ensure that supervisors and operators comply with all aspects of this safety program. All employees must successfully complete a training program and receive certification prior to the operation of any MEWP. In addition, anyone who is in the lift (occupant) must have documentation of training. Subcontractors operating MEWPs on our projects are expected to meet or exceed the requirements found in this program and comply with all applicable statues and regulations governing the use of powered industrial trucks as listed in Section 3.0 of this document.

Requirements

OSHA Standard 29CFR 1910.68 (Powered Platforms, Manlifts, and Vehicle-Mounted Work Platform)

OSHA Standard 29CFR 1926.453 (MEWPs)

ANSI/SIA A92.24–2018 (Self-Propelled Elevated Work Platforms) Group A and Group B

Purpose

This program has been developed to reduce the risk of physical injury or property damage in areas where MEWPs are in operation.

MEWP Procedures

Prior to the operation of any MEWP the Pre-Use Inspection Checklist found in the particular unit must be completed. This applies at the beginning of every work period, and whenever a new equipment operator takes control of the MEWP.

Any safety defects (such as hydraulic fluid leaks; defective brakes, steering, lights, or horn; and/or missing fire extinguisher, lights, seat belt, or back-up alarm) must be reported for immediate repair. They must also be locked and tagged and taken out of service.

All fueling operations shall take place with the lift secured and not running.

MEWPs shall not be operated within 15 feet of a power line.

General Safe Work Practices

- Operators shall not wear any loose clothing or any accessory that can catch in moving parts.
- Before machine is started, the operator must walk completely around the machine to ensure everyone and everything is clear of the machine.
- Articulating boom and extendable boom platforms, primarily designed as personnel carriers, shall have both platform (upper) and lower controls. Upper controls shall be in or beside the platform within easy reach of the operator. Lower controls shall provide for overriding the upper controls. Controls shall be plainly marked as to their function. Lower level controls shall not be operated unless permission has been obtained from the employee in the unit, except in case of emergency.
- Modifications and additions that may affect the capacity or safe operation of an MEWP are strictly prohibited without the manufacturer's written approval. Capacity, operation, and maintenance instruction markings will be changed as necessary if the manufacturer approves a modification.

- The insulated portion (if applicable) of an MWEP shall not be altered in any manner that might reduce its insulating value.
- Any signs, plates, or decals which are missing or illegible must be replaced.
- If the MEWP becomes disabled; a “out of service” tag or equivalent shall be attached to the controls inside the platform in a conspicuous location.
- MEWP devices with noted, reported deficiencies shall not be operated until repairs are made and equipment is authorized for use.
- Operators must report all incidents, regardless of fault and severity, to their Supervisor.

Safe Work Practices before Operation

- Consideration shall be given to the amount of wind. Follow the manufacturer’s instruction regarding operation in windy conditions. As a rule MEWPs shall not be operated in winds exceeding 25mph although this can vary depending on the model of equipment
    - At 20mph wind speeds or anticipated gusts, lifts will be lowered to a maximum height of 20 feet.
    - At 25mph wind speeds or anticipated gusts, lifts will be grounded.
    - **If at any time, employees feel unsafe in lifts, they may make decision to ground the lifts and cease with operations.**
- Guardrails must be installed, and access gates or openings must be closed before raising the platform.
- Boom and platform load limits specified by the manufacturer shall not be exceeded.
- Before moving an MEWP for travel, the boom(s) shall be inspected to see that it is properly cradled, and outriggers are in stowed position (if equipped).
- Consideration shall be given to the protection of bystanders via barricading, having another employee keep bystanders at a safe distance or by other means.
- MEWPs shall not be operated from trucks, scaffolds, or similar equipment.

Safe Use During Operation

- Attention shall be given towards the direction of travel, clearances above, below and on all sides.
- Employees shall not sit or climb on the guardrails of the MEWP.
- Planks, ladders or other devices shall not be used on the work platform.
- An MEWP shall not be moved when the boom is elevated in a working position with employees in the basket unless it is designed to do so.
- MEWP shall not be placed against another object to steady the elevated platform.
- MEWP shall not be used as a crane or other lifting device.
- MEWP devices shall not be operated on grades, side slopes or ramps that exceed the manufacturer's recommendations.
- The brakes shall be set and outriggers, when used, shall be positioned on pads or a solid surface.
- Speed of MEWP devices shall be limited according to the conditions of the ground surface, congestion, visibility, slope, location of personnel and other factors that may cause hazards to other nearby personnel.
- Stunt driving and horseplay shall not be permitted.
- Booms and elevated platform devices shall not be positioned to jack the wheels off the ground.
- The area surrounding the elevated platform shall be cleared of personnel and equipment prior to lowering the elevated platform.

- All equipment must be secured on the inside of the MEWP
- Operators are to call for assistance if the platform or any part of the machine becomes entangled.

Safe Work Practices After Operation

- Safe shutdown shall be achieved by utilizing a suitable parking area, placing the platform in the stowed position, placing controls in neutral, idling engine for gradual cooling, turning off electrical power, and taking the necessary steps to prevent unauthorized use.
- MEWPs shall be shut off prior to fueling. Fueling must be completed in well ventilated areas free of flames, sparks or other hazards which may cause fires or explosions.

Maintenance

- Any MEWP not in safe operating condition must be removed from service. Authorized personnel must make all repairs.
- Repairs to the fuel and ignition systems of MEWPs that involve fire hazards must be conducted only in locations designated for such repairs.
- MEWPs in need of repairs to the electrical system must have the battery disconnected before such repairs.
- Only use replacement parts that are currently recommended by the manufacturer.

Responsibilities

Operations Utilizing MEWPs

Health & Safety Director

- Must implement and administer the MEWP Safety program.
- Review the MEWP Safety program annually for compliance and effectiveness.
- Verify that all employees who operate or work near MEWPs are properly trained.
- Maintain written records of operator training on each model of MEWP and the name of the trainer.
- Maintain written records of all inspections performed by the MEWP owner, including the date any problems found, the date when fixed, and the name of the person performing the repairs.
- Can make recommendations for revisions if necessary.
- Establish expected operating conditions for MEWP and ensure it is safe.

Supervisors

- Coordinate employee training, and certify that all operators receive annual training including, but not limited to, the items listed in Section 8.0 of this document.
- Ensure that only trained and qualified individuals use MEWPs.
- Verify that employee complies with the principles and practices outlined in the MEWP Safety Program.
- Provide specific operational training for each MEWP.
- Observe the operation of MEWPs, and correct unsafe practices.

Operators

- Read the MEWP Safety Program.
- Complete the Daily Pre-Use Inspection Checklist before operating any MEWP.
- Know the procedures outlined in this program.

- Operate the lift within the established manufacturers' operating instructions.

Training Requirements

Employees who are authorized to operate MEWPs must receive training prior to engaging in their duties, and at least every three (3) years thereafter. The training is to ensure that the MEWP Safety Program is understood. The Safety Manager will also ensure that authorized MEWP operators have acquired the necessary practical skills required for safe operation.

Designated trainer will perform an operational training with each employee who may use an MEWP to determine if operators have the knowledge, training, and skills necessary to use the MEWP. Operational training will consist of a combination of general safety instruction, practical/operational training (demonstrations performed by the trainer, and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace. All operational training must be conducted under close supervision.

Initial Training

- Receive instruction on the intended purpose and function of each control.
- Prior to operating any MEWP, the trainee will read and understand the manufacturer's operating instructions.
- Be informed of the MEWP operating limitations and restrictions as defined by the manufacturer.
- Understand by reading or having a qualified person explain all decals, warnings, and instructions displayed on the MEWP.
- During operational training, trainees may operate an MEWP only under the direct supervision of authorized trainers, and where such operation does not endanger the trainee or other employees.
- All training and evaluation must be completed before an operator is permitted to use an MEWP without continual and close supervision.

Annual Training – must include at least the following

- Review of the MEWP Inspection & Maintenance Record
- Review of Procedures.
- Updated information on new equipment.
- Review of university written program.

Training Records

- A record of all individual training, including the Individual, date, trainer name and lift documentation will be maintained for 3 years.

Program Evaluation

The MEWP program shall be evaluated on an annual basis utilizing the protocols set forth by Safety Department. The evaluation team will consist of an operation representative(s) and a designee from Safety. Safety will define the scope of the evaluation. The final report will be developed by the department representative and operations utilizing the information received during the evaluation. The deficiencies determined in the report will be documented and corrective action plans will be developed.

Personal Protective Equipment

29 CFR1926.95 through .107 Requires that Company supply certain personal protective equipment to prevent injury from identified hazards. **Personal protective equipment is used only after engineering and administrative controls are deemed not feasible or inadequate. The Hierarchy of Controls policy shall be followed when planning work.** All PPE issued by the company meets applicable ANSI standards and must be maintained in good working condition by the employee. Report any defects immediately for repair or replacement.

Head

Hard hats will always be worn when an overhead hazard is present or required by site rules. Metal hard hats are not allowed. All hard hats are to be in good condition and meet ANSI Z89.1 standard for construction use. Hard hats are inspected periodically. Use squeeze test to confirm it is still fit for use.

Squeeze test is to take hard hat in both hands, squeeze the sides inward and release. If it returns to previous shape, it is acceptable for use if no other defects are present.

Hard hats are not billboards and any sticker will be relevant to the job, that is evidence of training, identification, and company logo. No offensive stickers and symbols shall appear on the hard hat. Violation will be subject to action per disciplinary policy and removal from the site.

Eyes

Eye Protection is required whenever a hazard to the eyes is present or required by site rules. All eye protection will meet ANSI Z 87 requirements. No metal frames allowed. Eye protection is required and determined based on hazard and goggles may be needed when working with dust, mists, fumes, and vapors. Prescription glasses may be worn if lenses meet ANSI standard and side shields are installed. If prescription eyewear lacks ANSI certification, then a cover glass/goggle must be used with that rating. Use of lasers may require special protective eyewear. Check with Health & Safety Director.

Face

Face shields are required whenever a hazard is present that can cause injury to the face. Examples include grinding metal, cutting metal with chop saw, using chain saw etc. Chemical use requires a shield to prevent splashing onto face causing burns, rashes, discoloration etc.

Note: a face shield does not provide impact protection.

Hearing

Hearing protection may be required if noise levels exceed 85dba or specified for certain tools and equipment. Level of protection is determined by decibel level of hazard and duration of exposure. **See hearing conservation program in Addendum B.**

Hands and Arms

Gloves or other hand and arm protection will be worn when a hazard that can cause injury is identified or mandated by site rules. Tasks that present a hazard include using chemicals, working with hazardous materials, exposed to sharp edges, exposed to abrasion and puncture plus manual lifting of rough materials. This includes sparks and slag generated from welding and/or torch cutting tasks.

Hand protection for chemicals is based on SDS and manufacturers' requirements.

Hand protection for sharp edges should be a minimum of cut resistance 3 or greater.

All hand and arm protection is based on a hazard analysis and level of protection afforded by different glove material.

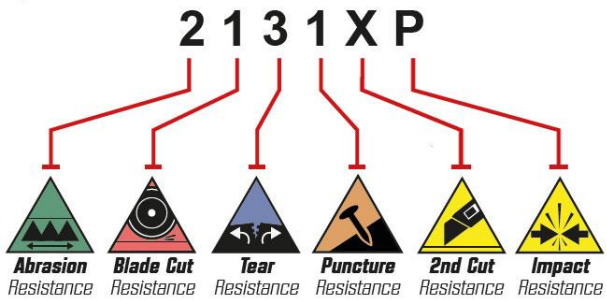
Employee shall determine size needed based on chart below

Hold Fingers together - Measure your right hand around the knuckles with your hand flat.
Do not measure the thumb

GLACIER GLOVE

SIZE	HAND CIRCUMFERENCE
X-SMALL	6" - 6 ⅛"
SMALL	6¾"- 7¼"
MEDIUM	7½"- 8"
LARGE	8¼"- 9"
X-LARGE	9¼"- 10"
XX-LARGE	10¼"- 11"

.



Clothing

Workers are not allowed to wear shorts, tank tops, sleeveless shirts, gym style pants, sweatpants, “clam digger” style or culottes on site. Long pants will be worn with no hip riders or styles that pose a trip hazard. It is recommended that workers acquire clothing with an SPF rating for sun protection. Workers who perform hot work shall wear natural fibers with preference for fire retardant clothing.

Vests worn shall meet requirements for reflective color and material per ANSI standard. Vests shall be kept in good condition with reflective stripe unmarked.

Protective clothing for chemicals shall be determined from the Safety Data Sheet.

Foot

Good heavy work boots will protect your feet and ankles. Work boots shall meet ANSI minimums. No tennis, sandals or soft soled shoes allowed on site that do not meet ANSI standards for construction. Work boots will be maintained in good working condition; no dilapidated, worn soles or outer covering. It is good practice to wear boots with protective toes.

Respiratory Protection

Employees who may be exposed to hazardous materials that generate fumes, vapors, mists, or dust that exceed OSHA permissible exposure limits (PEL) will be protected by use of respiratory protection should engineering and work practice controls not adequately control the hazard.

The respiratory protection program is attached as Addendum A.

Precast Concrete

The Company installs precast concrete structures that include tanks, pipes, manholes, vaults, and septic system components. A Qualified Person is required to be responsible for the inspection of all rigging and hardware and the supervision of the rigging of precast concrete members for unloading from the delivery vehicle.

All rigging shall meet applicable OSHA and ASME standards.

Unloading of Precast Concrete Members

Prior to precast concrete members being unloaded, confirm weight of the unit, inspect all rigging, and hardware, ensure the precast member is properly rigged, and the load is stable before releasing the binders. Use a tag line to control the load.

Placement of Precast Concrete Members

Precast members are not to be moved over workers.

Workers involved in the setting or connecting of precast members will strictly adhere to the 100% fall protection policy with no exception.

No worker will use hands to reach under a precast member to adjust a shim or bearing pad.

Any drilling, cutting, sawing, or grinding of precast shall follow the procedures in the Silica program. **(see Addendum C)**

RIGGING REQUIREMENTS

Equipment

- All rigging equipment shall be inspected prior to each shift and as necessary during the shift to ensure safety. Damaged or defective slings shall be immediately removed from service. Inspections shall be in accordance with regulatory standards.
- A detailed inspection of each sling will be documented monthly. See form in Appendix.
- All rigging devices including slings shall have permanently affixed identification stating size, grade, rated capacity, and manufacturer.
- Chain slings shall have documented inspections monthly. See Form in Appendix.
- Rigging not in use shall be removed from the immediate work area when not in use.
- Fabricated grabs, hooks, clamps, or other lifting devices shall not be used unless they have a tag stating capacity permanently affixed and evidence of testing.
- Slings, on the job, shall not be left lying on the ground or otherwise exposed to dirt and the elements.
- Eyes in wire rope bridles or slings shall not be formed by wire clips or knots.
- Protruding ends of strands in splices on slings or bridles shall be covered or blunted.

Safe Operating Practices

- The working load limit of the sling shall not be exceeded.
- Slings in use shall not be shortened by knots, bolts, or other makeshift devices.
- Slings in use shall not be “lengthened” by tying them together.
- All slings shall be padded, or softeners used to protect from damage due to sharp corners.
- No sling shall have a sling angle below 45 degrees.
- Slings used in a basket hitch shall have the loads balanced to prevent slippage.
- Loads handled by slings shall be landed on cribbing or dunnage so that slings need not be pulled from under or be crushed by the load.
- Slings subjected to shock loading shall be immediately removed from use and destroyed.

Inspection Criteria:

<u>Wire Rope Slings</u>

Shall be removed from service when:

- Two randomly distributed broken wires in one rope lay, or five broken wires in one strand in one rope lay.
- There is wear or scraping of one-third the original diameter of outside individual wires.

- Kinking, crushing, bird caging or similar damage results in distribution.
- End attachments are cracked, deformed, or worn.
- Corrosion of the rope or end attachments occurs
- Broken wire noted in rope core.

Synthetic Web Slings

Shall be removed from service when:

- Sling subjected to acid or caustic burns.
- Melting or charring of any part of the sling surface occurs.
- Snags, punctures, tears, or cuts are observed.
- Stitches are worn or broken and/or safety yarn is visible.
- Fittings are distorted, frayed or worn.

Chain slings

Shall be removed from service when:

- Any link is broken
- Links are distorted
- Tag is missing

IN CASE OF INCIDENT

In the event of an incident involving the crane or rigging, follow these procedures:

- Render all emergency first aid if required and secure the area.
- Confirm operator has secured the crane.
- Notify Safety Department
- To the extent possible, do not allow the crane, its components, or the load to be moved, unless vital to rescue operations, until Safety arrives.
- Take photographs of everything, including overall photography of entire scene, detailed photos of components and anything that will explain what happened.
- Identify and begin the interviewing process of witnesses and participants to determine what happened.
- Assist other investigating agencies while preserving the legal rights of Robert B. Our Co., Inc.
- Safety prepares a complete investigation and report of what happened and submits to Company ownership.

SCAFFOLDING

POLICY

All use of scaffolding (temporary work platforms) shall comply with OSHA 29CFR 1926. 451. All scaffolds shall have documented inspection before use, signed and dated by Competent Person.

Should Robert B. Our Co., Inc. supply scaffolding for itself and other subcontractors, then the subcontractor shall sign an indemnification for use and provide evidence of employee training.

Requirements

The following are key points from the regulation.

- All scaffolds are to be built and inspected before each use by a Competent Person. The Company uses the color-coded system to document inspections.
  - Red: No employee shall climb on or otherwise use scaffold.
  - Yellow: Portion of scaffold is not in compliance, check with Competent Person.
  - Green: Scaffold is safe to use.
- Any alteration or repair to scaffold requires a re-inspection by Competent Person.
- Scaffolds built over 125 feet in height must be designed by a registered professional engineer. All plans must be on site and copies given to Robert B. Our Co., Inc. prior to scaffold being built.
- All rolling scaffolds shall have the wheels locked while the scaffold is in use.
- Tubular welded rolling scaffolds require a horizontal/diagonal brace.
- All rolling scaffolds shall be fully planked while in use and guardrails with toe boards in place when the scaffold reaches a height of 6 feet.
- Baker style scaffolds shall always have proper guard rails with toe boards when next to shaft openings and/or windows regardless of the scaffold platform height from the floor.
- Properly secured ladder access or stairs shall be provided for all scaffolds.
- Cross bracing can be used as a guardrail or a mid-rail provided it meets height requirements.
- End rails shall be part of the guard rail system on all scaffolds.
- Scaffolds shall be secured to the structure when the scaffold height is four times the minimum base dimension and every 26 feet thereafter for scaffolds greater than 3 feet in width; and every 20 feet thereafter for scaffolds less than 3 feet in width.
- Independent lifelines for each worker on a swing scaffold are required. They shall be secured to a firm anchorage point separate from the scaffold anchorage.
- Scaffolds higher than four times its least base dimension shall be tied off to a structure or use outriggers.
- Scaffolds shall be constructed on a firm, stable base. If scaffolds shall be constructed on soft ground, proper mud sills shall be used.
- Never erect a scaffold without a base using screw jacks and sole plate. Never put an open pipe end directly on concrete, a wood support, asphalt paving or soil, as it may shift during use. Screw jacks shall not exceed 12 inches of thread showing.
- Fall protection shall be provided at all heights above 6 foot regardless of the type of scaffold.
- Whoever removes a guardrail is responsible to replace it.

- Scaffold components manufactured by different manufacturers will never be intermixed unless the components fit together without force and the scaffold's structural integrity is maintained.
- Scaffolds and scaffold components will never be loaded in excess of their maximum intended loads or rated capacities.
- Debris must not be allowed to accumulate on platforms.
- Scaffold shall not be within 10 feet of a power line

SCAFFOLD PLANKING

All planking shall be 2” (nominal) selected for scaffold plank use as recognized by grading rules approved by American Lumber Standards for the species of wood used.

- Platform planks shall be laid with no openings more than 1” between adjacent planks or scaffold members.
- All planks or platforms in a continuous run shall be overlapped (minimum 12”) or secured from movement.
- Wood scaffold planks, unless cleated or otherwise restrained at both ends, shall extend over their end supports not less than 6” or more than 12”.
- All metal frame supported scaffolds will have the level below the working level completely planked in addition to any other safety requirements for that scaffold.
- The use of commercially available aluminum and wood walk boards with positive locking devices are recommended.

SWING STAGING

- Swing staging shall be installed, inspected and used per manufacturer’s instructions and OSHA regulations.
- Test staging motors before task use.
- Capacity of staging is not to be exceeded.
- Fall protection anchors shall be independent of staging anchors.
- Guard rails are always maintained, no standing on rails.
- No flammable or combustible chemicals in swing stage.
- Users of staging will always be anchored to PFAS while in the unit.
- Inspect wire rope of staging for defects and replace if any noted.

Training

All employees who will use a scaffold shall have required training. This training includes safe access/egress, fall protection, planking, loading, and support.

Telehandler (Lull)

The operator of the machine must not operate the machine until the manufacturer's operating manual has been read, training is accomplished, and operation of the machine has been completed under the supervision of an experienced and qualified operator/trainer. Operation requires training per OSHA 1910.178; Powered Industrial Truck Standard. Operators of this equipment must possess a valid, applicable license and/or certification per federal and state regulations.

The operator must read, understand and comply with instructions contained in the following material furnished with the machine:

- This Operation & Safety Manual
- Telehandler Safety Manual (ANSI only)
- Instructional Decals and plates
- Optional equipment instructions.

The operator must also read, understand and comply with all applicable Employer, Industry and Governmental rules, standards and regulations.

Safety Requirements

Electric

- This machine is not insulated and does not provide protection from contact or being near electrical current.
- Always check for power lines before raising the boom.
- Maintain distance from electrical lines, apparatus, or any energized (exposed or insulated) parts according to the Minimum Approach Distance (MAD)
- Allow for machine movement and electrical line swaying
- Maintain a clearance of at least 10 ft (3m) between any part of the machine and its occupants, their tools and their equipment from any electrical line or apparatus carrying up to 50,000 volts.

General

- Never use an attachment without the appropriate manufacturer approved capacity chart
- installed on the telehandler.
- Understand how to properly use the capacity charts located in cab.
- **DO NOT** exceed rated lift capacity.
- Be sure that the ground conditions can support the machine.
- Be aware of wind conditions. Wind may cause load swing and dangerous side loads.
- **DO NOT** raise boom unless frame is level (0 degrees), unless otherwise noted on capacity chart
- **DO NOT** level machine with boom/attachment above 4 ft (1,2 m).

- Always maintain proper tire pressure. If proper tire pressures are not maintained, this machine could tip over
- Refer to manufacturer's specifications for proper fill ratio and pressure requirements for tires equipped with ballast.
- Always wear seat belt.
- Keep head, arms, hands, legs and all other body parts inside operator's cab always.

Emergency

If telehandler starts to tip over:

- Do not jump from machine
- Brace yourself and stay with the machine.
- Keep your seat belt fastened.
- Hold on firmly.
- Lean away from point of impact.

Non-Suspended Load

- **DO NOT** drive with boom raised.

Suspended Load

- Tether suspended loads to restrict movement.
- Weight of all rigging (slings, etc.) must be included as part of load.
- **DO NOT** attempt to use telehandler frame-leveling to compensate for load swing.
- Keep heavy part of load closest to attachment.
- Never drag the load; lift vertically.

When driving with a suspended load:

- Start, travel, turn and stop slowly to prevent load from swinging.
- **DO NOT** extend boom.
- **DO NOT** raise the load more than 300 mm (11.8 in) above ground surface or the boom more than 45 degrees.
- **DO NOT** exceed walking speed.

Travel Hazard

- Steering characteristics differ between steer modes. Identify the steer mode settings of the telehandler being operated.
- **DO NOT** change steer modes while traveling. Steer modes must be changed while telehandler is stationary.
- Visually verify proper wheel alignment after each steer mode change.
- Ensure that adequate clearance is provided for both rear tail swing and front fork swing
- Look out for and avoid other personnel, machinery and vehicles in the area. Use a spotter if you DO NOT have a clear view.
- Before moving be sure of a clear path and sound horn.
- When driving, retract boom and keep boom/attachment as low as possible while maintaining visibility of mirrors and maximum visibility of path of travel.

- Always look in the direction of travel.
- Always check boom clearances carefully before driving underneath overhead obstructions. Position attachment/load to clear obstacles.
- When driving in high speed, use only front wheel steer (if steering modes are selectable).
- Telehandlers equipped with solid or foam filled tires should not be used in applications requiring excessive roading or driving extended distances.
- In the event, an application requires excessive roading or driving expanded distances, it is recommended to use telehandlers not equipped with solid or foam filled tires.
- Never suspend load from forks or other parts of carriage weldment. Use only
- approved lift points.
- **DO NOT** burn or drill holes in fork(s).
- Forks must be centered under load and spaced apart as far as possible.

Lifting Personnel

- When lifting personnel, **USE ONLY** an approved personnel work platform, with proper capacity chart displayed in the cab.
- **DO NOT** drive machine from cab when personnel are in platform.

To maintain sufficient traction and braking capabilities, travel on slopes as follows:

- When unloaded, drive with forks pointed downhill.
- When loaded, drive with the forks pointed uphill.
- For additional travel requirements, refer to the appropriate capacity chart.
- To avoid over speeding the engine and drivetrain when driving down slopes, downshift to a lower gear and use service brake as necessary to maintain a slow speed.
- **DO NOT shift into neutral and coast downhill**.
- Avoid excessively steep slopes or unstable surfaces.
- To avoid tip over **DO NOT** drive across excessively steep slopes under *any* circumstances.
- Avoid turning on a slope. Never engage “inching” or shift to “Neutral” when going downhill.
- **DO NOT** park on a slope.

Pinch Points and Crush Hazards

- Stay clear of pinch points and rotating parts on the telehandler.
- Stay clear of moving parts while engine is running.
- Keep clear of steering tires and frame or other objects.
- Keep clear from under boom.
- Keep clear of boom holes.
- Keep arms and hands clear of attachment tilt cylinder.
- Keep hands and fingers clear of carriage and forks.
- Keep others away while operating.

Enter using the proper hand holds and steps provided. Always maintain 3-point contact when mounting or dismounting. Never grab control levers or steering wheel when mounting or dismounting the machine.

- **DO NOT** get off the machine until the shutdown procedure has been performed.
- **DO NOT** carry riders. Riders could fall off machine causing death or serious injury

Chemical Hazards

Exhaust Fumes

- **DO NOT** operate machine in an enclosed area without proper ventilation.
- **DO NOT** operate the machine in hazardous environments unless approved for that purpose by manufacturer and site owner. Sparks from the electrical system and the engine exhaust can cause an explosion.

Flammable Fuel

- **DO NOT** fill the fuel tank or service the fuel system near an open flame, sparks or smoking materials. Engine fuel is flammable and can cause a fire and/or explosion.

Hydraulic Fluid

- **DO NOT** attempt to repair or tighten any hydraulic hoses or fittings while the engine is running or when the hydraulic system is under pressure.
- Stop engine and relieve trapped pressure. Fluid in the hydraulic system is under enough pressure that it can penetrate the skin.
- **DO NOT** use your hand to check for leaks. Use a piece of cardboard or paper to search for leaks. Wear gloves to protect hands from spraying fluid.

Hand and Power Tools

Hand and power tools are an important part of accomplishing our work. They must be used properly to ensure efficiency and safe operation of the tool. All tools shall be inspected before use for any damage, defects, or missing parts. Remove from service and mark with tag any tool that does not pass inspection.

The Company requires that employees be trained in the handling and operation of tools, and the daily inspection of tools to aid in the prevention of occupational injuries and illnesses. Regulatory requirements for tools are found in Subpart I; 29CFR 1926.300-307. Manufacturers' operating instructions for tools shall be used.

Hand Tools

Employees shall use tools for the purpose for which designed and intended.

Tool Condition

- Tools furnished by the Company and tools furnished and owned by employees shall be inspected prior to use and maintained in a safe operating condition.
- Hand and power tools having jaws – wrenches, adjustable and socket, shall not be used when jaws are sprung to the point that slippage occurs.
- Impact tools shall be kept free of mushroomed heads.
- Hand tools having wooden handles shall be kept free of splinters or cracks. Handles shall be kept tight in the tool. No taping or repair of handle is allowed only full handle replacement.
- Tools shall be inspected before being issued, before use, and periodically, for defects and damage.
- Tool repair shall be performed only by qualified and authorized personnel.
- Tools with cutting blades shall be inspected to ensure blades are sharp.

Power Tools

- The manufacturer's safe operating pressure for hoses, pipes, valves, filters, and other fittings/attachments shall not be exceeded.
- Power tools that release fluid shall be equipped with automatic or visible manual safety devices to prevent accidental trigger release. Safety devices shall be in place to reduce pressure in case of hose failure.
- All hand-held powered tools equipped with a positive "on-off" control, a momentary contact "on-off" control and a lock-on control, or a constant pressure switch shall not be modified by any Company employee or subcontractor employee.
- Do not operate in explosive/flammable atmospheres unless "intrinsically" safe.
- Grinders are leading cause of injury. Before use, verify that maximum speed of grinder is not greater than maximum speed of wheel attachment. Also, verify that wheel is in operating condition by visual exam and ring test.
- Guards are not to be removed from any tool except for attachment change.

Electric Power

- Electric power operated tools shall either be of the approved double-insulated type or 3-prong grounded.
- The use of electric cords for hoisting or lowering tools shall not be permitted as it causes damage to the cord not readily seen.
- Unplug the tool from its power source when changing attachments.
- Do not run cords over sharp objects. The insulation can get cut.

Battery

- Battery operated tools require that the battery be removed before changing attachments and servicing the tool.
- Batteries shall be protected from damage during use and recharging. Recycle all batteries that are no longer able to hold a charge.
- Do not use in flammable atmosphere.
- Do not store battery packs near fire or high heat.

Pneumatic Tools

- Follow manufacturer’s instructions on tool operation.
- Verify that air pressure from compressor does not exceed tool’s capacity.
- Hoses shall not be used for lowering or hoisting tools.
- Pneumatic power tools shall be secured to the hose or whip to prevent the tool from becoming disconnected.
- Safety clips or retainers shall be securely installed and maintained on pneumatic impact tools to prevent attachments from being expelled.
- Compressed air shall not be used for cleaning purposes.

Fuel powered tools

- All fuel-powered tools shall be stopped during refueling and maintenance.
- Avoid spilling fuel over the engine and housing that could ignite.
- Fuel-powered tools, when used in confined spaces, shall comply with the requirements for such use in accordance with Company and OSHA requirements

Hydraulic power tools.

- Fluid used in hydraulic powered tools shall be fire-resistant.
- Manufacturer's safe operating pressures for hoses, valves, pipes, filters, and other fittings shall not be exceeded.

Powder-actuated tools.

- Only trained Company employees can operate a powder-actuated tool. Proof of training is required.

- Tools must be tested each day before loading to ensure safety devices are working correctly. Testing method shall be in accordance with the manufacturer's recommended procedure.
- Any tool found to be defective shall be immediately tagged and removed from service until repaired.
- Tools shall not be loaded until just prior to firing time. Tools shall never be pointed at employees, either loaded or unloaded. Keep hands clear of the open barrel end.
- Loaded tools shall not be left unattended.
- Do not drive fasteners into hard or brittle materials.
- Do not drive into easily penetrated materials unless backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying object hazard on the other side
- Do not drive fasteners into a spalled area caused by an unsatisfactory fastening.
- Do not use tools in an explosive or flammable atmosphere.
- All cartridges shall be disposed per manufacturers' instructions.
- Misfires shall follow manufacturers' procedures for removal and disposal.
- Cartridges for PAT shall be secured in a locked container.
- Unspent cartridges or misfires shall be placed in a bucket of water or sand.

LASERS

- All workers that will use a laser will be trained in proper use and hazards associated with lasers. No worker will install, adjust, or operate any laser equipment without a valid qualification card.
- Standard laser warning signs will be placed around the perimeter of the area where the laser is in use.
- No work will be allowed until all proper signage is in place.
- No laser equipment will be used that does not contain a label, indicating make, maximum output, and beam spread.
- Whenever a laser is not in use, shutters or caps will be used and the laser will be turned off. When performing internal alignment, lasers will only be guided by mechanical or electronic means.
- When environmental conditions exist such as rain, fog, snow, or extremely dusty conditions, use of lasers will not be permitted.
- Workers using lasers will use appropriate eye protection. This will be based upon the laser beam output parameters and recommended optical density as found in the laser manual.
- No laser beam will be directed at any person.

Guarding

- Power operated tools equipped with guards shall not have the guard removed while in use. Tools shall be used with the manufacturer recommended guard, shield, or attachment.

- Tool hazards including belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment shall be guarded if the parts create a hazard if contacted by employees.
- Tool guarding methods include barrier guard, two-hand tripping devices, and electronic safety devices. These methods shall be used to protect operators and other employees from hazards created by point of operation, ingoing nip points, rotating parts, flying chips and sparks.
- Hand tools used for placing and removing material shall permit handling of material without operator exposure of placing a hand in the hazard zone. These tools shall be used as supplement protection and not in lieu of other required guarding.

Personal Protective Equipment

- Company employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases shall use the personal protective equipment issued to them as protection from the hazard. This includes safety eyewear, face shields, and gloves.
- Verify PPE required with manufacturers' instructions.
- Chain saw PPE shall include chaps for legs, protective eyewear, and face shield.

Training

- Company employees shall receive training on each tool prior to use of the tool on the jobsite.
- Employees shall demonstrate the safe use of each tool while supervised by Foreperson.

MAINTENANCE AND PROTECTION OF TRAFFIC

When it becomes necessary to temporarily close a public street, roadway, or alley, reduce travel lanes, or otherwise inhibit traffic flow to perform our work, then a written traffic control plan is required showing how the closure will occur and submit it for review.

Refer to the Manual of Uniform Traffic Control Devices (MUTCD) part VI when developing a traffic control plan. At a minimum the written Traffic Control Plan will contain the duration and time frame the roadway will be required to be closed, a plan illustrating detour routes for traffic impacted by the closed streets, and detailed drawing showing the signage, flaggers, etc. All workers will wear high visibility attire in accordance with the ANSI requirements. Workers assigned as flagmen will be trained as recommended in the Manual of Uniform Traffic Control Devices and state DOT. Work will be stopped if it fails to follow the traffic control plan or occupies a city street or sidewalk without authorization.

The Company has an app available to assist with developing the traffic plan, entitled; WZSA “Work Zone Safety Application”. It is no cost and available on Apple and Google devices.

Work Zone Safety App (free)

WELDING AND CUTTING

When using compressed gases to burn or cut, flame arrestors will be installed on both the torch side and regulator side of the oxygen and gas hoses.

Workers performing welding, cutting, and/or soldering must have their Massachusetts Hot Work Certification card.

The Company and/or subcontractor will obtain necessary hot work permit from local AHJ before commencing work.

Arc Welding and Cutting

Welding current return circuits or grounds must carry their current without hot or sparking contacts and without passage of current through equipment or structures. Welding current must not be allowed to pass through any of the following materials:

- Acetylene, fuel gas, oxygen, or other compressed gas cylinders
- Tanks or containers used for gasoline, oil or other flammable or combustible material
- Pipes carrying compressed air, steam, gases or flammable or combustible liquids
- Conduits carrying electrical conductors
- Chains, wire ropes, metal hand railings, or ladders, machines, shafts, bearings, or weighing scales

All arc welding and cutting operations will be shielded by non-combustible or flame-proof screens whenever other workers or public are exposed to welder flash.

The ground for the welding circuit will be mechanically strong and electrically adequate for the service required and should be attached directly to the work piece. When possible, electrode and ground cables will be supported to prevent obstructions interfering with the safe passage of workers. Cables with worn insulation may not be used.

Contact points for the welding leads to the welding machine will be insulated.

Workers performing welding will have required eye and respiratory protection.

If welding any material that may contain hexavalent chromium such as stainless-steel piping, then the requirements of 29CFR1926.1126 will apply.

Gas Welding, Cutting, and Soldering

A suitable cylinder cart, chain, or other secure non-flammable fastening should be used to keep cylinders from being knocked over while in use. Only qualified personnel who have the Massachusetts Hot Work Certification will operate this welding, cutting and soldering equipment.

- Cylinders of oxygen will not be stored next to cylinders of acetylene or other fuel gas. They will be separated by 20 feet or by non-combustible barrier with ½ hour fire rating.
- Oxygen cylinders, cylinder valves, couplings, regulators, hose, and apparatus will be kept free of and away from oil and grease. Oil or grease in the presence of oxygen under pressure may ignite violently.
- Empty cylinders will have their valves closed.

- Valve protection caps will always be in place except when cylinders are in use or connected for use.
- Compressed gas cylinders, empty or full will always be secured in an upright position.
- Empty cylinders should be marked EMPTY or MT for identification.
- Regulators and hoses will be frequently inspected for leaks, wear and tear and loose connections.
- Regulators will also be checked for operable gauges.
- Flashback arrestors will be in place at the gauge end of the hose.

ADDENDUM A
RESPIRATORY PROGRAM

The work processes requiring respirator use at Robert B. Our Co. are outlined in the Scope and Application section of this program.

Personal respiratory protection will only be utilized after engineering and work practice controls of atmospheric hazards are proven inadequate or infeasible.

Scope and Application

This program applies to all employees who are REQUIRED to wear respirators during normal work operations, and during some non-routine or emergency operations.

Employees participating in the respiratory protection program do so at no cost to them. The expense associated with training, medical evaluations and respiratory protection equipment will be paid by the company.

Until Robert B. Our Co., Inc. Co., Inc. performs an employee exposure assessment as required, and documents that the employee is not exposed to levels above the PEL, the following respirators are required for the processes below:

Responsibilities

Program Administrator

The program administrator for Robert B. Our Co., Inc. Co., Inc. is the Health & Health & Safety Director.

The program administrator is responsible for administering the respiratory protection program, including the following duties:

- identifying work areas, processes or tasks that require workers to wear respirators
- selection of respiratory protection options
- monitoring respirator use to ensure that respirators are used in accordance with their certifications
- arranging for and/or conducting training
- ensuring proper storage and maintenance of respirator
- conducting or arranging for qualitative fit testing
- administering the medical surveillance program
- maintaining records required by the program
- evaluating the program
- updating the written program as needed

Supervisors

Supervisors are responsible for ensuring that the respiratory protection program is implemented in their work areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the employees under their charge. Duties of the supervisor include:

- ensuring that employees under their supervision (including new hires) have received appropriate training, fit testing, and annual medical evaluation
- ensuring the availability of respirators

- being aware of tasks requiring the use of respiratory protection
- enforcing the proper use of respiratory protection when necessary
- ensuring that respirators are properly cleaned, maintained, and stored according to the respiratory protection plan
- ensuring that respirators fit well and do not cause discomfort
- continually monitoring work areas and operations to identify respiratory hazards
- coordinating with the program administrator on how to address respiratory hazards or other concerns regarding the program

Employees

Each employee is responsible for wearing a respirator when and where required and in the manner, they were trained. Employees must also:

- Care for and maintain their respirators as instructed, and store them in a clean sanitary location
- Inform their supervisor if the respirator no longer fits well and request a new one that fits properly.
- Inform their supervisor or the program administrator of any respiratory hazards that they believe are not adequately addressed in the workplace and of any other concerns that they have regarding the program.

Respirator Selection

The program administrator will select respirators to be used on site, based on the hazard to which workers are exposed and in accordance with all OSHA and state standards. The program administrator will conduct a hazard evaluation for each operation, work process, or work area where airborne contaminants may be present in routine operations or during an emergency. The hazard evaluation will include:

- Identification and development of a list of hazardous substances used in the work process
- Review the work processes to determine where potential exposures to these hazardous substances may occur. This review shall be conducted by surveying the work site, reviewing process records, and talking with employees and supervisors.
- Exposure monitoring to quantify potential hazardous exposures. This will be done by a CIH or Company Health & Safety Director based on type of monitoring required.

The program administrator will revise and update the hazard assessment as needed (i.e. change in work process, new procedure). If an employee feels that respiratory protection is needed during a particular activity, they are to contact their supervisor or the program administrator. If it is determined that respiratory protection is necessary, all other elements of this program will be in effect for those tasks and this program will be updated accordingly.

Medical Evaluation

Employees are not permitted to wear respirators until a physician or other licensed healthcare professional (PLHCP) has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

Medical Evaluation procedures are as follows:

- The medical evaluation will be conducted using the questionnaire provided in Appendix C of the OSHA Respirator Standard. The program administrator will provide a copy of this questionnaire to all employees requiring medical evaluations. Assistance will be offered to any employee needing such help filling out the questionnaire.
- Follow up medical exam will be granted to employees as required by the standard, and/or as deemed necessary by the physician.
- All employees will be granted the opportunity to speak with the physician/PLHCP about their medical evaluation if they so request.
- The physician will be provided with a copy of this respirator program, a copy of the Respiratory Protection Standard, the list of hazardous substances by work area, and for each employee requiring evaluation: 1) their work area or job title, 2) proposed respirator type and weight, 3) length of time required to wear respirator, 4) expected physical work load (light, moderate, heavy), 5) potential temperature and humidity extremes, and 6) any additional protective clothing required.
- Any employee required for medical reasons to wear a positive pressure air purifying respirator, or who requests one, will be provided with a powered air purifying respirator (PAPR).
- After an employee has received medical clearance to wear a respirator, additional medical evaluations will be provided under the following circumstances:
    - The employee reports signs and/or symptoms relating to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing
    - The examining physician or supervisor informs the program administrator that the employee needs to be reevaluated
    - Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation
    - A change occurs in workplace conditions that may result in an increased physiological burden on the employee

All examinations and questionnaires are to remain confidential between the employee and the physician.

Fit Testing

Fit testing is required for employees wearing half/full face air purifying respirators (APRs) or PAPRs. Employees will be fit tested:

- Prior to being allowed to wear any respirator with a tight fitting facepiece
- Every 6 months
- When there are changes in the employee's physical condition that could affect respirator fit (e.g. significant change in body weight, facial scarring, dental conditions, etc.)

Employees will be fit tested with the make, model and size of respirator that they will actually wear. Employees will be provided with several models and sizes of respirators so they may find an optimal fit. Fit testing of PAPRs will be conducted in the negative pressure mode.

The Program Administrator or his/her designee will conduct fit tests following the OSHA approved irritant smoke protocol in Appendix B of the OSHA Respirator Standard.

Respirator Use

Employees will use their respirators under conditions specified by this program, and in accordance with the training they receive on the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or by its manufacturer.

All employees shall conduct user seal checks each time that they put on their respirator. Employees shall use either the positive or negative pressure check (depending on which test works best for them) specified in Appendix B-1 of the OSHA Respirator Standard. Employees will receive seal check training prior to being assigned a respirator.

Employees shall be permitted to leave the work area to maintain their respirator for the following reasons:

1) to clean their respirator if it is impeding their ability to work,

2) change filters or cartridges,

3) replace parts,

4) to inspect the respirator if it stops functioning as intended. Employees should notify their supervisor before leaving the area.

Employees are not permitted to wear tight-fitting respirators if they have any condition, such as facial hair, facial scars, or missing dentures, that prevents them from achieving a proper seal. Employees are not permitted to wear jewelry, headphones, or any other articles that may interfere with the face-to- facepiece seal.

Respirator Malfunction

For any malfunction of an air purifying respirator (e.g. such as breakthrough, facepiece leakage, or improperly working valve), the respirator wearer should inform his/her supervisor that the respirator no longer functions as intended, and go to the designated safe area to maintain the respirator. The supervisor must ensure that the employee receives the needed parts to repair the respirator or is provided with a new respirator.

Air Quality

Supplied air respirators are not used by Robert B. Our Co., Inc. Co. unless specifically required by Project Owner, General Contractor, or Safety Data Sheet.

Cleaning, Maintenance, Change Schedules and Storage

Respirators are to be regularly cleaned and disinfected. The company will supply cleaning supplies and allow an adequate amount of time to perform respirator cleaning and disinfection. Respirators issued for exclusive use of an employee shall be cleaned as often as necessary to maintain them in a sanitary and properly functioning condition.

The following procedure is to be used when cleaning and disinfecting respirators:

- Disassemble respirator, removing any filters, canisters, or cartridges.
- Wash the facepiece and associated parts in a mild detergent with warm water. Do not use organic solvents.
- Rinse completely in clean warm water.
- Wipe the respirator with disinfectant wipes (70% isopropyl alcohol) to kill germs.
- Air dry in a clean area.

- Reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other air tight container.

The Program Administrator will ensure an adequate supply of appropriate cleaning and disinfection material at the cleaning station. If supplies are low, employees should contact their supervisor, who will inform the Program Administrator.

Maintenance

Respirators are always to be properly maintained in order to ensure that they function properly and adequately protect the employee. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use. No components will be replaced, or repairs made beyond those recommended by the manufacturer.

Repairs to regulators or alarms of atmosphere supplying respirators will be conducted by the manufacturer. Arrangements for repairs will be made by the Program Administrator.

The following checklist will be used when inspecting respirators:

- Facepiece:
  - Cracks, tears, holes
  - Facemask distortion
  - Cracked or loose lenses/face shield
- Head strap
  - Breaks or tears
  - Broken buckles
- Valves
  - Residue or dirt
  - Cracks or tears in valve material
- Filters/Cartridges
  - Approval designation
  - Gaskets
  - Cracks or dents in housing
  - Proper cartridge for hazard

Employees are permitted to leave their work area to perform limited maintenance on their respirator in a designated area that is free of respirator hazards. Situations when this is permitted include to wash their face and respirator facepiece to prevent any eye or skin irritation, to replace the filter, cartridge or canister, and if they detect vapor or gas breakthrough or leakage in the facepiece, or if they detect any other damage to the respirator or its components.

Change Schedules

Employees wearing respirators with filters shall change the filters on their respirators periodically to ensure the continued effectiveness of the respirators.

Storage

Respirators must be stored in a clean, dry area, and in accordance with the manufacturer's recommendations. Each employee will clean and inspect their own air purifying respirator in

accordance with the provisions of this program and will store their respirator in a plastic bag. Each employee will have his/her name on the bag and that bag will only be used to store that employee's respirator.

Defective Respirators

Respirators that are defective or have defective parts shall be taken out of service immediately. If, during an inspection, an employee discovers a defect in a respirator, he/she is to bring the defect to the attention of the supervisor. Supervisors will give all defective respirators to the Program Administrator, who will decide whether to:

- Temporarily take the respirator out of service until it can be repaired
- Perform a simple fix on the spot, such as replacing a head strap
- Dispose of the respirator due to an irreparable problem or defect

Only replacement parts from the manufacturer of the respirator will be used. There will be no interchanging of parts from different respirator manufacturers.

When a respirator is taken out of service for an extended period of time, the respirator will be tagged out of service, and the employee will be given a replacement of similar make, model and size.

Training

The Program Administrator will provide training to respirator users and their supervisors on the contents of the Robert B. Our Co., Inc. Co., Inc. Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection Standard. Workers will be trained prior to_using a respirator in the workplace. Supervisors will also be trained prior to using a respirator in the workplace, or prior to supervising employees that must wear respirators.

The training course will cover the following topics:

- The Robert B. Our Co., Inc. Co., Inc. Respiratory Protection Program and the OSHA Respiratory Protection Standard
- Respiratory hazards encountered and their health effects
- Proper selection and use of respirators
- Limitations of respirators
- Respirator donning and user seal (fit) checks
- Fit testing
- Emergency use procedures*
- Maintenance, cleaning and storage
- Medical signs and symptoms limiting the effective use of respirators

Employees will be retrained annually, or as needed (e.g. if they change work procedures and need to use a different respirator). Employees must demonstrate their understanding of the topics covered in the training through hands-on exercises and a written test. Respirator training will be documented by the Program Administrator and the documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested.

Program Evaluation

The Program Administrator will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations will include regular

consultations with employees who use respirators and their supervisors, site inspections, air monitoring and a review of records.

Problems identified will be noted in an inspection log and addressed by the Program Administrator. These finding will be reported to Robert B. Our Co., Inc. Co., Inc. management, and the report will list plans to correct deficiencies in the respirator program and target dates for the implementation of those corrections.

Record Keeping

A written copy of this program and the OSHA standard is kept at the main office and is available to all employees who wish to review it.

Also maintained at the main office are copies of training and fit test records. These records will be updated as new employees are trained, as existing employees receive refresher training, and as new fit tests are conducted.

The Program Administrator will also maintain copies of the medical records for all employees covered under the respirator program. The completed medical questionnaire and the physician/PLHCP documented findings are confidential. The company will only retain the physician/PLHCP's written recommendation regarding each employee's ability to wear a respirator.

Voluntary Use

An employee may use a personal respirator by his/her choice if no contaminant is present in sufficient strength to require its use. The employee will adhere to requirements found in Exhibit D of 29 CFR1910.134. A form is attached for acknowledgement.

ADDENDUM B

HEARING CONSERVATION

Purpose:

The purpose of this plan is to establish a program and procedures for hearing conservation at the Company. This program applies to all areas that have operations that produce employee noise exposures equal to or in excess of 85 dBA (decibels, A-weighting), as an 8-hour time-weighted average (TWA).

The Occupational Safety and Health Administration Occupational Noise Exposure Standards 29 CFR 1926.52 (Construction Industry) call for the development, implementation and maintenance of a hearing conservation program when employee exposure to noise is equal to or exceeds an 8-hour TWA of 85 dBA. The written hearing conservation program will include and address the following categories in order to satisfy the minimum requirements of the applicable Occupational Noise Exposure Standard:

- Noise exposure monitoring (area and/or personal)
- Audiometric testing for employees exposed to noise equal to or in excess of 85 dBA, as an 8-hour TWA
- Hearing protection provided and utilized
- Employee training
- Record keeping

The hearing conservation program will include the following:

- Identification of personnel responsible for the program.
- How noise levels and employee exposures will be measured.
- How audiometric testing will be performed.
- How hearing protection will be selected, provided, replaced and use enforced.
- How training will be performed.
- Procedures to evaluate and update the program.
- How records will be maintained.

Responsibilities:

The Health & Safety Director is responsible for administering the hearing conservation program. This person is also responsible for:

- Monitoring noise via sound-level measurements or dosimetry in order to determine employee exposure to noise.
- Making available to employee's copies of the applicable Occupational Noise Exposure Standard and posting a copy of the standard in the workplace, such as on the employee bulletin board.
- Administering the audiometric testing program.
- Providing annual training for employees.
- Notifying employees of noise monitoring and audiometric testing results.
- Maintaining noise exposure monitoring, audiometric testing and training records.

- Reviewing the effectiveness of the hearing conservation program and making sure that it satisfies the requirements of all applicable federal, state or local hearing conservation requirements.

The Safety Coordinator, along with management, is responsible for the following aspects of the hearing conservation program:

- Enforcing the use of hearing protection by employees required to wear it.
- Ensuring that the hearing protectors are in good condition and are fitted and used correctly.
- Ensuring that hearing protectors provide adequate attenuation (i.e., the noise reduction rating is adequate).
- Enforcing administrative and engineering controls within the facility to reduce employee noise exposure.
- Proper care of hearing protection, including location of supply, and proper use and replacement of hearing protection equipment.

Employees are responsible for the following aspects of the hearing conservation program:

- Wearing hearing protection in work areas requiring it.
- Knowledge and understanding of the consequences associated with not following company policy concerning the proper use of hearing protection.
- Proper care of hearing protection, including proper use, routine care and cleaning, storage, and replacement.

Determination of Sound Levels:
To determine employee exposure, noise monitoring will be conducted and repeated whenever there is a change in the work environment.
Noise exposure monitoring will be conducted using the following methods:

- **Area monitoring** - Measuring the noise levels in an area by use of a sound level meter.

- **Personal monitoring** - Measuring an employee's noise exposure by use of a dosimeter. A dosimeter is worn by an employee for a representative time frame in order to evaluate noise levels that the employee is exposed to when doing his or her particular job.

Audiometric Testing:
The purpose of audiometric testing is to determine each employee's hearing threshold by determining the employee's response to noise at several frequencies. A baseline audiogram will be conducted within six months of the employee's first exposure to noise at or above the action level. If a mobile test van is used, the baseline audiogram will be conducted within one year of an employee's first exposure to noise at or above the action level. (Note: Where baseline audiograms are obtained more than six months after the employee's first exposure to noise at or above the action level, employees must wear hearing protectors for any period exceeding six months after first exposure until the baseline audiogram is obtained.)

The initial audiogram will be used as a baseline measurement to which all subsequent audiograms will be compared. Audiometric testing will be completed annually for all employees whose exposures equal or exceed an 8-hour TWA of 85 dBA.

Audiometric testing will be performed by either, the designated medical provider, or by a contracted and accredited audiometric testing company.

The audiometric testing will be performed at no cost to the employee.

Employees who are to receive audiograms during a workday must wear hearing protection prior to their tests or have been exempt from workplace noise for a period of 14 hours prior to the testing procedures. During the 14 hours prior to the testing, the employees shall refrain from any noisy non-work exposures such as listening to loud music, mowing the lawn, target practice and woodworking.

The annual audiogram will be compared to the baseline audiogram to determine if the audiogram is valid and if a standard threshold shift (STS) has occurred. An STS is defined as the average hearing loss of 10 dB or more at the tested frequencies of 2,000, 3,000 and 4,000 Hz in either ear.

If an STS is identified, the following steps will be taken:

1. Employees will be notified of the results in writing within 21 days (miners must be notified within 10 days) of the determination. Employees will also be fitted and trained in the use of hearing protection equipment.

2. Employees already wearing hearing protection will be refitted and retrained in the proper use of hearing protection. Hearing protection offering greater noise reduction will be provided to the affected employees.

3. An employee may be referred for a clinical audiological evaluation or an otological examination for additional testing.

4. The safety coordinator, along with management, will review the effectiveness of any engineering and administrative controls to identify and correct any deficiencies.

Evaluation of the results of the audiograms will be performed by the testing agency (either the designated medical provider or the contracted company). Robert B. Our Co., Inc. will follow all reasonable recommendations made for each employee by the tester.

If the results of the audiogram demonstrate an STS, the company reserves the right to conduct a second audiogram within 30 days and consider these results as the annual audiogram.

Hearing Protection:

Employees included in the hearing conservation program will be provided with hearing protection as follows:

- Hearing protection will be provided at no cost to employees
- Employees will be able to select their hearing protection from a variety of suitable hearing protectors (Note: Employees must be provided with a choice of at least one type of ear plug and one type of earmuffs at the very minimum)
- Employees will receive training in the use and care of hearing protection

- The use of hearing protection will be required for employees who have not yet had a baseline audiogram, who have experienced an STS, or whose exposures exceed an 8-hour TWA of 85 dBA

Training:
Employees included in the hearing conservation program will receive the following annual training:

- The effects of noise on the human ear and hearing
- The purpose of hearing protection, including the advantages and disadvantages of various types of hearing protection
- The proper selection, fitting, use and care of hearing protection
- The purpose and value of noise exposure monitoring and audiometric testing and a summary of the procedures
- The company's and employees' respective tasks for maintaining noise controls

Recordkeeping:
The Human Resources Director will maintain records pertaining to the hearing conservation program in a confidential manner. Any requests for records should be directed to him or her. The Human Resources Director will keep the following records:

- Noise exposure monitoring results
- Audiometric testing records
- Certificates of training
- Warnings issued to employees for not following the hearing conservation program

ADDENDUM C
HAZARD COMMUNICATION PROGRAM

Company Policy

To ensure that information about the dangers of all hazardous chemicals used by Robert B. Our Co., Inc. is known by all potentially affected employees, the following hazardous information program has been established. Under this program, all employees shall be informed of the contents of the OSHA Hazard Communications standard, the hazardous properties of chemicals with which you work, safe handling procedures and measures to take to protect yourself from these chemicals.

This program applies to all work operations in our company where an employee may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. All work units of this company will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available in the Safety Office for review by any interested employee. We have also provided a summary of the program in your employee handbook.

The Corporate Health & Safety Director is the program coordinator, with overall responsibility for the program, including implementing, reviewing and updating this plan as necessary.

Container Labeling

The Warehouse Manager/Shop Manager will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address. The Supervisor/Foreperson in each section/crew will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and the appropriate hazard warning. For help with labeling, see Corporate Health & Safety Director.

Robert B. Our Co., Inc. uses the GHS Pictograms on a container to identify hazards and dangers associated with the chemicals contained therein. These pictograms must appear on container labels, effective June 2015 and you will see them now as all suppliers and manufacturers must now use these pictograms.

There are eight mandatory pictograms by OSHA, and it is incumbent upon users of the chemicals to know their meaning. There is a ninth pictogram related to environmental hazards. This should not be ignored as it indicates specific disposal and storage of containers to prevent an environmental incident.

Container labels display specific mandatory information; including a “product identifier” that is the same as that appearing on the corresponding SDS. Container labels also have standardized “signal words”, “hazard statements”, and “precautionary statements” to better ensure you are alerted to the specific dangers and safety measures you should follow when working with that product. Finally, all container labels also display one, or more, of nine specific “pictograms”, which are basically icons that appear in small red boxes that will help you to quickly identify the specific hazard or hazards associated with the product you are using. All labels for containers will now have required information as noted below. This information must be transferred to secondary containers. If mixing chemicals, the highest hazard level will be assigned to the label as well as the pictograms.

Sample label is enclosed herein.

SAMPLE LABEL

PRODUCT IDENTIFIER

CODE _____
Product Name _____

SUPPLIER IDENTIFICATION

Company Name_____
Street Address _____
City _____ State _____
Postal Code _____ Country _____
Emergency Phone Number _____

PRECAUTIONARY STATEMENTS

Keep container tightly closed. Store in cool, well ventilated place that is locked.
Keep away from heat/sparks/open flame. No smoking.
Only use non-sparking tools.
Use explosion-proof electrical equipment.
Take precautionary measure against static discharge.
Ground and bond container and receiving equipment.
Do not breathe vapors.
Wear Protective gloves.
Do not eat, drink or smoke when using this product.
Wash hands thoroughly after handling.
Dispoae of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO_2) fire extinguisher to extinguish.

First Aid
If exposed call Poison Center.
If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.

HAZARD PICTOGRAMS

SIGNAL WORD
Danger

HAZARD STATEMENT

Highly flammable liquid and vapor.
May cause liver and kidney damage.

SUPPLEMENTAL INFORMATION

Directions for use
_____
_____
_____

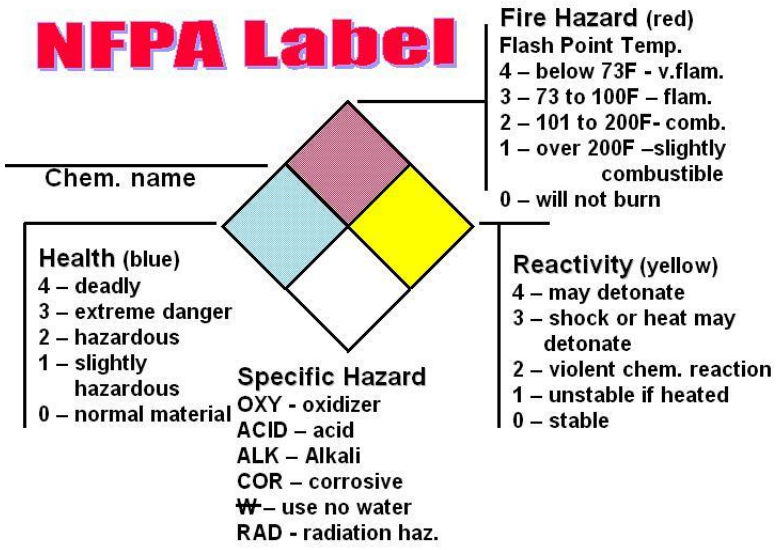
Fill weight: _____ Lot Number _____
Gross weight: _____ Fill Date: _____
Expiration Date: _____

HCS Pictograms and Hazards

Health Hazard • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	**Flame** • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	**Exclamation Mark** • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder • Gases Under Pressure	**Corrosion** • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals	**Exploding Bomb** • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle • Oxidizers	**Environment** (Non-Mandatory) • Aquatic Toxicity	**Skull and Crossbones** • Acute Toxicity (fatal or toxic)

The Environment pictogram is not required by OSHA however it is Robert B. Our Co., Inc. policy to note the hazards associated with this pictogram as Company may be liable for improper handling and disposal under other government agencies.

The NFPA Diamond is still in use on a label to convey the required hazard information for bulk storage:



The Health & Health & Safety Director will review the company labeling procedures annually and will update labels as required.

Note that vehicles that transport bulk chemicals must have appropriate DOT labels placed on the vehicle. See transportation policy and DOT regulations for correct labels.

Safety Data Sheets (SDS)

The Corporate Health & Health & Safety Director is responsible for establishing and monitoring the company SDS and SDS program. He/she will ensure that procedures are in place to obtain the necessary SDS's and will review incoming SDS's for new or significant health and safety information. He/she will see that any new information is communicated to affected employees. The procedure below will be followed when an SDS is not received with the chemical at the time of initial shipment:

- Delay use of chemical until SDS received and available to field.
- Notify distributor and/or supplier to supply SDS as soon as possible.
- Research chemical and obtain SDS on-line if a critical item in the work operation.

Copies of SDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in Safety Office, Warehouse Office and Shop.

SDSs will be readily available to all employees during each work shift. If an SDS is not available, contact Warehouse or Safety Department.

SDSs will be readily available to employees in each work area using the following format:

- SDS supplied by manufacturer or distributor in hard copy, paper format

- SDS contained in a binder with inventory of contents.

When revised SDSs are received, the following procedures will be followed to replace old MSDS OR SDSs:

- Confirm received SDS supersedes prior version by verifying and comparing revision dates.
- Director removes superseded MSDS OR SDS and places revised document in files located in Safety Department, Shop and Warehouse. Computer file copy loaded into system and prior version placed in a file labeled “Superseded MSDS OR SDS”.
- Notification of new SDS distributed to field by toolbox talk and submittal to Project file.

“Material Safety Data Sheets” (MSDS) are replaced by the term “Safety Data Sheets” (SDSs). Also, the new SDS’s are divided into 16 sections, with information about the product’s chemical hazards appearing in a set order that is always the same for every SDS.

If you still have MSDS, they must be replaced by current SDS immediately. Notify Safety Department, Warehouse or Shop manager to obtain new one.

Section 1 - Identification

This section identifies the chemical on the SDS as well as the recommended uses. It also provides the essential contact information of the supplier.

Section 2 – Hazards Identification

This section the hazards of the chemical presented on the SDS and the appropriate warning information associated with those hazards. The required information consists of:

Section 3 – Composition or Information on Ingredients

This section identifies the ingredients contained in the product indicated on the SDS, including impurities and stabilizing additives. This section includes information on substances, mixtures, and all chemicals where a trade secret is claimed.

Section 4 – First Aid Measures

This section describes the initial care that should be given by untrained responders to an individual who has been exposed to the chemical.

Section 5 – Fire Fighting Measures

This section provides recommendations for fighting a fire caused by the chemical.

Section 6 – Accidental Release Measures

This section provides recommendations on the appropriate response to spills, leaks, or releases, including containment and cleanup practices to prevent or minimize exposure to people, properties, or the environment. It may also include recommendations distinguishing between responses for large and small spills where the spill volume has a significant impact on the hazard.

Section 7 – Handling and Storage

This section provides guidance on the safe handling practices and conditions for safe storage of chemicals.

Section 8 – Exposure Controls and Personal Protection

This section indicates the exposure limits, engineering controls, and personal protective measures that can be used to minimize worker exposure.

Section 9 – Physical and Chemical Properties

This section identifies physical and chemical properties associated with the substance or mixture.

Section 10 – Stability and Reactivity

This section describes the reactivity hazards of the chemical and the chemical stability information. This section is broken into three parts: reactivity, chemical stability, and other.

Section 11 – Toxicology Information

This section identifies toxicological and health effects information or indicates that such data are not available.

Sections 12 to 15

These sections discuss Ecological, Disposal, Transportation and Regulatory information and are non-mandatory by OSHA because they deal with subjects that are not regulated by OSHA. These sections should be reviewed to ensure proper disposal, handling, and storage to prevent an environmental incident.

Section 16 – Other Information

This section indicates when the SDS was prepared or when the last known revision was made. The SDS may also state where the changes have been made to the previous version. Other useful information also may be included here.

Employee Training and Information

Corporate Health & Health & Safety Director is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the hazard communication standard and this plan before starting work. Each new employee will attend a health and safety orientation that includes the following information and training:

- An overview of the OSHA hazard communication standard
- The hazardous chemicals present at his/her work area
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment

- Steps the company has taken to reduce or prevent exposure to hazardous chemicals
- Procedures to follow if employees are overexposed to hazardous chemicals
- How to read labels and SDSs to obtain hazard information
- Location of the SDS file and written Hazard Communication program

Prior to introducing a new chemical hazard into the field, each employee will be given information and training as outlined above for the new chemical hazard. The training format will be as follows:

- Classroom instruction with sample SDS sheets for Field supervision.
- Pictograms of chemical reviewed
- Picture of NFPA label for chemical.
- Toolbox talk with signature sheet for new SDS.

5. Informing Other Employers/Contractors

It is the responsibility of Contract Administrator to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and suggested precautions for employees. It is the responsibility of the Project Manager or Foreperson to obtain information about hazardous chemicals used by other employers to which employees of this company may be exposed.

Other employers and contractors will be provided with SDSs for hazardous chemicals generated by this company's operations in the following manner:

- Hard copy of SDS with Table of Contents (if requested by Project)
- E-mailed copy of SDS to Project Administrator with submittal form at time of subcontract signing.
- Network access by Company Supervisor.

In addition to providing a copy of an SDS to other employers through the Project Office, other employers can be informed of necessary precautionary measures to protect employees exposed to operations performed by this company through the Project office.

Also, other employers will be informed of the hazard labels used by the company. These labels will comply with OSHA Hazard Communication Standard format and content. Other employers have the sole responsibility for training their workers on how to read, understand, and take action based on the label contents.

6. List of Hazardous Chemicals

A list of all known hazardous chemicals used by our employees is readily available. This list includes the name of the chemical, the manufacturer, and the work area in which the chemical is used. Further information on each chemical may be obtained from the SDSs, located in Warehouse Office.

When new chemicals are received, this list is updated (including date the chemicals were introduced) within 30 days. To ensure any new chemical is added in a timely manner, the following procedures shall be followed:

- Periodically audit chemicals in use in field and compare to SDS in file.

- If it does not match, check latest purchase for supplier and notify it to send SDS as soon as possible.
- Director removes superseded SDS and places revised document in files located in Safety Department, Shop and Warehouse. Computer file copy loaded into system and prior version placed in a file labeled “Superseded MSDS OR SDS”.
- Notification of new SDS distributed to field by toolbox talk and submittal to Project file.

The hazardous chemical inventory is compiled and maintained by the Warehouse Manager in cooperation with the Corporate Health & Health & Safety Director.

ADDENDUM D

Silica Control Program

Company Policy

Our company has established a Silica Control Program that includes all employees who may be exposed to respirable crystalline silica at or above the OSHA Action Level. The program includes air monitoring to assess employee exposures, engineering and work practice controls to reduce silica exposures, medical examinations (with emphasis on the lungs) to check on employees' health, providing appropriate respiratory protection, and employee training. The purpose of this program is to protect workers from the effects of overexposure to respirable crystalline silica in the workplace. The program applies to employees in the following operations in our company: demolition, concrete flat work, excavation, road work, and septic system with drainage installation.

The Health & Health & Safety Director is the program coordinator, acting with the project manager, who has overall responsibility for the program on the site. Health & Safety Director will review and update the program, as necessary. Copies of the written program may be obtained from the Safety Office.

Under this program, you will be informed of the possible effects of silica exposure on your health; the control measures implemented to reduce exposures; the purpose and selection of respiratory protection and purpose of medical monitoring. Instructions on fitting, use and care are found in the Company's Respiratory Protection Program.

Compliance with our company's safety and health requirements, including the Silica Control Program, is a ***condition of employment***. Failure to comply with the requirements of this program will result in disciplinary action outlined in the company's employment policies and procedures program.

Definitions

Action Level means a concentration of airborne respirable crystalline silica of 25 micrograms per cubic meter of air ($\mu g/m^3$) or 0.025 milligrams per cubic meter of air (mg/m^3).

Employee Exposure means the exposure to airborne respirable crystalline silica that would occur if the employee were not using a control or protection method.

Respirable Crystalline silica means quartz, cristobalite and/or tridymite contained in airborne particles that are determined to be respirable by a sampling device designed to meet the characteristics for respirable-particle-size-selective samplers specified in the International Organization for Standardization (ISO) 7708:1995: Air Quality - Particle Size Fraction Definitions for Health Related sampling.

Permissible Exposure Limit (PEL) means a concentration of airborne respirable crystalline silica of 50 $\mu g/m^3$ or 0.05 mg/m^3, calculated as an 8-hour Time Weighted Average (TWA).

Specified Exposure Control Methods

For each employee engaged in a task identified in Table 1 of the OSHA Respirable Crystalline Silica standard for Construction (29 CFR 1926.1153), we will fully and properly implement the

engineering controls, work practices, and respiratory protection specified for the task in Table 1. In implementing these control measures, we will:

- For tasks performed indoors or in enclosed areas, provide a means of exhaust/filtration as needed to minimize the concentration of respirable dust.
- For tasks performed using wet methods, apply water at flow rates sufficient to minimize release of visible dust.
- For measures implemented that include an enclosed cab or booth, ensure that the enclosed cab or booth.
    - 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 the continuous delivery of fresh air.
    - Has intake air that is filtered through a filter that is 95% efficient in the 0.3-10 µm range (e.g., MERV-16 or better); and,
    - Has heating and cooling capabilities.
- Where an employee performs more than one task in Table 1 during the course of the shift, and the total duration of all tasks combined is more than four hours, the required respiratory protection for each task will be the respiratory protection specified for more than four hours per shift. If the total duration of all tasks in Table 1 combined is less than four hours, the required respiratory protection for each task will be the respiratory protection specified for less than four hours.

For tasks not listed in Table 1, then alternative control measures will be implemented based on an assessment of the tasks performed. Where engineering controls are available through objective data, then they will be implemented, and employees trained in those controls.

Air Monitoring

Should Table 1 and objective data methods not address the hazards. Air monitoring surveys are used to evaluate breathing zone, employee exposure levels for each task. Air sampling is conducted on representative employees in each job category to evaluate 8-hour time-weighted average exposures to respirable crystalline silica. The monitoring results are used to:

- Determine which employees should be included in the Silica Control Program.
- Identify which equipment, work tasks, and projects are candidates for installation of engineering control measures; and
- Select appropriate respirators based on monitoring data to protect employees.

Air sampling will be conducted by a Certified Industrial Hygienist (CIH) through our insurance provider and/or an outside Consulting Firm. Monitoring will be conducted using high flow

sample pumps and cyclones, or other recognized size selective devices, and analyzed by an AIHA accredited laboratory using OSHA Method ID-142 or NIOSH Method (Method 7500). The air sampling pumps are to be calibrated before and after the survey to ensure validity of the measurements and results.

Initial surveys are conducted to evaluate representative employees' exposures during operations at the job site. If initial monitoring indicates that employee exposures are at or above the OSHA Action Level, but below the OSHA PEL, monitoring will be repeated within six months of the most recent monitoring. Where initial or subsequent exposure monitoring reveals that employee exposures are above the OSHA PEL, monitoring will be repeated within three months of the most recent monitoring. Monitoring will continue at the required frequency until at least two consecutive measurements, taken at least seven days apart, are below the Action Level.

Employees will be informed of air sampling results within 5 working days after completion of an exposure assessment. Affected employees will be notified of the air sampling results either individually in writing, or by the posting of the results in an appropriate location that is accessible to all affected employees. Where exposure monitoring shows employee exposures are at or above the OSHA PEL, the notification will inform the employee of the actions that will be taken to reduce employee exposures to or below the PEL.

Additional monitoring will be conducted if changes in means & methods, equipment or controls are implemented to determine the effect of those changes on employee respirable crystalline silica exposures. Any employee wishing to obtain further information, or the monitoring results should contact Safety Department.

Engineering and Work Practice Controls

If silica exposures exceed the OSHA PEL, feasible engineering and/or work practice controls will be implemented to reduce employee exposures to nonhazardous levels. The goal is to eliminate employee exposures to silica levels that exceed the OSHA PEL However, where this is not attainable, then respiratory protection will be added to the engineering and work practice controls.

Engineering controls have been implemented to reduce employee exposures to airborne silica and respirable dust associated with the operation of the heavy equipment, including trucks, loaders, etc., engineering controls include:

- Providing enclosed cabs for trucks, excavators and front-end loaders.
- Repairing door gaskets and window seals
- Controlling dust generated by frequently wetting down roadways used by trucks and other mobile equipment.

Concrete cutting operations are no longer performed "dry." Wet cutting equipment has been purchased for concrete cutting operations to reduce airborne dust levels.

Regulated Areas

Access to areas where employee exposures to airborne concentrations of respirable crystalline silica is, or can reasonably be expected to be, in excess of the OSHA PEL will be designated as Regulated Areas. Access to Regulated Areas is limited to authorized persons required by work duties to be in the regulated area, designated representatives of employees observing monitoring procedures, and any person authorized by the Occupational Safety and Health Act.

Regulated areas are marked with warning signs. The warning signs are posted at or near entrances to work areas, and in work areas where a potential crystalline silica exposure exists.

Exposure Control Plan

A written Silica Exposure Control Plan for each task/project is developed as a separate document. The plan contains the following information:

1. A description of the tasks in the workplace that involve exposure to respirable crystalline silica.

2. A description of the engineering controls, work practices, and respiratory protection used to limit employee exposure to respirable crystalline silica for each task; and,

3. A description of the housekeeping measures used to limit employee exposure to respirable crystalline silica.

4. A description of the procedures used to restrict access to work areas, when necessary, to minimize the number of employees exposed to respirable crystalline silica and their level exposure. This includes exposures generated by other employers or sole proprietors.

The Health & Health & Safety Director will review and evaluate the effectiveness of the written exposure control plan at least annually and update as necessary.

A designated competent person will make frequent and regular inspections of job sites, materials, and equipment to implement the written exposure control plan.
The written exposure control plan is available for examination and copying, upon request, to each employee and their designated representatives.

Housekeeping

The following housekeeping control measures have been established to reduce airborne dust exposures. Each supervisor is responsible for housekeeping in their work site.

- Cleaning with compressed air and dry sweeping silica are prohibited.

- HEPA- filtered vacuuming and washing down with water are used in place of dust-producing methods.

- Emphasis has been placed on maintaining surfaces free of accumulation of silica dust and on prompt cleanup of wet concrete to help reduce the potential for material to dry and become airborne.

Hygiene Procedures

The following hygiene procedures have been implemented to reduce employee exposures at the site and the potential for contamination of the employees' vehicle and home. Each manager is responsible for enforcing hygiene procedures.

- Smoking, eating and drinking are prohibited in areas with potential silica exposure.
- Employees' work clothing must be HEPA-filtered vacuumed before entering the lunch and break area and before removal at the end of the shift.
- Cleaning of work clothing by shaking or blowing with compressed air is prohibited.

Employee Training

Part of our Hazard Communication Program, employees will be informed of silica health hazards; the specific operations that could result in exposure to respirable crystalline silica above the OSHA PEL; the specific procedures implemented to protect employees from exposure to respirable crystalline silica including work practices and the use of personal protective equipment (e.g., respirators and protective clothing); the contents of the OSHA Silica Standard; the purpose and description of the medical surveillance program; and the identity of the competent person.

The Health & Health & Safety Director will review our employee training program and advise the project manager on training and retraining needs. As part of the assessment of the training program, the safety and health manager will obtain input from employees regarding the training they have received, and any suggestions for improvement.

Medical Management Program

All employees exposed to crystalline silica above the OSHA Action Level and who wore a respirator for more than 30 days, will be eligible to receive a medical exam in accordance with the regulation.

Our company has contracted with a licensed health care professional to perform baseline and periodic medical examinations, evaluate chest x-rays and advise of any action needed as a result of the evaluation. The chest x-rays are classified according to the 1970 ILO International Classifications of radiographs of Pneumoconiosis by a NIOSH certified class "B" reader.

All medical test results will be discussed with the worker by a physician. Problem chest x-rays are reviewed to determine if further evaluation is needed. The physician will issue a report to the employee that details results of the examination and any restrictions on using respiratory protection or being exposed to crystalline silica. In addition, the physician will advise the employee if a referral to a specialist is warranted.

The company's policy is to continually evaluate the effectiveness of our Silica Control Program. One way is through periodic medical examinations so that our employees' health and well-being are maintained. We want to secure day-to-day cooperation from our employees to ensure the success of this program.

In accordance with 29 CFR 1926.1020, medical records will be maintained for at least 30 years following the employee's termination of employment, unless the employee is employed for less than one year and the records are provided to the employee upon termination.

Respiratory Protection

All employees exposed to crystalline silica above the OSHA Action Level and who need to wear a respirator due to engineering and work practice controls lack adequate reduction of the hazard, will be included in the respiratory protection program.

Recordkeeping

Records are maintained, and made available to employees upon request, for all medical examinations, air sampling surveys and training sessions. Employees' requests for records should be directed to Human Resources Manager

- Survey information includes sampling and analytical methods; type of personal protective equipment, if any, in use at the time of sampling; and the monitoring results.
- Records will be maintained for at least 30 years following termination of a worker's employment.
- Each employee can obtain information on his/her exposure and medical examinations.

ADDENDUM E

Job Hazard Analysis

Job hazard analysis (JHA) is a tool to use in planning tasks and activities to identify potential and recognized hazards. Once identified, we can then determine the best means and methods to eliminate, reduce and/or protect ourselves and fellow workers from those hazards.

In order to ensure that we obtain an accurate assessment, it is imperative that our employees are involved in this process. Detailed below are 4 steps to assist in formulating your JHA.

Step 1: Begin the JHA for a specific job by breaking the job down into the steps or tasks performed while doing the job.

Here are some ways to do this:

- Watch an employee performing the job.
- Ask the employee what the various steps are–the employee may have some good insight here but remember that the employee may leave out some steps because they're "automatic" to him or her.
- Ask other employees who have performed the job to list or review the steps.
- Film the employee while the employee performs the jobs–this will help you identify the steps.

Step 2: Identify and list the hazards associated with each task (do one task first, then another, etc.)

Consider every possible thing that could go wrong. How could the worker be injured or be made ill? How could machines or equipment be damaged? Ask yourself the following questions:

- What could go wrong?
- What could cause that thing/those things to go wrong?
- What other factors could contribute to that thing/those things going wrong?
- What would happen if that thing/those things did go wrong?
- How likely is it that that thing/those things will go wrong?

Step 3: Write a hazard description (also called a hazard scenario).

Write a description of each hazard in a consistent, orderly manner that will help ensure you will later put in steps to control the hazard and create the best possible controls.

A good hazard description should include the following items.

- **Environment**: where does this hazard exist?
- **Exposure**: who or what might be injured or made ill by this hazard?
- **Trigger**: what event might cause the hazard to lead to an injury or illness?
- **Contributing factors**: are there other factors that might contribute to cause the hazard to lead to an injury or illness?
- **Outcome/consequence**: what would be the result if the hazard were to occur?

Step 4: Create a plan for controlling each hazard associated with each task.

Once you've written the hazard descriptions, now it's time to brainstorm some hazard controls so the hazard never really does lead to an injury or illness. And remember what we said earlier–if you've identified a severe hazard, and/or one with a great chance of causing illness or injury, address it immediately.

When you're considering a list of controls, think of the following (and in this order):

1. **Elimination and/or substitution:** If you can remove the hazard entirely, or put some form of substitute in place, do that. That's the best way to deal with a hazard–make it go away. An example would be removing a sharp edge on the corner of a machine so nobody could get cut.
2. **Engineering controls:** Engineering controls involve re-designing the work area so that the hazard is eliminated or reduced. An example would be putting up a guardrail instead of using personal fall protection.
3. **Administrative controls:** Administrative controls involve modifying the way people work around a hazard to reduce the risk. An example might be developing a standard operating procedure and train employees on it.
4. **Personal protective equipment (PPE):** PPE can be used to protect people who are working in the presence of hazards. An example would be giving a respirator to someone working near airborne crystalline silica. PPE should only be used as a last resort, once the other forms of controls listed above have been tried. PPE may be used in combination with the other forms of controls, too.

ADDENDUM F

Lock Out and/or Tag Out

Purpose

This program establishes minimum requirements for control of hazardous energy sources. It shall be used to ensure machinery, equipment and/or other energy sources are isolated before service, maintenance, installation, replacement, or connection to existing is performed. By implementing the procedures contained herein, the unexpected start-up or release of stored energy will be prevented.

All operations involving lockout/tagout require a Job Hazard Analysis be developed and implemented.

Responsibility

Only authorized employees are permitted to apply the lockout devices and perform lockout procedures for isolating equipment, machinery and systems from power/supply sources. Authorized employees have specific training and knowledge of lockout/tagout systems and procedures and application of lockout devices. They must understand principle behind “zero mechanical state” and how to achieve it for equipment, machinery and energy systems they control. All employees and other affected parties must be informed of the lockout/tagout of a machine, equipment piece and/or energy system to prevent anyone attempting to start or open it.

All procedures will comply with requirements of 29CFR1910.147 and NFPA 70E 2018.

Preparation

Authorized employee(s) must locate and identify what systems, equipment and machinery will require lockout/tagout. All energy sources must be identified and determine best methods to control energy release utilizing isolation devices. These devices include valve locks, pipe blanks, disconnect switches, switch locks, relief valves etc. based on analysis conducted to determine which will be most effective.

Sequence of a Lockout/Tagout Procedure

Authorized employee will first contact facility Owner to ascertain if there is a lockout/tagout procedure in place. If there is**, then utilize that procedure with Robert B. Our Co., Inc. lockout/tagout equipment.** If not, then utilize procedure that follows.

1. Notify all personnel affected that service, maintenance or repair is required on a piece of equipment, machinery or system and it must be shut down and locked out before any work can proceed. Affected employees are those who normally works with or is within the area of the equipment, machine or system that is being locked out.
2. Authorized employees refer to company procedure to identify the type(s) and magnitude of energy that must be locked out, know the hazards associated and know best methods to control the energy.
3. If the system, machine, or equipment is operating, shut it down using normal stopping procedures.
4. De-activate the energy isolating device(s) making the system, machinery or equipment isolated from its energy source.

5. Lockout/tagout the energy isolating device(s) with assigned locks and tags.
6. Stored or residual energy (e.g. springs, hydraulic systems,; air, gas, steam or water pressure; electricity in capacitors; etc.) must be dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down or similar methods to relieve that energy.
7. Ensure that all unnecessary personnel are removed from the area before disconnecting from the energy source(s). Verify isolation by attempting to restart machinery or equipment. If a pipe is locked out by blanking, carefully loosen a connection away from the blank to determine if liquid is still flowing. Return all controls to neutral after attempt.
8. Equipment, machinery and system should be in lockout condition.

Procedure Involving Multiple Personnel

In the steps outlined above, one person shall place his/her lock on each energy isolating device. If more than one person is working on that system, equipment or machine, then each person involved will place his/her own lock on the energy isolating device. A multi-hasp lock can be used if the energy isolating device lacks sufficient space to place each lock**. The lock can only be removed by the person who placed it except as noted below.**

If a person who placed a lockout device is not available to remove it when required, then the following procedure will be used:

1. Contact person to gain approval or determine when he/she can remove lock.
2. If unable to contact, notify person that lockout device will be removed within 24 hours.
3. Authorized employee removes lockout device as per removal procedure.
4. Documentation of contact attempts is kept on file.

Outside Contractors/Subcontractors

If utilized, outside contractors or subcontractors shall comply with facility or Owner lockout/tagout procedure. They will supply their own locks and tags to the energy isolating device. They will comply with the procedures that offer the highest level of protection.

Restoring to Service

The following procedure should ensure a safe return to service:

1. Check the area around the system, machinery and equipment to ensure all non-essential items, debris and tools are removed and components are intact and ready to return to service.
2. Check work area to ensure all employees have been safely positioned or removed if not involved in start-up.
3. Confirm controls are in neutral if applicable
4. Remove lockout device(s) and start system, machine or equipment. Removal of some forms of blanking or blocking may require equipment start-up before safe removal.
5. Observe operation to verify no start-up problems, system leaks or failures.
6. Notify affected employees that work performed is completed and turn operation back to them.

Training

All employees involved in lockout/tagout operations will be certified in safe operating procedures, recognition of hazards involved and consequences of non-compliance.

A certificate of completion will be issued to all employees who successfully complete training and demonstrate knowledge of hazards, safe operating procedures and requirements for lockout/tagout.