

CORPORATE SAFETY PLAN HANDBOOK

February 2023

<u>SUBJECT</u>

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Safety is a vital part of our company's everyday activities. This manual provides instructions for meeting a number of safety requirements. It is not intended that this safety procedure manual be confined to the following requirements. These rules are usually general, and should be used in conjunction with more specific federal, state and local regulations. Whenever the two conflict, the more stringent regulations should be applied.

It is our policy to perform all work with the highest regard for the safety of all our associates.

This company will provide a safe and healthy work place, abide by all regulations as they apply to our industry, as set forth in federal, state, and local standards, and exercise good practices as dictated by locations and circumstances.

Safety is of utmost importance in the performance of all duties and must not be neglected in emergencies or because of undue haste.

The continuing success of our safety program demands the full cooperation and active support of all associates. Thank you for your full cooperation.

It is the purpose of this stated policy to:

- 1. Abide by all federal, state and local regulations as they pertain to construction.
- 2. Apply good sense and safe work practices to all of our projects.
- 3. Exercise good judgment in the application of this policy.
- 4. Protect the public and other contractor associates from any and all hazards which result from our work operations.

Protecting the public and our associates is the most important part of any work we do. It is our policy to perform all work with the highest regard to safety of all our associates and contract associates. We are committed to providing associates with a safe and healthful workplace.

Safety must never be compromised. It is part of quality workmanship, and the mark of true professionals. We will meet or exceed government standards in the performance of our work. Safety is of the utmost importance in the performance of all duties and must not be neglected in emergencies or because of undue haste.

No job is so important or service so urgent that we cannot take the time to perform our work safely. Every associate on every project must assume responsibility for safety as a personal duty. Our associates have direct control over our safety program's success and benefit most from it.

We consider no phase of its operation of greater importance than that of accident prevention. Safety does not just occur by chance. It is the result of careful attention given to all company operations by those who are directly and indirectly involved. Associates at all levels must work together as a team to execute the company's safety policy of maintaining safety and occupational health on all work sites.

It is the obligation of all associates to be knowledgeable of the standards established by these agencies and to implement the rules and regulations contained therein on projects under their direction. The following rules are implemented for the protection of our associates. It is not intended that any project's safety procedures be confined to the following requirements. These rules are usually general, and should be used in conjunction with more specific federal, state and local regulations. Whenever two rules conflict, the more stringent regulations shall apply.

Associates are urged to offer comments or suggestions concerning job site safety directly to the safety director, as well as to their immediate supervisor. All concerns will be reviewed and given immediate attention.

Accident prevention is a goal well worthy of achieving. This is because the cost of accidents far exceeds the cost of prevention. It is, therefore, of the utmost importance that all aspects of our safety program are strictly adhered to and that the intent of this program is followed.

Our objective is to assure that no one is allowed to work in a way that endangers life or health. This policy statement expresses management's commitment to providing our associates a safe and healthful workplace.

Our objective is to ensure a safe work environment for all associates by providing them with the knowledge and awareness necessary to safely perform their job activities throughout the course of the day. In order to achieve this objective, the below goals need to be met:

- 1. During this fiscal year, the organization will provide twelve monthly safety- training programs that receive 100% participation rate.
- 2. Hold quarterly safety committee meetings and broadcast the items discussed as well as an action items required.
- 3. Maintain a zero loss time work environment for all associates over the fiscal year.

C&C Group is totally dedicated to non-discrimination and affirmative action in employment. It is the policy of the company to comply with Federal Executive Order No. 11246, as amended, which prohibits discrimination against any associate or applicant for employment on the basis of race, color, religion, Vietnam Veteran, sex, age, political beliefs, mental handicap, disabilities, in regard to any position for which the applicant is qualified.

Associates have various rights under this federal safety and health law. Among the more significant rights are the following:

- 1. "Right to have an authorized representative accompany a federal compliance officer on inspection."
- 2. "Right to observe monitoring of potentially toxic materials or measurement of potentially harmful physical agents."
- 3. "Right to be notified when exposed to toxic material or harmful physical agents in excess of permissible levels, and to be notified of corrective action being taken."
- 4. "Right not to be discharged or discriminated against because of filing a complaint or instituting and proceeding under provision of the Act."
- 5. "Right to be kept informed by the employer of their protections and obligations under the Act, including provisions of applicable standards."

Any discriminatory act resulting from insult, intimidation or harassment in any form should promptly be reported to your immediate supervisor for investigation and corrective action as deemed appropriate. Any associate who engages in this type of behavior shall be counseled and reprimanded to refrain from such conduct, and disciplined including possible termination of employment.

This policy shall be periodically brought to the attention of all supervisory personnel and shall be administered with a positive attitude. It is the responsibility of each supervisory personnel of C&C Group to insure the affirmative implementation of this policy.

No associate will be discriminated or retaliated against in any way for reporting violations of this policy. Associate complaints will be handled with strict confidentiality.

To be effective, this Safety Manual requires attention from each member of this company. The following is a list of major responsibilities or duties that are assigned to each level within the company.

RESPONSIBILITIES

A. SAFETY DIRECTOR

The person responsible for <u>Safety & Health</u> issues for C&C Group is **Chad Cillessen**.

He may be contacted at one of the following telephone numbers:

Corporate Office:	(913) 529-6240
Mobile:	(913) 515-1949

The person responsible for Safety & Health issues is primarily responsible for the overall safety and health program.

Specific duties include:

- 1. Reviewing accident reports.
- 2. Meeting with loss control representatives from insurance companies.
- 3. Setting up safety classes for field personnel.
- 4. Responding to OSHA regarding any safety and health violations.
- 5. Attending OSHA inspections and meetings at project(s) and on any company property.
- 6. Making recommendations and advising management on safety and health issues.
- 7. Periodically reviewing and updating written safety procedures manual as needed.
- 8. Corresponding with customer representatives on matters relating to safety and health.
- 9. Confirming that Project Supervisors and Associates are performing their duties regarding safety and health issues concerning company procedures.
- 10. Providing any safety and health equipment required for a project.
- 11. Informing field personnel of OSHA citations, and posting them for 3 days at or near the place of occurrence, or in a viewable area in the offices.
- 12. The Project Supervisor is responsible for completing a "**Supervisors Report of Injury/Illness- Appendix A**" if an injury occurs and sending the original copy of the report by email to <u>ccillessen@c-cgroup.com</u> or dropping it off at the corporate office to **Chad Cillessen** within 24 hours of when the accident occurred.

If an accident occurs:

- a. If injured associate needs immediate medical assistance, call 911.
- b. If 911 isn't needed, injured associate will need to notify Supervisor of the accident <u>immediately</u>. Supervisor will then need to <u>immediately</u> contact C&C Group Safety Director (Chad Cillessen) or Human Resources. Corporate will set up authorization at the closest facility if medical treatment is needed.
- c. If injured associate only requires first aid, this can be provided on-site. The incident will still need to be documented.
- d. Supervisor will need to complete "Supervisors Report of Injury/Illness-Appendix A" completely and accurately. Supervisor will need to forward completed report and any other related paperwork to Safety Director within 24 hours of accident.
- e. Once the accident is reported, follow-up will be handled by Safety Director and Human Resources, including a determination as to whether the injured associate may return to work.
- 13. Investigating all accidents to determine cause and corrective action to eliminate the hazard, or hazards that caused the accident or incident. Record all necessary information in a timely manner while the incident is still fresh to the injured associate or witnesses. After the injured have been taken care of and the scene is safe, it shall be secured immediately. Do not disturb the scene until the accident report is completed and pictures or videos are taken if needed.

B. ASSOCIATES

C&C Group will make every attempt to insure the continued safety and health of its associates. In return, associates are required to use good judgment and comply with company safety polices. Each person must accept responsibility for their own safety by working safely and insisting that their co-workers do the same.

When an associate is involved in a case of serious or gross misconduct, progressive disciplinary action will not be involved, and the associate will be subject to disciplinary action up to termination of employment at the discretion of corporate management. Any act of blatant disregard for the above stated policy, will be looked upon by management as a hindrance to our company's goals and objectives, and therefore will be dealt with accordingly, up to and including immediate discharge.

Specific duties include:

Strictly following all safety and health procedures noted in this manual. Every
associate will be placed under a <u>three-step</u> progressive disciplinary program noted in
this section. However when an associate is involved in a case of serious or gross
misconduct, progressive disciplinary action will not be involved, and the associate will
be subject to disciplinary action up to termination of employment.

Three-Step Associate Disciplinary Program

First Violation – Verbal Warning;

Second Violation – Associate will be written up;

Third Violation – Possible Termination;

*NOTE: See Associate Warning Notice <u>Appendix G</u> for Documentation of Disciplinary Acts.

2. Associates that are injured on the job and need additional treatment other than first aid must visit the clinic designated by the company.

*NOTE: C&C Group will not be liable for any treatment costs associated with visits to the associate's personal physician or non-specified clinics without prior approval.

- 3. Bringing any unsafe situation, condition or act to the attention of their immediate Supervisor or the Safety Director.
- 4. Reporting to work both physically and mentally prepared to handle their responsibilities. Horseplay or fighting is prohibited and will result in disciplinary action up to termination of employment.
- 5. Not possessing or being under the influence of intoxicating beverages or illegal drugs during working hours. The possession of intoxicating beverages or illegal drugs during working hours is strictly prohibited. If medically approved or prescribed medication must be taken during working hours, it is your responsibility to notify your supervisor of the medication(s) you are taking. Side effects of medications can cause serious accidents. The C&C Group **Drug and Alcohol Policy** is located in **Section 5** of this Safety Procedures Manual.
- 6. Utilizing all required safety and health equipment as required according to Manufacturer's recommendations and the procedures in this Safety Manual.
- 7. All associates (i.e. Technicians, Engineers, etc.) that participate in the field activities must complete OSHA 10 Hour Training. Any management associates responsible for the oversight of Associates working in the field must complete OSHA 30 Hour Training. All are required to complete the weekly toolbox talks on an ongoing basis.

We will maintain a safety committee made up of individuals from all divisions of our company, so all areas of concerns can be adequately addressed. Our goal is to promote and maintain the interest of Associate health and safety issues by encouraging safe working environment while on-site, contribute ideas and suggestions for improvements in safety and maintain/develop constant communication with all Associates concerning safety.

Activities of the Committee include:

- a) Assessing and controlling hazards
- b) Assessing safety training and awareness topics
- c) Communication with associates regarding safety committee activities
- d) Develop safety rules, policies, and procedures
- e) Educating associates on safety related topics
- f) Evaluating the safety program
- g) Motivating associates to create a safety culture in the workplace

This policy is to ensure that prompt and effective medical assistance is provided to the employees of C&C Group in case of workplace injury or illness, the following first aid and medical services procedure is provided.

It is the responsibility of each manager / supervisor to assure that compliance to the First Aid & Medical Services Procedure is provided.

This policy covers minimum performance standards applicable to all C&C Group employees and locations. Local practices requiring more detailed or stringent rules, or local, state or other federal requirements regarding this subject can and should be added as an addendum to this procedure as applicable.

<u>PURPOSE</u>

This First Aid & Medical Services Procedure is designed to establish specific common guidelines for C&C Group to follow in assuring that prompt medical attention is provided to employees suffering from either a work related or non-work related injury or illness.

C&C Group facility and jobsites must ensure that readily available medical personnel and first aid supplies are available to all employees to provide advice and consultation within reason, regarding matters of employee occupational health and to respond in case of accident. This includes identifying and posting the location of a designated medical treatment facility and/or emergency care center in a conspicuous location at each fixed location or fixed jobsite. Should outside medical services be unable to respond in a reasonable amount of time as defined by OSHA (3 to 4 minutes), C&C Group facility and jobsites may use various strategies to provide access within this time frame, such as training internal personnel who will be capable of acting as voluntary first responders.

SCOPE

Applies to all C&C Group work sites, i.e., offices, client job sites, etc., and includes visitors, vendors, and subcontractors.

DEFINITIONS

Established Medical Treatment Facility means the occupational medical treatment provider and/or emergency care center identified as being capable of, and established by a C&C Group location to initially treat employee injuries and illnesses.

First Aid means the following types of treatment:

- Using non-prescription medications at non-prescription strength
- Cleaning, flushing, or soaking wounds on the skin surface
- Using wound coverings, such as bandages, 'BandAids', gauze pads, etc., or using 'SteriStrips' or butterfly bandages
- Using hot or cold therapy
- Using any totally non-rigid means of support, such as elastic bandages, wraps, etc.

- Using temporary immobilization devices while transporting an employee, such as splints, slings, neck collars, or back boards
- Drilling a fingernail or toenail to relieve pressure, or draining fluids from blisters
- Using eye patches
- Using simple irrigation or a cotton swab to remove foreign bodies not embedded in or adhered to the eye
- Using irrigation, tweezers, cotton swab or other simple means to remove splinters or foreign material from areas OTHER than the eye
- Using finger guards
- Using massages
- Drinking fluids to relieve heat stress

Illness can be classified as a skin disease/disorder, respiratory condition, poisoning, or other illnesses resulting from an event in the work environment. Examples include, but are not limited to:

- Contact dermatitis
- Eczema
- Silicosis
- Asbestosis
- Toxic inhalation
- Poisonings by lead, mercury, or other metals
- Poisonings by carbon monoxide, hydrogen sulfide, or other gases
- Poisonings by organic solvents or by other chemicals
- Heatstroke, sunstroke, heat exhaustion, or other heat-related factors
- Freezing, frostbite, or other cold-related factors
- Effects of Non-ionizing radiation (welder's flash or lasers)
- Blood borne Pathogenic diseases
- Microbial Exposure
- Ionizing Radiation

Injury means any wound or damage to the body resulting from an event in the work environment. Examples include:

- Cut/laceration
- Puncture
- Abrasion
- Contusion/bruise

- Fracture
- Chipped tooth
- Amputation
- Insect bite
- Electrocution
- Thermal, chemical, electrical or radiation burn
- And, sprain/strain injuries to muscles, joints and connective tissues when the result from a slip, trip, fall or other similar accident

Medical Treatment means the managing and caring for a patient for the purpose of combating disease or disorder. The following activities are NOT medical treatment:

- First aid
- Visits to a doctor solely for observation or counseling
- Diagnostic procedures, including the administering prescription medications that are used solely for diagnostic procedures

Work-related Injury or Illness means an injury or illness resulting from an event or exposure in the work environment causing or contributing to the condition or significantly aggravating a preexisting condition.

Work Environment includes work sites where one or more employees are present as a condition of their employment.

REQUIREMENTS

Designated Medical Treatment Facility

C&C Group will ensure that readily available medical personnel are available to employees to provide advice and consultation within reason regarding matters of employee occupational health.

The facility and jobsite must identify and post the location of a designated medical treatment facility and/or emergency care center including name, address, telephone number, and hours of operation. This information should be posted in a conspicuous location at the facility or job site. The designated medical treatment facility or emergency care center should maintain similar hours of operation as the facility and be able to respond to a workplace emergency within a reasonable amount of time.

FIRST AID

ALL INJURIES, REGARDLESS OF HOW SMALL, MUST BE REPORTED TO THE EMPLOYEE'S IMMEDIATE SUPERVISOR AND TREATED AS SOON AS POSSIBLE AFTER AN ACCIDENT.

If an employee becomes injured or ill anywhere due to a work-related or non-work related problem and needs immediate medical aid, it must be reported to his/her Supervisor or the Safety Officer. Failure to report minor injuries or to receive supervised medical treatment may result in serious infections or complications to the employee's health.

In the absence of a clinic or hospital near the workplace, OSHA regulations require that a person or persons be trained to render first aid and that first aid supplies be readily available. Although the term "readily available" has not been defined in the regulations, OSHA has indicated that 3-4 minutes is acceptable as the time frame within which to begin first aid.

OSHA's interpretation presents a challenge to a service company like C&C Group because our "workplace" is not always in a fixed location -- it is a changing environment that follows the employee wherever they may be working. Accordingly, C&C Group will use various strategies to provide employees with access to First Aid. These may include training C&C Group personnel to self-administer First Aid; training C&C Group personnel who are willing to serve as "first responders" and render First Aid/CPR to others on a voluntary basis; providing access to trained individuals from other companies who work alongside C&C Group at job sites; providing access to client medical clinics; or calling 9-1-1 or local emergency phone numbers as indicated in the Health and Safety Plan.

Because of the potential for exposure to blood borne pathogens and significant liability concerns, there is no job in the Company that <u>requires</u> an employee to render First Aid or cardiopulmonary resuscitation (CPR) in the course and scope of their employment, unless such a requirement becomes necessary due to local, State or Federal Safety and Health Regulations.

Transportation of injured persons will be by ambulance unless a volunteer chooses to assist by driving the injured employee to a medical facility. If there is any question as to the best method of transportation an ambulance should be utilized.

When C&C Group's strategy for providing access to First Aid/CPR involves the use of "first responders", a First Responders Program should be established and administered at the local level. The Safety Officer is responsible for monitoring and maintaining this program, if implemented.

Elements of the First Responder Program should include:

- Safety Officer must be certified in basic First Aid & CPR per a recognized certification source such as the Red Cross, local hospital, etc. The Red Cross first aid course and CPR course are approximately 8 hours in duration. CPR requires annual refreshers. First Aid requires refreshers every three (3) years.
- Safety Officer will seek employees who wish to volunteer to be trained and certified in basic First Aid & CPR per a recognized certification source as defined by local or State requirements. These employees must maintain "current" First Aid and CPR certification, appropriately documented, in their personnel file.
- Basic First Aid & CPR will be administered by First Responders only to stabilize the employee until professional medical attention can be provided.

EMPLOYEE FIRST AID / CPR

Employee training in basic First Aid and cardiopulmonary resuscitation (CPR) is encouraged because of its value and benefit to individuals, their families and the community.

The company also supports any employee who, while on the job, chooses to act as a "Good Samaritan" to assist a fellow employee or another person with First Aid or CPR. It is C&C Group's intent that first Aid supplies and basic personal protective equipment against blood borne pathogens be accessible to employees at every work site during all shifts.

If an employee makes the decision to provide first aid to someone, universal precautions shall be followed, and it should be assumed that all blood and bodily fluids are contaminated with blood borne pathogens. In addition, they should wear protective medical gloves found in the First Aid Kit and use any other personal protective equipment (such as protective glasses with side shields or a full-face shield) to help avoid exposure to blood in the eyes or on the face.

First Aid providers should follow the example of emergency medical personnel, doctors and nurses who wear personal protective equipment to prevent exposure to blood borne pathogens.

If blood or potentially contaminated material gets on the skin, it must be washed off immediately using water and a non-abrasive soap. If available, an antiseptic soap or rinse must be used. If blood ever gets in the eyes, lips, mouth or nose, the employee must go to a sink, water fountain, eye wash or body wash station and flush the area with running water as quickly as he/she can.

The supervisor must always be aware of the potential exposure to a blood borne pathogen after the employee has washed or flushed the exposed area. Decontamination of the exposed surfaces, tools and equipment should be conducted. This must be done immediately, and no later than the end of the shift or work period. Remember that there is a vaccine for Hepatitis B. This must be discussed with a physician as soon as possible after a potential exposure.

FIRST AID STATIONS / FIRST AID KITS

A First Aid Station or First Aid Kit is to be readily available to employees as described previously. For employees working off-premises, a first aid kit should be provided in each company vehicle, signed-out for use when traveling in personal vehicles and rental vehicles, or provided on the jobsite.

Whether within the facility or in a vehicle, each First Aid Kit must be stored in a properly labeled weatherproof container, stocked with the basic supplies specified in the inventory in Attachment 7-1. The physician's approval of the inventory list is not required but may be needed to address unusual exposure situations.

IMPORTANT: If an employee declines First Aid and/or medical treatment for a reported on-the-job injury after the Supervisor recommends it, that employee should NOT be allowed to continue work. Supervisors should discuss each situation with the Safety Officer or Project Manager before allowing that employee to return to duty.

The Safety Officer, or someone he/she may designate, is responsible for checking and maintaining the First Aid Cabinets. Supervisors on jobsites are responsible for assuring suitable supplies are provided in the first aid kits on-site or in their vehicles. This person will take a weekly inventory of supplies and make sure the station or kit remains adequately stocked. A basic inventory list for First Aid Kits is provided on Attachment 7-1.

Because of the variety of operations that the Company is involved in, it is suggested that consultation with the Facility's designated medical treatment facility be arranged to determine if the First Aid Kits are adequate for the operational exposures of your particular workplace. Attachment 7-1 can be photocopied and used as a guide for re-ordering supplies.

EMERGENCY EYE / BODY WASH STATIONS

Where the eyes and/or body of any employee may be exposed to injurious chemical / corrosive materials, suitable eye and/or body drenching and/or flushing facilities shall be provided whether at the C&C Group facility or at a temporary worksite. Emergency eye and/or body wash stations can be either of temporary or permanent installation.

In areas where the extent of possible exposure to injurious chemical / corrosive materials is very low, a specially designated pressure controlled and identified water hose can be used when proper personal protective equipment also is used (e.g. full-face shield). The hose system must be equipped with a proper face and body wash nozzle and provide copious amounts of low velocity potable water. An appropriate portable eye wash device containing not less than one gallon of potable water, would also be acceptable under these conditions.

At locations where hazardous chemical / corrosive materials are handled by employees (e.g. battery servicing facility), proper eyewash and body drenching equipment must be available. Although OSHA has not adopted specific requirements regarding flow rates for drenching/flushing facilities, ANSI Z358.1 provides detailed information regarding the installation and operation of emergency eyewash and shower equipment, including the requirements for flow rate.

Section 4.1 of ANSI Z358.1 specifies that emergency shower heads shall be capable of delivering a minimum of 20 gallons per minute (gpm) of flushing fluid at a velocity low enough to be non-injurious to the user. A sufficient volume of flushing fluid shall be available to supply the flow rate for a minimum fifteen-minute period. As such, both temporary and permanently installed eye / body wash stations must provide at least 20 gpm for 15 mins.

Inspection and maintenance of eye wash systems should be provided at least weekly by assuring sanitary conditions and /or following the manufacturer's requirements for maintenance. Plumbed systems should also be provided a water flow test to minimize contaminants in the line. Inspection and maintenance should be properly documented.

BLOOD BORNE PATHOGENS (UNIVERSAL) PRECAUTIONS TRAINING

When an employee comes into direct contact with blood, bodily fluids or body tissues of another person, they are at risk of becoming infected with diseases that may be carried in the other person's body fluids. Accidental exposures can happen on or off the work site, in any number of day-to-day situations.

This is why the Company believes that each employee should have a basic understanding and awareness of the dangers of contracting a potentially deadly disease through such exposures. Communicating basic information about these hazards, including information contained in this policy, is part of the Company's safety and health program.

Therefore, employees should receive a basic awareness level training concerning "Universal Precautions" such that employees may follow Universal Precautions in the event of potential exposure to blood or other body fluids.

A. <u>Training Requirements</u>

Training records must be maintained by the Safety Officer containing the date of the training, a summary of the training session, names and qualifications of the instructors conducting the training and the names and job titles of the persons attending the training.

Training records must be maintained for a minimum of three (3) years from the date the training was conducted. Training must be conducted by a qualified and competent person <u>knowledgeable</u> in the subject matter.

B. <u>First Responder Exposure</u>

If an employee is a First Responder or decides to be a "Good Samaritan" and provides first aid on an injured victim involving blood or bodily fluids, personal protective equipment must be used and Universal Precautions followed treating all bodily fluids as infectious. Refer to OSHA 29CFR 1910.1030 - Blood borne Pathogens Standard and Policy Section 9 – Blood borne Pathogens for specific information.

In addition to those items listed in Attachment 7-1 and/or possibly required by a consulting physician, First Aid Stations must at least include the following supplies:

- latex gloves
- one-way valve CPR mask
- biohazard bags
- plastic baggies
- tongs

ATTACHMENT 7-1: FIRST AID KIT INVENTORY CHECKLIST

The First Aid Kit should contain the following or similar items but commercially available Kits vary widely and need not be identical in every respect.

Item	<u>Quantity</u>	Need
Protective Rubber Gloves (Surgical Type)	2 pair	
Protective CPR Mask w/One-Way Valve	1 each	
Protective eyewear and face covering	1 each	
Antiseptic Soap	1 each	
Absorbent gauze, 24" x 72"	1 pkg.	
Spool of absorbent gauze	1 spool	
Large adhesive bandages, 1"	1 pkg.	
Small adhesive bandages, 1/2"	1 pkg.	
Bandage compresses, 4", 1 per pkg.	1 pkg.	
Eye dressing	1 pkg.	
Bandage scissors	1 pair	
Tweezers	1 pair	
Triangular bandages, 1 per pkg.	3 pkg.	
Antiseptic pads, 3 per pkg.	2 pkg.	
Medical adhesive tape	1 roll	
Self-activating cool packs	2 each	
Burn ointment	4 pkg.	
Sterile eye wash, in bottle	1 each	
Heavy-duty sealable plastic bags	3 each	
Disposable splints	1 set	
Approved biohazard bags, red in color	4 each	
Large Baggies	4 each	
Tongs		
American Red Cross Pocket First Aid Guide		
First Aid Kit Inventory Checklist forms First Aid Report	Forms	
Date of order:	_ By:	_
For Location:		_
Consulting Physician (If Applicable.):		
Address:		
Telephone Number:		

ATTACHMENT 7-2: DESIGNATED MEDICAL TREATMENT FACILITY

In case of employee accident or injury, the following designated medical treatment facility has been identified to direct the injured employee for immediate treatment:

NAME OF FACILITY:		
ADDRESS:		
EMERGENCY TELEPHONE NUMBER:		
HOURS OF OPERATION:		
SUPERVISOR OR SAFETY OFFICER:		
SUPERVISOR OR SAFETY OFFICER CELL / PAGER NUMBER:		

ALL WORK-RELATED INJURIES OR ILLNESSES MUST BE IMMEDIATELY REPORTED TO THE SUPERVISOR.

C&C Group will take proactive steps to protect the workplace in the event of an infectious disease outbreak. It is the goal of C&C Group during any such time period to strive to operate effectively and ensure that all essential services are continuously provided and that employees are safe within the workplace.

C&C Group is committed to providing authoritative information about the nature and spread of infectious diseases, including symptoms and signs to watch for, as well as required steps to be taken in the event of an illness or outbreak.

PREVENTING THE SPREAD OF INFECTION IN THE WORKPLACE

C&C Group will ensure a clean workplace, including the regular cleaning of objects and areas that are frequently used, such as bathrooms, break rooms, conference rooms, door handles and railings.

We ask all employees to cooperate in taking steps to reduce the transmission of infectious disease in the workplace. The best strategy remains the most obvious—frequent hand washing with warm, soapy water; covering your mouth whenever you sneeze or cough; and discarding used tissues in wastebaskets. We will also install alcohol-based hand sanitizers throughout the workplace and in common areas.

Unless otherwise notified, our normal attendance and leave policies will remain in place. Individuals who believe they may face particular challenges reporting to work during an infectious disease outbreak should take steps to develop any necessary contingency plans. For example, employees might want to arrange for alternative sources of childcare should schools close and/or speak with supervisors about the potential to work from home temporarily or on an alternative work schedule.

A. Telecommuting

Telework requests will be handled on a case-by-case basis. While not all positions will be eligible, all requests for temporary telecommuting should be submitted to your manager for consideration.

B. Staying Home When III

Many times, with the best of intentions, employees report to work even though they feel ill. We provide paid sick time and other benefits to compensate employees who are unable to work due to illness.

During an infectious disease outbreak, it is critical that employees do not report to work while they are ill and/or experiencing the following symptoms: (Examples include fever, cough, sore throat, runny or stuffy nose, body aches, headache, chills and fatigue). Currently, the Centers for Disease Control and Prevention recommends that people with an infectious illness such as the flu remain at home until at least 24 hours after they are free of fever (100 degrees F or 37.8 degrees C) or signs of a fever without the use of fever-reducing medications. Employees who report to work ill will be sent home in accordance with these health guidelines.

C. Requests for Medical Information and/or Documentation

If you are out sick or show symptoms of being ill, it may become necessary to request information from you and/or your health care provider. In general, we would request medical information to confirm your need to be absent, to show whether and how an absence relates to the infection, and to know that it is appropriate for you to return to work. As always, we expect and appreciate your cooperation if and when medical information is sought.

D. Confidentiality of Medical Information

Our policy is to treat any medical information as a confidential medical record. In furtherance of this policy, any disclosure of medical information is in limited circumstances with supervisors, managers, first aid and safety personnel, and government officials as required by law.

Social Distancing Guidelines for Workplace Infectious Disease Outbreaks

In the event of an infectious disease outbreak, C&C Group may implement these social distancing guidelines to minimize the spread of the disease among the staff.

A. During the workday, employees are requested to:

- 1. Avoid meeting people face-to-face. Employees are encouraged to use the telephone, online conferencing, e-mail or instant messaging to conduct business as much as possible, even when participants are in the same building.
- If a face-to-face meeting is unavoidable, minimize the meeting time, choose a large meeting room and sit at least one yard from each other if possible; avoid person-to-person contact such as shaking hands.
- 3. Avoid any unnecessary travel and cancel or postpone nonessential meetings, gatherings, workshops and training sessions.
- 4. Do not congregate in work rooms, pantries, copier rooms or other areas where people socialize.
- 5. Bring lunch and eat at your desk or away from others (avoid lunchrooms and crowded restaurants).
- 6. Encourage members and others to request information and orders via phone and e-mail in order to minimize person-to-person contact. Have the orders, materials and information ready for fast pick-up or delivery

B. Outside activities

Employees might be encouraged to the extent possible to:

- 1. Avoid public transportation (walk, cycle, drive a car) or go early or late to avoid rush-hour crowding on public transportation.
- 2. Avoid recreational or other leisure classes, meetings, activities, etc., where employees might come into contact with contagious people.

The use, sale, purchase, possession, transfer, manufacture, or being under the influence of alcohol, illegal drugs or any controlled substance (hereinafter "alcohol or drugs") other than the proper use of lawfully prescribed medication during working hours, including break time and lunch time, or while on company's premises or worksites is strictly prohibited.

An associate who is taking lawfully prescribed medication must disclose this fact to their immediate supervisor, and a determination must be made concerning that associate's ability to work while taking such medication.

PURPOSE

It is our objective to create and maintain a safe, healthy and productive work environment for all associates, to provide high quality products and services for our customers in an efficient manner and to maintain the integrity and security of company facilities and property. This policy has been developed to achieve those objectives and to insure the safety of our associates, our customers, and other persons who do business with us by preventing accidents and casualties that result from impairment of associates because of alcohol, illegal drugs and/or other controlled substances.

A. Application - To the extent that the drug/alcohol testing policy set forth herein is determined by the company to be subject to statutory or other legal regulation or restriction, or collective bargaining agreement(s) not reflected in this Policy, this Policy will be administered and enforced in a manner consistent with such statutory or other legal regulation or restriction, or collective bargaining agreement(s). If for any reason any provision in this Policy is declared to be void, invalid or otherwise legally unenforceable, the remaining provisions of this Policy shall be valid and the company shall have the right to enforce such provisions.

B. Definitions

- 1. **Illegal Drugs and/or Controlled Substances:** any drug which is not legally obtainable or any narcotic drug, hallucinogenic drug, amphetamine, barbiturate, marijuana, or any other controlled substance. The terms also include inhalants, abuse-able glues, aerosol paints and other similar substances. These terms are used interchangeably herein.
- 2. **Legal Drugs:** a controlled substance taken pursuant to and in accordance with a valid prescription written for the applicant or associate by the associate's physician or other health care provider or when used as otherwise authorized by law. The term also includes over-the-counter and non-prescription medication taken pursuant to and in accordance with label direction.
- 3. **"Company Property":** any and all offices, work locations, desks, lockers, parking lots, motor vehicles, equipment and other tangible objects located on or in any property or facility owned by C&C Group, or on any location C&C Group engages in its business and any motor vehicles or equipment owned C&C Group or which are used to perform company business.

C. Legal Drugs

- 1. This policy does not apply to or prohibit the possession or use of legal drugs while at work, performing company business or on company property.
- 2. However, an associate is required to report the use of any legal drug to their immediate supervisor or other appropriate management person if the use of such legal drug may affect the associate's capacity or ability to properly and safely perform job duties or may create a danger to the associate or to other persons.
- 3. If an associate is determined by management to be under the influence of or impaired by a legal drug, the associate shall be required to take a leave of absence and/or to comply with other appropriate and reasonable requests by C&C Group.

D. Enforcement

C&C Group shall have the right to enforce this Policy through the following means, the submission to which, upon request C&C Group shall be a condition of continued employment.

- 1. Searches and/or Inspections. Any associate whom C&C Group reasonably suspects is in possession of alcohol, illegal drugs or other controlled substances, and/or drug paraphernalia, or otherwise has violated any provision in this Policy, while at work, performing company business or on company property, based upon the specific, personal observations of at least one management person or upon other reliable information, shall be required to submit to a Search and/or Inspection of:
 - a. any vehicle on company property (including an associate's personal vehicle or any vehicle in which an associate is a passenger or driver);
 - b. any vehicle engaged in company business;
 - c. any offices, lockers, rooms, parking lots, desks, tool boxes (whether company property or the individual associates), packages or other structures or containers on company property; and /or
 - d. the associate's personal property or effects (including but not limited to purses, briefcases, wallets, handbags, lunch boxes, tool boxes, coats and clothing).

E. Alcohol or Drug Testing

Associates shall be required to submit to blood, urine, breath or other alcohol and/or drug tests in the following circumstances:

- 1. **Pre-Employment**: When required by project specifications and shall be subject to any and all collective bargaining agreement restriction(s).
- 2. **Post-Accident**: Any associate who, while performing company business or while on company property, is directly involved in an accident or safety-related incident resulting in a fatality, personal injury requiring medical attention (other than minor first-aid treatment), or property damage shall be required to submit to post-accident

alcohol and/or drug testing. The term "directly involved in an accident or safety – related incident" means that an associate's conduct, actions or inactions are determined by the company to be, or cannot be ruled out as, a causative factor in the events leading to or causing an accident or safety-related incident.

- 3. **Reasonable Suspicion**: Any associate who C&C Group reasonably suspects is currently under the influence of or impaired by alcohol, illegal drugs and/or controlled substances (or a combination of alcohol, illegal drugs and/or other controlled substance), or C&C Group reasonably suspects is violating or has violated any provision in this Policy, while at work, performing company business or on company property, based upon the specific observations of at least one management official or upon other reliable information, shall be required to submit to alcohol and/or drug testing.
- 4. **Random Post-Positive**: Any associate who previously has had a positive alcohol and/or drug test or screen result shall be required C&C Group sole discretion, to submit to random, unannounced alcohol and/or drug testing for six (6) months following such positive test result. The limitation and frequency of random testing shall be subject to any and all collective bargaining agreement restrictions.

F. Disciplinary Action

The following disciplinary action may be taken against any associate in violation of thisPolicy:

- 1. Any associate who violates this Policy or any provision herein, or who fails to cooperate fully with C&C Group in the implementation and/or enforcement of this Policy, shall be subject to appropriate disciplinary action, up to and including immediate discharge, even for a first offense.
- 2. In addition to specific violations of this Policy, the following circumstances will be considered insubordinate misconduct and grounds for appropriate disciplinary action, up to and including immediate discharge, even for a first offense.
 - Failure or refusal to execute a consent/disclosure form and submit to an alcohol and/or drug test upon request by C&C Group Failure or refusal to disclose and explain the nature of any substance suspected of being in violation of this Policy upon request by C&C Group;
 - b. Failure or refusal to leave company property upon request by C&C Group;
 - c. Failure or refusal to submit to searches upon request C&C Group for falsifying or altering, or attempting to falsify or alter, a sample submitted for alcohol and/or drug testing;
 - d. A positive alcohol and/or drug test result;
 - e. Failure or refusal to sign and return to C&C Group the "Acknowledgment of Receipt and Compliance" form attached to this Policy.

3. Nothing in this Policy shall require C&C Group to impose alcohol and/or drug testing as a prerequisite to any disciplinary action, up to and including immediate discharge, nor shall this Policy restrict the discretion of C&C Group to take disciplinary action, including discharge, against an associate based solely on evidence of behavior, personal observations, or other evidence or information customarily relied upon in making employment and disciplinary decisions.

G. Testing Procedures

- 1. Unless circumstances dictate otherwise, alcohol testing will be by blood analysis and drug testing will be by urine analysis. A reputable laboratory selected by C&C Group will conduct the tests. C&C Group shall pay the cost of testing. The test will screen for and determine the presence of the following chemicals, drugs and related metabolites: amphetamines, barbiturates, benzodiazepines, marijuana, cocaine, methadone, methaqualone, opiates, phencyclidine, propoxyphene and ethyl alcohol/ethanol.
- 2. An alcohol and/or drug test shall be deemed positive only after a Gas Chromatography/Mass Spectrometry (GC/MS) test for drugs or a Gas Chromatography (GC) test for alcohol has confirmed and initial positive test/screen result. A copy or an individual's test results shall be provided to the individual only upon written request by the tested individual.
- 3. Alcohol and/or drug test results will be kept confidential and will be disclosed only to C&C Group management or other persons on a need-to- know basis.
- 4. Random-any associate that is classified as a maintenance of way worker by the Federal Railroad Administration is subject to random drug and alcohol testing at any time.

H. Associate Assistance and Rehabilitation Programs

It is the responsibility of each associate to seek assistance, treatment or rehabilitation from such programs before substance abuse problems are discovered or violations of this Policy occur. Once a violation of this Policy occurs, subsequently seeking assistance or entering a substance abuse treatment or rehabilitation program will not necessarily avoid or lessen the disciplinary action imposed on the associate or have any relevance or bearing on the appropriate disciplinary action taken by C&C Group. An associate's decision voluntarily to seek assistance or to enter a substance abuse program shall not be used C&C Group as the sole basis for any disciplinary action against the associate.

It is company policy to fully cooperate with inspections by enforcement agencies such as the Occupational Safety and Health Administration (OSHA). The following guidelines shall be followed when an OSHA or other agency representative arrives at our project:

A. INSPECTIONS

Use the **"OSHA Inspection Questionnaire – Appendix J"** as a guide and for the purpose of documentation of the inspection and follow these steps:

- 1. As soon as the OSHA Compliance Officer arrives on site, immediately contact by telephone the person responsible for Safety & Health issues, Chad Cillessen or any other designated C&C Group representative noted in this section.
- 2. Be polite, respectful, and cooperative while waiting for the Company Officer to arrive. Request up to a one hour delay for them to arrive before beginning the inspection.
- 3. Request to see the Inspector's credentials.
- 4. Get a copy, if possible, of the Compliance Officer's work assignment for your site (usually a building permit or Dodge Report, or a copy of a complaint.) C&C Group may want to contest an alleged violation, so record all pertinent information. The names, business affiliation and addresses of all persons present should be written down.
- 5. If a complaint is involved, you should ask if the party(s) filing the compliant requested that their name be withheld. If he/she made no such request, then the disclosure of the name of the party initiating the complaint is allowed. Whether the complaint was filed by a present or past associate, customer, subcontractor, material supplier, or by a person not directly employed around the workplace involved; the answers to these questions may be extremely important to us.

B. REASON FOR INSPECTION

Ask the Compliance Officer the reason for inspection. OSHA has established the following system of inspection priorities:

- 1. *Imminent Danger* situations are given top priority.
- 2. Catastrophes and Fatal Accidents: Investigation of fatalities and accidents hospitalizing three (3) or more company associates are second priority. OSHA must be notified within eight (8) hours. Investigations are made to determine if OSHA standards were violated and to avoid recurrence of similar accidents.
- Associate Complaints: Written and signed complaint by current associate. If it is a complaint, ask for a copy. (Inspections should include <u>only</u> the area of complaint accessed by the most direct route.)
- 4. *Programmed High Hazard Inspections:* A special program that targets inspections at the most dangerous work places.

5. Other Programmed Inspections (also referred to as General Inspection):

Randomly chosen low-hazard and non-manufacturing sites.

- 6. *Follow-up Inspections:* Re-inspection of earlier inspections to determine whether previously cited violations have been corrected.
- 7. Other types of inspections could include: *referrals, fax complaints, or focused inspections (very limited).*

C. OPENING CONFERENCE

The Opening Conference may begin prior to the arrival of the Safety Director or other designated representative. You may ask the Compliance Officer for a delay of up to **1-hour** to wait for the appropriate C&C Group representative to arrive.

Before starting the inspection, the Compliance Officer should explain the nature of the inspection, the general scope, and outline records he/she wants to review and the associates he/she wishes to question. You should request permission to notify the customer, other contractors, and subcontractors that an inspection is underway at the jobsite.

The Compliance Officer may ask questions necessary to obtain information to complete the inspection, such as:

- 1. Number of Associates
- 2. Number of Injuries/Illnesses at site
- 3. Name and address of subcontractor(s)
- 4. Hazard Communication Program Material Safety Data Sheets (SDS)
- 5. Size of Project Dollar Amount
- 6. Length of Project Completion Date

Be friendly and answer the questions, but only if you know the answers. Do not guess - it may be important later. Do not offer any additional information that is not requested of you. <u>It is your right</u>.

D. THE INSPECTION

It is appropriate to ask the Inspector to wait until the Company's designated representative can be notified. The following individuals shall be contacted in the event an OSHA Compliance Officer shows up on a jobsite:

OSHA INSPECTION PROCEDURES

NAME	TITLE	LOCATION	EMAIL
Chad Cillessen	CIO	KC OFFICE	Office: (913) 529-6240 Mobile: (913) 515-1949
Steve Hopfinger	KC Operations Manager	KC OFFICE	Office (913) 529-6261 Mobile: (913) 530-7164
Steve Wuennenberg	VP, General Manager	St. Louis Office	Office (314) 373-5941 Mobile: (314) 722-9823
Brian Schepers	VP, General Manager	Jefferson City Office	Office (573) 606-8450 Mobile: (573) 291-5425
David Travis	VP, General Manager	Wichita Office	Office (316) 494-4676 Mobile: (316) 308-5035
Neil Young	VP, General Manager	Springfield Office	Office (417) 429-4153 Mobile: (417) 894-3837

If the Compliance Officer is seeking to inspect without probable cause or to make an unreasonable inspection of the jobsite, consider requesting the Compliance Officer to obtain a search warrant in order to enter a jobsite. **C&C Group will not require a Compliance Officer to obtain a warrant before permitting entry <u>under normal circumstances</u>.**

<u>Probable cause</u> for an inspection exists if the employer has been selected for an inspection by a neutral process (a programmed inspection), if an accident has occurred, if an associate complaint has been filed, or if a Compliance Officer has witnessed a violation from outside the premises. In all these situations (other than a programmed inspection), probable cause to inspect exists only to the extent and scope required to investigate the accident, complaint or violation at issue and a copy of the inspection prompting paperwork should be provided to the Company. We may resist efforts to expand an inspection beyond the circumstances for which there is probable cause by requesting a search warrant.

E. RIGHTS TO REASONABLE INSPECTION

The OSHA Act guarantees employers the right to a reasonable, orderly and fair inspection. The inspection must be:

- 1. At a reasonable time.
- 2. To inspect within reasonable limits.
- 3. In a reasonable manner.
- 4. To question a reasonable number of associates if there is not an authorized representative of associates.

If the investigation involves a complaint, the Compliance Officer may inspect and interview only with respect to matters reasonably related to the complaint. After preliminary investigation, if you believe that a request is unreasonable, you must use careful judgment and good faith in handling the situation. You can discuss the matter with the Compliance Officer and explain why you think his/her request is unreasonable. If he/she insists on the request, then you may either give in or ask the Compliance Officer to wait until top Management can be consulted. If you have strong convictions that the request is unreasonable and unnecessary, you should consult with the C&C Group Construction, Safety Director or another designated C&C Group representative identified in this section before proceeding. There will probably be other areas that the Compliance Officer may wish to inspect while management is making a decision.

F. AVOIDANCE OF DISRUPTION

The United States Department of Labor's regulations direct Compliance Officers to conduct investigations to avoid any undue and unnecessary disruption of the normal operations of the employer. You should inform the Inspector of the day's schedule and assist him/her in conducting the investigation in a manner least disruptive of work.

G. ACCOMPANY THE OFFICER

This is an employer's right and a most important one, since in most cases you may be the only spokesperson for the company during the inspection, as well as the eyes and ears of Management for any contest proceeding later. The Company Representative is to take the OSHA Inspector to the site to be inspected by the most direct route, providing the fewest additional opportunities for unrequested inspections. The OSHA statute gives the Compliance Officer the authority to interview associates, privately if he/she wishes, and to examine machinery or equipment. The Compliance Officer is also permitted to take photographs, use a video camera, take samples, and to use other reasonable techniques. You should also take pictures, video, and samples as near to those of the Compliance Officer as possible. If the Compliance Officer wants to inspect additional areas not discussed during the opening conference, request another opening conference to determine the revised scope of the inspection.

TAKE NOTES: It is imperative that you keep as complete of a record as possible. It is advised to use your company phone to film the inspection, getting as much detail as possible. If the compliance officer tells you to stop recording, take as detailed written notes as possible. Identifying areas visited, equipment, material examined, associates interviewed and a description of each ALLEGED hazard. Regardless of what the compliance officer may say, it is your right to take notes/record the inspection. At the beginning of the recording (if possible) state the following quotation, if writing notes, write the following quotation at the top of the page: *"Confidential Attorney Work Product - Made in Anticipation of Litigation " or* use **Appendix J – OSHA Inspection Questionnaire** in this manual.

H. REPRESENTATIVES AUTHORIZED BY ASSOCIATES

The OSHA statute provides the right for an associate representative to accompany the Compliance Officer. This person is often the Project Supervisor, an appointed steward or union safety representative. The statute further provides, in the absence of an authorized associate representative, the Compliance Officer "shall consult with a reasonable number of associates concerning matters of safety and health in the workplace."

I. CLOSING CONFERENCE

After an Inspector completes the inspection, a closing conference is conducted with the employer representative. The inspector is also to <u>informally</u> advise you of any apparent violation(s). This closing conference is important; do not agree that you violated the act or any standards during the closing conference.

Any admission of violation of the OSHA Act will be noted by the Compliance Officer and can be used against the company at a later date.

If the Compliance Officer believes a violation may have occurred, he/she may tell you that he/she does not know if you will be cited for "such and such" conditions, but will ask how long it will take to correct those same conditions. You're agreeing to have alleged unsafe condition(s) corrected within a certain time period becomes your abatement period, assuming you receive a citation. All hazards noted should be abated immediately while performing the inspection if possible.

The employer has a say in deciding on an abatement date. The Compliance Officer does not set it alone. The Compliance Officer should ask, "When can you have it corrected?" It is up to the employer to insist on an adequate abatement period. If the condition to be corrected is a very minor one and will not be a problem to correct, and if the employer recognizes that it is an unsafe condition, then agree to an early abatement period (i.e., immediate or one day after receipt of citation). If you question the Inspector's reasoning and you feel you are, in fact, in compliance or know that a certain amount of time would be necessary to correct the alleged unsafe condition, then deny a violation and insist on a longer abatement date, usually 15 to 20 days. Remember that the abatement date becomes effective upon receipt of the Safety Order (citation) from OSHA. Even with immediate abatement, the company has one day after the receipt of the citation in which to correct the alleged unsafe condition.

1. Employers generally receive a Safety Order (citation) about ten (10) to fifteen (15) working days after an inspection, but OSHA has up to six (6) months to issue an employer a citation. It takes this long for an Inspector to write up his/her report, send it in, and have it go through all the administrative channels. If we wait to see what we will be cited on and we agree to an immediate or one-day abatement, then we may not have time to make the correction. Failing to correct within the time allowed may subject us to a maximum penalty of \$7,000 a day for failure to abate.

After the inspection process is over and a citation has been issued, make sure you correct cited violations that you decide not to contest. Re-inspections are becoming more prevalent, due to Federal pressures.

- 2. Items you may want to point out to the Compliance Officer:
 - a. Review of the Safety Task Analysis.
 - b. Review of Company Safety Manual requirements.
 - c. Copies of Jobsite Safety meeting minutes.
 - d. Copies of "Weekly Safety Meetings" or other associate training material.
 - e. Copies of "safety warnings to individuals, subs, and trade contractors".
 - f. Any other material that would help to establish "good faith compliance efforts."

3. <u>Written Records:</u>

If the project is cited for alleged violations, make a written report to the Safety Director immediately following the closing conference. This report should provide as much detail as possible. For instance, location of alleged violation; what actually was occurring at the time of inspection relating to the alleged violation; and what sort of investigation techniques or documentation were used by the Inspector.

4. <u>Alleged Violations:</u>

The company will receive by mail a Safety Order (citation) with a cover letter stating posting requirements. If these are sent to the Corporate Office, the Safety Director will see to the compliance of all Safety Order requirements. However, if it is determined after review with all concerned, that the company should contest, the Safety Director will take the correct steps to do so.

If the Safety Order is sent to the jobsite, it should be forwarded to the Safety Director at the Corporate Office so it may be expedited.

5. <u>Imminent Danger:</u>

If the Compliance Officer concludes that conditions or practices exist that could reasonably be expected to cause death or serious physical harm before the danger can be eliminated, he/she shall inform the employer or a representative of the company and attempt to get the employer to voluntarily abate the danger. When the danger can be immediately abated without great expense or shutting down the job, we should do so immediately. However, the Compliance Officer has no authority to shut down the job without a court order. He/she can often obtain such an order, however, in a matter of a few hours.

6. <u>Serious - Non-serious:</u>

A Safety Order for violation of a standard is either deemed serious or nonserious. If it is non-serious, no penalty is assessed unless ten or more violations were charged. In this event, penalties may be assessed for each non-serious violation. Read the Safety Order carefully. Note especially the date by which alleged violations are to be corrected. If you do not contest a particular violation, it must be corrected by the date so indicated. Failure to correct puts C&C Group in a position of "Failure to Abate," which fines may be assessed up to \$7,000 per day for up to ten days, the maximum fine being \$70,000.

7. <u>Contesting Citations:</u>

From the day we receive the Safety Order at the jobsite or office, we have fifteen (15) working days in which to contest. We may contest whether the violation occurred, its gravity (serious or non-serious), the amount of the penalty, the abatement period, or any combination thereof. If fifteen (15) working days elapse and no contest have been filed by us, the Safety Order becomes final and binding. We must then pay any assessed penalties and correct all alleged violations.

8. Informal Hearings:

During the fifteen (15) working day period in which we may contest a Safety Order, we may request an informal hearing. However, this request does not extend the 15 working day period while seeking judicial review.

J. OUTSIDE PARTIES

If the compliance officer brings another person who is neither a compliance officer, nor an authorized associate representative to participate in the inspection, you should carefully question this person to determine why he/she is present.

The best rule to follow is one of reasonableness and common sense. If the person is an equipment expert, and he/she is otherwise a disinterested party to the investigation, you may choose to let him/her participate. If, on the other hand, you feel the person's presence will be of questionable value concerning matters of safety and health in the workplace, then you may politely ask the outside party to wait until the Safety Director or another designated company representative can be consulted.

K. OSHA INSPECTION QUESTIONNAIRE

The questionnaire is to be completed immediately following the OSHA Inspector's departure and returned to your immediate Supervisor. The purpose of the questionnaire is to help our company respond to OSHA's request and charges, and it is in the associate's interest to fully complete "**OSHA Inspection Questionnaire - Appendix J.**"

Prior to commencing any routine or non-routine work that has a possibility of a chemical exposure, including piping systems; an evaluation of possible exposure will be made by the supervisor and associate to perform the work. If it is determined that an exposure may occur, then additional methods of exposure control will be identified and implemented.

<u>SCOPE</u>

This document serves as the written Hazard Communication Plan for C&C Group

This policy fulfills the requirement of a written hazard communication plan under OSHA 1910.1200.

Hazard communication (sometimes known as HAZCOM) informs associates of hazardous materials in the workplace. The hazardous properties of the chemicals are communicated with container labels, Safety Data Sheets and associate training. The Hazard Communication Plan provides detailed safety guidelines and instructions for the receipt, use and storage of chemicals at our facilities by associates and contractors.

The Hazard Communication Written Plan outlines:

- Responsible individuals
- Location
- Training requirements
- Contractor requirements
- Non-routine tasks
- Chemical inventories
- Container labeling
- Safety Data Sheets (SDSs)

This policy applies to all locations or projects where chemicals are used.

Location	Address

The following job titles will be included in the Hazard Communication Program and must follow the Hazard Communication Plan:

- Chief Information Officer
- Purchasing Manager
- Warehouse Manager
- Foreman

IMPLEMENTATION

It is the responsibility of Chief Information Officer to administer this policy. It is the responsibility of any associate or contractor involved to adhere fully to this policy. Individual responsibilities for implementing this plan are indicated below.

A. Management: Chief Information Officer

- 1. Ensure compliance with this program.
- 2. Conduct immediate corrective action for deficiencies found in the program.
- 3. Maintain an effective hazard communication training program.
- 4. Make this plan available to associates or their designated representative.

B. Purchasing Staff: Purchasing Manager/Warehouse Manager

- 1. Ensure that all received containers are properly labeled and that labels are not removed or defaced.
- 2. Ensure that all shipped containers are properly labeled.
- 3. Ensure that department associates are properly trained in spill response.
- 4. Ensure that received Safety Data Sheets (SDSs) are properly distributed.
- 5. Obtain from the supplier/manufacturer SDSs for all chemicals purchased from retail sources.

C. Location Safety Representative: Chief Information Officer

- 1. Maintain a list of hazardous chemicals using the identifier that is referenced on the SDS for all materials used in respective operations.
- 2. Ensure that the SDS for each of these materials is available in the designated location.
 - a. SDSs may also be maintained electronically as long as they are available at all times. The Risk Management Center has a SDS Management system which retains all SDSs.
- 3. Monitor the effectiveness of the program.
- 4. Conduct an annual audit of the program.
- 5. Monitor associate training to ensure its effectiveness.
- 6. Keep management informed of necessary changes.
- 7. Ensure that SDSs are readily accessible to all associates on all shifts.
- 8. Monitor facility for proper use, storage and labeling of chemicals.
- 9. Ensure that SDSs are available for emergency medical personnel when treating exposed associates.
- 10. Provide information, as requested, concerning health effects and exposure symptoms listed on SDSs.
- 11. Provide specific chemical safety training for assigned associates.
- 12. Ensure that chemicals are properly used, stored and labeled.
- 13. Ensure that only the minimum amount necessary is kept at work stations.

14. Ensure that contractor employers are provided with SDSs for materials used in the areas where their associates will be working.

D. Associates

- 1. Comply with the requirements of this program.
- 2. Report any problems with the storage or use of chemicals.
- 3. Immediately report spills or suspected spills of chemicals.
- 4. Use only those chemicals for which they have been trained.
- 5. Use chemicals only for specific assigned tasks in the proper manner.

E. Contractors

- 1. Comply with all aspects of this program.
- 2. Coordinate information with the Location Safety Representative, Chief Information Officer
- 3. Ensure that contractor associates are properly trained.
- 4. Notify the Location Safety Representative before bringing any chemicals into any facilities.
- 5. Monitor and ensure proper storage and use of chemicals by contractor associates.

PROCEDURE

A. General Program Information

- 1. This written Hazard Communication Plan consists of the following elements:
 - a. Chemical inventory and storage
 - b. Associate training
 - c. Non-routine tasks
 - d. Product labels
 - e. Safety Data Sheets (SDSs)
 - f. Contractors
 - g. Emergencies and spills
 - h. Chemical procurement procedures

B. Chemical inventory and Storage

- 1. A chemical inventory of hazardous chemicals will be created, reviewed and updated annually by Warehouse Manager
- 2. The inventory will be located in \\ccserver\data\Common\Toolbox\Safety\SDS Info
- 3. Chemicals will be identified in the inventory by the product identifier on the SDS and the product label.
- 4. Chemicals will be stored properly, based on the potential hazard of each chemical.

C. Associate Training

1. Initial orientation training:

- a. All new associates shall receive safety orientation training by Chief Information Officer covering the elements of the Hazard Communication Program and the Right-to-Know Program.
- b. The training will be assigned using company safety policy handbook
- c. This training will consist of general training, covering:
 - 1) The location and availability of the written Hazard Communication Program.
 - 2) The location and availability of the chemical inventory used in the workplace.
 - 3) The methods and observation techniques used to detect the presence or release of a hazardous chemical in the workplace.
 - 4) The specific physical and health hazards of all chemicals in the workplace as outlined in the Globally Harmonized System of Classifying and Labeling Chemicals (GHS).
 - The hazard classification system outlines the following hazards that must be identified:
 - o Physical
 - o Health
 - Pyrophoric
 - o Combustible dust
 - Asphyxiants
 - Hazards not otherwise classified (HNOC)
 - For each hazard classification, the specific hazard category is also determined based on the severity of the hazard and relevant scientific data.
- d. Specific control measures for protection from physical and/or health hazards.
- e. An explanation of the chemical labeling system.
- f. The location and use of SDSs.
- 2. Job-specific training
 - a. Associates will receive on-the-job training from their supervisor and/or the Location Safety Representative.
 - b. Training will include:
 - Health and physical hazards.
 - Container labels.
 - SDSs.
 - Control methods.
 - Proper personal protective equipment (PPE).
 - Proper handling of each chemical.
 - How to detect the presence or release of chemicals.

- Emergency procedures, including spill clean-up and accidents.
- 3. Annual refresher training
 - a. Annual hazard communication refresher training will be conducted as part of continuing safety training.
- 4. Immediate, on-the-spot training
 - a. This training will be conducted by supervisors and/or the Location Safety Representative when:
 - 1. A new chemical hazard is introduced.
 - 2. Any associate requests additional information or exhibits a lack of understanding of the safety requirements.

D. Non-Routine Tasks

- 1. Non-routine tasks are defined as:
 - a. Working on, near or with unlabeled piping.
 - b. Working with unlabeled containers of an unknown substance.
 - c. Confined space entry where a hazardous substance may be present.
 - d. A one-time task using a hazardous substance differently than intended, i.e., using a solvent to remove stains from tile floors.
- 2. Training will be conducted by Chief Information Officer
- 3. Non-routine tasks require the following steps:
 - 1) Conduct a hazard determination.
 - 2) Determine precautions.
 - 3) Implement specific training and documentation.
 - 4) Perform the task.
- 4. All non-routine tasks will be evaluated by the Foreman before the task commences to determine all hazards present.
 - a. This determination will be conducted with quantitative/qualitative analysis, air sampling, substance identification/analysis, etc., as applicable.
- 5. Once the hazard determination is made, Foreman will determine the necessary exposure controls.
 - a. In addition, the Department Supervisor or Location Safety Representative will provide specific safety training for associates present or affected and will document the training using the **Chemical Safety Training Document** (Appendix B of this document), marking it as "Non-Routine Task Training."
- 6. Off-site use or transportation of chemicals will fall under the requirements of non-routine tasks if needed.

E. Container Labels

1. Each container will have an appropriate label prominently displayed that includes:

- a. A product identifier.
- b. A signal word.
- c. The applicable hazard statements.
- d. A pictogram.
- e. Precautionary statements.
- f. The contact information of the responsible party.
- 2. Portable containers which contain a small amount of chemicals need not be labeled if they are used immediately during that shift, but they must be under the strict control of the associate using the product.
- 3. All warning labels, tags, etc., must be maintained in a legible condition and not defaced. Facility weekly inspections conducted by Warehouse Manager will check for correct labeling
- 4. Incoming chemicals are to be checked for proper labeling.

F. SDS Information

- 1. SDSs are supplied by the chemical manufacturer to provide additional information concerning the safe use of the product.
- 2. SDSs must have a unique product identifier that corresponds to the product label.
- 3. SDSs must be in English; however, other languages are allowed in addition to an English version.
- 4. The SDSs will be kept in \\ccserver\data\Common\Toolbox\Safety\SDS Info
- 5. SDSs must be readily accessible to all associates on all shifts.
- 6. Prior to beginning work with a chemical, associates must be trained on its SDS.
- 7. Each SDS provides these sixteen sections in the following order:
 - Section 1. Identification
 - Section 2. Hazard identification
 - Section 3. Composition information on ingredients
 - Section 4. First aid measures
 - Section 5. Fire-fighting measures
 - Section 6. Accidental release measures
 - Section 7. Handling and storage
 - Section 8. Exposure controls/personal protection
 - Section 9. Physical and chemical properties
 - Section 10. Stability and reactivity
 - Section 11. Toxicological information
 - Section 12. Ecological information
 - Section 13. Disposal considerations
 - Section 14. Transport information
 - Section 15. Regulatory information
 - Section 16. Other information

G. Contractors

- 1. All outside contractors working inside our facilities are required to follow the requirements of this program.
- 2. The Warehouse Manager/Chief Information Officer will provide contractors information on:
 - a. Location of SDSs.
 - b. Precautions to be taken to protect contractor associates.
 - c. Potential exposure to hazardous substances.
 - d. Chemicals used in or stored in areas where they will be working.
 - e. Location and availability of SDSs.
 - f. Recommended personal protective equipment (PPE).
 - g. Labeling system for chemicals.

H. Emergencies and Spills

- 1. In case of an emergency, implement the Emergency Action Plan:
 - a. Evacuate people from the area.
 - b. Outside personnel will be will be contacted, i.e., first responders.
 - c. Isolate the area.
 - d. If the material is flammable, turn off ignition and heat sources.
 - e. Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures.

I. Chemical Procurement Process Requirements

- 1. Obtain permission through Purchasing Manager prior to purchasing any chemical product.
 - a. A Hazard Assessment is performed prior to people using and being exposed to the material.
 - b. Hazard Assessment tools are available in the Risk Management Center to assist with developing control procedures, including the PPE required.
- 2. Update the hazardous material inventory.
 - a. Maintain a hazardous material inventory that lists all of the hazardous materials used at this workplace.
 - b. File a copy of the hazardous material inventory in \\ccserver\data\Common\Toolbox\Safety\SDS Info
- 3. Manage the SDSs.
 - a. Obtain SDSs for all chemicals before they are used.
 - b. Review each SDS when it is received to evaluate whether the information is complete and to determine if our existing protective measures are adequate.
 - c. Replace SDSs when updated sheets are received.
 - d. Communicate any significant changes to those who work with the chemical.
 - e. SDSs are required for all hazardous materials used on site by project personnel.
 - f. Labels

4. Ensure that all received containers are properly labeled and that labels are not removed or defaced.

J. Documentation Summary

- 1. File these records in the Safety Filing System:
 - a. Chemical inventory
 - b. Location of the SDS inventory
 - c. Training records
 - d. Contractor/Subcontractor notifications
- 2. The Safety Toolbox is to be used to document all information including the following:

Documents	Risk Management Center Location
Written Safety Program	Safety Toolbox
Training Documentation including:	Safety Toolbox
 Classroom training and training course completed 	
- Sign-in sheets	
- Quizzes	
- Skills evaluations	
- Operator Certificates	
Pre-shift Inspection Checklists	Safety Toolbox
Safety Observations	Safety Toolbox
Near misses	Safety Toolbox
Accidents and claims	Safety Toolbox
Supplier and manufacturer COIs	Certificates Toolbox
Safety Data Sheets	Safety Toolbox

Facility/ Building:

Date: _____

SEC

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Department:

This information can be found on the container labels.

Name of Material	Address of the Material's Maker	Phone Number of the Material's Maker	Is it a household product, and is it used in the same amount and manner as household use? (YES/NO)	The SDS is on file. (YES/NO)	Container Size	Container number	Hazard Statements Noted on the Label*	Chemical Class**

* Hazards			** Chemical classes:				
Physical Hazards: 1= Flammable 2= Combustible 3= Oxidizer	Health Hazards: 4= Skin Irritant or 5= Eye Irritant or 6= Respiratory hazard 7= Nervous system 8= Reactive 9= Kidney hazard 10= Liver hazard 11= Reproductive hazard	Other: 12= Pyrophoric 13= Combustible dust 14= Hazards not otherwise classified (HNOC)	 1= Solvents/flammable paints 2= Liquid Fuels (gasoline, diesel) 3= Acids 4= Bases 5= Compressed inert gas 6= Compressed fuel or flammable gas 7= Coolants 8= Grease/lubricant 	9= Wood based materials 10= Resins/glues 11= Metals (including welding rod/wire; saw blades and component metal materials) 12= Other (specify)			

APPENDIX B: CHEMICAL SAFETY TRAINING DOCUMENT

Hazard Communication & Chemical Safety	Training is an annua	al re-training r	equirement for all
associates.	-	-	

Associate:	Training type:
Trainer:	Routine
Training Date:	Non-routine

On the above date, Hazard Communication & Chemical Safety Training was provided. Training consisted of the following topics:

- A. Hazard communication requirements
 - 1. Written product information
 - 2. Labeling of containers
 - 3. Understanding and use of SDS
 - 4. Safe handling and storage of chemical products
- **B.** How to identify potentially harmful chemicals
- **C.** Location of the written Hazard Communication Program
- **D.** Actions to take on a spill or fire involving chemical products
- E. Location and contents of SDSs
- **F.** Uses of personal protective equipment (PPE):
 - 1. When PPE is required
 - 2. What PPE is required
 - 3. How to don and remove PPE
 - 4. Limitations of specific PPE
 - 5. Proper care, maintenance and useful life
 - 6. Disposal
- **G.** Walk-through of emergency procedures
- H. Workplace chemicals
- I. Specific responsibilities of associate

ASSOCIATE CERTIFICATION:

I have received the above training on chemical product safety and am aware of my responsibilities for safe chemical use, storage, handling and emergency procedures.

Associate Signature:	 Date:

Trainer Signature: _____

A. Hazardous Chemical Inventory

- 1. An inventory will be taken of all chemicals used at the workplace and in the Corporate office shop areas and a determination will be made as to which of those are hazardous chemicals. The Safety Director will have the responsibility of compiling this inventory.
- All associates will maintain a current list of all hazardous chemicals used at their work areas or in Company vehicles, and will make that list available upon request. This list may be supplemented by appropriate Material Safety Data Sheets (SDS) compiled in book format.
- 3. A master list of all chemicals and SDS(s) will be maintained at the Office of the Company Safety Director.
- 4. All associates shall have the responsibility to report any containers of chemicals or hazardous substances used for their scope of work activities which neither appears on their list of chemical substances nor contains a label or other form of identification.
- 5. If it is determined to be a hazardous chemical by the Safety Director, then the appropriate SDS and labels shall be immediately put in place according to this policy.
- 6. Interim labeling will be the responsibility of the associate or user and they will have the responsibility to make an interim label for any hazardous chemical if needed.
- 7. For inventory control, safety and labeling purposes, all containers of chemicals used during work activities which have been determined to be hazardous, should have assigned designated storage areas in vehicles or storage areas. Each storage area has been determined by the associate, according to production needs and the precautionary safeguards recommended by the labels / SDS(s) for safe handling and storage of these various types of hazardous chemicals.
- 8. All associates shall ensure that these hazardous substances are stored and maintained in their designated areas in accordance with this plan. They will have the responsibility of reporting any deviation from this plan to the Safety Director and / or Immediate Supervisor.
- 9. Hazardous materials stored in the company shop will also be put into designated areas and / or containers as determined by the Safety Director or Shop Manager.

10. We intend to rely on the evaluations of the chemical manufacturers and importers and the labels and SDS(s) provided by them on their hazardous substances. Where the appropriate SDS(s) and / or labels are not in evidence, the Safety Director will have the responsibility of seeking outside sources for purposes of formulating SDS(s) and labels for in-house use of company products.

B. Container Labeling

- C&C Group shall require, by specific language on purchase orders, that suppliers furnish the appropriate SDS(s) and appropriate labels of all purchased chemicals. Associates shall report to their Immediate Supervisor and / or the Safety Director for appropriate action, any supplier refusing or failing to supply the appropriate SDS(s) or labels. Associates shall also require that suppliers certify that their SDS(s) and labels meet the criteria of 29 CFR 1910.120.
- All associates shall ensure that the hazard identification labels on incoming containers are not removed or defaced. Containers without labels shall be immediately taken back to the corporate office where the manufacturer or SDS information may be verified and not used in any workplace until a legible label is put in place.

C. Material Safety Data Sheets (SDS)

- 1. The Associate will request SDS(s) for all purchased chemicals per paragraph B. (1) above.
 - a. If not previously obtained, a SDS will be requested and obtained for currently used hazardous chemicals.
 - b. All initial orders, or orders for new chemicals not presently in use, must include a request for the appropriate SDS(s) and labels.
 - c. Associates will maintain a manual of SDS(s) on all hazardous chemicals used in their work areas or in company vehicles and make it available to any interested person upon reasonable request.
 - d. The Safety Director will maintain a master set of SDS(s) and will coordinate periodically with Supervisor's or Shop Manager's to keep the list current as is reasonable possible. The master set of SDS(s) will be accessible to the Medical Department, associates, their designated representatives, the general public in needed situations, and the Assistant Secretary of Labor.

D. Associate Training

- 1. Associates exposed to hazardous chemicals will be trained in Company procedures included in this section prior to use of any hazardous chemical.
- When a new hazardous chemical is introduced into the workplace, all affected associates will review the SDS and container labels for the hazards associated with the chemical before use. If more than one associates performs this new task training, it should be documented for training files at the corporate offices using the Associate Training Record Form – Appendix O.

- 3. Elements of Associate Training will consist of the following:
 - a. Information on the requirements of OSHA Hazard Communication Regulation 29 CFR 1910.120.
 - b. Information on safety and operating procedures in their work areas or departments where hazardous chemicals are present.
 - c. An explanation of reading and interpreting appropriate SDS(s) with respect to the physical and health hazards associated with the chemical.
 - d. An explanation of reading and interpreting information on hazards chemical labels.
 - e. Methods associates can use to protect themselves, such as work practices and the use of personal protective equipment if necessary.
 - f. Ways associates can obtain and use the available hazard information.
 - g. If associates may be exposed to hazardous chemicals while performing nonroutine tasks, the associate shall understand the associated chemical hazards and protective measures needed. If associates are assigned to work areas containing vessels or pipes which are unlabeled, or to areas that contain hazardous chemicals, the Supervisor will advise those associates of the hazards and protective measures in case of spill or other potential exposure.
 - h. Information on the monitoring system employed by the company and other methods (including how to read and SDS) and observations that may be used to detect the presence or release of a hazardous chemical in the workplace.
 - i. An explanation of the existing safety rules, the new rules required by this H.C.P., and a statement of the disciplinary actions which will be taken for any associate violation.
 - j. Completion of New Task training should be verified by having each associate sign the Associate Training Record Form Appendix O and this form or a sign in sheet shall be placed in the Associates or Safety File.

E. Outside Contractors

- 1. It will be the responsibility of the User to inform outside contractors or the owner of the hazardous chemicals in the work area to which their associates may be exposed, and insure before use they are not exposed during their scope of work.
- 2. It will be the responsibility of all outside contractor associates to abide by all job safety rules and personal protective programs, and further, that the contractor will review the SDS(s) of the appropriate hazardous chemicals available at the work area as needed, and follow the requirements of this Hazardous Communication Program.

F. Miscellaneous

It will be the responsibility of the Safety Director to monitor all other aspects of the Hazard Communication Rule with respect to in-house compliance and to audit this H.C.P., at least on an annual basis, for any updating or amendments to any chemical information in possession by C&C Group or its associates.

Supervisors and associates will assess their work area exposures to identify if there is a need to increase the personal protective equipment (PPE) from the minimum level established. All associate-owned personal protective equipment used on company or customer's property must be kept in good working condition. Equipment must be checked & cleaned daily before each days use and be immediately removed from service or destroyed if found defective. Employees will be trained or retrained (if necessary) on the selection, use and care of PPE. All PPE to be properly sized to fit the associate.

SCOPE

All work activities and exposures will be assessed to determine if hazards are present, or likely to be present, which will necessitate increasing the level of personal protective equipment (PPE) from the established minimum. A **Personal Protective Equipment (PPE) Assessment Form is Appendix O** of the Appendix Section of this manual for hazard identification documentation purposes. **Part J of this section** contains a **Protection Chart** to help select the appropriate protection depending on the hazard associates are exposed to while working.

All protective devices listed in this policy shall be used after **engineering or work practice controls** are deemed infeasible. Examples include but are not limited to associate rotation or isolation, barrier wall construction, wet sweeping or utilizing different equipment if possible. If these methods cannot eliminate or reduce the exposure, then proper PPE must be utilized.

A. HARDHATS

- 1. All associates shall wear Hard Hats when required by being near an overhead danger or work area. Hard hats must be of the approved type that complies with ANSI Z89.1-1987 and be in good condition. Bump caps or baseball caps may not be utilized in place of hard hats.
- 2. The outside shell of all hard hats shall be free of paint, holes, cracks or cuts, and the inside suspension shall be in good working order. Associates shall visually inspect all safety equipment each day before use for defects.
- 3. The company will issue approved head protection to any company associate requiring it.

B. EYE PROTECTION

- Industrial grade protective shields, goggles or safety glasses with side shields meeting ANSI Z-87.1 - 1989 requirements are required to be worn while working in designated areas or when working conditions require such protection by all personnel working in the field. Examples of hazards included would be chipping, grinding, drilling, using chemicals or working overhead.
- 2. Approved eye protection that complies with ANSI Z87.1-1989 will be issued by the Company and worn by associates when machines or operations present potential eye injury from physical, chemical or radiation agents.
- 3. Associates exposed to laser beams shall be furnished suitable safety goggles, which will protect from the specific wavelength of the laser and be optical density (OD) adequate for the energy involved.

4. Associates involved in welding operations shall wear filter lenses or plates of at least the proper shade number required. Tinted safety glasses are prohibited.

NOTE: NEVER LOOK DIRECTLY INTO THE ARC OF AN ELECTRIC WELDER WITHOUT PROPER EYE PROTECTION!

C. HEARING PROTECTION

- 1. Hearing protection must be worn in designated areas. Generally if you cannot speak in a normal tone at arm's length to your fellow workers you should wear hearing protection. Annual hearing conservation training to be provided.
- 2. Only approved earplugs or earmuffs shall be worn when using certain tools and equipment or working in confined areas. Cotton or paper shall not be used as a substitute for proper hearing protection.
- 3. Approved hearing protection will be issued by the company to any associate requiring it including those exposed to noise of 85 dBA or greater. At least 2 different types of disposable plugs shall be kept in either the tool container or Company vehicle. Read all instructions and precautions listed on the box or package before using. Ensure the Noise reduction rating (NRR) for the protective device is adequate for the level of decibels the work will produce. If help is needed for this determination, contact the Company Safety Director. *The OSHA standards for noise exposure without utilizing protection or engineering or work practices control measures are as follows:*

CONSTRUCTION PERMISSIBLE NOISE EXPOSURES	

Duration per day, hours	Sound Level dBA slow response
8	
6	
4	
3	
2	
1 1/2	
1	
1/2	110
1/4 or less	

D. RESPIRATORY PROTECTION

- Only approved respiratory protection shall be issued by the company to any associate requiring it. Those associates using a non-mandatory respirator shall be required to comply with all parts of this section if the respirator is tight fitting. Appendix N for non-mandatory use of a respirator is available for associate review to understand proper precautions to take for this type of use.
- 2. If any reasonable doubt exists as to whether respirators are needed, the atmosphere shall be tested for any suspected contaminant to determine the concentration. (A skilled competent person shall do the testing to properly determine any contaminant level before the start of work.)
- 3. Respirators shall be selected based on the hazards to which the workers are exposed. Dusts masks are to be used only for dust protection and are not required to have a fit test or medical evaluation. Only two strap dust masks may be used.
- 4. Any person required to wear a respirator shall be determined by a medical doctor to be medically fit to wear a respirator, and complete a Medical Evaluation Questionnaire available at the Doctor's offices or in the OSHA Respiratory Standards. This must be completed only once and kept in the associates file.
- 5. A competent person skilled in the selection and use of respirators shall ensure all users have completed respirator training before the start of work. Any associate required to wear a respirator shall be instructed and trained in the proper use of respirators and their limitations, how to inspect, put on and remove, and check the seals of a respirator, maintenance and storage requirements, and the requirements of this section.
- 6. All respirators shall be regularly cleaned and disinfected. Those respirators used by more than one worker shall be thoroughly cleaned and disinfected after each use.
- 7. All associates required to wear a respirator shall complete a fit test before using the respirator. This must also be completed annually or when another type or model of respirator is used.
- 8. Respirators shall be inspected daily. Any respirator found defective shall be repaired or replaced. Associates shall conduct a negative and positive pressure test each time when donning the respirator.
- 9. Respirators shall be stored in a clean, sanitary, and convenient location. Never store a respirator with the filters in place. Filters shall be kept in a separate bag to ensure long life and help keep contaminants from entering the respirator.
- 10. Excessive facial hair, such as beards, long side burns or bushy moustaches will interfere with the proper fit of respirators. Associates required to wear respirators will not have in excess of one-day beard growth.
- 11. Contact lenses shall not be worn with respirators. If corrective spectacles or goggles are required they shall be worn so as not to affect the fit of the respirator face piece.

E. FOOT PROTECTION

- 1. Appropriate Work Shoes or Boots shall be worn at all times. Only sturdy, heavy duty work boots are permitted. Canvas shoes, tennis shoes, open-toe shoes or street loafers are not permitted.
- 2. Rubber boots with protection should be used on jobs subject to chemically hazardous conditions.
- 3. Foot guards or steel toed boots must be worn when there is a danger of an object striking the foot or toes.

F. GLOVES

1. Gloves should be worn when handling rough or sharp edges, abrasive materials, welding, handling hot items or splintered material. Glove protection rating should adhere to the required ANSI guidelines. It is up to the individual to ensure their gloves are adequate for the job at hand.

Old ANSI Cut-Resistant Levels (Grams)	New ANSI Cut-Resistant Levels (Grams)	Applications by Cut Level
1 (200)		Material handling, small parts assembly (sharp edges), packaging, warehouse, general purpose, forestry, construction
2 (500)	A2 Light/medium cut hazards (500)	Material handling, small parts assembly (sharp edges), packaging, warehouse, general purpose, forestry, construction, pulp ad paper, automotive assembly
3 (1000)		Material handling, small parts assembly (sharp edges), packaging, warehouse, general purpose, forestry, construction, pulp ad paper, automotive assembly
4 (1500)	A4 Medium cut hazards (1500)	Appliance manufacturing, bottle and light glass handling, canning, drywall work, electrical, carpet installation, HVAC, pulp ad paper, automotive assembly, metal fabrication and handling, packaging, warehouse, aerospace industry, food prep/ processing
5 (1500)		Appliance manufacturing, bottle and light glass handling, canning, drywall work, electrical, carpet installation, HVAC, pulp ad paper, automotive assembly, metal fabrication and handling, packaging, warehouse, aerospace industry, food prep / processing
		Metal stamping, metal recycling, pulp and paper (changing slitter blades), automotive assembly, metal fabrication, sharp metal stampings, glass manufacturing, recycling plant/sorting, HVAC, food prep / processing, meat processing, aerospace industry
		Metal stamping, metal recycling, pulp and paper (changing slitter blades), automotive assembly, metal fabrication, sharp metal stampings, glass manufacturing, recycling plant/sorting, HVAC, food prep / processing, meat processing, aerospace industry
		Metal stamping, metal recycling, pulp and paper (changing slitter blades), automotive assembly, metal fabrication, sharp metal stampings, glass manufacturing, recycling plant/sorting, HVAC, food prep / processing, meat processing, aerospace industry
		Metal stamping, metal recycling, pulp and paper (changing slitter blades), automotive assembly, metal fabrication, sharp metal stampings, glass manufacturing, recycling plant/sorting, HVAC, food prep / processing, meat processing, aerospace industry

2. Plastic or rubber gloves must be worn when working with acids, corrosives, solvents, chemically treated material, etc.

G. **PROPER CLOTHING**

- 1. Shirts Shall be worn by all workers. Short sleeves or sleeveless shirts are permitted, but shall cover the upper shoulder from the base of the neck to the arm. Shirts shall also cover the trunk of the body, starting at the base of the neck to the belt line.
- 2. Trousers Heavy duty trousers covering the length of the leg to the boot top must be worn on all jobsites and in the shop. **Baggy trousers must be secured.**
- 3. Shorts/Cut-Offs This type of apparel is not allowed because it does not protect the legs from the elements or hazards encountered on jobsites.

H. FLAGMEN VESTS

Reflective vests shall be worn when flagging or when exposed to traffic or limited visibility in congested areas of the projects, and shall be supplied by C&C Group upon request.

I. SEAT BELTS

Seat belts must be installed in the all seats of all company owned cars, pickups and trucks. Seat belt use is mandatory in all company owned, leased or rented vehicles.

J. **PROTECTION CHART**

SOURCE	ASSESSEMENT OF HAZARDS	PROTECTION
Biohazard	Exposure to blood and body fluids	Gloves, gowns, goggles, face shield
Radiation	Medical exposure	Lead protection i.e. – aprons, gloves, shield
Compressed Gas Cylinders: Helium	Explosive	Safety glasses
Oxygen	Flammable, explosive	Safety glasses
Nitrous Oxygen	Flammable, explosive	Safety glasses
Heat	High temp. exposure	Face shields, goggles, gloves
Hydraulic	Crushing	LOTO devices
SOURCE	ASSESSEMENT OF HAZARDS	PROTECTION
Electrical	Shock, burn	LOTO devices
Chemical	Burns, respiratory, eye, skin, splash, irritating mist	Goggles, gowns, face shields, nitride gloves, respirator
Mechanical	cuts, pinching, crushing	LOTO devices, Safety training
Impact	Falling objects, crushing	Hardhat

C&C Group is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this goal, the following Hearing Conservation Program is provided for all workers whose noise exposures equals or exceeds an action level of 85 decibels for an eight-hour day or a noise dose of 50%. This Hearing Conservation Program has been developed in accordance with Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.95.

PROGRAM ADMINISTRATION

The Chief Information Officer is responsible for the implementation of the Hearing Conservation Program.

It is the responsibility of management to protect their employees. Management shall:

- A. Monitor noise exposure
- B. Institute control measures
- C. Implement a Hearing Conservation Program when occupational noise exposure exceeds an eight-hour time-weighted average (TWA) of 85 decibels

METHODS OF COMPLIANCE

A. MONITORING

- 1. A noise survey will be conducted to identify the areas where employee noise exposure may exceed an 85 decibel eight-hour TWA.
- Workers will be monitored in questionable areas with a calibrated audio dosimeter that will measure all continuous, intermittent and impulsive sound levels between 80-130 decibels on the "A weighted' scale (slow response).
- 3. Each employee will be notified of the monitoring results if exposed at or above the 85 decibel TWA.
- 4. Additional monitoring will be conducted if changes in production, equipment, processes or controls suggest that noise exposures may have increased.

B. AUDIOMETRIC TESTING

 A baseline audiogram (hearing test) will be obtained for all employees with noise exposures equal to or greater than an 85 decibel TWA. A baseline audiogram will be obtained within six months of the employee's first exposure to noise above the action level. In the case that a mobile van is used for testing, the audiogram will be obtained within one year. However, employees must use hearing protection six months after their first exposure until a baseline audiogram is obtained.

- Workers will be informed that baseline audiometric testing must be preceded by at least 14 hours without exposure to noise levels above 80 decibels. Workers may use hearing protection to meet this requirement.
- 3. Annual audiograms are required for all workers with noise exposures equal or greater than an 85 decibel TWA.
- 4. Audiometric tests will be performed by a licensed or certified audiologist, otolaryngologist, qualified physician, or qualified technician responsible to the audiologist or physician.
- 5. If a comparison of the annual audiogram with the baseline audiogram indicates that a Standard Threshold Shift* has occurred, a retest within 30 days may be conducted and the second test may be considered the annual audiogram.
- 6. If a Standard Threshold Shift* is confirmed, the employee will be:
 - a. Informed of this fact, in writing, within 21 days of the determination.
 - b. Referred to an audiologist, otolaryngologist or qualified physician for further evaluation. They will be provided with both the baseline and the most recent audiogram of the employee, and the required records on the audiometer and the audiometric test room.
- 7. Unless the audiologist or physician determines that the Standard Threshold Shift is not work-related or aggravated by noise exposures in the work place, the worker will be required to use suitable hearing protection. For workers exposed to noise levels less than 90 decibel TWA, the use of hearing protection will continue until subsequent audiometric testing indicates that the Standard Threshold Shift is not permanent.
- 8. An annual audiogram may be substituted for the baseline audiogram when the audiologist or physician evaluating your program declares:
 - a. A Standard Threshold Shift is persistent; or
 - b. The hearing threshold in the annual audiogram indicates a significant improvement over the baseline audiogram.
- 9. All audiometric testing and evaluations will be provided free of charge to our employees.
- 10. The requirements for the types and calibration of audiometers, and the background noise levels allowed in audiometric test rooms are specified in Appendices C, D, and E of the OSHA Noise Standard.(29 CFR 1910.95) The records of the firm we plan to use for audiometric testing will be checked to confirm that they are complying with OSHA standards.
- * A Standard Threshold Shift is defined as an average hearing shift in either ear of 10 decibels or more at the test frequencies of 2000, 3000 and 4000 Hertz.

C. HEARING PROTECTORS

- 1. Hearing protectors will be (1) required and (2) provided for all employees with noise exposure:
 - a. Greater than a 90 decibel TWA; or
 - b. Equal to or greater than an 85 decibel TWA and who have experienced a Standard Threshold Shift; or
 - c. Equal to or greater than an 85 decibel TWA for six months or more and who have not obtained a baseline audiogram.
- 2. Hearing protectors will be available for use to all employees with noise exposures between an 85 and 90 decibel TWA who have not experienced a Standard Threshold Shift.
- 3. Hearing protectors will be provided at no cost to employees and a variety of suitable types will be available for their selection.
- 4. Hearing protectors will be evaluated for their ability to adequately reduce the noise exposures in the work place to a 90 decibel TWA or less (or an 85 decibel TWA for those workers who have experienced a Standard Threshold Shift).

NOTE: One method for evaluating hearing protectors is to refer to the noise Reduction Ratisn (NRR) listed on the hearing protector package. Subtract 7 from the NRR and divide the result by 2. This number is the noise attenuation for this type of hearing protection and should be subtracted from the employee's noise exposure to determine his/her reduced noise exposure.

Other methods for determining noise reduction factors are specified in Appendix B of the OSHA Noise Standard (29 CFR 1910.95).

D. TRAINING

Annual training will be required for workers included in the Hearing Conservation Program. The training will cover:

- 1. The effects of noise on hearing;
- 2. The purpose of hearing protectors;
- 3. The advantages, disadvantages and noise reduction capabilities of the various types of hearing protectors;
- 4. Instructions on the selection, fitting, use, and care of hearing protectors;
- 5. The purpose of audiometric testing and an explanation of the test procedures.

E. RECORDKEEPING

The following records will be maintained in C&C Group's ERP, and are available upon request, to our employees or an OSHA representative:

1. Noise exposure records will be retained for at least two years.

- 2. ALL audiometric test records will be retained for the duration of each worker's employment and will include:
 - a. Audiogram with the name and job classification of the worker, date of the audiogram and the examiner's name.
 - b. Measurements of the noise levels in the audiometric test booth and the date of the last acoustic or exhaustive calibration of the audiometer.
 - c. Employee's most recent noise exposure measurement.

NOTE: You are required to post a copy of the <u>Occupational Noise Exposure Standard 29 CFR</u> <u>1910.95</u> in your work place if you have noise levels exceeding 85 decibels.

NOTE: A Standard Threshold Shift of 25 decibels or greater must be recorded on the OSHA 300 log if caused or aggravated by exposure to occupational noise.

F. PROGRAM REVIEW AND UPDATE

The Hearing Conservation Program shall be reevaluated under these circumstances:

- 1. Annually, when the annual audiogram testing is done.
- 2. Whenever there is a change in production, process, equipment or controls that might have questionable noise levels.

Working in extreme temperatures (hot or cold) can overwhelm the body's internal temperature control system. When the body is unable to warm or cool itself, heat or cold related stress can result. Heat and cold stress can contribute to adverse health effects which range in severity from discomfort to death.

Environmental Health and Safety (EHS) has developed this Heat and Cold Stress Safety Program to minimize the effects of heat and cold stress on C&C Group employees. This program contains the procedures and practices for safely working in temperature extremes. EHS can also conduct exposure assessments and assist departments with the development of procedures to minimize the adverse effects of heat and cold stress among their employees. Additionally, EHS has developed an online training module to train employees on the hazards of thermal stressors.

The Occupational Safety and Health Administration (OSHA) does not currently have specific standards for heat or cold stress. However, the Occupational Safety and Health Act of 1970 General Duty Clause (Section 5(a)(1)) states that "Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees." In addition, 29 CFR Subpart I relating to personal protective equipment requires employers to provide protection to employees exposed to hazards in the workplace. The OSHA website contains Fact Sheets and Guidance Documents that relate to heat and cold stress that have been incorporated into this program.

RESPONSIBILITIES

Environmental Health and Safety (EHS) shall maintain, review, and update this program as needed. EHS will also provide monitoring, upon request, and assist employees with the development of procedures to minimize the adverse effects of heat and cold stress in the workplace. EHS provides an online training to cover the basic hazards and safety precautions related to heat and cold stress.

A. Supervisors

Each supervisor managing employees exposed to heat and/or cold stress has the following responsibilities:

- Review and comply with the provisions outlined in this program.
- Ensure all employees are properly trained before working in extreme temperature conditions. Document any in-person training conducted.
- Assess the day-to-day heat or cold stresses on employees.
- Assess employees' workload and assigning work and rest schedules as needed.
- Ensure all employees have the appropriate personal protective equipment (PPE) prior to working in extreme temperature conditions.
- Ensure employees are familiar with this safety program.

B. Employees

Employees exposed to heat and/or cold stress when performing their job duties have the following responsibilities

- Review and comply with the provisions outlined in this program.
- Complete training before working in extreme temperature conditions.
- Wear the appropriate PPE.
- Report heat and cold stress concerns to their supervisor.

HEAT-RELATED ILLNESSES: SIGNS. TREATMENT. AND PREVENTION

While working in hot conditions, the human body may not be able to maintain a normal temperature just by sweating. If this happens, heat-related illnesses may occur. The most common health problems caused by hot work environments include:

- A. Heat stroke_- This is the most serious heat related effect. Heat stroke occurs when the body temperature increases above 104F. Signs and symptoms of heat stroke are confusion, loss of consciousness, seizures, and lack of perspiration. This condition must be treated as a medical emergency and the employee must receive immediate medical attention. While waiting on medical assistance, the victim should be moved to a cool/shaded area, cooled with water/wet towels/ice packs, and fanned to increase cooling.
- B. Heat exhaustion Signs and symptoms of heat exhaustion include headache, nausea, dizziness, weakness, irritability, confusion, thirst, heavy perspiration and a body temperature greater than 100.40F. Employees experiencing heat exhaustion should be moved to a cool area, given fluids to drink and given cold compresses for their head, face and neck. Employees should also be taken to a clinic or emergency room to be monitored by medical personnel.
- C. Heat cramps Signs and symptoms of heat cramps include muscle pains usually caused by the loss of body salts/fluids, this can happen later as well. Employees should replace fluid loss by drinking water and/or carbohydrate-electrolyte replacement liquids (e.g. Gatorade) every 15 to 20 minutes. If cramps are severe, seek medical attention.
- **D. Heat rash –** Heat rash is caused by excessive perspiration and looks like a red cluster of pimples or small blisters. Heat rash usually appears on the neck, upper chest, in the groin, under the breasts and in elbow creases. Treatment for heat rash is to provide a cooler, less humid environment.
- E. Dehydration Dehydration is a major factor in most heat disorders. Signs and symptoms of dehydration include increasing thirst, dry mouth, weakness or light-headedness (particularly if worse upon standing), and a darkening of the urine or a decrease in urination. Dehydration can be reversed or put back in balance by drinking fluids that contain electrolytes (i.e. Gatorade) that are lost during work related activities. Avoid caffeinated drinks.

PREVENTION

While heat related illness are dangerous and potentially life threating, they can be prevented. Prevention methods include:

- A. Acclimation Acclimation is a process by which the physical processes of an employee's body adjusts to the environment over a period of time. Based on data obtained from OSHA, this process usually takes five to seven days. This process could take up to three weeks depending on the individual and their work environment. According to the American Industrial Hygiene Association, the process requires a consistent work level for at least two hours each day during the acclimation period in order for an employee to become acclimatized. Mere exposure to heat does not confer acclimatization, nor does acclimatization at one heat stress level confer resistance to heat stress at a higher temperature or more vigorous workload. Employees who are not adequately acclimatized to the heat may experience temporary heat fatigue resulting in a decline in performance, coordination or alertness. They may also become irritable or depressed. This can be prevented through gradual adjustment to the hot environment. People in good physical condition tend to acclimatize better because their cardiovascular systems respond better.
- **B.** Engineering Controls For employees working indoors, the best way to prevent heat-related illness is to make the work environment cooler. Where and if possible, use air conditioning to cool the work area. Alternatively, increase the general ventilation as much as possible by opening windows or doors. When available, use cooling fans to aid in increasing ventilation.
- C. Safe Work Practices_– For employees working outdoors or working indoors without air conditioning or ventilation, take scheduled breaks in cool areas. Ensure there is plenty of cool water to drink and take water breaks as needed. Immediately report any problems to a supervisor. Supervisors should consider scheduling the hottest work for the coolest part of day, assigning extra employees to high demand tasks, and using work-saving devices (e.g. power tools, hoists or lifting aids) to reduce the body's work load. All employees should watch out for the safety of their coworkers.
- D. Heat Index The Heat Index is a single numeric value that uses both temperature and humidity to inform the public on how the weather outdoors "feels". The higher the Heat Index, the hotter the weather feels. OSHA has used the Heat Index to assign protective measures for workers as the Heat Index increases. These protective measures may reduce the likelihood of heat related illnesses. The Heat Index and related protective measures are contained in Appendix A.

COLD-RELATED ILLNESSES AND INJURIES: SIGNS, TREATMENT, AND PREVENTION

SIGNS AND TREATMENT

During cold weather, an employee's body will use energy to maintain a normal internal body temperature. This will result in a shift of blood flow from employee's extremities (hands, feet and legs) and outer skin to the employee's core (chest and abdomen). If this happens, cold-related illnesses and injuries may occur if exposed to cold conditions for an extended period of time. The most common health problems caused by cold work environments include:

A. Hypothermia – Hypothermia is a potentially serious health condition. Hypothermia occurs when body heat is lost faster than it can be replaced. When the core body temperature drops to approximately 95°F, the onset of symptoms normally begins. The employee may begin to shiver, lose coordination, have slurred speech, and fumble with items in the hand. The employee's skin will likely be pale and cold. As the body temperature continues to fall these symptoms will worsen and shivering will stop. Once the body temperature falls to around 85°F severe hypothermia will develop and the person may become unconscious, and at 78°F, vital organs may begin to fail.

Treatment depends on the severity of the hypothermia. For cases of mild hypothermia move to warm area and stay active. Remove wet clothes and replace with dry clothes or blankets, cover the head. To promote metabolism and assist in raising internal core temperature drink a warm (not hot) sugary drink.

Avoid drinks with caffeine. For more severe cases do all the above, plus contact emergency medical personnel (Call 911 for an ambulance), cover all extremities completely, place very warm objects, such as hot packs or water bottles on the victim's head, neck, chest and groin. Arms and legs should be warmed last. In cases of severe hypothermia, treat the employee very gently and do not apply external heat to re- warm. Hospital treatment is required

B. Frostbite – Frostbite occurs when the skin freezes and loses water. In severe cases, amputation of the frostbitten area may be required. While frostbite usually occurs when the temperatures are 30° F or lower, wind chill factors can allow frostbite to occur in above freezing temperatures. Frostbite typically affects the extremities, particularly the feet and hands. The affected body part will be cold, tingling, stinging or aching followed by numbness. Skin color turns red, then purple, then white, and is cold to the touch. There may be blisters in severe cases.

Do not rub the area to warm it. Wrap the area in a soft cloth, move the employee to a warm area, and contact medical personnel. Do not leave the employee alone. If help is delayed, immerse in warm (maximum 105 °F), not hot, water. Do not pour water directly on affected part. If there is a chance that the affected part will get cold again do not warm. Repeated heating and cooling of the skin may cause severe tissue damage.

- C. Trench Foot Trench Foot is caused by having feet exposed to damp, unsanitary and cold conditions including water at temperatures above freezing for long periods of time. It is similar to frostbite, but considered less severe. Symptoms usually consist of tingling, itching or burning sensation. Blisters may be present. For treatment, soak feet in warm water, then wrap with dry cloth bandages. Drink a warm, sugary drink. Seek medical attention if necessary.
- D. Dehydration It is easy to become dehydrated during cold weather. Signs of dehydration include increasing thirst, dry mouth, weakness or light-headedness (particularly if worse upon standing), and a darkening of the urine or a decrease in urination. Dehydration can be reversed or put back in balance by drinking fluids that contain electrolytes (i.e. Gatorade) that are lost during work related activities. Avoid caffeinated drinks.

PREVENTION

Just as with heat related illness, cold related illnesses and injuries are dangerous and potentially life threating, however, they can be prevented. Prevention methods include:

- A. Acclimation Employees exposed to the cold should be physically fit, without any circulatory, metabolic, or neurologic diseases that may place them at increased risk for hypothermia. A new employee should not be required to work in the cold full time during the first days of employment until they become adjusted to the working conditions and required protective clothing. New employees should be introduced to the work schedule slowly and be trained accordingly.
- **B.** Engineering Controls_ For employees working indoors, the best way to prevent cold-related illness is to make the work environment warmer. Where and if possible, use heaters to warm the work area.

Alternatively, decrease the general ventilation as much as possible by closing windows or doors.

- C. Safe Work Practices For employees working outdoors or working indoors without heat, take scheduled breaks in warm areas. If available, use wind barricades to block the wind from the employees. Ensure there is plenty of water to drink and take water breaks as needed. Immediately report any problems to a supervisor. Supervisors should consider scheduling the most work for the warmest part of day, assigning extra employees to high demand tasks that will require longer periods in cold areas. All employees should watch out for the safety of their coworkers.
- **D. Personal Protective Equipment (PPE)** PPE is an important factor in preventing cold stress related illnesses and injuries. Employees should adhere to the following recommendations when dressing for work in a cold environment:
 - Wear at least three layers of clothing; an inner layer of wool, silk or synthetic to wick moisture away from the body; a middle layer of wool or synthetic to provide insulation even when wet; an outer wind and rain protection layer that allows some ventilation to prevent overheating.
 - Wear a hat or hood; up to 40% of body heat can be lost when the head is left exposed.
 - Wear insulated boots or other footwear.
 - Do not wear tight clothing; loose clothing provides better ventilation.
 - Keep a change of clothing available in case work clothes become wet.
- E. The Cold Stress Equation OSHA has incorporated information obtained from the American Conference of Governmental Industrial Hygienists (ACGIH) threshold limit values into the Cold Stress Equation. As the temperature decreases and/or the wind speed increases, the potential for cold stress related illnesses and injuries increases. The Cold Stress Equation and the Wind Chill Temperature Index is contained in Appendix B.

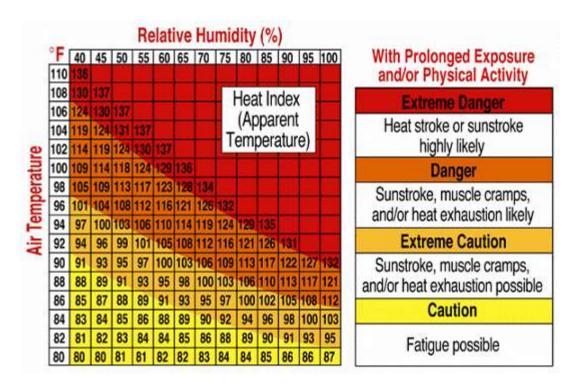
TRAINING

Employees who may be exposed to extreme hot or cold conditions must receive training prior to working in such conditions. An online training module is available from EHS. This training will cover the general safety precautions related to heat and cold stress. However, employees must still be trained on any additional precautions specific to their equipment or work areas.

APPENDIX A: HEAT INDEX

The heat index is a simple tool and a useful guide for employers/employees making decisions about protecting employees in hot weather. It does not account for certain conditions that contribute additional risk, such as physical exertion. Consider taking the steps at the next highest risk level to protect employees from the added risks posed by:

- Working in the direct sun (can add up to 15°F to the heat index value)
- Wearing heavy clothing or protective gear



APPENDIX A: HEAT INDEX (Continued)

Heat Index	Risk Level	Protective Measures
<91°F	Lower (Caution)	 Provide plenty of drinking water Ensure that adequate medical services are available Plan ahead for times when heat index is higher, including worker heat safety training Encourage workers to wear sunscreen If workers must wear heavy protective clothing, perform strenuous activity or work in the direct sun, additional precautions are recommended to protect workers from heat related illness
91°F to 103°F	Moderate	 In addition to the steps listed above: Remind workers to drink water often (about 4 cups per hour) Review heat related illness topics with workers such as recognition, prevention and first-aid Schedule frequent breaks in cool, shaded areas Acclimatize workers Set up a buddy system and instruct workers and supervisors to watch for signs of heat related illnesses Schedule strenuous activities at a time when the heat index is lower Develop and enforce work rest schedules Monitor workers closely
103°F to 115°F	High	 In addition to the steps listed above: Alert workers of high risk conditions Limit physical exertion Have a knowledgeable person at the work site who is well informed about heat related illness and able to determine appropriate work/rest schedules Adjust work activities (e.g. reschedule work, pace/rotate jobs) Use cooling techniques Watch/communicate with workers at all times
115°F	Very High to Extreme	 If essential work must be done, in addition to the steps listed above: Conduct physiological monitoring (e.g. pulse, temperature, etc.) Stop work if essential control methods are inadequate or unavailable Reschedule non-essential activities for days with a reduced heat index or to a time when the heat index is lower Move essential work tasks to the coolest part of the work shift Consider earlier start times, split shifts or evening/night shifts Strenuous work tasks and those requiring the use of heavy or non-breathable clothing or impermeable chemical protective clothing should not be conducted when the heat index is at or above 115°F

APPENDIX B: WIND CHILL TEMPERATURE INDEX

	WIND CHILL TEMPERATURE INDEX Frostbite Times are for Exposed Facial Skin											
				A	ir Tem	perat	ure (°(C)				
Wind Speed (km/h)	5	0	-5	-10	-15	-20	-25	-30	-35	-40	-45	-50
5	4	-2	-7	-13	-19	-24	-30	-36	-41	-47	-53	-58
10	3	-3	-9	-15	-21	-27	-33	-39	-45	-51	-57	-63
15	2	-4	-11	-17	-23	-29	-35	-41	-48	-54	-60	-66
20	1	-5	-12	-18	-24	-30	-37	-43	-49	-56	-62	-68
25	1	-6	-12	-19	-25	-32	-38	-44	-51	-57	-64	-70
30	0	-6	-13	-20	-26	-33	-39	-46	-52	-59	-65	-72
35	0	-7	-14	-20	-27	-33	-40	-47	-53	-60	-66	-73
40	-1	-7	-14	-21	-27	-34	-41	-48	-54	-61	-68	-74
45	-1	-8	-15	-21	-28	-35	-42	-48	-55	-62	-69	-75
50	-1	-8	-15	-22	-29	-35	-42	-49	-56	-63	-69	-76
55	-2	-8	-15	-22	-29	-36	-43	-50	-57	-63	-70	-77
60	-2	-9	-16	-23	-30	-36	-43	-50	-57	-64	-71	-78
65	-2	-9	-16	-23	-30	-37	-44	-51	-58	-65	-72	-79
70	-2	-9	-16	-23	-30	-37	-44	-51	-58	-65	-72	-80
75	-3	-10	-17	-24	-31	-38	-45	-52	-59	-66	-73	-80
80	-3	-10	-17	-24	-31	-38	-45	-52	-60	-67	-74	-81

FROSTBITE GUIDE

Increasing risk of frostbite for most people in 10 to 30 minutes of exposure

High risk for most people in 5 to 10 minutes of exposure

High risk for most people in 2 to 5 minutes of exposure

High risk for most people in 2 minutes of exposure or less

All associates will assess all work area exposures to identify fall hazards and to ensure methods to prevent falls or protection where they are able to fall, while utilizing the proper protective equipment. All associate-owned fall protection equipment used on company or customer's property must be kept in good working condition. Equipment must be checked daily as well as periodically and be immediately removed from service if found defective.

<u>SCOPE</u>

All work activities and exposures will be assessed to determine if fall hazards are present, or likely to be present, which will necessitate increasing the level of fall protection.

METHODS OF FALL PROTECTION

F. PERSONAL FALL ARREST SYTEMS

1. A full-body harness with a lanyard attached appropriately at the middle of the back and secured to a rope grab and lifeline or an object capable of supporting

5,000 pounds shall be worn by associates where:

- a. They are not protected from a fall of more than six (6) feet by other methods, such as guardrail system, floor covers, or company safety procedures outlined in within this manual.
- b. When working off a swing stage or suspended personnel platform.
- c. Any other situations or conditions that dictate the use of fall protection for each jobsite as determined by the associate's immediate Supervisor.
- 2. All fall protection and fall arrest equipment shall be used, maintained and stored at all times according to the manufacturer's recommendations.
- A full-body harness including the hardware must be inspected daily before each use. Inspect for broken or worn hardware, loose rivets, and torn or rotted fabric or materials. Equipment that is defective or damaged shall be immediately removed from service and replaced. Lanyards shall be as short as possible, but never longer than six (6) feet.
- 4. Lanyards shall not be lengthened by connecting two lanyards together.
- 5. A lifeline or lanyard shall be secured to an anchorage of structural member capable of supporting a dead weight of not less than 5,000 pounds per person.
- 6. When securing to a structural member, tie off the lanyard and lifeline as high as possible to minimize the falling distance, never below the D-ring position on the users back. Free fall shall never exceed 6 feet, unless specialized equipment is utilized and associates are trained for that equipment use, and a specific rescue plan is available.

- 7. Never attach your lanyard below you or climb higher than where your lanyard is attached; this will increase the distance and force in the event of a fall.
- 8. The use of homemade or job-made hooks or attachment devices is strictly prohibited.
- 9. All safety latches shall be of the double locking type and in working condition. Snap hooks shall not be engaged directly to webbing, rope or wire rope, to each other, to a D-Ring which another snap hook or other connector is attached, or to any object incompatibly shaped or dimensioned such that unintentional disengagement could occur (Roll-Out).
- 10. Self-retracting lifeline's (SRL) which automatically limit free fall distance to 2 feet or less shall not be used with a lanyard which would increase fall distances. These units will be anchored to an object capable of supporting at least 5,000 pounds per person and not used lying on the floor surface unless designed.
- 11. Fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for associate protection until inspected and determined safe and undamaged by a Competent Person to be suitable for reuse.
- 12. Whenever the use of general fall protection systems is infeasible or creates a greater hazard, the Safety Director shall be contacted and a site-specific fall protection plan will be developed and implemented before work begins.
- 13. Prompt methods for rescue of associates in the event of a fall shall be determined before the start of work by the project supervisor. Methods include self-rescue, equipment on the project which may be utilized, the assistance of other associates, or the local fire department. If the fire department is to be used, Associate Supervisors must first contact the fire department to ensure equipment and training is available through that local department. These options will be determined as needed for each jobsite before the start of work.

G. FLOOR AND WALL OPENINGS

1. Standard guardrail system shall consist of a top rail, intermediate rail, and toe board. The top rail shall be 42 inches, plus or minus 3 inches above the walking/working level, and shall be capable of supporting 200 pounds when applied in a downward or outward motion within 2 inches of the top edge without failure.

NOTE: If working in an area where another contractor has built the rails, ensure they meet the above requirements before starting work.

2. Ladder way floor openings or platforms shall be guarded by standard railings with toe boards on all exposed sides.

- 3. Every open-sided floor or platform six (6) feet or more above an adjacent floor or ground level shall be protected by a standard guardrail system. Wire rope can only be utilized for perimeter floor protection. When wire rope is utilized for perimeter floor protection, two (2) strands of wire rope shall be installed per OSHA standards of at least 200 pounds of protection and must be utilized to serve as a top-rail and mid-rail. The top wire rope shall not have more than three (3) inches of deflection and be flagged at not more than six (6) feet intervals with highly visible material. If these cables are to be used as fall arrest anchorage points, then these cables shall have 5,000 pounds of protection for each person attached.
- 4. Skylight openings shall be guarded by a fixed standard railing system on all exposed sides or be appropriately covered with a material that will support twice the intended load that may be applied upon them.
- 5. Wall openings from which there is a fall hazard of more than six (6) feet, and the bottom of the opening is less than three (3) feet above a working surface, shall have a standard guardrail or warning line system.
- 6. Floor openings larger than **<u>2 inches</u>** in diameter shall be properly covered, secured, and labeled "**Danger-Floor Hole.**" These covers shall support twice the intended load that will be placed upon them. Be sure to consider not only associate weight, but tools and equipment in the work area.
- 7. Never lean heavily against any guardrail system. Guardrail systems shall be capable of withstanding, without failure, a force of at least 200 pounds applied within 2 inches of the top edge in any outward or downward direction, at any point along the top edge, and are not meant to increase working height or hang tools or equipment from, or tie fall arrest lanyards or components to for anchorage.

H. RAMPS & RUNWAYS

- 1. Ramps and runways shall be designed to support the maximum intended load.
- 2. All ramps and runways with sides that are six (6) feet or more above the floor or ground level shall have guardrail systems installed on both sides of the ramp.

I. ROOF AREA WARNING LINES

<u>Warning lines</u> may only be used by associates engaged in activities on low-slope roofs or as outlined in a written Fall Protection Plan.

- 1. These systems may be used in conjunction with any of the conventional fall protection equipment.
- 2. The warning lines shall have their lines placed no closer than <u>15 feet</u> to the unprotected edge. No associate may work beyond the warning line without conventional fall arrest equipment.

J. FALL PROTECTION PLANS

<u>Fall Protection Plans</u> may be developed for any phase of work when it can be demonstrated that it is infeasible or it creates a greater hazard to use conventional fall protection equipment. The fall protection plan must conform to the following provisions:

- 1. A Qualified Person will develop the plan specifically for the site where the work is being performed and the plan must be changed as needed throughout the work process to ensure compliance.
- 2. A Qualified Person shall approve any changes to the fall protection plan.
- 3. A copy of the fall protection plan with all approved changes shall be maintained at the project or by the associate.
- 4. The implementation of the fall protection plan shall be under the supervision of a Competent Person.
- 5. The fall protection plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety nets systems) are infeasible, or why their use would create a greater hazard.
- 6. The fall protection plan shall include a written discussion of other measures that will be taken to reduce or eliminate the fall hazard for workers who cannot be provided with protection from the conventional fall protection systems. For example, the plan shall discuss the extent to which scaffolds, ladders, or vehicle mounted work platforms can be used to provide a safer working surface and thereby reduce the hazard of falling.
- 7. The fall protection plan shall identify each location where conventional fall protection methods cannot be used. These locations shall then be classified as controlled access zones and the plan must comply with the criteria in 1926.502 (g) of the OSHA Standards.
- 8. The fall protection plan must include a statement which provides the name or other method of identification for each associate who is designated to work in these Controlled Access Zones. No other associates may enter Controlled Access Zones.
- 9. In the event an associate falls, or some other related, serious incident occurs, (e.g., a near miss) the associate's immediate supervisor will investigate the circumstances of the fall or other incident to determine if the fall protection plan needs to be changed (e.g. new practices, procedures, or training) and shall implement those changes to prevent similar types of falls or incidents.

F. TRAINING REQUIREMENTS

- 1. Any associate who will be exposed to possible fall hazards while working on a company project will have previously completed or will be trained before the start of work with the procedures of this section.
- 2. When there is reason to believe that any affected associate who has been previously trained does not have the understanding or skill required by this manual, then retraining shall be completed in these procedures. This would include changes in the jobsite, change to the systems being used, or inadequate knowledge or skill by the user.

Associates will be trained in the appropriate safety requirements while working with electrical systems. Supervisors shall ensure that all electrical equipment is free from recognized hazards that are likely to cause death or serious physical harm to associates. On site competent person shall be the administrator of this program

<u>SCOPE</u>

To establish proper work habits to prevent electrical shock or other injuries resulting from either direct or indirect electrical contacts while working with electrical power and lights at the jobsite.

A. **PROCEDURES**

- All tools and equipment must utilize electrical protection with a Ground Fault Circuit Interrupter (GFCI). GFCI's can successfully reduce electrical hazards on jobsites and shall be placed <u>close to the source</u> to protect both the cord and the tools. Providing more GFCI's or shorter circuits can prevent accidental fault trips caused by the cumulative leakage from several tools or by leakages from extremely long circuits. GFCI shall be used on all 120 volt single phase 15-20 amp temporary wiring on construction sites.
- 2. All electrical tools and equipment must be <u>grounded or double insulated</u>. Double insulated tools are manufactured with non-metallic cases and shall have a legible label to indicate double insulation protection. While this design reduces the risk from grounding deficiencies, a danger of shock still exists, so remember double insulated does NOT mean double safe.
- All extension cords shall be of the three-wire type and specified for <u>Heavy Duty</u> or <u>Extra Heavy Duty</u> use. There should be a listed rating on the cord jacket stating S, ST, STO, STJ or STJO to meet OSHA cord requirements. Be sure to check the cord. Do NOT use frayed, cracked or deteriorated extension or equipment and cords that are not meant for outdoor construction work.

Do not use electrical tape to repair cuts to the jacket of the cord. If the electrical conductors become exposed through the outer jacket, there is a danger of shocks, burns, or fires and the cord needs to be destroyed and replaced.

- 4. Only Qualified Persons may repair cords or tools. Live parts of electrical equipment operating at 50 volts or more must be guarded against accidental contact. Replace the cord if damaged and do not use electrical tape for minor repairs to the outer jacket.
- 5. Each associate shall visually inspect his or her cords and tools daily. They may be damaged by activities on the jobsite, door or window edges, staples or fastenings, abrasions from adjacent materials, or aging. Damaged or defective tools or cords shall not be used, tagged and shall be immediately removed from service and replaced.
- 6. Electrical extension cords should not be fastened or hung from non-insulated staples, nails or suspended by wire. Cords and cables shall be protected from vehicles and equipment by positioning them overhead or covering them with protective material.

- 7. Remove plugs from outlets by pulling on the plug itself, not by pulling on the wire.
- 8. Energized wiring outlets, junction boxes, circuit breaker panels, etc., must be covered at all times.
- 9. Temporary lights shall have protective cages to prevent accidental contact with the bulb, and each work area shall be bright enough to safely perform work, or additional lights shall be utilized as needed. All temporary 120 volt single phase equipment 15-20 amp equipment shall require GFCI.
- 10. Do not use standard electrical tools in wet or damp conditions.
- 11. If any electrical product gives the slightest sensation of shock when touched, it should be tagged defective and removed from service and stored where it cannot be used accidentally.
- 12. Do not use electrical cords for hoisting or lowering, or tie them to the guardrails or aerial platforms.
- 13. Never use conductive materials or work within 10 feet of any power line. Assume all power lines are hot until proven otherwise. Contact the Safety Director for assistance before beginning work near these lines. They may need to be de- energized or insulated by the power company.
- 14. All electrical receptacles shall be mounted and secured. Never use a receptacle laying on a deck, ground, or floor. Ensure all cover plates are in place before plugging in to the receptacle or allowing the electrician to energize the circuits.

All tools, hand and power, are to be maintained in a safe working condition. Tools that are damaged, altered from engineered design, job made, or otherwise made unsuitable for their intended purpose are not to be used. Use practices that will also conform to the manufacturers' recommended guidelines and comply with requirements specified in the Electrical Standards by the Occupational Safety & Health Administration.

SCOPE

All tools, hand and power, that are furnished by the company, by the associate, or another entity at the jobsite.

A. **PROCEDURES**

- 1. Power tools can be hazardous when improperly used. There are several types of power tools, based on the power source: electric, pneumatic, liquid fuel, hydraulic, and powder-actuated. Do not use any hand or power tool until you have been properly instructed and understand the hazards as well as the precautions to prevent those hazards from occurring.
- 2. Inspect all hand and power tools thoroughly before each use. If a tool needs to be serviced, tag the tool as defective and take it immediately out of service.
- 3. Hazardous moving parts of a power tool need to be safeguarded with a proper guard. Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating or moving parts of equipment must be guarded if they may contact an associate.
- 4. Defective hand tools should be reported to your immediate supervisor and replaced. Common defects include: burred, battered, mushroomed, splintered, spilt, broken, loose handles, worn teeth on wrenches, etc.
- 5. Hand and power tools should be kept in good condition and used only for the job intended. Do not force tools beyond their limitation; or use "cheaters" to increase their capacity.
- 6. Saws, grinders and other power tools that require guards must have the guards in place at all times. Removing or rendering of these guards inoperable is strictly prohibited.
- 7. Flying debris is a normal occurrence when using powered tools. Always use saw blades, knives, cutters, and other tools as they are directed away from aisle areas and other associates working in close proximity. Recognize this fact and be aware to warn people around you and always use proper personal protection.
- 8. Safety requires that floors be kept as clean and dry as possible to prevent accidental slips with or around dangerous hand and power tools.
- 9. Never use power tools near heat, oil or sharp edges. Be sure to keep a good footing and maintain good balance when operating hand or power tools.

- 10. Never carry a tool by its cord or hose, or yank the cord to disconnect it from the outlet or receptacle. Avoid accidental starting and never hold a finger on the switch button while carrying a plugged in tool.
- 11. Always make certain that all electrical powered tools are grounded and/or double insulated. Do not forget to inspect the cord, when completing initial tool inspection to assure all are free from defects.
- 12. Be familiar with the tool you are using. If the tool has moveable parts, take a second to think about that. Moveable parts may jam up. Look at your clothing; loose clothes may get wrapped up in these moveable parts as well, and should not be worn.
- 13. Disconnect tool from the power source before changing drills, blades, grinding disks, etc. Never leave a running tool unattended.
- 14. Power operated tools shall only be repaired by only trained associates. Do not use a tool you have no experience with or have been trained on.
- 15. Only associates who possess a valid license to prove that they have been trained in the use of **Powder Actuated Tools** are permitted to operate them. If a misfire occurs, the associate shall wait 30 seconds before trying to fire it again. If it will still not fire, wait another 30 seconds so the faulty cartridge is less likely to explode, then carefully remove the load, and immediately place it in water.
- 16. **Powered abrasive grinding and cutting wheels** create special safety problems because they may throw off flying fragments. Always closely inspect and sound or ring test as described below all abrasive wheels before mounting to ensure it is free of cracks and defects.
- 17. To test, wheels should be tapped gently with a light nonmetallic instrument. If the wheels sound cracked or dead, there is possibility they could fly apart in operation and must not be used. A sound of an undamaged wheel will give a clear metallic tone or "ring."
- 18. To prevent the wheel from cracking, the user should be sure it fits freely on the spindle and tightened enough to hold the wheel in place without distorting the flange.
- 19. Care must be taken to ensure the spindle wheel will not exceed the abrasive wheel specifications, and that all manufacturers' recommendations are strictly followed at all times. In addition, when using a powered grinder, associates shall:
 - a. Always wear appropriate eye and face protection,
 - b. Turn off the power or unplug the tool when not in use
 - c. Never clamp a hand-held grinder in a vise or clamp.

NOTE: KEEP PERSONAL TOOLS IN GOOD WORKING CONDITION!

No company or contract associate is allowed to enter a confined space until all criteria of this confined space program has been reviewed with them and the requirements of the permit required confined space procedures have been met and all associates have been trained in Confined Space.

SCOPE

This program applies to all personnel, including non-company, who work in or around a confined space and who might be exposed or create exposures to the confined space.

PURPOSE

To establish a procedure for identifying and classifying a confined space, evaluating potential hazards associated with these spaces and to develop hazard control and entry procedures.

A. **DEFINITIONS**

- 1. **Acceptable Entry Conditions -** The conditions that must exist in a confined space to allow entry and to ensure that associates involved can safely enter into the space.
- 2. **Attendant -** A person designated to monitor a confined space and provide support or react as required.
- 3. **Confined Space -** Means any space having limited means of egress, which is subject to the accumulation of toxic or flammable contaminants or has an oxygen deficient atmosphere. Confined spaces could include but are not limited to: storage tanks, process vessels, bins, boilers, ventilation or exhaust ducts, sewers, underground utility vaults, tunnels, pipelines, and open top spaces more than 4 feet in depth such as pits, tubs, vaults and vessels.
- 4. *Hazard Evaluation -* A process to assess the severity of a known, real or potential hazard at or in the confined space.
- 5. **Hazardous Atmosphere -** An atmosphere that may expose associates to the risk of death, incapacitation, and impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness from one or more of the following causes:
 - a. Flammable gas, vapor or mist in excess of 10% of the lower flammability limit (LFL).
 - b. Airborne combustible dust at a concentration that meets or exceeds its LFL.
 - c. Atmospheric oxygen concentration below 19.5% or above 23.5%.

- d. Atmospheric concentration of any substance for which a dose or permissible exposure of a toxic substance is greater than the permissible exposure limit established by OSHA Regulations. The most common for Construction activities are hydrogen sulfide (20 ppm) and carbon monoxide (50 ppm).
- e. Any other atmospheric condition that is immediately dangerous to life and health.
- 6. *Hot Work -* Work within a confined space that causes arcs, sparks, flame, heat or other sources of ignition.
- 7. **Non-Permit Confined Space -** A space in which, by definition, is a confined space but after evaluation, does not contain nor has the potential to contain a hazardous atmosphere.
- Permitted Confined Space A confined space that after evaluation has actual or potential hazards, which have been determined to require written authorization for entry.
- 9. **Testing -** The process by which the hazards present in a confined space are identified and evaluated.

B. TESTING, EVALUATION AND MONITORING

All confined spaces shall be tested by a Qualified Person <u>before entry</u> to determine whether the confined space atmosphere is safe for entry. Test shall be made by using a direct readout instrument. A test shall be performed for all known or suspected vapors, gases or mists. Minimum tests shall include oxygen, combustible gases, carbon monoxide and hydrogen sulfide. Tests shall be made at several elevations in the confined space including the top, middle and bottom of the area or space. Gases and vapors have different characteristics. Some linger at the bottom of an area; others may float to the top or mid-point of the area. An evaluation will be made at that time on whether the confined space will be treated as permitted or non-permitted confined space (see definitions listed above).

1. Oxygen Hazards

Too much oxygen in the air increases the potential for normally nonflammable materials such as grease, oil or clothing to catch fire at normal temperatures or when exposed to flames. More often the atmosphere may contain too little oxygen resulting in physical effects to workers in the space.

The following are defined as high and low oxygen levels:

- 23.5% and above High levels
- 20.8% to 21% Normal levels
- 19.5% and below
 Low levels

Effects of Oxygen Deficiencies:

<u>% Oxygen</u>	Effects
16 - 14%	Deep breathing, accelerated heartbeat,
	impaired attention, thinking and coordination
14 - 10%	Faulty judgment, poor coordination, rapid
	fatigue, intermittent breathing
10% and below	Nausea, vomiting, unconsciousness followed
	by death
Less than 6%	Spasmodic breathing, convulsive movements,
	death in minutes

2. Flammability Hazards

An atmosphere is flammable when there is oxygen in the air and there is flammable gas, vapor, or dust in the proper mixture. Different gases have different flammable ranges. OSHA considers an atmosphere to pose a serious fire or explosion hazard if a flammable gas or vapor is present at a concentration greater than 10% of its lower flammability limit (LFL).

3. Toxic Hazards

A toxic atmosphere is usually caused by the product that was stored or present in the space or from work being conducted such as cutting, welding, spraying, cleaning, etc. It could also be from other toxins in the area of the confined space that may have entered and settled into the space. An evaluation must be made on what chemicals or a combination of chemicals to sample. A typical four-gas air monitor will monitor Hydrogen Sulfide and Carbon Monoxide, which are set at 20 ppm and 50 ppm respectively.

a. CONTROL OF HAZARDS

- i. Fresh air ventilation shall be pumped into the space before and during space entry as needed. Oxygen and carbon monoxide testing should be performed on the fresh air discharge to ensure the makeup air is acceptable.
- ii. Whenever possible, all piping, duct work, lines, etc., that could unexpectedly carry toxic materials, vapor, gases, etc., into the confined space should be blocked or blanked off. This can be accomplished by closing valves, removing piping or plugging the opening of the holes entering the space. All mechanical hazards such as augers, conveyors, blades, etc., must be turned off and locked out.
- iii. No hot work shall be done in the space without the Supervisor's permission and continuous monitoring with the direct read out instrumentation while this work is being performed.

b. EVALUATION

The attendant shall make a determination based on sampling, observation and evaluation of the intended process on whether the confined space can be entered on a non-permit basis. The "**Confined Space Entry Permit -Appendix B**" of this manual shall be completed and signed by the project foreman on site. A "**Confined Space-Safety Meeting & Checklist -Appendix C**" is to be utilized to determine compliance with company procedures and associate policy or procedure review before entering the space each shift. If a determination can be made that ventilation is sufficient to keep the confined space within acceptable atmospheric conditions, workers can be allowed to enter the area. All observations must be logged and the area should be checked regularly or whenever working conditions or activities introduce new hazards into the area.

NOTE: If the attendant cannot make a determination that the space is a non-permit type space, no entry shall be permitted. The Safety Director shall be contacted and a permit type confined space entry procedure shall be utilized.

- c. ASSOCIATE DUTIES AND RESPONSIBILITIES
 - i. **ATTENDANT:** An attendant must be stationed and remain outside the permit-required space(s) at all times during entry operations, and have knowledge of site specific issues such as the following:
 - Knowing specific space hazards;
 - Is aware of possible effects of hazard exposure;
 - Maintains an accurate count of entrants;
 - Remains outside the permit space during entry;
 - Communicates with authorized entrants;
 - Monitors activities inside and outside the space;
 - Summon rescue and other emergency services;
 - Performs non-entry rescues and no other duties.
 - ii. **SUPERVISOR:** Must be present at all times when entry into the space is allowed and be able to evaluate and properly abate any hazards before allowing work to continue and have knowledge of site specific issues such as the following:
 - Knowing specific space hazards;
 - Verifies that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin;
 - Terminates the entry and cancels the permit if hazardous conditions arise;
 - Verifies that rescue services are available;
 - Removes unauthorized individuals.

d. TRAINING REQUIREMENTS

- i. All associates involved in a confined space entry shall successfully complete a formal confined space training session before they are allowed to enter a confined space or take part in any portion of this activity.
- ii. Training content shall include, but is not limited to the following:
 - A review of this Confined Space Entry Program.
 - A review of C&C Group Confined Space Entry Form and related instructions.
 - The general duties of authorized entrants, attendants, and entry supervisors.
 - A demonstration of the proper use of atmospheric testing equipment and rescue equipment.
 - A test to establish proficiency in the covered material.
- iii. In addition to specific confined space entry training, personnel involved in confined space operations shall successfully complete Hazard Communication Training and Respiratory Protection Training if they pertain to the scope of work.
- iv. Refresher training shall be completed on an annual basis (or as necessary) to ensure proficiency with this program.
- v. Personnel who use atmospheric testing equipment shall be trained in the proper use of it and in accordance to the manufacturer's instructions. This training shall include, but is not limited to the following:
 - Limitations of the equipment
 - Calibration
 - Maintenance
 - All training shall be documented and records shall be kept on file and be available for review for all confined space participants.

Good housekeeping is not only an essential part of our safety program, it is good business. Associates are expected to keep their work areas and company vehicles clean and orderly during work activities. This includes cleaning up before moving from one work area to another.

A program for debris removal throughout the work area will be established by the Supervisor and the Building Occupant and agreed to by all associates prior to work beginning.

- A. PROCEDURES
 - 1. Aisles, walkways, and stairways must be kept clean and free of debris at all times.
 - Trash receptacles must be made available throughout work areas so associates have a handy place to discard trash. These receptacles must be emptied regularly to permanently dispose of this material. (Failure to remove debris promptly causes obstruction of other activities, fire hazards, potential for associate injury, handling the same material repeatedly, and is extremely expensive.)
 - 3. Reusable materials must be cleaned, sorted, and stacked in appropriate storage areas.
 - 4. Protruding nails must be completely removed from material.
 - 5. The accumulation of "junk piles" of debris is not allowed in any storage yard or work area.
 - 6. Materials must not be dropped or thrown from upper levels to lower levels or to the ground from roof areas unless the following conditions are met:
 - a. When dropping materials more than 20 feet to any area outside of a building, an enclosed chute shall be used. Contact the Safety Director or the Supervisor for additional information.
 - 2. When dropping to areas less than 20 feet down, the drop area shall be barricaded and flagged.
 - ii. When debris is dropped through holes in a floor, provide an enclosed chute, or completely enclose the drop area with barricades that are 42 inches high and located at least six feet back from the edges of the opening above. Signs warning of the hazard of falling materials shall be posted at each drop area.
 - 7. Coordinate the removal of debris from the drop area, so other debris is not dropped at the same time.
 - a. 8Whenever possible waste should be recycled.
 - 8. Trash, rubbish or garbage must not be allowed to accumulate on our projects.
 - 9. All combustible debris such as soiled rags, crating, boxes, packing materials and lunch area scraps must be placed in containers and be removed promptly. Provide an extra fire extinguisher for any area in which these materials accumulate on an ongoing basis.
 - 10. Keep site lunch and break areas clean and provide suitable receptacles for disposal of all trash and debris.
 - 11. Subcontractor(s) shall clean up and remove all rubbish and debris caused by its operations and in connection with the execution of its work to the satisfaction of this company, or after written notice, the Supervisor shall arrange to have this work performed and charge the cost to the subcontractor.

C&C Group will evaluate work activities that might result in an uncontrolled fire to ensure that these activities are properly assessed and controlled. The purpose of this Fire Prevention Plan is to assign responsibilities and duties for fire safety, to identify those areas that pose the greatest risk of fire and to establish procedures to reduce those risks. A **Hot Work Permit – Appendix P** must be completed for the projects where specified.

<u>SCOPE</u>

All welding, torch cutting, portable heaters, fuel storage/filling or any other activity that involves a heat source above the ignition time/temperature of exposed materials. This plan applies to all operations in the company or at the worksite, and each associate is responsible to ensure their work practices comply with this policy. The Safety Director is the Program Coordinator.

A. **PROCEDURES**

- 1. Have a fire extinguisher readily available at all times. Extinguishers should be located at no more than 100 feet of travel distance to any part of the project, near all flammable storage area, wherever 5 or more gallons of flammable liquids are being used, or on every level of a multi-level building structure.
- 2. Know the location of firefighting equipment and have knowledge of its use and application.
- 3. Report defective firefighting equipment to your supervisor immediately.
- 4. If you use or find a discharged fire extinguisher, take it out of service and make it known to your supervisor that a replacement is needed.
- 5. Smoke only in designated areas. Discard the butts properly. Never drop a smoldering butt. You never know what may have been spilled in that spot or what kind of flammable vapors may be present.
- 6. Gasoline and other flammable liquids shall only be stored in metal DOT approved safety containers 5 gallons or less in size. All flammable containers and hazardous chemicals must be properly labeled with their true contents at all times. Ensure that a Material Safety Data Sheet (SDS) is available covering each containers content.
- 7. All equipment should be shut off before attempting to refuel it.
- 8. There shall be no smoking or open flame in the vicinity of a refueling area. A fire extinguisher shall be readily available at each refueling area.
- 9. Keep fuel and oil spillage cleaned up.
- 10. Fire extinguisher training will occur annually via the company's toolbox talks programs
- 11. Fire extinguishers shall be visually inspected on a monthly basis and are subjected to an annual maintenance check.

- 12. If owner requires a welding or burning permit, secure permit prior to the start of work.
- 13. Post a fire watch when necessary. Before leaving areas where hot work has been completed for that work shift, associates shall ensure that no possibility of fire exists. Hot work shall stop 30 minutes before the end of the work shift.
- 14. Know how to properly report a fire or correctly use fire alarms when applicable.
- 15. On any enclosed structure, try to establish two separate exit ways. Be sure to keep these exits clean and free from scrap, debris, materials and tools.
- 16. When working in an existing structure, ensure all emergency exits are located and marked. Maintain these exits free of material or debris for proper and easy exit.
- 17. Combustible waste materials, such as oily rags, paint rags, must be stored in covered metal containers and be disposed of properly.

B. FIRE SAFETY INSPECTIONS & HOUSEKEEPING

The Associate is responsible for conducting work site safety inspections that include observations of compliance with all Fire Safety Procedures. These inspections should include observations of building owner's associate's safety and housekeeping issues and should specifically address proper storage of chemicals and supplies, unobstructed access to fire extinguishers, and emergency evacuation routes. Also, a determination shall be made to ensure that a emergency evacuation plan is present and specific for all work areas and that associates are familiar with this plan and know where a copy may be obtained upon request.

C. EMERGENCY EXITS

- 1. Every exit will be clearly visible, or the route to it conspicuously identified in such a manner that every occupant of the building or work area will readily know the direction of escape from any point. At no time will exits be locked or blocked.
- 2. Any doorway or passageway which is not an exit but which may be mistaken for an exit, should be identified by a sign reading "Not an Exit" or a sign indicating its actual use (i.e., storeroom, closet). Exits and accesses to exits will be marked by a readily visible sign. If the building is to be occupied after hours, each exit sign will be illuminated by a reliable light source providing not less than 5-foot candles on the illuminated surface.

D. CLASSIFICATIONS

- 4. **Flammable Liquids** a liquid with a flash point at or below 199.4 °F (93 °C). Flammable liquids are:
 - a. **Category 1** shall include liquids having flashpoints below 73.4 °F (23 °C) and having a boiling point at or below 95 °F (35 °C).
 - b. **Category 2** shall include liquids having flashpoints below 73.4 °F (23 °C) and having a boiling point above 95 °F (35 °C).
 - c. **Category 3** shall include liquids having flashpoints at or above 73.4 °F (23 °C) and at or below 140 °F (60 °C). When a Category 3 liquid with a flashpoint at or above 100 °F (37.8 °C) is heated for use to within 30 °F (16.7 °C) of its flashpoint, it shall be handled in accordance with the requirements for a Category 3 liquid with a flashpoint below 100 °F (37.8 °C).
 - d. **Category 4** shall include liquids having flashpoints above 140 °F (60 °C) and at or below 199.4 °F (93 °C). When a Category 4 flammable liquid is heated for use to within 30 °F (16.7 °C) of its flashpoint, it shall be handled in accordance with the requirements for a Category 3 liquid with a flashpoint at or above 100 °F (37.8 °C).
 - e. When liquid with a flashpoint greater than 199.4 °F (93 °C) is heated for use to within 30 °F (16.7 °C) of its flashpoint, it shall be handled in accordance with the requirements for a Category 4 flammable liquid.

It should be mentioned that flash point was selected as the basis for classification of flammable liquids because it is directly related to a liquid's ability to generate vapor, i.e., its volatility. Since it is the vapor of the liquid, not the liquid itself that burns, vapor generation becomes the primary factor in determining the fire hazard. The expression "low flash - high hazard" applies. Liquids having flash points below ambient storage temperatures generally display a rapid rate of flame spread over the surface of the liquid, since it is not necessary for the heat of the fire to expend its energy in heating the liquid to generate more vapor.

The above definitions for classification of flammable liquids are quite complex. The diagram on below should aid in their understanding.

5. Combustible Liquids – a liquid having a flash point at or above 100° F.

E. STORAGE & USAGE OF FLAMMABLE LIQUIDS

The Associate shall designate storage areas for all work sites, both indoors and outdoors, and coordinate with the building owner as needed. All flammable and combustible liquids require careful handling at all times. The proper storage of flammable liquids within a work area is very important in order to protect personnel from fire and other safety and health hazards, and the storage requirements are as follows:

- 1. Storage of flammable liquids shall be in NFPA approved storage lockers or in low value structures at least 50 feet from any other structure. Do not store other combustible materials near flammable storage areas or lockers.
- 2. Bulk drums of flammable liquids must be grounded and bonded to containers during dispensing.

- 3. Portable containers of gasoline or diesel are not to exceed 5 gallons.
- 4. Containers used for dispensing flammable or combustible liquids shall be kept at a point of use.
- 5. Appropriate fire extinguishers are to be mounted or be available within 75 feet of outside areas containing flammable liquids, and within 10 feet of any inside storage area for such materials.
- 6. Storage rooms for flammable and combustible liquids must have explosion proof light fixtures.
- 7. No flames, hot work, or smoking is to be permitted in flammable or combustible liquid storage areas.
- 8. The maximum amount of flammable liquids that may be stored in a building are:
 - a. Not more than 60 gallons of Category 1, 2, or 3 flammable liquids, nor more than 120 gallons of Category 4 flammable liquids may be stored in a storage cabinet.
 - b This standard permits both metal and wooden storage cabinets. Storage cabinets shall be designed and constructed to limit the internal temperature to not more than 325°F when subjected to a standardized 10-minute fire test. All joints and seams shall remain tight and the door shall remain securely closed during the fire test. Storage cabinets shall be conspicuously labeled, "Flammable - Keep Fire Away."
 - c. The bottom, top, door, and sides of metal cabinets shall be at least No. 18 gage sheet metal and double walled with 1½-inch air space. The door shall be provided with a three-point lock, and the door sill shall be raised at least 2 inches above the bottom of the cabinet.
- 9. Flammable liquid transfer areas are to be separated from other operations by distance or by construction having proper fire resistance.
- 10. When not in use flammable liquids shall be kept in covered containers.
- 11. Class I liquids may be used only where there are no open flames or other sources of ignition within the possible path of vapor travel.
- 12. Maintenance and operating practices shall be in accordance with established procedures, which will tend to control leakage and prevent the accidental escape of flammable or combustible liquids. Spills shall be cleaned up promptly.
- 13. Combustible waste material and residues in a building or work area shall be kept to a minimum, stored in covered metal receptacles and disposed of daily.

F. CABINETS

Not more than 120 gallons of Class I, II, and IIIA liquids may be stored in a storage cabinet. Of this total, not more than 60 gallons may be Class I and II liquids. Not more than three such cabinets may be located in a single fire area except in industrial areas.

G. STORAGE INSIDE BUILDINGS

Where approved storage cabinets or rooms are not provided, inside storage will comply with the following conditions:

- 1. The storage of any flammable or combustible liquid shall not physically obstruct a means of egress from the building or area.
- 2. Containers of flammable or combustible liquids will remain tightly sealed except when transferred, poured or applied. Remove only that portion of liquid in the storage container required to accomplish a particular job.
- 3. If a flammable and combustible liquid storage building is used, it will be a one- story building devoted principally to the handling and storing of flammable or combustible liquids. The building will have 2-hour fire-rated exterior walls having no opening within 10-feet of such storage.

H. VENTILATION

Every inside storage room will be provided with a continuous mechanical exhaust ventilation system. To prevent the accumulation of vapors, the location of both the makeup and exhaust air opening will be arranged to provide, as far as practical, air movement directly to the exterior of the building and if ducts are used, they will not be used for any other purpose.

We are so accustomed to having compressed gas cylinders around us, we sometimes forget the severe dangers these cylinders present. The following procedures must be followed for everyone's protection.

<u>SCOPE</u>

This policy will apply to gas or arc welding and cutting, fire prevention during these type of work, ventilation and protection requirements during these operations, and anytime preservative coatings are present while performing this work. Specific safety requirements are listed for transporting, moving, placing, storing, use and operation and must be strictly followed.

A. **PROCEDURES**

- 1. All gas cylinders shall have contents clearly marked on the outside of each cylinder.
- 2. Oxygen and fuel/gas (acetylene, LPG, mapp, etc.) cylinders must be stored at least twenty (20) feet apart or separated by a one-hour firewall at least 5 feet in height. LPG should be stored outside at all times, except if the building is uninhabited by other associates or personnel at night and only in small quantities.
- 3. Cylinders must be placed and secured in an upright position, including storage and transfer.
- 4. Cylinder valves must be protected with caps or guard when not in use.
- 5. Full and empty cylinders are to be stored separately and secured with suitable devices to keep cylinders in an upright position.
- 6. Empty cylinders should not be treated any differently than full cylinders.
- 7. Never use an oxygen or fuel/gas cylinder when it is lying down.
- 8. All burning units must be broken down at the end of the shift or when work is completed before leaving the area, with regulators removed and protective caps screwed down hand tight.
- 9. When cylinders are hoisted, always use proper carries. They should never be choked or lifted by their protective cap.
- 10. Keep oil and grease away from oxygen cylinders. Never use oily or greasy gloves, rags or tools around oxygen cylinders.
- 11. Do not use compressed gas to clean your clothing, blow out anchor holes or otherwise clean your work area.
- 12. All hoses, gauges and torches must be inspected each day before use. Those found defective shall be taken out of service and replaced.
- 13. All cutting torch carts shall have a readily available fire extinguisher in the immediate area at all times. If needed, an extinguisher may be placed on the cart for transport to the project, and then set off immediate to the work area as needed.

The Safety Director and Supervisors are responsible for pre-screening projects and continuously monitoring work tasks/activities that have the potential to pose a significant risk of back injuries to associates. When feasible, additional help, a dolly, forklift or other type of lifting equipment shall be utilized.

SCOPE

This applies to all projects where manual material handling activities or repetitive bending and lifting are required.

PURPOSE

The purpose of this section is to educate associates and prevent potential back injuries through identifying work activities that have the potential to cause back related injuries to associates.

A. **PROCEDURES**

- 1. Be sure to stretch before attempting to lift or move material at the start of each day. Many back and muscle injuries are due to improper stretching or straining.
- 2. Always size up your load. Get help for heavy or bulky loads. This may require the utilization of material handling equipment, i.e., power industrial trucks, pallet jacks, etc.
- 3. Inspect your path of travel. Choose the safest, not the shortest route. Be aware of tripping or slipping hazards.
- 4. Always bend your knees, keeping your back straight, not necessarily vertical. Tuck your chin to keep it in line with your neck and spine. Never lift or lower objects with a rounded back and straight legs.
- 5. Get a firm grip on the object with your whole hand (not just your fingers).
- 6. Draw the object close to you with your weight centered over your feet.
- 7. Tuck your elbows and arms for more power. Lift by straightening your legs use slow easy motions, and avoid quick, jerky motions.
- 8. Avoid shifting with the load. Try to point your foot in the direction you intend to go.
- 9. Do not kick objects out of your pathway, or don't block your view with too large of a load.

Ladders shall only be set up and used by a trained associate who is familiar with all requirements pertaining to the particular type of ladder. Manufacturers' recommendations concerning the set-up and use of the ladder shall be strictly followed. All ladders must meet OSHA/ANSI specifications.

SCOPE

This policy applies to all access-related activities that involve ladders, including the set-up, inspection and use.

Inspect all ladders before use. Defective ladders with broken or split side rails, missing rungs, or steps, or other faulty or defective construction shall be taken out of service and be appropriately labeled "DEFECTIVE - DO NOT USE."

A. STRAIGHT/EXTENSION LADDERS

- 1. Inspect ladders before use. Defective ladders with broken or split side rails, missing rungs or steps, or other faulty or defective construction shall not be used.
- 2. Ladders must be equipped with a tie-off rope and nonskid safety feet.
- 3. Top of ladders shall extend at least 36 inches above the supporting object when used as access to an elevated work area. Ladders must be adequately secured to prevent displacement and do not extend 36 inches above surfaces.
- 4. Do not take extension ladders apart to use either section separately.
- 5. Ladders shall be placed at such a pitch that the horizontal distance from the top support to the base is about one-quarter of the working length of the ladder.
- 6. Do not place ladders in front of doors opening toward the ladder unless the door has been locked or blocked.
- 7. Never use ladders horizontally as platforms, runways or scaffolds.
- 8. After extension section of ladder has been raised to desired height, check to see that safety latches are engaged and extension rope is secured to a rung on the base of the ladder.
- Job-made ladders shall be constructed for their intended use. Cleats should be inset the side rails 1/2-inch, or filler blocks used. Space cleats uniformly, 12 inches top to top. See "Job Made Ladder Requirements - Appendix F" to ensure proper construction before using these ladders. <u>Do not use these ladders if they do not</u> <u>meet these requirements.</u>

B. STEPLADDERS

- 1. Shall always be completely open, set level on all four feet, and spreaders locked in place. Never use a stepladder like a straight ladder.
- 2. Do not stand on the platform or the top step of a stepladder. Use the proper ladder for each job as required.
- 3. Do not place tools or materials on steps or platform. Do not attempt to climb ladders while holding these items. Always ensure while using a ladder 3 points of contact is maintained at all times.
- 4. Stepladders must be secured to prevent displacement with all doorways and/or walkways barricaded under certain conditions.
- 5. Use only as required by the manufacturer. Labels shall indicate these procedures and they shall be legible at all times on the side rails of the ladders.
- 6. Always stay in the center of the ladder to ensure it does not tip over while in use. Keep your belt buckle inside the outside rails of the ladder so that it does not tip over. Reposition the ladder if possible, or scaffolding or personnel lifts may be needed.

Scaffolds shall only be used, erected or dismantled under the supervision of a Competent Person who is familiar with all requirements pertaining to the installation and use of the scaffold. Manufacturers' recommendations concerning the installation and use of the scaffolding shall be strictly followed.

SCOPE

This policy applies to all access-related activities that involve scaffolds, including the erection, inspection, use, modification and dismantlement.

A. **DEFINITIONS**

- 1. **Competent Person** means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to associates, and who has authorization to take prompt corrective measures to eliminate them.
- 2. **Qualified Person** means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his or her ability to solve or resolve problems related to the subject matter, the work, or the project.
- 3. **Scaffold** means any temporary elevated platform (supported or suspended and its supporting structure including points of anchorage), used for supporting associates or material or both.

B. FABRICATED FRAME OR TUBULAR SCAFFOLDING

- All scaffolds used by the company shall be erected, dismantled, moved, and altered under the direction of a Competent Person. There is a **Daily Scaffold Checklist – Appendix K** if the contractor requires documentation of the inspection before the start of work.
- 2. All scaffolds shall be inspected by a Competent Person at the start of each shift, or after any occurrence which could affect the integrity of the system. Never use any equipment that is damaged or defective in any way. Mark it and tag it as defective or completely remove it from the worksite. The Competent Person must be on-site at all times while working from the scaffolding.
- 3. Associates shall not work on scaffolds during storm or high winds. Tools, materials, and debris shall not be allowed to accumulate in quantities to cause a hazard, and slippery conditions shall be eliminated as soon as possible after they occur.
- 4. Scaffolds shall be erected on sound, rigid footing, capable of handling *4 times* the maximum intended load without upset. Unstable objects, such as barrels, boxes, loose brick, or concrete blocks shall not be used to support scaffolds or planks.
- 5. Scaffolds must be level with all cross braces securely attached. The use of blocks, brick, boxes or any other unstable objects to level the scaffold is prohibited. Screw legs shall be used to increase working heights as needed, and base feet shall be used at all times with mudsills either along the width or length of the scaffold from one base foot to the other.
- 6. Scaffolds more than two sections high should be tied off to prevent displacement, every 20 feet horizontally starting at both ends, and every 30 feet vertically starting at

the top and bottom. A common procedure to secure scaffolding is a push-pull type of connection using lumber and 9-wire twisted tight.

- 7. Scaffold platforms shall be fully decked from post to upright when feasible, with no more than 1 inch between each plank. Walkways shall be a minimum of two 10-inch planks wide, and have guardrails according to the Fall Protection section of this manual if the fall hazard is10 feet or more to any lower level.
- 8. Scaffold planks shall be of the approved type, and shall be a minimum of 1,500 fiber (Stress Grade) construction grade lumber. Both ends of the plank shall be painted and shall have plank savers installed to prevent splitting. These planks should be marked to ensure they are not used for any other purpose. If a plank is used as a mud sill, it shall never be used as a plank again and marked accordingly.
- 9. Planking shall be inspected before first use. Planking that has severe cracks, splits or shows signs of rotting shall be removed from service and replaced. Once a plank is used as a mudsill, it cannot be used as a plank.
- 10. Planks shall be cleated or otherwise secured and not hang over their end supports less than six inches or more than twelve inches for an 8-foot or shorter plank. Planks which are 10 feet or greater can extend a maximum of 18 inches. All planking of platforms shall be overlapped a minimum of 12 inches or secured against movement.
- 11. The poles, legs, or uprights of all scaffolding shall be plumb, and securely and rigidly braced to prevent swaying and displacement.
- 12. Each associate on a scaffold more than (10) ten feet above a lower level shall be protected from falling to that lower level. Guardrails are required on all open sides and ends of scaffolds greater than (10) ten feet. Rope guardrails shall not be used. All guardrails will meet the criteria listed in Section 9 Fall Prevention and Protection. When guardrails are not feasible, full body harnesses with lifelines attached shall be used.
- 13. Toe boards are to be used at all times when materials are stored near an edge which would create a falling object hazard to associates below with a minimum height of 4 inches and shall be capable of supporting 50 pounds without failure. When associates are required to work or pass under the scaffold or the material is stored at a height greater than 4 inches, scaffolds shall be provided with a screen or mesh material between the toe board and guardrail, extending along the entire opening or the area below shall be barricaded to prevent associate access. All associates working on or near scaffolding shall wear a hard hat at all times.
- 14. Scaffolds and all other metal objects and tools shall be kept at least 10 feet from any overhead power line or electrical source. If this is not feasible, contact the Safety Director immediately.
- 15. When loads must be swung near the scaffolding, they shall have tag lines to prevent contact.

C. MOBILE SCAFFOLDS (In addition to the scaffolding requirements in section B)

- 1. Platforms to the scaffolding shall be tightly planked the full width of the scaffold, with no more than 1 inch between planks.
- 2. Height may not be more than (4) four times its minimum base dimension without securing the unit or installing outriggers to prevent displacement.

- 3. All wheels must be locked when scaffold is in use. Locks that are found defective shall be removed from service and replaced before using the scaffolding.
- 4. Associates shall not ride upon mobile scaffolding while it is being moved. Associates may access mobile scaffolding once it has been moved and the wheels re-locked.

D. **SUSPENSION SCAFFOLD** (In addition to the scaffolding requirements in section B)

Each set of suspension scaffolding shall be erected under the direct supervision of a Competent Person and used by Qualified and Trained Associates. *It is C&C Group policy to have only trained and authorized associate's set-up, assemble, use or dismantle the suspensions scaffolding systems for jobsite use.* The following items are guidelines to ensure safe set-up and inspection criteria:

- 1. The manufacturer's recommendations and guidelines shall be strictly followed at all times.
- 2. The checklist located in the Appendix L will be completed by the Competent Person before the start of each shift when the scaffold will be used and after any occurrence could affect the safety of our work. The purpose of this check list is to provide useful reminders to a <u>Competent Person</u> inspecting suspended scaffold rigging and equipment. Always be sure to follow the manufacturer's instructions and guidelines, and any Federal, State/Provincial, and Local regulations that apply. It is required that the Competent Person complete this form for each stage and every rigging operation <u>BEFORE</u> <u>ANYONE OPERATES</u> the equipment and/or leaving the job site.
- 3. All suspension scaffold and support devices shall be attached to or rest on surfaces capable of supporting at least 4 times the intended load weight.
- 4. Before any scaffold is used, all direct connections shall be evaluated by the Competent Person.
- 5. Suspension outrigger beams shall be restrained to prevent movement. They shall stop bolts or shackles at both ends, securely fastened together with the flanges turned out, installed with all bearing supports perpendicular to the beam center line, set and maintained with the web in a vertical position, and made of steel, wrought iron, or materials of equivalent strength.
- 6. The inboard ends of the outrigger beams shall be stabilized by counterweights. These weights shall be made of non-flowable material. Sand, gravel and similar materials that can be dislocated shall not be used. Only those items specifically designed as counterweights shall be used for these scaffold systems, and shall be secured by mechanical means to the outrigger beams. If a nut and bolt is used, these shall be checked for tightness before each shift. While performing this inspection, all wire rope clips will also be checked for tightness.
- 7. Outrigger beams which are not stabilized by bolts or other direct connections to the floor or roof deck shall be secured by tiebacks. These tiebacks shall be equivalent in strength to the scaffold suspension ropes.
- 8. Outrigger beams shall be placed perpendicular to the bearing support which is usually the face of the building or structure. If not feasible, they may be placed at some other angle, provided opposing angle tiebacks are used.
- 9. Tiebacks shall be secured to a structurally sound anchorage of the building or structure. This includes structural members, but not standpipes, vents, other piping systems, or electrical conduit. These tiebacks shall be installed perpendicular to the face of the building or

structure, or opposing angle tiebacks may be used. Single tieback lines are prohibited.

- 10. All wire ropes shall be inspected for defects by the competent person prior to each use and after any occurrence which could affect the ropes integrity. Ropes shall be replaced if any of the following conditions exist:
 - a. Any physical damage which impairs its function and strength,
 - b. Kinks that might impair the tracking or wrapping of rope around the sheave or drums,
 - c. Six randomly broken wires in one rope lay or three broken wires in one strand in one rope lay,
 - d. Abrasion, corrosion, scrubbing, flattening or peening causing loss of more than onethird of the original diameter of the outside wires,
 - e. Heat damage caused by a torch or any damage caused by contact with electrical wires,
 - f. Or evidence that the secondary brake has been activated during an over speed condition and has engaged the suspension wire rope.
- 11. Suspension scaffold power operated hoists and manual hoists shall be tested by a qualified laboratory. Ask the rental company for this certification upon delivery.
- 12. Gasoline powered equipment and hoists shall not be used on suspension scaffolds.
- 13. Gears and brakes of hoists shall be enclosed.
- 14. While working from suspension platforms, the platform shall be tied or otherwise secured to prevent from moving or swaying.

E. TRAINING REQUIREMENTS

- 1. Each associate who performs work while on a scaffold shall have completed training or will be trained before first use in the procedures in this section and how to control or minimize all possible hazards for the jobsite while using the system.
- For each project, associates using scaffold units shall understand the nature of any electrical, fall and falling object hazards and the procedures for erecting, using, handling of materials or disassembling the scaffold. They shall also understand as needed the maximum intended load and load-carrying capacities for the type of scaffold system used.
- 3. Those associates who erect, disassemble, move, operate, repair, maintain or inspect a scaffold must have completed training by a Competent Person to ensure they may recognize any hazard associated with the work in question which may differ from the associates who only work upon the scaffolding. This training shall include the correct procedures for each operation performed for the specific type of scaffold system in use, and the design criteria and maximum intended load capacity and intended use of the scaffolding.
- 4. When there is reason to believe that an associate lacks the understanding or skill needed for safe work involving the erection, use or dismantling of the scaffolding, retraining shall be completed to ensure safe working knowledge. Retraining is also required when changes at the jobsite present a hazard which an associate has no previous training or knowledge of, or when changes in the scaffolding present a hazard.

All associates will perform their work in accordance with the Aerial Lift Program that addresses the safety and best-use of both manual and motorized Aerial Lift Machines.

SCOPE

This Program applies to the operation of all aerial lifts operated by C & C Group Associates and its Contractors.

PURPOSE

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

AERIAL LIFT PROCEDURES

A. General Safe Work Practices

- 1. Prospective operators are required to have completed an Aerial Lift Training Course prior to operation of equipment
- 2. Operators shall not wear any loose clothing or any accessory that can catch in moving parts.
- 3. Aerial Lift Operators will ALWAYS use a body harness in conjunction with a retractable lanyard. Both must be appropriately rated, and sized for the operator.
 - The Harness must be donned and the lanyard secured, both to the harness and the anchor point on the lift before operation.
 - The operator may only anchor their harness/lanyard kit to the lift manufacturer designated anchor point.
- 4. Before machine is started, the operator must walk completely around the machine to ensure everyone and everything is clear of the machine.
- 5. 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.
- 6. Lower level controls shall not be operated unless permission has been obtained from the associate in the lift, except in case of emergency.
- 7. Modifications and additions that may affect the capacity or safe operation of an aerial/scissor lift are strictly prohibited without the manufacturer's written approval.
- 8. Capacity, operation, and maintenance instruction markings will be changed as necessary if the manufacturer approves a modification.
- 9. The insulated portion (if applicable) of an aerial / scissor lift shall not be altered in any manner that might reduce its insulating value.
- 10. Any signs, plates, or decals which are missing or illegible must be replaced.
- 11. If the aerial / scissor lift becomes disabled, a "out of service" tag or equivalent shall be attached to the controls inside the platform in a conspicuous location.
- 12. Aerial/scissor lift devices with noted, reported deficiencies shall not be operated until repairs are made and equipment is authorized for use.
- 13. Operators must report all accidents, regardless of fault and severity, to their Supervisor.

B. Safe Work Practices Before Operation

- 1. Consideration shall be given to the amount of wind. Follow the manufacturer's instruction regarding operation in windy conditions. As a general rule aerial lifts shall not be operated in winds exceeding 25mph although this can vary depending on the model of equipment
- 2. At 25mph wind speeds or anticipated gusts, lifts will be grounded.
- 3. If at any time associates or contractors feel unsafe in lifts, they may make decision to ground the lifts and cease operation.
- 4. Guardrails must be installed and access gates or openings must be closed before raising the platform.
- 5. Boom and platform load limits specified by the manufacturer shall not be exceeded.
- 6. Before moving an aerial lift for travel, the boom(s) shall be inspected to see that it is properly cradled and outriggers are in stowed position (if equipped).
- 7. Consideration shall be given to the protection of bystanders via barricading, having another associate keep bystanders at a safe distance or by other means.
- 8. Aerial lifts shall not be operated from trucks, scaffolds, or similar equipment.
- 9. ANSI and OSHA standards specify minimum safe distances that are to be maintained from power lines while working in an aerial lift, as indicated in the table below. If these distances cannot be achieved, do NOT use the equipment.

<50 KV 10 ft 50 - <199 KV 15 ft 200 – 349 KV 20 ft 350 – 499 KV 25 ft 500 – 749 KV 35 ft 750 – 1000 KV 45 ft

C. Safe Operation

- 1. Attention shall be given towards the direction of travel, clearances above, below and on all sides.
- 2. Associates shall not sit or climb on the guardrails of the aerial lift.
- 3. Planks, ladders or other devices shall not be used on the work platform.
- 4. An aerial lift shall not be moved when the boom is elevated in a working position with associates in the basket.
- 5. Aerial lift shall not be placed against another object to steady the elevated platform.
- 6. Aerial lift shall not be used as a crane or other lifting device.
- 7. Aerial lift devices shall not be operated on grades, side slopes or ramps that exceed the manufacturer's recommendations.

- 8. The brakes shall be set and outriggers, when used, shall be positioned on pads or a solid surface.
- 9. Speed of aerial lift 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.
- 10. Booms and elevated platform devices shall not be positioned in an attempt to jack the wheels off the ground.
- 11. The area surrounding the elevated platform shall be cleared of personnel and equipment prior to lowering the elevated platform.
- 12. All equipment must be secured on the inside of the aerial lift
- 13. Operators are to call for assistance if the platform or any part of the machine becomes entangled.

D. Safe Work Practices After Operation

- 1. 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.
- 2. Aerial lifts 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.

INTRODUCTION

Powered industrial trucks (PITs), also known as forklifts or lift trucks, are important tools in many workplaces. They perform a variety of material handling tasks and can facilitate moving, raising, lowering, or removing heavy or bulky materials or a number of smaller objects on pallets or in boxes, crates, or other containers. This makes it easier for the employee to move materials. During the movement of materials, there are numerous opportunities for injuries and property damage to occur. This program has been created to minimize the risk of injury to employees or bystanders and to avoid damage to company property. These requirements are established under OSHA Powered Industrial Trucks, 29 CFR 1910.178.

<u>SCOPE</u>

This program applies to the operation of all powered industrial trucks, motorized hand trucks, or other specialized industrial trucks by company employees. It may also be used as guidelines for contractors using powered industrial trucks engaged in company projects.

DEFINITION

Powered Industrial Truck (PIT): Any mobile power-propelled truck used to carry, push, pull, lift, stack or tier materials. Powered industrial trucks can be ridden or controlled by a walking operator. Earth moving and over the road haulage trucks are not included in the definition. Equipment that was designed to move earth but has been modified to accept forks are also not included. Excluded are vehicles used for earth moving and over-the-road hauling. Commonly known as forklifts, pallet trucks, rider trucks, fork trucks or lift trucks.

RESPONSIBILITIES

Safety and Risk Management has the primary responsibility for the implementation and enforcement of the Industrial Truck Safety Program and is responsible for the following:

- Developing, implementing, and evaluating the Industrial Truck Safety Program to ensure compliance.
- Providing initial and periodic training of employees on the safe operation of equipment.
- Maintaining the training documentation of employees who complete training sessions.

SUPERVISORS

Supervisors in support and administrative areas are responsible for providing the necessary direction and support to ensure the effective implementation of the Industrial Truck Safety Program for their work areas.

Supervisors are responsible for the following:

- Ensuring that employees have been trained and evaluated on the specific types of powered industrial trucks that they will be operating.
- Ensuring that employees inspect powered industrial trucks at the beginning of each work shift and complete the appropriate inspection forms.

- Ensuring that proper maintenance according to the manufacturers' recommendations is performed on the powered industrial truck and any hazards identified are corrected
- Ensuring that employees comply with all OSHA regulations while operating a powered industrial truck.

EMPLOYEES

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Affected Employees are responsible for the following:

- Completing the required safety training course for powered industrial trucks.
- Operating all powered industrial trucks in a safe manner consistent with their training.
- Inspecting powered industrial trucks at the beginning of each work shift and completing the appropriate inspection forms.
- Reporting all equipment malfunctions and/or maintenance needs to their supervisor immediately.
- Complying with all OSHA regulations while operating a powered industrial truck.

A. Evaluator Requirements

All operator training and evaluation shall be conducted by a person who has the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence. The evaluator is required to demonstrate the use of the forklift and assist the operator in locating the functions of the forklift and assist the operator in locating the functions of the forklift for employee who are unfamiliar with forklifts or possess only a few skills in the operation of a forklift.

B. Operator License Requirements

All employees who operate a powered industrial truck as part of their job must be at least eighteen (18) years of age and successful completed either online or classroom training and practical training.

It is a violation of Federal law for anyone UNDER 18 years of age to operate a forklift or for anyone OVER 18 years of age who is not properly trained and authorized to do so.

C. Training

Only trained and authorized operators shall be permitted to operate a powered industrial truck. Training will consist of either online or classroom safety training and hands-on training, including a skills test performed on the specific powered industrial truck that the employee will operate. If there are two or more types of powered industrial trucks that the employee will be operating, then the employee must have practical training for each different powered industrial truck they will be operating.

Training is to be done prior to:

- 1. Before the employee operates a powered industrial truck
- 2. When an employee is assigned to a different truck
- 3. Before a new hazard is introduced into the work environment
- 4. After any accident

5. As deemed necessary by a qualified person

All employees are required to be retrained at least once every three (3) years on the operator's performance of using a powered industrial truck.

Contractors are not allowed to operate any company powered industrial truck under any circumstances

Any employee who refuses such training will not be permitted to operate a power industrial truck on company property.

Powered industrial truck training must include the following information:

- 1. Safe Operation Instructions
- 2. Differences between powered industrial trucks and automobiles
- 3. Controls and instrumentation
- 4. Inspection
- 5. Engine or motor operation
- 6. Steering and maneuvering
- 7. Visibility
- 8. Fork attachment: use and limitations
- 9. Vehicle capacity
- 10. Vehicle stability
- 11. Refueling and/or recharging
- 12. Operating limitations
- 13. Surface conditions
- 14. Loading and unloading
- 15. Pedestrian traffic
- 16. Hazardous locations in which the equipment will be operated
- 17. Ramps and sloped surfaces
- 18. Any unique or potentially hazardous conditions that could affect safe operation

Once all powered industrial truck training is complete, the employee will be issued a Forklift License Certificate that expires three (3) years from the date of it is issued. The certification shall include:

- 1. Name of the operator
- 2. Date of the training
- 3. Date of the evaluation
- 4. The identity of the person(s) performing the training or evaluation

D. Employee Qualifications

Employees must demonstrate their driving competence by passing a written test and completing a practical driving test for powered industrial trucks. Employees must demonstrate acceptable competence and knowledge in performing each task.

E. Refresher Training

Refresher Training in relevant topics shall be provided to the employee when:

- 1. The operator has been observed to operate the vehicle in an unsafe manner.
- 2. The operator has been involved in an accident or a near miss incident.
- 3. The operator has received an evaluation that reveals that the operator is not operating the truck safely.
- 4. The operator is assigned to drive a different type of powered industrial truck.
- 5. A condition changes in the workplace that could affect the safe operation of the powered industrial truck
- 6. Shall be provided at least every three (3) years if none of the above situations occur.

F. Inspection and Maintenance

- Each powered industrial truck will be inspected before each daily shift (Appendix A).
- Daily inspection records shall be kept on file with the supervisor of the power industrial truck for thirty (30) day internals.
 - 1. To ensure all essential features of the truck are inspected routinely.
 - 2. This is to provide documentation that inspections are occurring as required.
- A maintenance log will be kept that identifies repair needs and corrective actions taken for each powered industrial truck. Documentation shall be kept with the supervisor onsite of the powered industrial truck.
- If repairs are required on a powered industrial truck such that it cannot be safety operated, it must be tagged "Out of Service" and taken out of service until the repairs have been completed.
- Maintenance or repair activities are to be performed by a qualified service technician.
- After repairs have been completed, the powered industrial truck will be operated to inspect that repairs have been completed and the equipment is safe for normal operation.
- Powered industrial trucks will be kept in clean condition, free of dirt, excess oil, and grease.

G. OPERATIONS

Employees shall follow the powered industrial truck operations:

Review operating instructions, warning, and precaution for the type of truck being operated.

- When a powered industrial truck is left unattended, the equipment will be put into neutral, the emergency brake will be set, and the power will be shut off. When the powered industrial truck is parked on an incline, the wheels will be blocked.
- A powered industrial truck will be considered unattended when the operator is 25 feet or more away or when the vehicle is not in view.
- When the operator has dismounted the powered industrial truck and is within 25 feet of the truck, the load will be lowered, the controls will be neutralized, and the brakes will be set.
- Powered industrial trucks will not be used to open or close freight doors.
- Floors of truck trailers will be checked for breaks and weaknesses before powered industrial trucks are driven on them.
- Riders are prohibited on forklifts and in cargo area of powered industrial trucks.
- Persons are not allowed to pass under raised forks.

When an employee is being lifted by a powered industrial truck, a safety platform will be used that is firmly secured to the lifting carriage and/or forks. An operator will remain at the controls of the truck while the employee is being lifted.

- Propane tanks will not be replaced while the engine is running.
- Oil or other fluids spilled on the floor will be cleaned up immediately.
- Only stable and safely arranged loads will be handled.
- Only loads within the rated capacity of the powered industrial truck will be handled.
- Only attachments approved and listed by the manufacture may be used. No "inhouse" constructed attachments can be used.
- Horseplay or unsafe driving is not tolerated.
- Accidents are immediately reported to the direct supervisor and the Safety and Risk Management Office.

H. Standard Safety Equipment

- Seatbelts that are installed and must be utilized on each powered industrial truck.
- Powered industrial trucks must have a functional horn and fire extinguisher.
- Powered industrial trucks must have a nameplate listing lift category, load rating, and load center prominently affixed.
- Powered industrial trucks must have a driver cage installed to protect the employee from falling materials.

I. Traveling

Employees shall follow these powered industrial truck travel requirements:

• Safe speed limits will be observed, and under all travel conditions a powered

industrial truck will be operated at speeds that will permit it to be brought to a stop in a safe manner.

- Three truck lengths (or two seconds) will be maintained between powered industrial trucks in operation. The powered industrial truck will be kept under control at all times.
- When vision is obscured, the operator will slow down and sound the horn.
- If the load blocks the operator's view, the powered industrial truck will be driven in the direction that provides the best visibility.
- The operator will keep a clear view of the path of travel.
- The loaded powered industrial truck will be driven with the load upgrade when driving on ascending or descending grades greater than 10%.
- Dock boards and bridge plates will be properly secured before they are driven over.

J. Securing the Load

Employees shall follow these powered industrial truck load securing requirements:

- Always place the load against the backrest to help stabilize the load.
- Always place the larger or heaviest part of the load closest to the backrest.
- If carrying wide loads such as lumber or steel, adjust the forks as wide as possible to support the load.
- Use clamps of wooden blocks to keep road objects such as pipes from rolling during transport.
- Use shrink wrap or tape as needed to secure items stacked on pellets.
- Never have a person walk in front of the forklift to stabilize a load while the truck is being driven.
- Check all wooden pellets for damage or defects before using.

K. Conducting the Lift and Carry

Employee shall follow these powered industrial truck load lifting and carrying requirements:

- Always evaluate the situation before making a lift.
- Always pickup an object with the heaviest side against the backrest
- If the load is too large to see around, always drive in reverse.
- Always carry the load a low as possible and watch out for overhead obstructions, such as but not limited to light fixtures, sprinkler head, or building support beams etc.

APPENDIX A: DAILY CHECKLIST

POWERED INDUSTRIAL TRUCK DAILY CHECKLIST (Propane/Diesel/Gasoline)

Pre-operation Inspection Checklist (Fuel Powered Forklifts)

Forklift Truck MFG	Model		Serial Numb	per	Department		
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
KEY OFF - Procedures							
Overhead guard							
Hydraulic cylinders							
Mastassembly							
Lift chains and rollers						j	
Forks							
Tire condition (damage/inflated)							
Fluids leaking							
Fuel System Fittings/Hose/Fuel Gauge							
Propane tank bracket positioned/locked down							
Check fire extinguisher							
KEY ON - Procedures							
Check all gauges/warning lights							
Hour meter							
Battery voltage indicator							
Test standard equipment							
Steering							
Brakes							
Front, rear, and brake lights							
Horn							
Seat (including seatbelt)							
Operation of attachments						_	
Pre-inspection date >>>>>							
Operator's Printed Initials >>>>							

Instructions: Operator must check off each item as having been checked "OK" and safe to use during daily inspection prior to operation

Comments:

SECT

N 24

APPENDIX B: FORKLIFT OPERATOR EVALUATION FORM

FORKLIFT OPERATOR EVALUATION FORM

Instructions: Use this checklist during the field session to evaluate operator proficiency. It can also be used for periodic evaluation to ensure that operators are continuing to operate forklifts properly.

Operator	Name			Evalu	ator Nan	ne	
Date of Evaluation Equipment Op		erated					
	OPERATOR BEHAVIOR	3	Good	Fair	Poor	N/A	Comments
Pre-use l	nspection						
1.	Follow the Operator's Dail	y Checklist.					
2.	Look for damage.						
3.	Document all findings on t	ne checklist.					
Picking U	lp a Load						
1.	Square up on the center o	f the load.					
2.	Stop with the fork tips abo the load.	ut 1 foot from					
3.	Clear personnel from the a the load.	irea near					
4.	Level the forks; then slowly until the load contacts the						
5.	Lift the load carefully and s it is clear.	smoothly until					
6.	Tilt the mast back slightly t the load.	o stabilize					
7.	Look over both shoulders.						
8.	After out and stopped, low travel height.	er the load to					
Traveling	l						
1.	Do not raise or lower the low while traveling.	oad and forks					
2.	Maintain a safe speed.						
3.	Observe all traffic rules, wa floor load limits and overhe						
4.	Keep arms and legs inside	the forklift.					
5.	Follow other vehicles at a	safe distance.					

POWERED INDUSTRIAL TRUCKS (PITs)

6.	Slow down when cornering.								
7.	Use the horn to alert others.								
8.	Travel with the load facing uphill while on a ramp or incline.								
9.	Stop smoothly.								
Put	ting Down a Load								
1.	Make sure there is sufficient clearance for the load.								
2.	Clear personnel from the area near the load.								
3.	Square up to the location; then stop about 1 foot away.								
	OPERATOR BEHAVIORS	Good	Fair	Poor	N/A	Comments			
Put	ting Down a Load (continued)								
4.	Raise the load to placement level.								
5.	Move slowly forward.								
6.	If the load is on a pallet, lower it into position and lower the forks further.								
7.	Look over both shoulders before backing out.								
8.	Back straight out until the forks have cleared.								
9.	Lower the forks to traveling position.								
Par	king								
1.	Fully lower the forks.								
2.	Neutralize the controls.								
3.	Set the brakes.								
4.	Turn off the power.								
5.	If parked on an incline, block the wheels.								
6.	Park only in authorized areas.								
	FINA		UATION						
	Based on my evaluation, the operator has successful completed the evaluation and is qualified to operate the following equipment:			Equipment Type		De			
Based on my evaluation, the operator has not demor competence in operating the following equipment:			nstrated Equipment Type						
Eva	Evaluator Signature:			Date:					
Em	Employee Signature:			Date:					

All associates will perform their work in accordance with the LOCK OUT/TAG OUT PROCEDURE that addresses the servicing and maintenance of machines and equipment during which unexpected startup or energization may result.

<u>SCOPE</u>

All work activities; including but not limited to, service, maintenance, demolition, construction; that requires an associate to remove/bypass a guard or other safety engineered control. Included are any activities that require an associate to place any part of his/her body into an area or machine or a piece of equipment where work is actually performed upon process material (point of operation) or where an associated danger zone exists during machinery or equipment operating cycles.

PURPOSE

This program is to prevent injury and accidents that result from the unexpected release of energy. As such, all requirements established the minimum acceptable level of performance.

A. **DEFINITIONS**

- Authorized Person An associate who implements a Lock Out and/or Tag Out procedure on machinery or equipment in order to perform work on that machinery or equipment.
- Affected Associate An associate whose job activities require him/her to operate, use or be in the area of machinery or equipment that is being serviced or maintained subject to the control provisions of the company's LOCK OUT/TAG OUT Program.
- 5. Energy Isolation Device A mechanical device that physically prevents the transfer or release of energy. It includes, but is not limited to: manually operated circuit breakers, fusible disconnect switches, plug and receptacles, normally operated switches (where circuit conductor can be disconnected from all ungrounded supply conductors and no pole can be operated independently), and process line blinds.

NOTE: Push button switches and other control circuit actuators are not Energy Isolation Devices.

- 6. **Energy Source** Electrical, hydraulic, mechanical, pneumatic, chemical, thermal, or other energy; both active and stored.
- 7. **Function Checks** The act of ensuring equipment and/or machinery is at a Zero Energy State after LOCK OUT/TAG OUT is completed. A minimum electrical function check is accomplished by using a meter rated for the equipment being worked on and by operating all controls in every mode.
- Lock Out Placement of LOCK OUT device on an Energy Isolating Device in accordance with established procedures, ensuring that the Energy Isolation Device and the machinery/equipment being controlled cannot be operated until the LOCK OUT Device is removed.

- 9. **Lock Out Device** A device the employs a positive method of securing an Energy Isolation Device in a safe position to prevent the energization of machinery or equipment. This generally refers to a lock or multiple locking hasp and lock.
- 10. *Multiple Locking Hasp A manufactured device designed to accommodate a* number of locks (usually six) to allow more than one person, craft, etc., to secure an Energy Isolation Device.
- 11. **Function Checks** The act of ensuring equipment and/or machinery is at Zero Energy State after LOCK OUT/TAG OUT is completed. A minimum electrical function check is accomplished by using a meter rated for the equipment being worked on and by operating all control in every mode.
- 12. **Tag** A prominent warning device incorporating the warning message "DANGER DO NOT OPERATE" and accommodations attachment that will withstand 50 pounds of pull stress, to an Energy Isolation Device.

B. LOCK OUT PROCEDURES

- 1. The Associate will obtain clearance from the owner or other responsible party to determine de-energization effects and timing.
- 2. The Supervisor, along with the associate who will be performing the work, will identify and be in agreement that the correct control point and method has been established (circuit breaker, disconnect).

NOTE: Control Circuits, Stop Buttons, etc., shall not be used for purpose of LOCK OUT.

- 3. The person performing the work will de-energize and place their lock(s), lockout device(s), and identification tag(s) at the agreed upon points. The tag(s) will be legible and each block of information will be completed.
- 4. After lock out is complete, verify that equipment is at zero energy state with all power isolated. This is accomplished by performing voltage meter checks and by operating control mechanisms such as circuits, switches, in all modes. If there is any question about secondary or temporary power(s) to the equipment, it should be resolved at this time.
- 5. If more than one associate is working on the de-energized equipment or system, each associate must attach their individual lock and completed information tag at the lock out control point.
- 6. Once the equipment is locked out, appropriately tagged and verified to be zero energy state, the key for the lock(s) are to be delivered to the project foreman or supervisor for control and tracking.

7. When work is completed, the Associate and the Supervisor will verify that equipment/system startup poses no danger to personnel or equipment. Once this check is complete and all parties who might be affected have been informed of planned start- up, then the associate who performed the work, along with the project foreman will remove the lock and/or lockout device and tag. This will allow the equipment/system to be re-energized.

C. TAG OUT PROCEDURES

The TAG OUT Procedures follows the same steps and has the same requirement for insuring de-energization as the LOCK OUT Procedures. However, because Tag Out does not provide the same level of security that is present with Lock Out the conditions listed below must be met:

- 1. Tag Out shall only be implemented when there is no physical engineered accommodation for lock out and the associate(s) performing the work can maintain continuous line of sight monitoring of the tag location(s).
- 2. Tag Out requires the use of completed **"DANGER DO NOT OPERATE TAG(S)."**

D. EMERGENCY LOCKOUT/TAGOUT REMOVAL PROCEDURES

All locks, points of attachments, equipment/systems identification and associates performing work information will be available upon request. If an individual is not available at site or cannot be contacted away from the site and it becomes necessary to remove or otherwise alter the lock out/tag out that the associate installed, the Project Supervisor or Associate may re-energize by implementing the following steps:

- 1. The Associate will confirm contact with the associate performing the work cannot be established.
- 2. The Associate will, with the benefit of all knowledgeable personnel available, determine the status of the work.
- 3. If all personnel who might be affected by startup of the equipment are in agreement that the work is complete and that no hazard to personnel and/or equipment is presented by equipment/system start up, then the job foreman can remove equipment/system locks, locking devices, and tags.
- 4. Upon removal of lock out/tag out controls and re-energization, a "bump" test should be performed to further ensure safe operation
- 5. The Associate shall verbally report the changed status to the unavailable associate who initiated the Lock Out immediately upon that associates' return to the work area.

Any motor vehicle used to conduct company-related business shall be operated safely in accordance with DOT highway/roadway laws and C&C Group requirements.

<u>SCOPE</u>

Applies to all C&C Group drivers using motor vehicles to conduct company business.

<u>PURPOSE</u>

To define the procedures for the safe operation of motor vehicles in company-related business activities.

A. **DEFINITIONS**

- 1. *Motor Vehicle Collision* means an incident involving a motor vehicle that results in injury and/or property damage.
- 2. **Driver (Class I) -** means operators of company owned/leased motor vehicles.
- 3. **Driver (Class II)** means those associates who receive car allowances or regular mileage reimbursement and those associates who can be reasonably expected to rent vehicles on a regular or recurring basis.
- 4. **Motor Vehicle Report -** (MVR) means a report obtained from the records of the relevant state authority that gives the activity of an individual's driving record.

B. **REQUIREMENTS**

1. Approved Driver Process

Motor Vehicle Reports (MVR's) will be obtained by **Chad Cillessen at (913) 529-6240**, confidentially maintained and reviewed for any field associates, assigned drivers and selected office associates upon hire, on an annual basis thereafter, and on a post-accident basis when a driver is deemed to be at-fault.

The associate shall authorize the MVR request on the standard MVR Disclosure & Release form. Altered or incomplete forms will not be accepted. **Chad Cillessen** will issue these forms. No associate will be allowed to operate a company vehicle without this form being properly completed and provided back to **Chad Cillessen**.

The C&C Group Vehicle Procedure incorporates infractions noted on the MVR and for other events that have been observed and documented over the previous 3-year period from the date the MVR was run. This procedure has been established for internal use and it is separate and distinct from insurance company procedures.

Each MVR will be evaluated as shown in this section, and retained in the individual's personnel file for a period of 36 months. After 36 months, the MVR will be discarded and removed from the driver's file.

MVR's will also be obtained and reviewed prior to employment for those individuals seeking positions requiring the driving of either a company or personal vehicle. For those individuals, a deficient driving record due to numerous accidents or traffic violations will make them ineligible to be hired at the discretion of C&C Group management. With their hiring, their record will be checked annually as described in this policy.

After the commencement of the program, citations for any of the following events will lead immediately to revocation of driving privileges of company vehicles or personal vehicles on company business:

- a. driving while license suspended or revoked;
- b. knowingly leaving the scene of an accident;
- c. driving while intoxicated or impaired;
- d. reckless driving.

Understand that in many instances, revocation of driving privileges will lead to termination.

2. VEHICLE OPERATING GUIDELINES

a. Fuel

Each company vehicle is issued a fleet-fueling card, which must be used for each fill-up.

b. Tires

After repairs and fuel, tires are the most costly operating expense. An associate can substantially lower the cost of operating their vehicle by:

- 1. Maintaining the manufacturer recommended tire pressure.
- 2. Checking tire pressure at least once a week, including the spare.
- 3 Carefully inspecting tires for uneven wear, cuts, fabric breaks and abrasions.

Proper tire inflation is a do-it-yourself job which requires only a few minutes of work each week and will minimize expenses by extending tire life and enhancing the safe operation of the vehicle.

c. Oil Changes

The assigned driver is responsible for oil changes. Please follow the manufacturer recommended interval.

d. Keys

The assigned driver is responsible for his own set of keys. It is recommended that each driver make an extra set of keys, since the company will not pay for locksmith services.

e. Use of Warehouse Vehicles or Trailers

The company does not allow personal use of vehicles in our warehouse operations, including stake beds, open or enclosed trailers; lift trucks, boom trucks, etc.

3. Driver Requirements

- a. Use defensive driving practices at all times.
- b. Maintain a valid Driver's License from the state of legal residence, providing documentation when requested.
- c. Non-resident state licenses shall only be accepted for the first month of employment. Thereafter, driving privileges with our company shall be lost, until a resident-state Driver's License is obtained or, if more restrictive, in accordance with state statute.
- d. Failure to inform the company of any current suspension, revocation or court action that nullifies the state driver's license shall result in the loss of driving privileges for an additional 6 months beyond when state driving privileges are restored.
- e. Use seat belts and require all occupants to do likewise in accordance with state laws. If the vehicle is not designed to have seat belts (such as in a bus) this provision does not apply.
- f. Do not permit any unauthorized person to drive company owned /leased /rented vehicles. Loaning a vehicle to an unapproved driver shall result in your driving privilege being suspended.
- g. Cell phones are not permitted to be used while driving. This encompasses any and all use of the cell phone, whether that be using a hand held or hands free cell phone, as well as any other use of the phone.
- h. Do not pick up hitchhikers.
- i. Clean off any snow, ice, and dew before operating the vehicle.
- j. Do not drive while abilities are impaired by the consumption of drugs or alcohol.
- k. Such activities would further be a violation of our company's Drug and Alcohol Policy.
- I. Assume all responsibilities for all fines and applicable handling fees of traffic violations and parking tickets.
- m. Operate the vehicle at speeds appropriate for road conditions and posted speed limits.
- n. Take at least a 10-minute break when traveling at least 3 hours at a stretch.
- o. When leaving the vehicle, do not leave anything of value, such as cell phones, lap top computers, etc. in plain sight.
- p. Ensure all cargo is securely fastened to the vehicle prior to driving the vehicle.

3. Additional Driver Requirements

- a. Have a copy of the current insurance card and accident report kit in the vehicle.
- b. Turn off the ignition, remove the keys, and lock the vehicle and the toolbox (if applicable) when out of sight of the vehicle, even briefly. Make sure all attached equipment, material, and tools are secure before moving.
- c. Lights shall be on whenever windshield wipers are being used.
- d. All drivers shall back in to park at work sites. When parking elsewhere it is recommended that you park by backing in.

4. **Training of Drivers**

If directed by management, drivers of company vehicles shall complete an approved defensive driving course within six (6) months of being assigned a company vehicle and every five years thereafter.

5. Accident/Incident/Citations Reporting Procedures

In the event of a vehicular accident/incident, the Associate / Supervisor shall follow this incident protocol:

- a. Do not admit guilt.
- b. Call local law enforcement. Do not leave the scene until law enforcement has completed their investigation. If the law enforcement does not respond, get all necessary information from everyone involved in the accident, including any witnesses. The associate should also take pictures of the scene, damage, and insurance card(s).
- c. Obtain a copy of the citation if applicable, or at a minimum law enforcement case number.
- d. Complete an Incident /Accident Report contained in the accident report kit.
- e. Post-accident drug testing, regardless of fault, will be required per company Drug-Testing policy.

Immediately (or at least within 24 hours) report all work related citations, accidents and incidents to your Supervisor or to the Safety Director.

6. Vehicle Inspection (Class I)

Inspect the vehicle daily by checking the tires for proper inflation and or defects, looking for fluid leaks and other operational problems with lights, windows, and brakes. Deficiencies shall be reported immediately to your Supervisor.

NOTE: Do not operate any vehicle if the safety of the vehicle is in any way compromised!

7 Company Car Insurance

The name of the insurance company covering your vehicle along with appropriate information on the vehicle's insurance coverage will be supplied to you at the time a company vehicle is assigned. If you do not receive this information at the time your vehicle is assigned to you, please contact the fleet operations manager immediately.

Insurance cards and packets are issued once a year. These are to be kept in the car at all times. Failure to do so will result in a fine in most states.

8 Personal Use of a Company Vehicle

This policy has been established by our insurance carrier and must be observed for the protection of the associate and the company.

It is the policy of this company that the company vehicles provided for associates be used only for company business. If an associate needs to use a company vehicle for personal use, a request must be sent via email to the VP of the appropriate office/division, stating the nature of each personal use. A decision to allow limited personal use shall be based upon past driver performance and usage anticipated. Driver will be required to furnish a copy of their personal insurance coverage. Any damage occurred while operating for personal use will be covered by the driver's personal insurance including the deductible.

In addition, drivers should limit their stops on their drive into work and drive home from work.

A driver road observation program is also in effect to monitor usage of the vehicles during business and off hours.

Associates driving company vehicles may be observed on a random basis, after call in complaints, after an accident or as appropriate.

The company also prohibits:

- The use of the vehicle by anyone other than the assigned associate. This includes spouses, children, neighbors, friends, etc.
- The transport of a hitchhiker or stranger.
- The use of a company vehicle for any business venture other than that pertaining to the associate's job duties and responsibilities at the company.
- The acceptance of any form of compensation from any individual for carrying passengers or material.

POLICY

C&C Group has established this plan to maintain a safe and healthful environment for occupants in an event of an emergency at any C&C Group office.

<u>SCOPE</u>

Associates will be trained in the use of this plan and their role in implementing it. This plan shall also be followed by all office personnel, company associates and visitors while working, or visiting this facility.

*For emergency situations, dial 911, and then notify a C&C GROUP CORPORATE OFFICE associate from the Emergency Contact List below. If the first individual listed does not answer, proceed to the next selection.

EMERGENCY CONTACT LIST

* Normal working hours are 8:00 A.M. to 5:00 P.M. (Central Standard Time) Monday through Friday.

- A. Name: Danny Davies Title: President *Office Telephone: (913) 529-6272 Mobile Telephone: (913) 30-7530
- B. Name: Chad Cillessen Title: CIO *Office Telephone: (913) 529-6240 Mobile Telephone: (913) 515-1949

EMERGENCY TELEPHONE NUMBERS

	KC Office	St. Louis	Springfield	Jeff City	Wichita
Police	911 or (913) 477-7300	911 or (636) 529-8210	911 or (417) 864-1810	911 or (913) 477-7300	911 or (316) 337-9126
Fire	911 or (913) 888-6380	911 or (314) 739-3118	911 or (913) 888-6380	911 or (913) 888-6380	911 or (913) 888-6380
Emergency Ambulance	911 or (913) 371-2121	911 or (314) 739-3118	Cox Ambulance Network 911 or (417) 683-5555	911	911 or (316) 660-7994
Area Hospital	Overland Park Regional Hospital: 911 or (913)541-5000	SSM Health DePaul Hospital 911 or (314) 344-6000	Cox South Emergency: 911 or (417)/269-4083	Capitol Regional Medical Center 911 or (573) 632-5000	Via Christi Hospital 911 or (316) 258-5000
Poison Control	Poison Control 911 or 1-800-222-1222				
MO Highway Patrol	MO Highway Patrol 1-800-525-5555 or (816)524-9200				
KS Highway Patrol		(785) 296-6800			
KS Highway Patrol Weather Line		1-800-585-7623			
To Report Oil or Toxic Spills		1-800-424-8802			
KS Gas Service Emergency Number:		1-888-482-4950			
MO Gas Service Emergency Number:		1-888-582-0000			

NON-EMERGENCY MEDICAL CARE

Associates shall notify or have someone notify their immediate Supervisor of the need for nonemergency medical treatment and for the location for this care at the nearest clinic location for treatment.

A. GENERAL EVACUATION PROCEDURES

- 1. When notified of an emergency evacuation, all associates must immediately evacuate themselves and their personnel or visitors from the offices or the shop area.
- 2. When evacuating the offices or the shop area, associates should utilize the nearest exit to them.
- 3. All associates shall meet at a predetermined meeting location away from the hazard, in order for management to conduct and confirm that all associates have safely evacuated the site. A good location would be in the parking lot across Darnell Street (across Patterson St. for Springfield, across Hoover Ct. for Wichita, in the general parking lot for the complex for Jeff City, in the parking lot east of the front entry across Chesterfield Industrial Blvd for St. Louis). Only trained and authorized associates shall re-enter the site for emergency rescue operations and/or administer first aid.

- 4. Depending on the type of emergency, evacuated associates should be a minimum of 25 feet away from the offices/affected area or an equivalent safe distance.
- 5. Evacuated associates and other personnel shall remain a safe distance from the affected area, until a Qualified Representative deems that no further hazards are present and allows work to continue.
- 6. Proper authorities (site security, police, fire, rescue, ambulance, etc.) will be notified of the emergency, by C&C Group as soon as possible. Signs with emergency phone numbers; instructions and the Company address are clearly posted in the corporate offices or available by contacting the receptionist.

B. INJURY TO AN ASSOCIATE

- 1. As stated in this manual, all injuries and/or accidents must be reported to C&C Group immediately. If the injury requires medical treatment, an authorization form must be completed by C&C Group Representative and sent with the injured party to the predetermined clinic or hospital. Each office and work site will have readily available first aid supplies that are adequately stocked including emergency eyewash stations.
- 2. Transportation of the injured party, to and from the clinic or hospital, is the responsibility of the injured person's supervisor. No injured person shall leave the office unattended at the discretion of the Supervisor.
- 3. Directions, lists, maps, phone numbers, etc. for approved clinics and/or hospitals can be obtained from the C&C Group Office or by contacting the Safety Director.
- 4. In the event that the injury is more serious or life threatening, 911 will be called and the injured party will be transported by ambulance to the nearest emergency care facility. The emergency numbers are located in this emergency plan for Lenexa, Kansas.
- 5. Only people having been trained & certified by an accredited certifying agency in basic First Aid or CPR or beyond shall administer emergency medical care to the injured party.

C. INJURY TO VISITORS

- 1. In the event that a visitor is injured during the course of business, C&C Group must be promptly notified.
- 2. Visitors will be directed to follow instructions by associates and will be accompanied at all times.
- 3. Do not allow the injured party to be moved (unless imminent danger is present).
- 4. Only people having been trained in basic First Aid or CPR or beyond shall administer emergency medical care to the injured party.
- 5. Proper authorities (site security, police, fire, rescue, ambulance, etc.) shall be notified immediately.

D. FIRE

- 1. All associates must comply with the fire safety requirements located in this manual.
- 2. In the event of an emergency evacuation due to fire, the *General Evacuation Procedures* described above shall be utilized.

E. **PROPERTY DAMAGE**

- 1. C&C Group must be made aware of any damage to property on the site, regardless of who the owner of the property is.
- 2. Certain incidents involving property damage may require an associate evacuation from the jobsite. (An example is a rupture of an underground gas line)
- 3. This section could include but is not limited to the following:
 - a. Utility lines or pipes;
 - b. Vehicles located on-site;
 - c. Equipment/Tools;
 - d. Jobsite Trailers/Offices;
 - e. Jobsite Fencing/Barricades.

F. PUBLIC DEMONSTRATIONS

- 1. Any public demonstration (including but not limited to: parades, any form of rioting, labor disputes, marches, public or organizational protests, etc.) that may affect normal construction activities on Company property will be addressed at the time of occurrence by Management of C&C Group.
- 2. If necessary, normal construction activity (this may include associate parking, delivery and visitor traffic, entrances and exits to the site, etc.) will be altered, in order to ensure public safety during demonstrations near the offices.
- 3. If any public demonstration poses a threat to associate safety during normal working conditions, steps will immediately be taken to eliminate the hazard(s) that the above said associate(s) are exposed to. This includes notifying authorities of any unlawful act that has been committed by any member of the public.

G. BOMB THREATS

- 1. In the event that a bomb threat is placed with C&C Group or any of the associates working in the offices or shop areas, naming the property or any combination thereof, the areas must immediately be evacuated by all personnel, using the steps outlined above in *General Evacuation Procedures*.
- 2. Proper authorities (site security, police, fire, rescue, ambulance, etc.) shall be notified immediately. The jobsite shall remain evacuated of all personnel, until a complete investigation is conducted and the situation is deemed free of hazard by the acting authorities.

H. WEATHER RELATED EMERGENCIES

- 1. When experiencing lightening, flooding, or tornado threatening weather, C&C Group will warn all associates of the current weather conditions, as well as closely monitor up to the minute forecasts and instructions issued by local or state authorities, local media and/or National Weather Service.
- 2. When seeking shelter from a tornado, the preferred choice should be a ditch or protected excavations. If inside the shop area or offices, try to go to a hall way with no windows or doors and sit on the floor with your head between your legs. If not possible, then all windows and doors shall remain open.
- 3. Associates should avoid using the shop area, equipment, job trailers, and small structures as a means of shelter from a tornado, nor should they position themselves in an area where there are materials, tools or equipment being stored nearby or overhead.

I. MEDIA CONTACTS

1. **At no time**, shall any unauthorized person speak to the media regarding jobsite emergencies or any other publicized affair related to the C&C Group or their associates work locations. If necessary, proper statements will be issued by C&C Group's Management.

NOTE: This Emergency Action Plan will be periodically reviewed to ensure that the policies outlined above remain effective and applicable, when faced with an emergency. In the event that this policy is altered, all associates will be notified of the amendments and receive new site specific orders if necessary to comply with this plan.

POLICY

This policy establishes a protocol for managing and reporting a crisis at a C&C Group Property or work location. It was created to ensure that critical crisis response procedures are followed and that all key audiences, including the authorities and media, are communicated guickly, accurately, and appropriately.

<u>SCOPE</u>

This procedure applies to all C&C Group associates and visitors on C&C Group properties and office locations. This section is intended to be used by management personnel, but should be reviewed by all field supervisors and associates for training and compliance.

DEFINITION

What is a Crisis? A jobsite crisis is any event that involves loss of life, potential loss of life, serious damage or disruption of operations or services to the community.

Examples include: accident involving injury or death, structural failure, equipment failure, utility accident, fire, contamination, and natural disasters.

If in doubt whether a situation qualifies as a crisis, immediately call C&C Group President or the Safety Director, at the Corporate Office at (913) 888-6200.

Only Corporate Management shall make statements to the press and authorities when a crisis occurs. All associates should refer all questions to their immediate supervisor.

Attached to this manual is "Appendix L for Crisis Management Guide" for Corporate Office

Use and shall be used as a reference for Corporate Management.

This section sets forth the requirements to protect associates and jobsite personnel exposed to the environmental hazards associated with working with potential chemicals during the course of work.

Many chemicals used in construction today can be toxic. Even some of the most common materials can be toxic after long or repeated exposure. Some also have a delayed effect, causing health problems even though you may not notice right away. The Material Suppliers will assist with any questions on how to work safely with chemicals.

Chemicals can affect us through our skin, eyes, lungs, or by getting on our food or cigarettes. It is our job to protect ourselves from these hazards by using proper clothing, gloves, goggles, and respirators. Good personal hygiene and common sense will also help. *All products used must be used to keep associate exposure below the listed Permissible Exposure Limit (PEL) which is listed on the products SDS.*

A. FORM OILS AND LUBRICANTS

These can cause a skin condition called dermatitis. Some might contain additives that have more serious effects like cancer. Protective gloves and clothing must be worn when applying these materials. Respiratory protection may be required when they are sprayed, heated, or burned. Consult the Safety Director for additional help or information.

B. FUELS – GASOLINE AND PROPANE

The primary danger with these chemicals is fire and explosion. The Project Supervisor should explain each of the following rules to each associate using or dispensing fuels:

- 1. Never use fuels as solvents.
- 2. Keep fuels only in approved containers in good condition.
- 3. Store fuels in properly designed storage areas, not areas of work, which are away from any sources of ignition.
- 4. Review the codes governing the storage of fuels.
- 5. Provide adequate fire protection.
- 6. Notify the local fire department of how much fuel is on site and where it is located, if large amounts are stored or dangerous conditions or amounts are present.

C. PAINTS AND COATINGS

There is a wide variety of paints and coatings in use and they have different levels of toxicity. If there are questions about the hazards of a product ask the Material Suppliers for more information. Different kinds of protection are needed depending on the product that will be used. Skin and eyes should be protected with gloves, clothing, and goggles wherever contact is possible. Respirators must also be used if vapors can accumulate. With products other than latex paints, airline respirators may also be needed.

Materials that may be toxic include the following:

- 1. Oil Base Paints
- 2. Epoxies and Urethanes
- 3. Varnishes and Shellacs
- 4. Concrete Sealers and Coatings
- 5. Cold Galvanizing
- 6. Treatments for Wood, Plastic, or Metal
- 7. Coatings that are Sprayed, Troweled, Brushed, or Poured
- 8. Floor Coatings
- 9. Primers and Bonding Agents

D. CAULKS, MASTICS, AND GLUES

Skin irritation and eye injury are the main hazards with these products. Some products can cause cancer with repeated skin contact. Occasionally, toxic fumes will be a problem, especially in confined spaces. This is particularly true of petroleum and formaldehyde-based products and epoxy. Silicones are strong eye irritants and Cyanoacrylates (Super Glues) can bond skin on contact and cause immediate blindness if they contact the eye. Gloves must always be used to prevent contact with the skin. Goggles or Face shields with Safety Glasses must be worn if there is any chance of eye contact.

Staying clean is the best defense. Clean hands won't contaminate eyes, contact lenses, or food. Always ensure proper hand washing facilities or means are provided.

E. SOLVENTS

Solvents often produce toxic vapors that make respiratory protection necessary. Some are so toxic that special air-supplied respirators must be used. Most are harmful to the skin. Many are very flammable.

The hazards associated with solvents are even greater when they are used in areas with poor ventilation or in large quantities.

Protective clothing and respirators are minimum precautions. Always use products outside if possible. The Material Supplier should be consulted with any question on proper handling or storage.

F. ACIDS AND BASES

Hydrochloric acid, also called muriatic acid, can burn the skin and eyes, and create toxic fumes that can cause permanent lung damage. It is often used as a brick cleaner and for other jobs such as etching. Acids and bases can cause skin burns and must only be used with proper gloves, goggles, and respirators.

These products include:

- 1. Chlorine solution for tank cleaning
- 2. Brick cleaners
- 3. Etching solutions

G. CEMENT, MORTAR, AND GROUT

Even though these materials aren't toxic, prolonged exposure can cause lung damage and severe skin burns. Because eye contact can cause blindness, goggles should always be worn. Where dust will be produced, respirators should also be used. Associates whose job involves prolonged contact must wear rubber gloves and protective clothing. When skin is exposed, the material should be washed off immediately. Remind the associate to stand upwind if possible to avoid dust exposure.

H. SAND BLASTING, DUST, AND WELDING

Sandblasting sand normally contains silica, as does much of the dust formed during general cleaning and demolition work. A dust mask or respirator must be worn and, in the case of sandblasting, only air-supplied hoods are allowed with barricaded areas to prevent unauthorized entry.

Welding fumes from cutting or welding cad-plated, galvanized, or coated metals can be toxic, producing fume fever, brain damage, cancer and other ill effects depending on exposure. Ensure proper ventilation is provided by opening work areas to outside air or use fans if possible.

Cutting and welding in confined spaces should be done only with the approval of the Safety Director. Oxygen deficiency, high fume concentrations, and explosion hazards can exist. Contact the Project Supervisor or Safety Director if air monitoring is needed before beginning or proceeding with work.

I. TOXIC GASES

Hydrogen sulfide and carbon monoxide are the two most common gases that pose problems. Hydrogen sulfide is usually encountered when connecting into sanitary sewers and in some industrial settings like paper mills and refineries. It is very dangerous; because it impairs the sense of smell at about the same level it becomes highly toxic. Workers have no warning of being exposed. Carbon monoxide is most commonly found as exhaust from combustion such as heaters, cars, compressors, or other equipment. It can cause problems during heated concrete pours and when working in confined spaces with mobile equipment.

The Project Supervisor or Safety Director shall be consulted when the possibility of air contamination exists before beginning work.

J. CRYSTALLINE SILICA

All associates cutting, grinding, mixing, or drilling concrete shall be trained in the exposure hazards of Silica. All associates shall be trained in the types of protection available to them. A review of Silica Hazards and Types of Protection are as follows:

Crystalline silica, also known as quartz, is a natural compound in the earth's crust and is a basic component of sand and granite. Breathing dust containing crystalline silica particles in excess of the PEL may cause a disabling or fatal chronic lung disease known as silicosis. The dust can cause fibrosis or scar tissue formations in the lungs that reduce the lungs' ability to work to extract oxygen from the air. There is no cure for this disease, thus prevention is the only answer. It is the intention of this company to use engineering means wherever possible to reduce this exposure to zero. Where engineering controls cannot be affected, we will follow procedures as follows in the program.

Most crystalline silica comes in the form of quartz. Sand can be as much as 100% quartz, a common ingredient in concrete and masonry products. Since concrete and masonry products are primary materials for construction, there are many ways workers are exposed at construction sites. Activities such as chipping, hammering, and drilling of rock or masonry products, abrasive blasting using silica, abrasive blasting of concrete (regardless of abrasive used), or dry sweeping or pressurized air blowing of concrete, rock, or sand dust could provide a potential overexposure to silica.

Associates must be protected from the silica hazards created during certain activities because exposures to silica exceeding the PEL might occur. The current silica dust PEL established by OSHA for the total respirable dust concentration is 10 milligrams per cubic meter \div (%SiO₂ + 2). The use of other abrasive blasting materials often creates dust hazards as well. Most substitute materials have a PEL of 5 mg/m³ for the respirable fraction or 15 mg/m³ for the total dust.

The key to preventing silicosis is to prevent silica dust from being released into the air. To control exposures to silica a hierarchy of controls is used. For engineering controls, non-silica abrasives can sometimes be used to eliminate the silica hazard.

Administrative controls limiting exposure times to blasters are not usually effective since the dust levels created in abrasive blasting are so high. Rotating pot-tending and clean- up associates into non-exposure areas is however often effective in reducing daily exposures to abrasive dusts.

Work practice controls may also be used to reduce dust exposures. A simple control may work. However, OSHA requires administrative or engineering controls to be used whenever possible.

Using the following controls methods can help achieve compliance and reduce associate exposure:

- 1. All work areas must be cleaned as soon as work permits with all dust removed properly to prevent further exposure to this dust.
- 2. Engineering controls such as water sprays, blasting cabinets, and ventilation of containment structures. (For example, use water hoses to wet dust down at the point of generation.)
- 3. Always use the dust control system and keep it in good maintenance.
- 4. Use abrasives containing no silica whenever possible or less than 1% crystalline silica during abrasive blasting to prevent harmful quartz dust from being released into the air.
- 5. Use dust collection systems, which are available for many types of dust generating equipment. Use local exhaust ventilation to prevent dust from being released into the air.
- 6. Be aware of the health effects of crystalline silica and that smoking adds to the damage.
- 7. Know the work operations where exposure to crystalline exposure may occur.
- 8. Use type CE positive pressure abrasive blasting respirators for sandblasting.
- 9. For other operations where respirators may be required, use a respirator approved for protection against crystalline silica-containing dust. Do not alter the respirator in any way. Workers who use tight-fitting respirators cannot have beards or mustaches, which interfere with the respirator seal to the face.
- 10. If possible, associates should change into disposable or washable work clothes at the worksite; shower (where available) and change into clean clothing before leaving the worksite.
- 11. Do not eat, drink, use tobacco products, or apply cosmetics in areas where there is dust containing crystalline silica.
- 12. Wash your hands and face before eating, drinking, smoking, or applying cosmetics outside of the exposure area.
- 13. Regardless of the type of abrasive used, associates must be protected from the high impact velocity of the abrasives through the use of suitable PPE such as leather gloves, aprons and chaps. Safety shoes should also be worn where heavy pieces of work are handled.
- 14. Respirators should only be used after dust controls are in place. Respirators should not be the primary method of protection. If engineering or administrative controls cannot keep dust levels below permissible exposure levels then respirators should be used. When engineering, work practice, and administrative controls are not employed or they are insufficient to fully control exposures to levels below the PEL, the company respirator protection program must be utilized.

Blood borne Pathogens

The purpose of this policy is to prevent any blood borne pathogens exposure incident involving company associates or contract associates present on any company worksites.

A. <u>EXPOSURE DETERMINATION</u>

Exposure to blood borne pathogens at a construction site is, or should be very minimal. However, at least two potential exposure possibilities exist. They are the following:

- 1. Associates who are insulin users and improperly dispose of insulin needles at the jobsite, thus creating potential blood borne pathogens exposure incidents for other workers such as laborers who clean the work area.
- 2. Associates trained in First Aid/CPR procedures that maybe required to respond in an emergency situation.

B. <u>SCHEDULE AND METHOD OF IMPLEMENTATION</u>

<u>Universal precautions, in–as much as they apply to construction jobsites or service locations, shall be implemented immediately and at all future jobsites and workplaces of C+C Group, Inc.</u>

1. Engineering and Work Practice Controls – Shall be utilized to eliminate or minimize associate exposure.

- 2. Personal Protective Equipment (PPE) Where total elimination of associate exposure is impossible, personal protective equipment shall be provided and utilized by any and all exposed associates.
- 3. Training and Education Shall be provided to all associates potentially endangered by blood borne pathogens and any other potentially infectious materials to communicate the hazards of the job.

C. WORK PRACTICE CONTROLS

- 1. Associates who have a medical need to take insulin injection(s) during working hours <u>SHALL NOT DISPOSE OF HYPODERMIC NEEDLES AT THE WORKSITE.</u>
- 2. Associates using insulin injection needles at work shall be counseled to seek advice from their personal physician as to proper disposal.
- 3. Associates using insulin injection needles at work shall treat the used hypodermic needles as a contaminated "SHARP" and immediately after use shall place the "SHARP" in an appropriate container which is puncture resistant, labeled, or color coded as a biohazard and leak resistant.
- 4. Any associate trained in first-aid/CPR and required by his employer to respond to medical emergencies at work shall receive the training required by OSHA's Blood borne Pathogen Standard, be provided personal protective equipment, be provided with information on the exposure control plan and have access to hepatitis B vaccination at no cost to the associate.
- 5. All associates shall be instructed as to how to properly handle an incident involving discovery of a potentially contaminated "SHARP," i.e. Injection needle, or any other item potentially contaminated with human blood or other human body fluid. The procedure shall be as follows:
 - a. The affected associate shall not touch the item discovered and shall immediately notify the Project Supervisor of the discovery.
 - b. The Project Supervisor shall contact the Safety Director at the corporate office for proper handling to insure that all safety precautions are utilized in recovering the item or items for proper incarceration and disposal.
- 6. All equipment and/or working surfaces shall be cleaned after contact with blood or other infectious material.
- 7. All work sites shall have hand washing facilities or antiseptic hand cleansing / towelettes available.

POLICY

This standard provides requirements for work practices, procedures and protective equipment used during any work with or around all asbestos containing materials (ACM) or presumed asbestos containing materials (PACM). C&C Group is not licensed for nor does it perform work with asbestos containing products. From time to time, work may involve working around facilities that do contain asbestos.

All asbestos sampling must be completed by an approved asbestos abatement Company prior to any associate working in an asbestos environment must conduct removal, handling or cleanup.

There are many severe health hazards involved in working with asbestos. It is corporate policy that no associate is to be involved in work with asbestos materials. This includes demolition, removal, repair or installation. When possible, work involving asbestos abatement or removal should be complete before our company starts work on a project. If that isn't possible, asbestos abatement will be done by prequalified asbestos abasement contractors. Abatement contractors must be pre-qualified by the Project Manager. C&C Group may have to ensure an assessment of all work areas where asbestos is or could be present, which would include any buildings or structures built before 1980.

When a subcontractor is involved, the Project Superintendent / Manager will assure that the subcontractor has met the requirements of the "Asbestos Pre-Project Checklist – Appendix Q" before work is begun. This must be done for each project.

If you have any questions on asbestos handling, contact the Corporate Safety Director.

A. Dangers of Asbestos and Permissible Exposure Limits

- Inhaling air containing asbestos fibers has been shown to cause cancer and lung disease in humans. The risk of developing lung cancer is higher for cigarette smokers who are exposed to asbestos. Asbestos is found in some types of insulation, siding/roofing materials, such as Marinite and transite, floor tiles, automotive brakes and clutches and within valve pump packing and gaskets. Asbestos becomes hazardous when it is friable (crushable by hand pressure) and becomes airborne. While the risk employed with exposure to lower levels of airborne asbestos is not clear, it is prudent to keep airborne fiber levels as low as possible. The "Asbestos Containing Materials List Appendix R " includes a listing of materials commonly found in buildings that contains asbestos for your reference.
- 2. Air Concentration Limits (*Fibers /cubic centimeter of air or f/cc*)
 - a. Permissible Exposure Limit (PEL) 0.05 f/cc for an 8 hour average
 - b. Excursion Limit (EL) -1.0 f/cc for a 30 minute average

B. If Associate Exposure Occurs

- 1. There are to be no visible emissions (visually detectable without the aid of instruments) to the outside air from regulated asbestos-containing materials.
- 2. Contact the Safety Director of the Host facility or plant if you come into any material you reasonably believe to contain asbestos. On nights and weekends, notify the Corporate Safety Director directly.

- 3. In the event of accidental exposure to asbestos fibers, the following steps should be taken to ensure associates are properly decontaminated. Every effort should be made to isolate the asbestos contamination. For the exposed worker(s), immediately:
- 4. Have the worker remain at the worksite.
- 5. A disposable type coverall should be put on over the contaminated clothing. If a high efficiency particulate filtered vacuum (HEPA vac) is available, use this to first remove all visible debris.
- 6. Have the worker wash hands and face or at least wipe with wet cloth if it can be done at worksite.
- 7. Transport the worker to a asbestos decontamination facility. The worker should be transported in a matter that will not spread contamination, e.g., back of pick-up with camper shell.
- 8. If the asbestos content of the material is not known, a sample must be collected and sent to a laboratory for analysis.
- 9. The "contaminated" associate's Company representative must remain on-site during the decontamination process.
- 10. The Asbestos Company will document the completion of the decontamination on a sign in/sign out log.
- 11. Contaminated associate(s) will be issued clean clothing.
- 12. Depending on the situation, the contaminated associate(s) clothes and effects will be decontaminated, disposed of and/or stored.

C. Responsibilities

The Project Supervisor is responsible for:

- 1. Notifying the Corporate Safety Director of damaged and deteriorated asbestos containing material needing remediation or repair.
- 2. Controlling incidental mechanical work to prevent the disturbance of asbestos insulation.
- 3. Informing other on-site employers of asbestos work requiring the establishment of a regulated area.
- 4. Assigning only contract personnel who have received medical surveillance, respirator fit- testing, adequate training certification to jobs requiring asbestos material handling.
- 5. Applying labels to all asbestos products and to all containers that hold these products, including waste containers.

D. Personal Protective Equipment

- 1. Respirators
 - a. If the task requires respiratory protection, at a minimum, cartridge respirators (not dust masks) with HEPA filters must be worn. Please refer to the PPE Section of this manual for respirator requirements.
 - b. An evaluation of expected airborne asbestos concentrations must be performed by a competent person to assure that workers wear the proper respiratory protection.
- 2. Protective Clothing
 - a. Asbestos abatement workers are required to use whole body impermeable disposable clothing, head coverings, gloves and foot coverings. Any associate exposed to airborne concentrations of asbestos above the PEL's or performing a job for which a required negative exposure assessment is not produced, must also use the protective clothing noted above. All personnel who enter a regulated area must use PPE required for abatement workers in the area.
 - b. Asbestos abatement workers must use white disposable coveralls while working with ACM. Tape should be used to seal gloves to wrist and rubber boots to pant legs.

E. Training

- 1. Training for associates performing Class IV operations shall be equivalent to the two- hour awareness-training course for all associates who work in buildings containing ACM/PACM.
- 2. Training completion certification shall be available upon request to interested persons.

<u>SCOPE</u>

As job scope of work is performed, Field Supervision shall assess any conditions that may lead to a mold producing condition and the existence of mold.

Introduction

There are many different types of biological organisms and bio-aerosols present in the indoor environment. Mold, a group of microscopic fungi, is just one of the types. These spore-producing organisms can thrive in certain indoor conditions – when there is a temperature range conducive to growth, sufficient water or moisture, and a source of nutrients or food. While ubiquitous in nature, excessive mold in the indoor environment can result in offensive odors from the volatile organic compounds released by certain molds during growth and death cycles, and destruction of building components by penetration of the filaments and hyphae produced.

Health Effects

Although current research does not conclusively indicate that mold causes illness in the normal, healthy working population, there is some evidence that excessive exposure to mold may aggravate pre-existing respiratory conditions such as allergic rhinitis and asthma, and may cause allergic reactions in some people. Although adverse health effects related to exposure to mold have been reported, at this time, there is not a conclusive link to pulmonary hemorrhage nor is there conclusive evidence that mold-related illnesses are increasing. Additionally, to date there is no documentation of universal adverse health effects related to exposure to mold. To further complicate the issue, there are no known mold biomarkers at this time. Biomarkers are chemicals in the body which have a particular molecular feature that makes it possible to measure if an individual has been exposed to disease-causing organisms as well as the progress of any disease resulting from such exposure or the effectives of treatment. Biomarkers are traditionally used to prove correlation between exposure and symptoms or disease.

Preventive Measures

Regular visual inspections for signs of mold growth and proper building design, operation, and maintenance are key to preventing mold-related incidents in building occupants. Routine measures can be taken to minimize mold growth indoors, primarily by controlling water intrusion into buildings including leaks, condensation and excessive moisture in outdoor air.

Renovation and remodeling provide the opportunity for unintentional dissemination of previously contained mold contamination if proper containment and decontamination procedures are not developed and implemented. Similarly, such projects provide the opportunity to select construction materials and systems that allow for ready visual inspection and ease of access and maintenance in light of the current concern regarding mold and biological contamination.

Assessments

There are several key indicators that the level of mold present in a building may be a problem:

- 1. There are obvious and hidden causes of excess moisture such as roof and water leaks, humid conditions, lack of positive building pressurization, and improper or compromised vapor barriers;
- 2. There are complaints of musty odors or visual signs of mold growth.

When assessing a building, it is critical to identify and understand:

- 1. How the building is currently operating with respect to heating, ventilating and airconditioning;
- 2. Any patterns or cycles of complaints;
- 3. Visual signs of uncontrolled moisture incursion or mold growth.

Questions That May Assist in Determining Whether a Mold Problem Currently Exists:

- 1. Are there existing moisture problems in the building?
- 2. Are ventilation systems shut down during unoccupied hours?
- 3. Is the relative humidity of the building's interior kept at a safe level?
- 4. Are papers, clothing, or other "mold food" stored in contact with basement floors or outer walls?
- 5. Are spills mopped up quickly?
- 6. Is excess humidity removed by using an exhaust fan or opening a window?
- 7. Are air conditioning units the appropriate size for the building and/or room?
- 8. Are cold water pipes insulated if they have a visibly damp exterior?
- 9. Are gutters kept clean to ensure that rain water drains away from the building quickly enough to prevent saturation of walls and floors that contact the earth?
- 10. Are showers wiped down after use to prevent the formation of mold?
- 11. Are building materials or furnishings visibly moisture damaged?
- 12. Have the building materials been wet more than 48 hours?
- 13. Has the building been recently remodeled or has the building use changed?
- 14. Has routine maintenance been delayed or the maintenance plan been altered"?
- 15. Are the building's occupants reporting health problems that they think are related to mold in the indoor environment?

C&C GROUP CORPORATE OFFICE's policy when Field Supervisors become aware of and/or anticipate a future mold situation, that the following steps be taken:

- 1. Assess the situation by answering the above questions for determining a potential mold problem.
- 2. Recognize situations and conditions that are outside the limits of the workers' ability to respond and address in a safe manner (e.g., identification of situations that may require additional professional intervention and assistance)
- 3. Document your findings in the daily project log. Photograph all visible evidence.
- 4. Notify C&C GROUP CORPORATE OFFICE's Field Superintendent and Project Manager to advise him of the current situation.
- 5. Notify the Owner or Owner's Project Superintendent.
- 6. Stop...

Minimizing worker exposure to mold:

There are workplace situations and activities that have the potential to expose workers to mold. C&C GROUP CORPORATE OFFICE associates need to be aware of such situations and be able to identify activities that may result in increased potential for workers and building occupants to be exposed to excessive levels of mold. C&C GROUP CORPORATE OFFICE field personnel are trained with the knowledge and skills needed to identify potential mold contamination and situations that could require remediation may be needed, as identification of and responding to mold-related situations may well be a new area of activity for workers.

C&C GROUPCORPORATE OFFICE's training includes, at a minimum, information regarding:

- 1. Conditions that promote mold growth (e.g. temperature, humidity, moisture);
- 2. Procedures for reporting suspected mold growth by building occupants and workers;
- 3. Recognize situations and conditions that are outside the limits of the workers' ability to respond and address in a safe manner (e.g., identification of situations that may require additional professional intervention and assistance).

Work activities that have the potential to increase worker or building occupant exposure to mold or have the potential to spread any existing mold contamination.

Remediation:

Different situations require different approaches and responses. A preventive approach to remove mold when first identified would be different from a situation where there is pending litigation and/or liability issues. Remediation efforts, when undertaken, should include measures to protect the remediation workers and the workers in the building and minimize the potential spread of the contamination.

The primary rule should be "do no harm".

Key considerations of include:

- 1. Assessing the situation and determine the appropriate response of level of remediation;
- 2. Using methodologies to minimize the potential to increase airborne concentrations of mold such as containment and/or isolation of remediation areas;
- 3. Ensuring proper removal, transportation, and disposal or cleaning of any contaminated or water-damaged materials;
- 4. Repairing the defects of correcting the condition which lead to the problem, generally water intrusion and/or accumulation, water-damaged materials, and/or elevated humidity, in conjunction with, or prior to, remediation;
- 5. Establishing a process to ensure proper maintenance and operation of HVAC and related building systems that may have an impact on water incursion within the building envelope;
- 6. Applicability of, and conformance with, appropriate building codes and recognized engineering codes of practice and nationally recognized consensus standards;
- 7. Limitations on the use of disinfectants or biocides for remediation workers and for the building occupants.

There are a variety of currently available standards and guidelines published by different agencies and organizations. However, there is not, at this time, one universally accepted consensus standard that can be held as the Standard of Care.

POLICY

This program is to establish and implement practices and procedures for protecting the health of associates and subcontractors on C&C Group projects exposed to lead on the job. This program also establishes methods for complying with the OSHA Construction Industry Lead Standard.

Lead is a cumulative and persistent toxic substance that poses a serious health risk. A rigorous housekeeping program and adherence to basic personal hygiene practices will minimize associate exposure to lead. In addition, these two elements of the worker protection program will help to prevent taking lead-contaminated dust out of the worksite and home to the workers' families, thus ensuring that the duration of lead exposure does not extend beyond the work shift and providing added protection to associates and their families.

SCOPE

This program applies to all C&C Group projects involving the disturbance of lead and applies to all subcontractors working under The C&C Group, or subcontractors on C&C Group jobsites involved with lead removal projects and activities. Subcontractors must provide all manpower, supplies, equipment, training, and medical examination and testing necessary to comply with this program.

A. HOUSEKEEPING

An effective housekeeping program involves at least daily removal of accumulations of lead dust and lead-containing debris. Vacuuming lead dust with high-efficiency particulate air (HEPA)- filtered equipment or wetting it with water before sweeping are effective control measures. Such cleaning operations should be conducted, whenever possible, at the end of the day, after normal operations cease. Furthermore, all persons doing the cleanup should be provided with suitable respiratory protection and personal protective clothing to prevent contact with lead.

In addition, all lead-containing debris and contaminated items accumulated for disposal should be collected and put into sealed impermeable bags or other closed impermeable containers. Bags and containers should be appropriately labeled as lead-containing waste. These measures are especially important as they minimize additional sources of exposure that engineering controls generally are not designed to control.

B. DEFINITIONS

<u>Lead:</u> The word "lead" when used in this program means elemental lead, all inorganic lead compounds, and organic lead compounds. Lead is a heavy metal at room temperature and pressure and is a basic chemical element. It can combine with various other substances to form lead compounds.

<u>Action Level</u>: Associate exposure, without regard to the use of respirators, to an airborne concentration of lead in micrograms per cubic meter of air (ug/m3) calculated as an eight hour time-weighted average (TWA). The action level for lead is 30 ug/m3. The Action Level may be exceeded where lead-containing coatings or paint are present and the following activities are performed: abrasive blasting, cleanup of expendable abrasive, containment movement and removal, spray painting with lead paint, manual scraping, manual sanding, power tool cleaning with and without dust collection systems, water jetting, chemical stripping, and heat gun applications. Some non-painting related

activities include: manual demolition of structures; welding, cutting, torch burning, or rivet busting; installation, removal or demolition of lead containing materials; lead burning; and lead contamination/emergency cleanup operations.

Whenever workers' airborne lead exposures exceed or are expected to exceed the Action level of 30 ug/m3, C&C Group will not perform any of the work. A licensed contractor shall always be utilized.

<u>PEL (Permissible Exposure Limit)</u>: Associate exposure, without regard to the use of respirators, to an airborne concentration of lead in micrograms per cubic meter of air (ug/m3) calculated as an eight hour time-weighted average (TWA). The PEL for lead is 50 ug/m3.

C. ASSOCIATE INFORMATION AND TRAINING

All associates who work on projects where lead exposures could occur on the project during work activities shall be provided information and training on the hazards of lead and measures for controlling these hazards and protecting their health. The content of lead training includes:

An overview of the OSHA Construction Industry Lead Standard.

- a. Specific exposure producing operations.
- b. Methods of compliance including engineering controls and work practices.
- c. C&C Group safety program requirements.

POLICY

This Respirable Crystalline Silica Program was developed to prevent associate exposure to hazardous levels of Respirable Crystalline Silica that could result through construction activities or nearby construction activities occurring on worksites. Respirable Crystalline Silica exposure at hazardous levels can lead to lung cancer, silicosis, chronic obstructive pulmonary disease, and kidney disease. It is intended to meet the requirements of the Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153) established by the Occupational Safety and Health Administration (OSHA).

All work involving chipping, cutting, drilling, grinding, or similar activities on materials containing Crystalline Silica can lead to the release of respirable-sized particles of Crystalline Silica (i.e. Respirable Crystalline Silica). Crystalline Silica is a basic component of soil, sand, granite and many other minerals. Quartz is the most common form of Crystalline Silica. Many materials found on constructions sites include Crystalline Silica; including but not limited to – cement, concrete, asphalt, pre-formed structures (inlets, pipe, etc.) and others. Consequently, this program has been developed to address and control these potential exposures to prevent our associates from experiencing the effects of occupational illnesses related to Respirable Crystalline Silica exposure.

SCOPE

This Respirable Crystalline Silica Program applies to all associates who have the potential to be exposed to Respirable Crystalline Silica when covered by the OSHA Standard. The OSHA Respirable Crystalline Silica Construction Standard applies to all occupational exposures to Respirable Crystalline Silica in construction work, except where associate exposure will remain below 25 micrograms of Respirable Crystalline Silica per cubic meter of air ($25 \mu g/m3$) as an 8-hour time-weighted average (TWA) under any foreseeable conditions.

RESPONSIBILITIES

C&C Group firmly believes protecting the health and safety of our associates is everyone's responsibility. This responsibility begins with upper management providing the necessary support to properly implement this program. However, all levels of the organization assume some level of responsibility for this program including the following positions.

A. Upper Management:

- Conduct job site assessments for Silica containing materials and perform associate Respirable Crystalline Silica hazard assessments in order to determine if an associate's exposure will be above 25 μg/m³ as an 8-hour TWA <u>under any foreseeable conditions</u>
- Select and implement into the project's ECP the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Construction Standard Table 1; and potentially including (but not limited to) - a written Exposure Control Plan (ECP), exposure monitoring, Hazard Communication training, medical surveillance, housekeeping and others.

NOTE: OSHA's Construction Standard Table 1 is a list of 18 common construction tasks along with acceptable exposure control methods and work practices that limit exposure for those tasks.

- 3. Ensure that the materials, tools, equipment, personal protective equipment (PPE), and other resources (such as worker training) required to fully implement and maintain this Respirable Crystalline Silica Program are in place and readily available if needed.
- 4. Ensure that Project Managers and associates are educated in the hazards of Silica exposure and trained to work safely with Silica in accordance with OSHA's Respirable Crystalline Silica Construction Standard and OSHA's Hazard Communication Standard. Managers and Competent Persons may receive more advanced training than other associates.
- 5. Maintain written records of training (for example, proper use of respirators), ECPs, inspections (for equipment, PPE, and work methods/practices), medical surveillance (under lock and key), respirator medical clearances (under lock and key) and fit-test results.
- 6. Conduct an annual review (or more often if conditions change) of the effectiveness of this program and any active project ECP's that extend beyond a year. This includes a review of available dust control technologies to ensure these are selected and used when practical.
- 7. Coordinate work with other employers and contractors to ensure a safe work environment relative to Silica exposure.

B. Project Management:

- 1. Ensure all applicable elements of this Respirable Crystalline Silica Program are implemented on the project including the selection of a Competent Person.
- 2. Assist Upper Management in conducting job site assessments for Silica containing materials and perform associate Respirable Crystalline Silica hazard assessments in order to determine if an ECP, exposure monitoring, and medical surveillance is necessary.
- 3. Assist in the selection and implementation of the appropriate control measures in accordance with the Construction Tasks identified in OSHA's Construction Standard Table 1; and potentially including (but not limited to) a written Exposure Control Plan (ECP), exposure monitoring, Hazard Communication training, medical surveillance, housekeeping and others.
- 4. Ensure that associates using respirators have been properly trained, medically cleared, and fit-tested in accordance with the company's Respiratory Protection Program. This process will be documented.
- 5. Ensure that work is conducted in a manner that minimizes and adequately controls the risk to workers and others. This includes ensuring that workers use appropriate engineering controls, work practices, and wear the necessary PPE.

6. Where there is risk of exposure to Silica dust, verify associates are properly trained on the applicable contents of this program, the project-specific ECP, and the applicable OSHA Standards (such as Hazard Communication). Ensure associates are provided appropriate PPE when conducting such work.

C. Associates

- 1. Follow recognized work procedures (such as the Construction Tasks identified in OSHA's Construction Standard Table 1) as established in the project's ECP and this program.
- 2. Use the assigned PPE in an effective and safe manner.
- 3. Participate in Respirable Crystalline Silica exposure monitoring and the medical surveillance program. (if applicable)
- 4. Report any unsafe conditions or acts to the Project Manager and/or Competent Person.
- 5. Report any exposure incidents or any signs or symptoms of Silica illness.

D. DEFINITIONS

If a definition is not listed in this section, please contact your supervisor. If your supervisor is unaware of what the term means, please contact the Competent Person or your Safety Department.

- 1. <u>Action Level</u> means a concentration of airborne Respirable Crystalline Silica of 25 μ g/m3, calculated as an 8-hour TWA.
- 2. <u>Competent Person</u> means an individual who is capable of identifying existing and foreseeable Respirable Crystalline Silica hazards in the workplace and who has authorization to take prompt corrective measures to eliminate or minimize them.
- 3. <u>Associate Exposure</u> means the exposure to airborne Respirable Crystalline Silica that would occur if the associate were not using a respirator.
- 4. <u>High-Efficiency Particulate Air (HEPA) Filter</u> means a filter that is at least 99.97 percent efficient in removing monodispersed particles of 0.3 micrometers in diameter.
- 5. <u>Objective Data</u> means information, such as air monitoring data from industry-wide surveys or calculations based on the composition of a substance, demonstrating associate exposure to Respirable Crystalline Silica associated with a particular product or material or a specific process, task, or activity. The data must reflect workplace conditions closely resembling or with a higher exposure potential than the processes, types of material, control methods, work practices, and environmental conditions in the employer's current operations.
- Permissible Exposure Limit (PEL) means the employer shall ensure that no associate is exposed to an airborne concentration of Respirable Crystalline Silica in excess of 50 µg/m3, calculated as an 8-hour TWA.

- 7. <u>Physician or Other Licensed Health Care Professional (PLHCP)</u> means an individual whose legally permitted scope of practice (i.e., license, registration, or certification) allows him or her to independently provide or be delegated the responsibility to provide some or all of the particular health care services required by the Medical Surveillance Section of the OSHA Respirable Crystalline Silica Standard.
- 8. <u>Respirable Crystalline Silica</u> 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.
- 9. <u>Specialist</u> means an American Board Certified Specialist in Pulmonary Disease or an American Board Certified Specialist in Occupational Medicine.

E. REQUIREMENTS

Specified Exposure Control Methods

When possible and applicable, C&C Group will conduct activities with potential Silica exposure to be consistent with OSHA's Construction Standard Table 1. Supervisors will ensure each associate under their supervision and engaged in a task identified on OSHA's Construction Standard Table 1 have fully and properly implemented the engineering controls, work practices, and respiratory protection specified for the task on Table 1 (unless C&C Group has assessed and limited the exposure of the associate to Respirable Crystalline Silica in accordance with the Alternative Exposure Control Methods Section of this program).

The task(s) being performed by C&C Group identified on OSHA's Construction Standard Table 1 is/are: Handheld and stand mounted drills.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIALS CONTAINING CRYSTALLINE SILICA

Construction Task or		Engineering and Work Practice Control	Required Respiratory Protection	
Equipment Operation		Methods	≤ 4 hours/shift	>4 hours/shift
1	Stationary masonry saws	 Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None
2a	Handheld power saws (any blade diameter) when used outdoors	 Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
2b	Handheld power saws (any blade diameter) when used indoors or in an enclosed area	 Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
3	Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less) for tasks performed outdoors only	 Use saw equipped with commercially available dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency. 	None	None
4a	Walk-behind saws when used outdoors	 Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None
4b	Walk-behind saws when used indoors or in an enclosed area	 Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
5	Drivable saws for tasks performed outdoors only	 Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None

6	Rig-mounted core saws or drills	 Use tool equipped with integrated water delivery system that supplies water to cutting surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None
7	Handheld and stand- mounted drills (including impact and rotary hammer drills)	 Use drill equipped with commercially available shroud or cowling with dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes. 	None	None
8	Dowel drilling rigs for concrete for tasks performed outdoors only	 Use shroud around drill bit with a dust collection system. Dust collector must have a filter with 99% or greater efficiency and a filter cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
9a	Vehicle-mounted drilling rigs for rock and concrete	 Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector. 	None	None
9b	Vehicle-mounted drilling rigs for rock and concrete	• Operate from within an enclosed cab and use water for dust suppression on drill bit.	None	None
10a	Jackhammers and handheld powered chipping tools when used outdoors	• Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10b	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	 Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
10c	Jackhammers and handheld powered chipping tools when used outdoors	 Use tool equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask

13 a	Walk-behind milling machines and floor grinders	 or filter-cleaning mechanism. Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None
12c	Handheld grinders for uses other than mortar removal when used indoors or in an enclosed area	 Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism. 	None	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask
12b	Handheld grinders for uses other than mortar removal when used outdoors	 Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism. 	None	None
1 2 a	Handheld grinders for uses other than mortar removal for tasks performed outdoors only	 Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. 	None	None
11	Handheld grinders for mortar removal (i.e., tuckpointing)	 Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	Powered Air-Purifying Respirator (PAPR) with P100 Filters
10d	Jackhammers and handheld powered chipping tools when used indoors or in an enclosed area	 Use tool equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. 	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask	N95 (or Greater Efficiency) Filtering Facepiece or Half Mask

13b	Walk-behind milling machines and floor grinders	 Use machine equipped with dust collection system recommended by the manufacturer. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. When used indeers or in an enclosed area, use 	None	None
14	Small drivable milling machines (less than half-lane)	 When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes. Use a machine equipped with supplemental water sprays designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize 	None	None
15a	Large drivable milling machines (half-lane and larger) for cuts of any depth on asphalt only	 dust emissions. Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions. 	None	None
15b	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	 Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions. 	None	None
15c	Large drivable milling machines (half-lane and larger) for cuts of four inches in depth or less on any substrate	 Use a machine equipped with supplemental water spray designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions. 	None	None
16	Crushing machines	 Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., hoppers, conveyers, sieves/sizing or vibrating components, and discharge points). Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions. Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote control station. 	None	None
17a	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe- ramming, rock ripping) or used during demolition activities involving silica- containing materials	Operate equipment from within an enclosed cab.	None	None

17b	Heavy equipment and utility vehicles used to abrade or fracture silica-containing materials (e.g., hoe- ramming, rock ripping) or used during demolition activities involving silica- containing materials	 When associates outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions. 	None	None
18a	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	 Apply water and/or dust suppressants as necessary to minimize dust emissions. 	None	None
18b	Heavy equipment and utility vehicles for tasks such as grading and excavating but not including demolishing, abrading, or fracturing silica-containing materials	 When the equipment operator is the only associate engaged in the task, operate equipment from within an enclosed cab. 	None	None

When implementing the control measures specified in Table 1, C&C Group shall:

- 1. For tasks performed indoors or in enclosed areas, provide a means of exhaust as needed to minimize the accumulation of visible airborne dust;
- 2. For tasks performed using wet methods, apply water at flow rates sufficient to minimize release of visible dust;
- 3. Where an associate performs more than one task included on OSHA's Construction Standard Table 1 during the course of a shift, and the total duration of all tasks combined is more than four hours, the required respiratory protection for each task is the respiratory protection specified for more than four hours per shift. If the total duration of all tasks on Table 1 combined is less than four hours, the required respiratory protection for each task is the respiratory protection specified for less than four hours per shift.

F. Alternative Exposure Control Methods

Alternative Exposure Control Methods apply for tasks not listed in OSHA's Construction Standard Table 1, or where C&C Group cannot not fully and properly implement the engineering controls, work practices, and respiratory protection described in Table 1.

First, C&C Group will assess the exposure of each associate who is or may reasonably be expected to be exposed to Respirable Crystalline Silica at or above the Action Level in accordance with either the Performance Option or the Scheduled Monitoring Option.

1. <u>Performance Option</u> – C&C Group will assess the 8-hour TWA exposure for each associate on the basis of any combination of air monitoring data or objective data sufficient to accurately characterize associate exposures to Respirable Crystalline Silica.

G. Control Methods

C&C Group will provide control methods that are either consistent with Table 1 or otherwise minimize worker exposures to Silica. These exposure control methods can include engineering controls, work practices, and respiratory protection. Listed below are control methods to be used when Table 1 is not followed:

When cutting access floor tile associates are to use a HEPA filtered vacuum to store and collect the dust generated.

H. Respiratory Protection

Where respiratory protection is required by this program, C&C Group will provide each associate an appropriate respirator that complies with the requirements of the company's Respiratory Protection Program and the OSHA Respiratory Protection Standard (29 CFR 1910.134).

Respiratory protection is required where specified by the OSHA Construction Standard Table 1, for tasks not listed in Table 1, or where the company has not fully and properly implemented the engineering controls, work practices, and respiratory protection described in Table 1. Situations requiring respiratory protection include:

- 1. Where exposures exceed the PEL during periods necessary to install or implement feasible engineering and work practice controls;
- 2. Where exposures exceed the PEL during tasks, such as certain maintenance and repair tasks, for which engineering and work practice controls are not feasible; and
- 3. During tasks for which an employer has implemented all feasible engineering and work practice controls and such controls are not sufficient to reduce exposures to or below the PEL.

I. Housekeeping

C&C Group does not allow dry sweeping or dry brushing where such activity could contribute to associate exposure to Respirable Crystalline Silica unless wet sweeping, HEPA-filtered vacuuming, or other methods that minimize the likelihood of exposure are not feasible.

C&C Group does not allow compressed air to be used to clean clothing or surfaces where such activity could contribute to associate exposure to Respirable Crystalline Silica unless:

1. The compressed air is used in conjunction with a ventilation system that effectively captures the dust cloud created by the compressed air; or

2. No alternative method is feasible.

J. Written Exposure Control Plan

When associate exposure on a construction project is expected to be at or above the Action Level, a Written Exposure Control Plan (ECP) will be established and implemented. This ECP will contain at least the following elements:

- 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 associate exposure to Respirable Crystalline Silica for each task;
- 3. A description of the housekeeping measures used to limit associate exposure to Respirable Crystalline Silica; and
- 4. A description of the procedures used to restrict access to work areas, when necessary, to minimize the number of associates exposed to Respirable Crystalline Silica and their level of exposure, including exposures generated by other employers or sole proprietors.

The written ECP will designate a Competent Person to make frequent and regular inspections of job sites, materials, and equipment to ensure the ECP is implemented.

The written ECP will be reviewed at least annually to evaluate the effectiveness of it and update it as necessary. Having said this, ECP's are project specific and most project durations do not exceed a year. The written ECP will be readily available for examination and copying, upon request, to each associate covered by this program and/or ECP, their designated representatives, and OSHA.

K. Hazard Communication

C&C Group will include Respirable Crystalline Silica in the company's Hazard Communication Program established to comply with the OSHA Hazard Communication Standard (29 CFR 1910.1200).

C&C Group will ensure that each associate has access to labels on containers of Crystalline Silica and those containers respective Safety Data Sheets (SDS's).

All associates will be trained in accordance with the provisions of the OSHA Hazard Communication Standard and the Training Section of this program. This training will cover concerns relating to cancer, lung effects, immune system effects, and kidney effects. C&C Group will ensure that each associate with the potential to be exposed at or above the Action Level for Respirable Crystalline Silica can demonstrate knowledge and understanding of at least the following:

- 1. The health hazards associated with exposure to Respirable Crystalline Silica;
- 2. Specific tasks in the workplace that could result in exposure to Respirable Crystalline Silica;
- Specific measures C&C Group has implemented to protect associates from exposure to Respirable Crystalline Silica, including engineering controls, work practices, and respirators to be used;
- 4. The contents of the OSHA Respirable Crystalline Silica Construction Standard;
- 5. The identity of the Competent Person designated by C&C Group; and

C&C Group will make a copy of the OSHA Respirable Crystalline Silica Construction Standard readily available without cost to any associate who requests it.

L. PROGRAM EVALUATION

This program will be reviewed and evaluated on an annual basis by the Chief Information Officer unless changes to operations, the OSHA Respirable Crystalline Silica Construction Standard (29 CFR 1926.1153), or another applicable OSHA Standard require an immediate re-validation of this program.

POLICY

The intent of this respiratory policy is to specify a standard operating procedure to protect all associates from respiratory hazards that may be encountered in the workplace.

<u>SCOPE</u>

The scope of this program is to ensure that proper respiratory protection is provided and used, when necessary, to protect the health of all associates from respiratory hazards. Respirators are to be used when engineering and/or administrative controls of inhalation hazards are not economically feasible or do not mitigate such hazards within acceptable levels, while engineering controls are being installed, in emergencies, or when an individual associate wishes to wear them.

In addition, some associates have expressed a desire to wear respirators during certain operations that do not require respiratory protection. As a general policy, C & C Group will review each of these requests on a case-by-case basis. If the use of respiratory protection in a specific case will not jeopardize the health or safety of the worker(s), C & C Group will provide respirators for voluntary use. As outlined in the following sections of this program, voluntary respirator use is subject to certain requirements of this program.

RESPONSIBILITIES

Program Administrator

The Respiratory Protection Program Administrator has the overall responsibility for the administration of this program and must be adequately trained to perform this role. Duties of the program administrator include:

- Identifying work areas, processes or tasks that require workers to wear respirators, and evaluating hazards.
- Selection of respiratory protection options.
- Monitoring respirator use to ensure that respirators are used in accordance with their certifications.
- Arranging for or conducting training.
- Ensuring proper storage and maintenance of respiratory protection equipment.
- Arranging for or conducting qualitative fit testing with acceptable testing agent.
- Administering the medical surveillance program.
- Maintaining records required by the program.
- Evaluating the program.
- Updating written program, as needed.

The following is the contact information for the Program Administrator:

Name: Chad Cillessen, Chief Information Officer

Phone Number: 913.529.6240

Supervisors

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

- Ensuring that associates under their supervision (including new hires) have received appropriate training, fit testing, and medical evaluation.
- Ensuring the availability of appropriate respirators and accessories.
- 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.

Associates

Each associate has the responsibility to wear his/her respirator when and where required and in the manner in which they were trained. Associates also must:

- 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 feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program.

GENERAL REQUIREMENTS

- All respirators used on site must be kept in good working condition.
- All associates required to wear a respirator will first be medically evaluated and fit tested in the specific brand, model, type, and size of respirator to be used.
- Training is required before associates are required to use respirators.
- The respirator must be appropriate for the hazard present.

MEDICAL EVALUATIONS

A medical evaluation is mandatory to determine whether an associate is able to safely use a respirator.

Once workers have been medically evaluated and cleared for respirator use, they will be fit tested.

All medical questionnaires and examinations shall remain confidential and completed during the associate's normal working hours or at a time and place convenient to the associate. The medical questionnaire is administered so that the associate understands its content. All associates are provided an opportunity to discuss the questionnaire and examination results with their physician or other licensed health care professional (PLHCP).

Once the examiner determines the eligibility of the associate to wear a respirator, the examiner will provide the company with a written recommendation containing only the following information:

- Limitations on respirator use related to the medical condition of the associate or relating to the workplace conditions in which the respirator will be used, including whether or not the associate is medically able to utilize a respirator.
- The need, if any, for follow-up medical evaluations.
- A statement that the PLHCP has provided the associate with a copy of the PLHCP's written recommendation.

RESPIRATOR SELECTION

Respirators are to be used only where engineering controls of respiratory hazards are not feasible, do not adequately control the hazard, while engineering controls are being installed, or in emergencies.

All respiratory equipment will be provided by the company at no cost to the associate.

No personal/associate owned respiratory protection equipment is allowed to be utilized on company worksites or property.

Respirators shall be selected based on the exposure by the Program Administrator.

All respirators must be certified by the Mine Safety and Health Administration (MSHA) and/or National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate MSHA and/or NIOSH approval label. The label must not be removed or defaced while it is in use.

Before selecting a respirator, Program Administrator must first assemble the necessary toxicological, safety, and other relevant information for each contaminant, including the following:

- General use conditions, including determination
- Physical, chemical, and toxicological properties of contaminants(s)
- Odor threshold data, if applicable
- Exposure limits (Time Weighted Averages (TWA) unless a ceiling limit exists for the Compound.)
- Eye irritation potential
- Any service life information available (for cartridges and canisters).

FIT TEST PROCEDURES

To provide the proper protection, respirators must fit properly. If a tight seal is not maintained between the respirator and associate's face, contaminated air will be drawn into the breathing zone of the worker rendering the respirator ineffective. Fit testing seeks to protect the associate against breathing contaminated ambient air and is one of the core provisions of our respirator program.

Fit testing may either be qualitative or quantitative. Qualitative Fit Testing (QLFT) involves the introduction of gas, vapor, or aerosol test agent into an area around the head of the respirator user. If that user can detect the presence of the test agent through subjective means, then the respirator seal has failed. The respirator and must be readjusted and a new fit test conducted.

In a Quantitative Respirator Fit Test (QNFT), the adequacy of respirator fit is assessed by measuring the amount of leakage into the respirator, either by generating a test aerosol as a test atmosphere, using ambient aerosol as a test agent, or using controlled negative pressure to measure the volumetric leak rate. Appropriate instrumentation is required to quantify respirator fit in QNFT.

Fit testing shall be conducted with the same make, model, style, and size of respirator that will be used whenever any of the following are encountered:

- Associates are required to use any respirator with a negative or positive pressure tightfitting face piece.
- Whenever a different respirator face piece (size, style, model, or make) is used.
- At least annually.
- Whenever the associate physical conditions change that could affect respirator fit.
- Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery or an obvious change in body weight.
- When the associate notifies the company that the fit of the respirator is unacceptable. The associate will be retested with a different respirator face piece.

Associates must pass one (1) of the following fit test types:

- 1. QLFT (Only used to fit test negative pressure air-purifying respirators that must -achieve a fit factor of 100 or less. May be used to test tight-fitting atmosphere-supplying respirators and tight-fitting powered air purifying respirators if tested in the negative pressure mode).
- 2. QNFT (May be used to fit test a tight-fitting half face piece respirator that must achieve a fit greater OR a tight-fitting full-face piece respirator that must achieve a fit factor of 500 or greater or tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators if tested in the negative pressure mode).

INSTRUCTIONS ON TRAINING, USE AND PROGRAM REVIEW

Each user will be instructed and trained in the proper use and care of respirators and their limitations. This training will provide the associate with an opportunity to handle the respirator, have it fitted properly, test its face piece-to-face seal, wear it in normal air for a familiarity period, and finally, wear it in a test atmosphere. Every respirator wearer will receive fitting instructions, including demonstrations and practice in how the respirator should be worn, how to adjust it, and how to determine if it fits properly. All training shall be documented and available upon request.

No worker will wear a respirator when existing conditions prevent a good face seal. Such conditions may include growth of a beard, sideburns, the absence of one or both dentures, a skull cap that projects under the face piece, or temple pieces on eye glasses. The associates' diligence in observing these factors will be evaluated by periodic checks. To assure proper protection, the face piece fit will be checked by the wearer each time the wearer puts on the respirator. This will be done by following the manufacturer's instruction.

If a filtering face-piece respirator [FFPR] is mandatory, all rules of the respiratory standard apply to its use and fitting. If no mandatory respirator is required, but FFPR's are provided and used voluntarily – associates utilizing a FFFR will receive an awareness statement for the use of such respirators as a voluntary.

Surveillance of work area conditions will be performed where respirators are or will be in use to determine:

- Identity of substances that may cause associate over exposure;
- Extent of associate exposure;
- Whether engineering controls need to be provided to reduce or eliminate the exposure;
- The estimated average, and potential maximum exposure concentration on a time weighted average (TWA) basis, that can be expected for normal operation;
- The estimated peak exposures that can be expected from any short-term exposure;
- Type of required respirator; and
- Frequency of periodic monitoring to be conducted.

Program Review and Update

In order to assure that associate protection and compliance are maintained, a periodic review of airborne contaminants will be made. This review may include air sampling, process and work practice review, raw materials/intermediates/ products review, engineering control effectiveness and emergency procedure evaluations. Monitoring will be performed at periods specified in the standards.

In addition, the following indicators will be used in evaluating the effectiveness of the program:

- Observation of respirator users in their normal work activities;
- Associate interviews to determine the degree of acceptance to the program. Factors to be considered are their ability to breath without objectionable effort, ability to perform work without undue interference, confidence in the face piece fit, general comfort and adequate vision with provisions for prescription glasses, if necessary;
- Inspections to ascertain that respirators are used, inspected, cleaned, and stored correctly; and
- Where mandated, laboratory tests such as urine, blood or fecal analysis along with a physical examination to determine if respirators are providing appropriate protection.
- All findings from the evaluation along with plans and target dates for correcting faults in the program will be documented. A follow up will be conducted to ensure that corrections are made. Records on the inspection and maintenance of respirators and the training provided will be maintained.
- Respirator use will be re-evaluated when process' materials are changed. The written operating procedure shall be modified to reflect the evaluation results, if necessary.

Medical Surveillance

No associate will be assigned to a task that requires the use of a respirator, unless it has been determined that the person is physically able to perform under such conditions. In addition, once a determination is made as a physical ability to wear a respirator and perform the work task, a review of the associate's health status will be made on an annual basis. A copy of medical questionnaire will be provided and shall be examined by physician or licensed health care professional, who makes the initial determination and subsequent review. As with any medical evaluation, due care will be used to address confidentiality questions.

TRAINING INFORMATION

To ensure proper use, all associates that are required to wear respiratory protection, and their supervisors, will be given training in selection, use and maintenance of respirators. C & C Group requires that training of both associates and supervisors include the following no matter what the circumstances:

- Opportunity to handle the respirator;
- Proper fitting, including demonstrations and practice in wearing, adjusting and determining the fit of the respirator;

- Test of face piece-to face seal;
- A familiarization period of wear in normal air;
- Wear the respirator in a test atmosphere;
- Discussion of the engineering and administrative controls in use and why respirators are needed;
- Explanation of the nature of the respiratory hazard and what happens if the respirator is not used properly;
- Explanation of why a particular type of respirator has been selected; and
- Discussion of how to recognize and handle emergencies.

Supervisors should have a comprehensive knowledge of respirators and respiratory protection practices. To provide this knowledge, their training will include:

- Basic respiratory protection practices;
- Selection and use of respirators to protect workers against every hazard to which they may be exposed
- Nature and extent of the respiratory hazards to which workers may be exposed;
- Structure and operation of the entire respirator program. The supervisor should understand their responsibility to facilitate functioning of the program. This includes maintenance that workers may be able to do themselves, issuance of respirators, control of their use, and evaluation of the program's effectiveness; and
- The legal requirements pertinent to the use of respirators.

Because proper respirator use depends especially upon the wearer's motivation, it is important that the need for the respirator be fully explained. Each wearer's training will include:

- Instruction in the nature of the hazard, whether acute, chronic, or both, and an honest appraisal of what may happen if the respirator is not used;
- Explanation of why non-respirator control is not feasible. This should include recognition that every reasonable effort is being made to reduce or eliminate the need for respirators;
- Discussion of why this is the proper type of respirator for a particular exposure;
- Discussion of the respirator's capabilities and limitations;
- Classroom and field training in recognizing and coping with emergencies; and
- Other special training as needed.

CLEANING AND SANITIZING

Respirators are to be regularly cleaned and disinfected.

Respirators issued for the exclusive use of an associate shall be cleaned as often as necessary, but at least once a day.

Atmosphere supplying, and emergency use respirators are to be cleaned and disinfected after each use.

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 materials are available. If supplies are low, associates should contact their supervisor, who will inform the Program Administrator.

MAINTENANCE AND INSPECTIONS

Respirators are to be properly maintained at all times in order to ensure that they function properly and adequately protect the associate. 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.

The following checklist will be used when inspecting respirators:

Facepiece:

- cracks, tears, or holes
- facemask distortion
- cracked or loose lenses/face-shield

Head-straps:

- 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

Air Supply Systems:

- breathing air quality/grade
- condition of supply hoses
- hose connections
- settings on regulators and valves

Respirators for emergency use will be inspected at least once a month and after each use. Inspection for SCBA breathing gas pressure will be performed weekly.

STORAGE

Each respirator will be stored in a convenient, clean, and sanitary location. These locations should protect the respirator from dust, sunlight, heat, extreme cold, excessive moisture or damaging chemicals that could accelerate deterioration. Storage should be in a plastic bag within a rigid container or suitable container with a resealable lid. Care should be taken not to damage the size or shape of the face piece when in storage.

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 associates 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 findings will be reported to C & C Group management, and the report will list plans to correct deficiencies in the respirator program and target dates for the implementation of those corrections.

RECORDKEEPING

A written copy of this program is kept in the Program Administrator's office and is available to all associates who wish to review it.

Also maintained in the Program Administrator's office are copies of training and fit test records. These records will be updated as new associates are trained, as existing associates receive refresher training, and as new fit tests are conducted.

The Program Administrator will also maintain copies of the medical records for all associates covered under the respirator program. The completed medical questionnaire and the physician's documented findings are confidential and will remain at Medical Clinic that is utilized for the medical evaluations. The company will only retain the physician's written recommendation regarding each associate's ability to wear a respirator.

DEFINITIONS

Abrasive Blasting Respirator - An airline respirator designed to protect the wearer from inhalation of, impact of and abrasion by materials used or generated in abrasive blasting.

Aerodynamic Diameter - The diameter of a unit density sphere having the same terminal settling velocity as the particle in question.

Aerosol - Particles, solid or liquid, suspended in air (e.g., dust, fumes, mists or fibers).

Airline Respirator (Supplied-Air Respirator – SAR) - An atmosphere-suppling respirator in which the respirable air is supplied from a hose or breathing tube, rather than being carried by the wearer.

Air-Purifying Respirator - A respirator where ambient air is passed through an air-purifying element by either inhalation or by means of a blower.

Ambient Air Pump - A motorized blower used to supply air to a continuous flow airline respirator.

Approved - A respirator for which a formal certificate was issued by the National Institute for Occupational Safety and Health (NIOSH) or by NIOSH and the Mine Safety and Health Administration (MSHA) in accordance with 42 CFR Part 84 Respiratory Protective Devices and is maintained in full compliance with the certificate.

Assigned Protection Factor (APF) - The minimum expected workplace level of respiratory protection that would be provided by a properly functioning and used respirator or a class of respirators to properly fitted and trained wearers when all elements of an effective respirator program are established and are being implemented.

Atmosphere-Supplying Respirator - A class of respirators that supply a respirable atmosphere, independent of the workplace atmosphere. This class includes airline respirators and self-contained breathing apparatus (SCBA).

Bioassay - A determination of the concentration of a substance in biological fluids and tissue by analysis of urine, feces, blood, bone, tissue, etc.

Bioaerosol - A liquid droplet (generated for example by coughing, sneezing) or a solid particle (generated for example by sweeping, shoveling) suspended in the air that is living or originate from living organisms. Bioaerosols include living or dead microorganisms, fragments, toxins and particulate waste products from all varieties of living things. They are capable of causing infection, adverse or allergic response potentially leading to disease. Note: Individual bioaerosols most often range in size from 0.01-µm to 100-µm in diameter.

Bio-Monitoring - A determination of the concentration of a substance in biological fluids or tissue and used for occupational exposure surveillance.

Canister (Air-Purifying) - A container with (1) gas and vapor removing sorbent or catalyst or (2) gas and vapor removing sorbent or catalyst that remove gases and vapors, and filter that removes particles from inspired air (or air drawn through the unit). Typically attached to a full facepiece either mounted directly to the chin or connected to a breathing tube so the canister may be worn in the front or back of the person. Note: Respirators with air-purifying canisters are approved by NIOSH as gas masks and contain an approval number TC-14G-xxxx.

Canister (Carbon Dioxide Scrubbing) - A container filled with a chemical used to remove carbon dioxide from exhaled air before that air is rebreathed in a closed-circuit SCBA.

Canister (Oxygen-Generating) - A container filled with a chemical that generates oxygen 4by chemical reaction used in closed-circuit SCBA.

Cartridge - A small container filled with sorbents or catalysts that remove gases and vapors from the inspired air. The cartridge may also have particulate filters that are an integral part or ones that are replaceable.

Ceiling Limit - The maximum allowable concentration of an airborne contaminant that shall not be exceeded at any time.

Certified - See "Approved".

Change Schedule - A time interval after which a used filter, cartridge or canister is replaced with a new one.

Confined Space - An enclosed space not designed for human occupancy that has the following characteristics:

- restricted entry and exit;
- primary function is something other than human occupancy, and
- contains potential or known respiratory hazards.

Examples of confined spaces include, but are not limited to; tanks, silos, vessels, pits, sewers, pipelines, tank cars, boilers, septic tanks and utility vaults. See 29 CFR 1910.146 and ANSI/ASSE Z117.1 for more details on permit-required confined spaces.

Contaminant - A potentially harmful, irritating or nuisance airborne material.

Continuous Flow Respirator - An atmosphere-supplying respirator that provides a continuous flow of respirable air to the respiratory inlet covering.

Demand Respirator - An atmosphere-supplying respirator that admits respirable air to the respiratory inlet covering only when a negative pressure is created inside the respiratory inlet covering by inhalation.

Disposable Respirator - A respirator for which maintenance is not intended and that is designed to be discarded after excessive resistance, sorbent exhaustion, physical damage or end-of-

service-life renders it unsuitable for use. Examples of this type of respirator are a disposable half-mask respirator or a disposable escape-only self-containing breathing apparatus (SCBA).

Dust - An aerosol consisting of mechanically produced solid particles derived from breaking up of larger particles.

End-of-Service-Life Indicator (ESLI) - A system or device that warns the wearer of the approach of the end of adequate respiratory protection.

Escape-Only Respirator - A respirator intended only for use during emergency egress from a hazardous atmosphere.

Filter - Material used in air-purifying respirators to remove solid or liquid aerosols from inspired air. Some filters are encapsulated in a container and some are not.

- N-Series Particulate Filter The NIOSH classification for particulate filters effective against particulate aerosols free of oil; time use restrictions may apply.
- R-Series Particulate Filter The NIOSH classification for particulate filters effective against all particulate aerosols; time use restrictions may apply.
- P-Series Particulate Filter The NIOSH classification for particulate filters effective against all particulate aerosols.
- HE Filter The NIOSH classification for a 99.97% efficiency filters used in powered airpurifying respirator (PAPR) which is effective against all particulate aerosols.
- N-, R- and P-series particulate filters are tested at 99.97%, 99% and 95% efficiency levels, referred to as classes 100, 99 and 95 respectively.

Filtering Facepiece - A negative-pressure respirator where the filter is an integral part of the facepiece or comprises the entire facepiece.

Fit Check - A test conducted by the wearer to determine if the respirator is properly seated to the face.

Fit Factor - A numeric expression of how well a tight-fitting respirator fits a wearer during a quantitative fit test. It is the ratio of the measured challenge agent concentration outside the respirator (C-out) to its concentration inside the respirator (C-in). (Fit factor = C-out/C-in). A fit factor resulting from a qualitative fit test has been validated to 100.

Fit Test - The use of a qualitative or quantitative protocol to evaluate sealing surface leakage of a specific tight-fitting respirator while worn by an individual.

Fume - Aerosols formed by condensation of a vaporized solid.

Gas - A fluid that has neither independent shape nor volume and tends to expand indefinitely. In contrast, liquids have independent volume, but not independent shape.

Hazardous Atmosphere - An atmosphere that contains a contaminant(s) in excess of the occupational exposure limit or that is oxygen-deficient.

Hazard Ratio - A number obtained by dividing the concentration of a contaminant by its occupational exposure limit.

Helmet - A hood that offers head protection against impact and penetration to the wearer.

High-Efficiency Particulate Air (HEPA) Filter - HEPA filters are considered N100, R100, P100 and HE. P100 and HE filters are identified with a magenta color.

Hood - Tight-fitting or loose-fitting respiratory inlet covering that completely covers the head and neck and may cover portions of the shoulders.

Immediately Dangerous to Life or Health (IDLH) - Any atmosphere that poses an immediate hazard to life or poses immediate irreversible debilitating effects on health.

Loose-Fitting Facepiece - A respiratory inlet covering that is designed to form a partial seal with the face, does not cover the neck and shoulders and may or may not offer head protection against impact and penetration.

Mass Median Aerodynamic Diameter (MMAD) - The calculated aerodynamic diameter that divides the aerosol particles based on the weight of the particles. By weight, 50% of the particles will be larger than the MMAD and 50% of the particles will be smaller than the MMAD.

Mist - An aerosol composed of liquid droplets produced either mechanically or by condensation of vaporized liquid.

Mouthpiece and Nose Clamp Assembly - A respiratory inlet covering that is held in the wearer's mouth and must always be used in conjunction with a nose clamp.

Maximum Use Concentration (MUC) - The maximum atmospheric concentration of a hazardous substance from which a wearer can be expected to be protected, when wearing a respirator, and is frequently determined by the assigned protection factor of the respirator or class of respirators and the exposure limit of the hazardous substance. The MUC can be frequently determined mathematically by multiplying the assigned protection factor specified for a respirator by the required time weighted average occupational exposure limit (OEL), short-term exposure limit or ceiling limit. When no OEL is available for a hazardous substance, an employer must determine a MUC on the basis of relevant available information and informed professional judgment.

Negative-Pressure Respirator - A respirator in which the air pressure inside the respiratory inlet covering is negative during inhalation with respect to the ambient air pressure.

Occupational Exposure Limit (OEL) - The maximum allowable concentration of a contaminant in the air to which an individual may be exposed over a period of time. Commonly 5 used OELs

include OSHA permissible exposure limits (PELs) and ACGIH threshold limit values (TLVs). These may be time-weighted averages, short-term limits or ceiling limits.

Occupational Health Professional - An individual whom, by experience and education, is competent at recognizing, evaluating and controlling health hazards in the workplace.

Physician or Other Licensed Health Care Professional (PLHCP) - An individual whose legally permitted scope of practice (i.e., license, registration or certification) allows them to independently provide, or be delegated the responsibility to provide, some or all of the health care services.

Poor Warning Properties - A substance whose odor, taste or irritation effects are not detectable or not persistent at concentrations at or below the exposure limit.

Positive-Pressure Respirator - A respirator in which the pressure inside the respiratory inlet covering is normally positive with respect to ambient air pressure (Annex A.7).

Powered Air-Purifying Respirator - An air-purifying respirator that uses a blower to move the ambient atmosphere through air-purifying elements into the respiratory inlet covering.

Pressure-Demand Respirator - An atmosphere-supplying respirator in which the pressure inside the respiratory inlet covering, in relation to the pressure surrounding the outside of the respiratory inlet covering, is positive during both inhalation and exhalation.

Qualitative Fit Test (QLFT) - A pass/ fail fit test that relies on the subject's sensory response to detect a challenge agent.

Quantitative Fit Test (QNFT) - A fit test that uses an instrument to measure face-seal leakage.

Radionuclide - An atom that spontaneously emits particles, gamma or x-radiation.

Respirator - Personal protective equipment designed to protect the wearer from inhalation of hazardous atmospheres.

Respiratory Inlet Covering - That portion of a respirator that connects the wearer's respiratory tract to an air-purifying or atmosphere-supplying respirator. They may be either tight fitting or loose fitting in design. It may be a facepiece, helmet, hood or mouthpiece/nose clamp.

Required Fit Factor (RFF) - The numeric value established as pass/fail point or acceptance criterion for a quantitative fit test.

Respirator Manufacturer - An entity that designs and/or manufactures a respirator, or has a respirator designed and/or manufactured for them under their name or trademark.

Respirator User Instructions - Instructions and information provided by the respirator manufacturer.

Sanitization - The removal of contaminants and the inhibiting of the action of the agents that cause infection or disease.

Self-Contained Breathing Apparatus (SCBA) - An atmosphere-supplying respirator in which the respirable gas source is designed to be carried by the wearer.

Service Life - The period of time that a respirator provides adequate protection to the wearer.

Shall - The word "shall" is to be understood as denoting a mandatory requirement.

Should - The word "should" denotes a recommendation.

Sorbent - A material that removes specific gases and vapors from the inhaled air.

Suit - A respiratory inlet covering designed to cover the entire body. This term does not include protective clothing that only provides skin protection.

Supplied-Air Respirator - See "Airline Respirator".

Tight-Fitting Respiratory Inlet Covering - A respirator component designed to form a complete seal with the face or neck. A half-facepiece (includes quarter masks, filtering facepiece and half-masks with elastomeric facepieces) covers the nose and mouth; a full facepiece covers the nose, mouth and eyes. Tight-fitting hoods seal at the neck.

Time Weighted Average (TWA) - The average concentration of a contaminant in air during a specific time period.

User - Person or organization who makes use of the respirator; for example, one involved in selecting, maintaining or wearing the respirator.

Vapor - The gaseous phase of matter that normally exists in a liquid or solid state at room temperature and pressure.

Wearer - The person who wears the respirator.

Wearer Seal Check (a.k.a. User Seal Check) - A procedure conducted by the wearer to determine if a tight-fitting respirator is properly donned.

Written Record - Documentation, either paper or electronic, of any record-keeping requirements and details of the respirator program.

MEDICAL EVALUATION QUESTIONNAIRE

Can you read (circle one): Yes / No

Your employer must allow you to answer this questionnaire during normal working hours, or at a time and place that is convenient to you. To maintain your confidentiality, your employer or supervisor must not look at or review your answers, and your employer must tell you how to deliver or send this questionnaire to the health care professional who will review it.

Part A. Section 1. (Mandatory) The following information must be provided by every associate who has been selected to use any type of respirator (please print).

- 1. Today's date: _____
- 2. Your name: ______
- 3. Your age (to nearest year): _____
- 4. Sex (circle one): Male/Female
- 5. Your height: ______ft. _____ in.
- 6. Your weight: _____ lbs.
- 7. Your job title:
- 8. A phone number where you can be reached by the health care professional who reviews this questionnaire (include the Area Code):
- 9. The best time to phone you at this number:
- 10. Has your employer told you how to contact the health care professional who will review this questionnaire (circle one): Yes / No
- 11. Check the type of respirator you will use (you can check more than one category):

____ N, R, or P disposable respirator (filter-mask, non-cartridge type only).

____ Other type (for example, half- or full-facepiece type, powered-air purifying, supplied-air, self-contained breathing apparatus).

12. Have you worn a respirator (circle one): Yes / No

If "yes," what type(s):

Part A. Section 2. (Mandatory) Questions 1 through 9 below must be answered by every associate who has been selected to use any type of respirator (please circle "yes" or "no").

- 1. Do you currently smoke tobacco, or have you smoked tobacco in the last month: Yes / No
- 2. Have you ever had any of the following conditions?
 - Seizures (fits): Yes / No
 - Diabetes (sugar disease): Yes / No
 - Allergic reactions that interfere with your breathing: Yes / No
 - Claustrophobia (fear of closed-in places): Yes / No
 - Trouble smelling odors: Yes / No
- 3. Have you ever had any of the following pulmonary or lung problems?
 - Asbestosis: Yes / No
 - Asthma: Yes / No
 - Chronic bronchitis: Yes / No
 - Emphysema: Yes / No
 - Pneumonia: Yes / No
 - Tuberculosis: Yes / No
 - Silicosis: Yes / No
 - Pneumothorax (collapsed lung): Yes / No
 - Lung cancer: Yes / No
 - Broken ribs: Yes / No
 - Any chest injuries or surgeries: Yes / No
 - Any other lung problem that you've been told about: Yes / No
- 4. Do you currently have any of the following symptoms of pulmonary or lung illness?
 - Shortness of breath: Yes / No
 - Shortness of breath when walking fast on level ground or walking up a slight hill or incline: Yes / No
 - Shortness of breath when walking with other people at an ordinary pace on level ground: Yes / No
 - Have to stop for breath when walking at your own pace on level ground: Yes / No
 - Shortness of breath when washing or dressing yourself: Yes / No
 - Shortness of breath that interferes with your job: Yes / No
 - Coughing that produces phlegm (thick sputum): Yes / No
 - Coughing that wakes you early in the morning: Yes / No
 - Coughing that occurs mostly when you are lying down: Yes / No
 - Coughing up blood in the last month: Yes / No
 - Wheezing: Yes / No
 - Wheezing that interferes with your job: Yes / No
 - Chest pain when you breathe deeply: Yes / No
 - Any other symptoms that you think may be related to lung problems: Yes / No

- 5. Have you ever had any of the following cardiovascular or heart problems?
 - Heart attack: Yes / No
 - Stroke: Yes / No
 - Angina: Yes / No
 - Heart failure: Yes / No
 - Swelling in your legs or feet (not caused by walking): Yes / No
 - Heart arrhythmia (heart beating irregularly): Yes / No
 - High blood pressure: Yes / No
 - Any other heart problem that you've been told about: Yes / No
- 6. Have you ever had any of the following cardiovascular or heart symptoms?
 - Frequent pain or tightness in your chest: Yes / No
 - Pain or tightness in your chest during physical activity: Yes / No
 - Pain or tightness in your chest that interferes with your job: Yes / No
 - In the past two years, have you noticed your heart skipping or missing a beat: Yes / No
 - Heartburn or indigestion that is not related to eating: Yes / No
 - Any other symptoms that you think may be related to heart or circulation problems: Yes / No
- 7. Do you currently take medication for any of the following problems?
 - Breathing or lung problems: Yes / No
 - Heart trouble: Yes / No
 - Blood pressure: Yes / No
 - Seizures (fits): Yes / No
- 8. If you've used a respirator, have you ever had any of the following problems? (If you've never used a respirator, check the following space and go to question 9:)
 - Eye irritation: Yes / No
 - Skin allergies or rashes: Yes / No
 - Anxiety: Yes / No
 - General weakness or fatigue: Yes / No
 - Any other problem that interferes with your use of a respirator: Yes / No

9. Would you like to talk to the health care professional who will review this questionnaire about your answers to this questionnaire: Yes / No

Questions 10 to 15 below must be answered by every associate who has been selected to use either a full-facepiece respirator or a self-contained breathing apparatus (SCBA). For associates who have been selected to use other types of respirators, answering these questions is voluntary.

10. Have you ever lost vision in either eye (temporarily or permanently): Yes / No

11. Do you currently have any of the following vision problems?

- Wear contact lenses: Yes / No
- Wear glasses: Yes / No
- Color blind: Yes / No
- Any other eye or vision problem: Yes / No

12. Have you ever had an injury to your ears, including a broken ear drum: Yes / No

13. Do you currently have any of the following hearing problems?

- Difficulty hearing: Yes / No
- Wear a hearing aid: Yes / No
- Any other hearing or ear problem: Yes / No

14. Have you ever had a back injury: Yes / No

15. Do you currently have any of the following musculoskeletal problems?

16.

- Weakness in any of your arms, hands, legs, or feet: Yes / No
- Back pain: Yes / No
- Difficulty fully moving your arms and legs: Yes / No
- Pain or stiffness when you lean forward or backward at the waist: Yes / No
- Difficulty fully moving your head up or down: Yes / No
- Difficulty fully moving your head side to side: Yes / No
- Difficulty bending at your knees: Yes / No
- Difficulty squatting to the ground: Yes / No
- Climbing a flight of stairs or a ladder carrying more than 25-lbs: Yes / No
- Any other muscle or skeletal problem that interferes with using a respirator: Yes / No

Part B. Any of the following questions, and other questions not listed, may be added to the questionnaire at the discretion of the health care professional who will review the questionnaire.

- In your present job, are you working at high altitudes (over 5,000 feet) or in a place that has lower than normal amounts of oxygen: Yes / No If "yes," do you have feelings of dizziness, shortness of breath, pounding in your chest, or other symptoms when you're working under these conditions: Yes / No
- 2. At work or at home, have you ever been exposed to hazardous solvents, hazardous airborne chemicals (e.g., gases, fumes, or dust), or have you come into skin contact with hazardous chemicals: Yes / No

If "yes," name the chemicals if you know them:

- 3. Have you ever worked with any of the materials, or under any of the conditions, listed below:
 - Asbestos: Yes / No
 - Silica (e.g., in sandblasting): Yes / No
 - Tungsten/cobalt (e.g., grinding or welding this material): Yes / No
 - Beryllium: Yes / No
 - Aluminum: Yes / No
 - Coal (for example, mining): Yes / No
 - Iron: Yes / No
 - Tin: Yes / No
 - Dusty environments: Yes / No
 - Any other hazardous exposures: Yes / No
 - If "yes," describe these exposures:
- 4. List any second jobs or side businesses you have:
- 5. List your previous occupations:
- 6. List your current and previous hobbies:
- Have you been in the military services? Yes/No If "yes," were you exposed to biological or chemical agents (either in training or combat): Yes / No

- 8. Have you ever worked on a HAZMAT team? Yes / No
- 9. Other than medications for breathing and lung problems, heart trouble, blood pressure, and seizures mentioned earlier in this questionnaire, are you taking any other medications for any reason (including over-the-counter medications): Yes / No If "yes," name the medications if you know them:
- 10. Will you be using any of the following items with your respirator(s)?
 - HEPA Filters: Yes / No
 - Canisters (for example, gas masks): Yes / No
 - Cartridges: Yes / No
- 11. How often are you expected to use the respirator(s) (circle "yes" or "no" for all answers that apply to you)?
 - Escape only (no rescue): Yes / No
 - Emergency rescue only: Yes / No
 - Less than 5 hours per week: Yes / No
 - Less than 2 hours per day: Yes / No
 - 2 to 4 hours per day: Yes / No
 - More than 4 hours per day: Yes / No
- 12. During the period you are using the respirator(s), is your work effort: Light (less than 200 kcal per hour): Yes / No

If "yes," how long does this period last during the average shift: _____hrs.____mins.

(Examples of a light work effort are sitting while writing, typing, drafting, or performing light assembly work; or standing while operating a drill press (1-3 lbs.) or controlling machines.)

Moderate (200 to 350 kcal per hour): Yes / No

If "yes," how long does this period last during the average shift: _____hrs.____mins.

(Examples of moderate work effort are sitting while nailing or filing; driving a truck or bus in urban traffic; standing while drilling, nailing, performing assembly work, or transferring a moderate load (about 35 lbs.) at trunk level; walking on a level surface about 2 mph or down a 5-degree grade about 3 mph; or pushing a wheelbarrow with a heavy load (about 100 lbs.) on a level surface.)

Heavy (above 350 kcal per hour): Yes / No

If "yes," how long does this period last during the average shift: _____hrs.____mins.

(Examples of heavy work are lifting a heavy load (about 50 lbs.) from the floor to your waist or shoulder; working on a loading dock; shoveling; standing while bricklaying or chipping castings; walking up an 8-degree grade about 2 mph; climbing stairs with a heavy load (about 50 lbs.).)

13. Will you be wearing protective clothing and/or equipment (other than the respirator) when you're using your respirator: Yes / No

If "yes," describe this protective clothing and/or equipment:

- 14. Will you be working under hot conditions (temperature exceeding 77° F): Yes / No
- 15. Will you be working under humid conditions: Yes / No
- 16. Describe the work you'll be doing while you're using your respirator(s):
- 17. Describe any special or hazardous conditions you might encounter when you're using your respirator(s) (for example, confined spaces, life-threatening gases):

18. Provide the following information, if you know it, for each toxic substance that you'll exposed to when you're using your respirator(s): Name of the first toxic substance:	be
Estimated maximum exposure level per shift:	
Duration of exposure per shift:	
Name of the second toxic substance:	_
Estimated maximum exposure level per shift:	
Duration of exposure per shift:	_
Name of the third toxic substance:	
Estimated maximum exposure level per shift:	
Duration of exposure per shift:	_
The name of any other toxic substances that you'll be exposed to while using your	respirator:

19. Describe any special responsibilities you'll have while using your respirator(s) that may affect the safety and well-being of others (for example, rescue, security):

Voluntary Use

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the exposure limits followed by MSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

- 1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
- Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- 3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
- 4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

Associate's Name (print):

Associate's Signature: _____

Date: _____

POLICY

Prior to January 1st of each calendar year all individuals, who turn in expenses for mileage reimbursement (PM's, Engineers, etc.) or have an auto allowance (Sales), are required to submit their vehicle insurance to our HR Director. The insurance coverage must be valid/current. Should any changes occur, coverage lapse, etc. these must be conveyed to the HR Director and new insurance be provided. Failure to do so can result expense reimbursement being delayed or denied or auto allowance being withheld from the Associate's pay.

POLICY

The company has important objectives in reducing workers' compensation costs and assisting associates who have experienced work-related injuries to return to their regular jobs. To accomplish these mutually beneficial objectives we must evaluate the restrictions and determine what the associate can do and attempt to find work for them whenever possible. We will accommodate 100% of work related restrictions.

In reality the majority of injured associates will be released back to full duty with 7-10 days of the initial injury. It is not uncommon for restricted duty to last less than a week. One key to remember though is that at no time may an associate be requested, required, or allowed to work beyond their restrictions.

The purpose of the Restricted Duty Program is to assist the associate in the rehabilitative process. The program is also a benefit as it helps save the associate from losing pay during the waiting period. C&C Group recognizes that there are both physical and emotional components to rehabilitation and that for the associate to stay productive and coming into a work assignment is an important aspect in an individual's recovery process.

What work an associate can due will be determined by the authorized treating physician. You may choose to decline restricted duty, however it may impact your workers' compensation benefits.

Restricted duty may be on another shift, at another location, or even include volunteer work at a 3rd party volunteer site such as the Salvation Army or other charitable organization. These are not permanent positions and an associate on restricted duty will be evaluated every 45 days.

Also note that while on restricted duty you are still required to follow all company policies and procedures just like when working your regular job. You are also responsible to follow your restrictions and not exceed them.

POLICY

The purpose of this policy is to ensure that all employees and contractors are given the responsibility and authority to Stop Work when they believe that a situation exists that places himself/herself, coworker(s), contractors, or the public at risk or in danger. An employee's and contractor's responsibility and authority to Stop Work also includes situations, that if allowed to continue, could adversely affect the safe operation or cause serious damage to a facility or equipment, or adversely affect the environment.

SCOPE

This policy applies to all C&C Group locations, work sites, and areas containing C&C Group owned equipment. It is applicable to all C&C Group employees and C&C Group approved contractors working at these locations.

GENERAL REQUIREMENTS

- 1. A Stop Work intervention should be initiated for conditions or behaviors that could reasonably be expected to pose a risk or danger to person(s), safe operation of a facility, serious damage to equipment or adversely affect the environment. Situations that warrant a Stop Work intervention may include, but are not limited to the following:
 - a. Unsafe conditions
 - b. Change in conditions
 - c. Changes to scope of work or work plan
 - d. Equipment used improperly
 - e. Lack of knowledge, understanding or information
 - f. Clarify work instructions
 - g. Propose additional controls
- 2. Any Stop Work issue(s) requiring corrective action(s) to resolve the issue(s), shall be documented on a Stop Work Authority Form (Attachment A).

RESPONSIBILITIES

- 1. Employees and Contractors: In supporting safe execution of work, all employees and contractors have:
 - a. The responsibility and authority to initiate a Stop Work intervention immediately, without fear of reprisal, when the individual believes a situation exists which places himself/herself, a coworker(s), contract employee(s), or the public in danger or at risk.
 - b. The responsibility to report any activity or condition the individual believes is unsafe or for which they have initiated a Stop Work. Notification shall be made to the affected worker(s) at the location where the activity or condition exists.
 - c. The responsibility and authority to Stop Work or decline to perform an assigned task to discuss and resolve work and safety concerns. The Stop Work may include discussions with co-workers, supervision, and/or a safety representative.
 - d. The responsibility to notify his/her supervisor if a raised Stop Work issue has not been resolved to their satisfaction prior to the resumption of work.
 - e. The responsibility to initiate a Stop Work intervention in good faith and support a Stop Work intervention initiated by others.

MANAGERS AND SUPERVISORS

Managers and Supervisors are committed to promptly resolve issues resulting from an individual raised Stop Work issue and are responsible to:

- a. Take the lead on any unresolved Stop Work issues that have resulted in an individual stopping a specific task or activity.
- b. Provide feedback to an individual and the affected work group(s) who have exercised their Stop Work responsibility on the corrective action(s) taken to resolve a Stop Work issue prior to resuming work. If the individual that initiated a Stop Work intervention is not available, then the Supervisor shall provide the feedback to the Safety Coordinator prior to resuming work.
- c. Notify the Safety Coordinator if a raised Stop Work issue has not been resolved.
- d. Hold employees and contractors accountable for full compliance with the Stop Work Authority policy.
- e. Ensure no actions are taken as reprisal or retribution against individuals who raise safety concerns or stop an activity they believe is unsafe.

SAFETY COORDINATOR

The Safety Coordinator are responsible to:

- a. Assist employees, contractors, supervisors and managers in the resolution of Stop Work issues and concerns.
- b. Immediately contact Management and work to resolve a Stop Work issue when an individual has called a Stop Work issue to their attention that has not been resolved.
- c. Discuss corrective action(s) taken to resolve a Stop Work issue(s) with the individuals involved where resolution was completed after their shift or when they were unavailable, or where he/she acted as their representative in reaching resolution.

PROTOCOL

- An individual shall immediately initiate a Stop Work intervention when he/she identifies a
 perceived unsafe condition, act, error, omission, or lack of understanding that could result in an
 undesirable event. The individual shall briefly introduce him/her self and start the conversation
 with the phrase, "I am using my Stop Work Authority because......". Using this phrase will
 clarify the initiator's intent and set expectations.
- 2. The individual shall make the area as safe as possible by removing personnel and stabilizing the situation.
- 3. The individual shall ensure that all affected personnel discuss the situation and come to an agreement on the Stop Work issue. If all parties come to an agreement the condition or behavior is safe to proceed without corrective action(s), (e.g. the initiator was unaware of certain information or circumstances), the affected persons should show appreciation to the Stop Work initiator for his/her concern and then resume work. The Stop Work is complete at this point and no further action is required.

- 4. If it is determined and agreed that the Stop Work issue(s) requires corrective action(s) to resolve the issue(s), then work shall be suspended and every attempt shall be made to resolve the issue(s) with all individuals involved before work is allowed to restart.
- 5. When the Stop Work issue(s) has been resolved, all affected individuals shall be notified of the corrective actions taken. If all affected personnel are in agreement with the corrective actions, then work can restart.
- 6. The individual (Front Line Worker [FLW] or the contractor as applicable) shall document the Stop Work issue(s) by completing "Section 1" and the corrective action(s) taken to resolve the issue(s) by completing "Section 2" of a Stop Work Authority Form (Attachment A). The original form shall be provided to the department Supervisor and copies sent to the department Safety Coordinator.
- 7. If the Stop Work issue has not been resolved to the agreement of all affected individuals, then the Stop Work remains in place. The individual (FLW or the contractor as applicable) shall notify his/her supervisor of the Stop Work issue(s). The individual (FLW or the contractor) shall document the Stop Work issue(s) by completing "Section 1" of a Stop Work Authority Form (Attachment A). Work may resume when all corrective actions to resolve the issue(s) have been implemented and all affected personnel are in agreement with the corrective action(s). Personnel involved in the resolution of the Stop Work issue(s) may include the FLW, contractor, co-workers, the Supervisor, Safety Coordinator and Management. The objective is to reach resolution at the lowest levels of engagement possible. The corrective action(s) taken to resolve the Stop Work issue(s) shall be documented by completing "Section 2" of the Stop Work Authority Form (Attachment A). The original form shall be provided to the department Supervisor and copies sent to the department Safety Coordinator.
- 8. The Stop Work Authority Form shall be reviewed by the department Supervisor, Management and Safety Director to determine if any long term corrective actions are required, (i.e., actions outside the immediate time frame and determined to be required to prevent the Stop Work issue from occurring during like or similar activities). Document any required long term corrective actions by completing "Section 3" of the Stop Work Authority Form (Attachment A). The original form shall be provided to the department Supervisor and copies sent to the department Safety Coordinator.

TRAINING

Training for the Stop Work Authority Policy shall be conducted as part of all new employee and contractor site orientation.

FORMS

Stop Work Authority Form (Attachment A)

SUBCONTRACTOR PREQUALIFICATION

Project procurement procedures require that all subcontractors submit prequalification documentation for evaluation. Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents, and safety statistics. Acceptable safety metrics and average or better scores on OSHA 300 forms will be used as criteria for selecting subcontractors. The Project Manager conducts the safety prequalification evaluation in accordance with the subcontractor prequalification process and scorecard form included.

Prior to starting work on site subcontractors will be provided a site orientation as well as be included in pre-job meetings including hazard assessments. Following completion of projects a post project performance of our subcontractors will be performed to ensure our safety and work practices were met and to determine if the subcontractor will be eligible to work on another project.

PURPOSE:

The purpose of the Hazard Analysis is to provide a method for a supervisor and his/her crew to inspect an upcoming job, identify potential hazards related to that job, and to arrive at agreement on the development of a Safe Work Plan for completing their assignment.

POLICY

Once the client/owner has issued a permit, it is each **of C&C Group's** employees responsibility to ensure that the Safe Work Plan for the work he/she is about to do is properly developed. After receiving a valid work permit from the client/owner and before starting a job, each crew shall review the permit requirements and perform a thorough Hazard Analysis. The Hazard Analysis process serves as **C&C Group's** Safe Work Plan. As such, by completing the process and signing on the back of the form, employees are indicating that they are prepared to accomplish the assigned task efficiently and safely.

In the event conditions change, the Hazard Analysis Form must be updated. Potential hazards, including those specific to the task and those general to the work area, must be discussed and a plan formulated to eliminate or minimize identified hazards. Each person on the crew must understand his/her role relating to the tasks at hand. When a new worker is assigned to a job in progress, the Hazard Analysis must be reviewed with this person and he/she must sign the form before beginning work.

PROCEDURE:

- 1. Once the client/owner work permit has been issued, the assigned crew shall conduct a thorough Hazard Analysis session at the job site, which includes, but is not limited to:
 - a) Walking the job and reviewing all elements of the assignment. The supervisor shall identify all equipment that is to be worked on.
 - b) Identifying existing and/or potential hazards and take appropriate action to eliminate or minimize identified hazards; reaching agreement on the safest plan to complete the assigned task. Each person on the crew must thoroughly understand their role in the upcoming tasks.
 - c) Evaluating PPE requirements and upgrading permit required PPE or providing additional PPE whenever necessary to provide maximum level of employee protection.
 - d) Ensuring that all workers know and are properly trained for their assignment(s).
 - e) Posting the completed form(s) along with the work permit in a conspicuous place in the work area. In the event it is not possible to post the form(s), they shall be kept readily available at the job site. The forms shall be kept in a manner that protects them from weather damage.
- 2. Whenever possible the supervisor shall be involved in the Hazard Analysis Session. However, there are times when this is not possible. Should the supervisor find that he/she will not be available, he/she shall assign a competent person to lead the session. As soon as practical following the beginning of a job, the supervisor shall review all Hazard Analysis Forms of crews assigned to him/her and sign the back of the form in the section provided.

GENERAL INSTRUCTIONS:

- Print and make sure the form is legible/readable. The only place you do not print required information is when you place your signature on the back of the form.
- Involve the entire crew in the process. The more eyes and experience used to identify hazards, the better.
- Whenever possible, the completed Hazard Analysis should be reviewed for proper completion and signed by the designated lead person, foreman, supervisor or Safety dept. representative before the work is started. If this is not possible, the form should be reviewed as soon as practical.
- When the form (s) is completed, it must be posted & readily available at the job site.

Front of Hazard Analysis Form

- <u>Description of job</u> The first step of hazard analysis is to accurately describe the work to be performed. This will provide the basis for the rest of the process. At the top of the form, provide a brief, but specific description of the job you will perform.
- <u>Date and Time</u> Enter the date the work will be performed and the time you started the Hazard Analysis process.
- **Location** Enter the name of the facility where the work will be performed. For example:
- **Supervisor** Enter the name of the immediate foreman or supervisor.
- <u>Client Contact</u> Enter the name of the client contact person for that job.
- <u>Crew</u> Clearly print the name(s) of each person that will be working on the job. This may include non-C&C Group employees, such as other contractors or client personnel working with you.
- <u>Unit</u> Enter the name of the unit where the work will be performed. For example:
- <u>Equipment</u> Enter the number or name of the equipment you will be working on. Be as specific as possible. Make sure that you are preparing to work on the right equipment. If there is no number or name for the equipment, enter the number or name of the equipment it is connected to. For example:
- <u>Product</u> Enter the name of the product or material that is present or that was present when the equipment/line was in service. In addition, if the equipment/line was flushed or cleaned before the work is performed, indicate that on the form.
- <u>Permit Numbers</u> Enter the number from the client permit(s) in the appropriate section. Some jobs may have multiple permits.
- Location of (Enter the location of the nearest):
 - Telephone This is the telephone that would be used to report an emergency (*i.e.* operators shack). If there is no telephone in the immediate area, indicate how you would report an emergency (*i.e.* radio, cell phone).
 - Emergency Phone No.(s) Enter the phone number(s)/radio channel(s) for reporting emergencies at that location

- Fire Extinguisher Enter the location of the nearest portable fire extinguisher. Be sure to check the extinguisher and verify that it is fully charged, is operational, and has been inspected within the past year. Report any extinguisher that appears to be inoperable, damaged, discharged or in need of service.
- Eyewash/Safety Shower Enter the location of the nearest eyewash/safety shower. If it is alarmed, check with the unit operator before activating. If it is not connected to an alarm system, verify that it is operational by activating the control lever/device, until the water flows clear. Once the system is flushed be sure to replace the protective caps on the eyewash applicators.
- <u>Yes, No, N/A Questions</u> Each one of these questions requires an answer. Carefully consider each question and how it will affect or apply to the work being performed. If the question doesn't apply to the job, mark it "N/A" (Not applicable). Each question is important.

Back of Hazard Analysis form –

- <u>Fall Protection</u> Answer the first question in this section. If you check "No", then you can move on to the next section. If you check "Yes", then you must complete the entire Fall Protection section. Make sure that workers are properly trained in the use of fall protection equipment.
- <u>Scaffold User Inspection</u> Answer the first question of this section. If you check "No" then you can move on to the next section. If you check "Yes", then you must conduct a thorough inspection of the staging prior to use and complete the entire Scaffold User Inspection section.
- If the scaffold is yellow-tagged, identify the hazard(s) that require the yellow tag (*i.e. hole in deck, missing guardrail, restricted access*).
- Job Steps Briefly outline or list the steps necessary to safely complete the job from start to finish. For example:
- Inspect/Prepare job site, obtain permit, complete Hazard Analysis form and review with crew, obtain/inspect tools and PPE, perform job, cleanup, return tools.
- **Existing Hazards** List hazards that are present at the job site. These will primarily be existing physical hazards. For example:
- Elevated work, uneven surfaces, confined space, high noise levels, pinch points, conflicting work above/below, weather conditions.
- <u>Potential Hazards</u> List hazardous conditions that may be created/exposed while doing the work. For example:
 - Hot Pipes, product release, exposure to hazardous material(s), sparks/slag, heavy lifting, explosive atmosphere.
- <u>Action Taken To Eliminate or Minimize Hazards</u> List what you are going to do to eliminate or control each of the identified hazards.

- <u>Crew/Employee Signatures</u> Now that you have filled in the blanks and answered the questions, review the Hazard Analysis form with all crewmembers and any other contractor client personnel working on the job. When each crew member understands the hazards present, is properly trained for their assigned task and understands how to complete the work safely, they must sign their name in the same numbered space as they printed their name on the front of the form. Do not sign if you don't understand or aren't properly trained.
- <u>Hazard Analysis session lead by</u> The supervisor or foreman or lead person that conducts the Hazard Analysis review with all crew members and checks the form for proper completion must print and sign their name and indicate the date and time the review was held.

Now you can start the job! Remember, the form is complete, but **the process continues**. Always remain alert for changing conditions. The Hazard Analysis form must be modified/updated if conditions change or new hazards are found. Any modifications must be communicated with all crewmembers. *Remember to review the Hazard Analysis with any new crewmembers that are added while the job is in progress. Their name(s) and signature(s) must also be added to the Hazard Analysis form.

Post all completed forms in a conspicuous and readily available location.

JOB HAZARD ANALYSIS

	HAZARD ANALYSIS / SAFE WORK PLAN – GENERAL WORK								
THIS CREW IS TO PERFORM THE FOLLOWING:									
DATE	DATE LOCATION								
TIME	TIME LOCATION OF:								
SUPERVISOR EMERG				RGENCY PH	ONE NO.				
CLIEN				TEL	EPHONE				
CREW	/: (Print name below and	sign in t	he sam	ie numt	pered space	✓ PPE - Check Applicab			
on the	back of this sheet.	0			•		Ie		
	UNIT					MINIMUM	ida Ohia		
	EQUIPMENT		Fire	e Extingu	lisher	 Hard Hat, Safety Glasses with Side, Shields, Goggles, Ear, Plugs, Gloves, Fire Retardant Coveralls, Work Boots 			
	What product is/was in equipm	nent?	Eve	wash/Sa	afety Shower				
						ADDITIONAL			
	All permit numbers must be lis	ted	Eva	acuatio	n Area	ALWAYS provide maximum level of worker protection			
	below.		Prir	nary:					
	HOT WORK #					 Knee Pads 			
	" COLD WORK		Sec	condary:		□ Face Shield			
						Ear Muffs			
	UNIT ENTRY #					Safety Harness & Lanyard			
	CONFINED SPACE					 Supplied Air Half Face Respirator 			
	#					□ Full Face Respirator			
	OTHER #			N DOUE		Acid Gear			
			STO	<u>OP AND</u>	ASK!!	Rain Suit			
						 Rubber Gloves Rubber Boots 			
						□ Rubber Boots □ Other			
	1	YES	NO	N/A			YES	NO	N/A
Crew PSN	M trained?				Motorized equip	oment inspected?			
Crew prop	perly trained for job?				Operator(s) trai	ned? Operator(s) on approved list?			
	w knows emergency n procedure?					ropes, wire ropes, come-alongs, spected and found safe?			
	ken to prevent worker to Hazardous Material?				Equipment blocked, de-pressured and drained?				
Crew kno	ws potential hazards?				Equipment lock	ed/tagged out?			
Crew kno	ws location of MSDS?				GFCI's/low volta	age lighting used?			
Entire cre	w familiar with safety manual?				Crew knows ha	nd signals?			
Weather p	presents a problem?				Crew aware of	pinch points?			
Conflicting jobs in area?				Tools/equipment inspected and found safe?					
Barricades installed as needed & tagged?				Tool holders available for use with knocker wrench?					
Work area	a clean, orderly & safe?				Equipment blind	ded?			
Hoses an	d cords out of walkways?				Correct type of	blinds & gaskets for job?			
Drains pro	operly covered?				Is work in confir	ned space?			
Work area	a clear of flammable hazards?								

PLAN YOUR WORK, AND THEN WORK YOUR PLAN SAFELY!!!

FALL PROTECTION								
Is work being performed at an unprotected elevated area where workers may be exposed to a fall of 6 feet or more? Yes Note: Client/Owner or working conditions may require fall protection at lower elevations. If yes , complete the following information:							No □	
		Yes	No	, complete an			Yes	No
Have workers that require fall protection been provided with a full body harness, appropriate lanyard(s) with shock absorbing device and boom strap (if needed)?				Is static line required If yes, has it been ins prior to use?	? spected by a competent perso			
Have all workers completed fall protect	•			Are adequate anchor	points present?			
Has all fall protection equipment been found to be in safe condition?								
List any other fall protection equipment required:								
SCAFFOLD USER INSPECTI					s, complete the section be	elow.		
Inspect the following items	before using: (Check bo	x wher						
□ Top and mid rails in place			□ Bars and clamps tight and secure					
□ Toe boards and falling object		ure		adders in place and	secure			
Weather conditions do not pr				oles in decks adequ	•			
Planks in safe condition and	secured		ΠF	ree of slipping and/o	r tripping hazard			
Personnel barriers installed of	on hot lines/equipment		□S	caffolding properly ta	agged			
□ Free of overhead hazards				Maximum Load Allov				
List any hazards:			(Heavy	Duty Formula is Squar	re Feet x 75 PSF = Max Capa	acity in po	ounds)	1
Steps of Task (List steps necessary to completed the task)	Potential Hazards Evaluate hazards associated <u>Tools</u> being used, <u>Methoo</u> employed to accomplish ta <u>Materials</u> required to complete and Working Environment/Conditions	Controls (Identify preventative measures to be used to control each identified hazard)		PSM standards require employees to be trained on the hazards associated with each task. Do not sign this form unless you have been trained and understand the potential hazards associated with this task. If you have not been trained, do not understand or feel you cannot complete this job safely, speak to your supervisor before starting work.				
					Sign your n	name:		
					1			
					2			
					3			
					4			
					5			
					6			
					7			
					8			
					9			
					10			
Hazard Analysis session lead l	by: <i>(check one)</i>		□ St	upervisor	Lead Person] Other		
Print Name:	Signature:				Date / Time:			
Reviewed By: (check one)			🗆 Si	upervisor	□ Safety □] Other		
Print Name:	Signature:				Date / Time:			
CCG2/7/2023	Safety Pl	an Hai	ndbook	Return to TOC		,	177	

ASupervisor's Report of	of Injury/Illness
B Confined Space	e Entry Permit
CConfined Space-Work Per	mit & Checklist
DSafety	Audit Checklist
E Aerial & Scissor Lift Insp	ection Checklist
FJob Made Ladder	Requirements
G Associate	Warning Notice
H Associate Emergency No	otification Form
IPowered Industrial Truck I	nspection Form
JOSHA Inspection	Questionnaire
K Daily Scaffo	olding Checklist
LAssociates Information for Using Respirators When Not Required Under the C	SHA Standard
M Personal Protective Equipment (PPE) Hazard As	sessment Form
ΝΗ	lot Work Permit
O Associate Safety Orientation Training Docu	mentation Form
PAsbestos Pre-Pla	Inning Checklist
Q Asbestos Containir	ng Materials List
R	Restricted Duty
SExposu	ure Control Plan
TStop Work Authority Form	(Attachment A)



SUPERVISOR'S REPORT OF INJURY / ILLNESS

PROJECT NAME:	JOB #:
ADDRESS:	
NAME OF INJURED PERSON:	
OCCUPATION:	
	IURY?
NATURE AND EXTENT OF INJURY:	
	TIME OF ACCIDENT:
WHAT I HAVE DONE TO CORRECT THE SITUATI	ION?
ACCIDENT WITNESS ONE:	TELEPHONE NO.
ACCIDENT WITNESS TWO:	TELEPHONE NO.
	RECEIVED?
	IPERVISOR NOTIFIED:
SUPERVISOR'S SIGNATURE:	DATE:
ASSOCIATE'S SIGNATURE:	DATE: RATE OFFICE WITHIN 24 HOURS OF WHEN ACCIDENT OCCURRED)

CONFINED SPACE PERMIT

Date	9:	Projec	ct			
	ne:	-				
	#:		ct Foreman:			
	ipment to be worked on:					
Wor	k to be performed:					
Pre-	Entry (See Safety Procedure)					
1.	Atmospheric Checks: Time AM/PM Flammability% L.F.L. Carbon MonoxidePPM	Hydro	Oxygen gen Sulfide: Other		% PPM	
2.	Source isolation (NO Entry): Pumps or lines blanked, disconnected, or	locked out?	N/A ()	Yes ()		
3.	Ventilation Modification: Mechanical Natural Ventilation Only		()	() ()	() ()	
4.	Atmospheric check after isolation and ventil Oxygen% grea Explosive% L.F. ToxicPPM k Carbon MonoxidePPM k	ater than 19.5% .L. less than 10% ess than 10 PPN	5 1 H2S	%		
Entr	y (See Safety Procedures)					
1.	Has safety meeting been held with all entry	and monitoring	Yes personnel? ()	-		
2.	Equipment? Direct reading gas monitor tester Safety harness and lifelines for entry Hoisting equipment Communication equipment Personal protective equipment Protective clothing Lighting	N/A () () () () () ()	Yes () () () () () ()	No () () () () () ()		

If conditions are in compliance with the above requirements and there is no reason to believe conditions may change adversely, then proceed with work. If conditions are not in compliance with the above requirements or there is reason to believe that conditions may change adversely, do not authorize entry and contact the Safety Director for further instructions. I have reviewed the work authorized by this checklist and the information contained herein. Written instructions and safety procedures have been reviewed and are understood.

Check List Prepared by:	
Approved by (Supervisor):	



SAFETY MEETING AND CHECK LIST OF CONSIDERATIONS FOR ENTRY, WORKING IN AND EXITING CONFINED SPACES CHART

Pr	oject Name:					
	cation:					
Work to be performed: Safety Director:						
Da	ite:					
X =	= Requirement	O = Determination by the Qualified Person				
(C	heck off each completed item:					
1.	Permit	X () O ()				
2.	Atmospheric Testing Type of test	X() O()				
	Reading	O2 Content Other				
3.	Monitoring	X() O()				
4.	Medical Surveillance	X () O ()				
5.	Training of Personnel	X () O ()				
6.	Labeling and Posting	X () O ()				
7.	Preparation Isolate/Lockout/Tag Purge and Ventilate Cleaning Processes Requirements for Special Equipment and Tools	X() O() X() O() X() O() X() O() X() O() X() O()				
8.	Procedures: Initial Plan Standby Communications Rescue Work	X() O() X() O() X() O() X() O() X() O() X() O()				

APPENDIX C

Head Pro Hearing F Hand Pro Foot Prot Respirato	Protection	X () X () X () X () X () X () X ()	O() O() O() O() O() O() O()
10. Rescue Eq	uipment	X ()	Ο()
11. Record Kee	eping/Exposure	X ()	Ο()
12. Observer R	equired at Entry	X ()	O()

The Company has complied with all required measures.

Project

Supervisor:

I have received instruction on this work and fully understand and have complied with all provisions noted on this form.

Associates:

APPENDIX D

SAFETY AUDIT CHECKLIST

Project: _____Date: _____Date: _____

Project Name: ______Job #:_____

Foreman: _____

A - Indicates Attention Needed X – Indicates Acceptable N/A – Not Applicable

OSHA Safety & Protection Poster	1 Г
Emergency Phone Numbers Posted	
First Aid Kit & Supplies	
Adequate Posters & Warning Signs	
Hazard Communication Info. Posted	
Housekeeping	
PPE - Hard Hats	
PPE - Hearing Protection	
PPE - Eye & Face Protection	
PPE - Respiratory Protection	
Are personnel wearing PPE	
Safety Meetings being conducted	
Fire Extinguishers	
Proper Storage of Flammable Liquids	

Electrical Hazards / GFCI	
Competent Person on Site	
Scaffold / Lifts	
Ladders / Stairs	
Barricades / Guard Rails	
Fall Protection	
Confined Space	
Container Labeling	
Power Tools / Extension Cords	
Hand Tools	
Excavations / Trenches	
Material Storage	
Heavy Equipment	
Safety Attitude	

Notes:

Inspection by:

Supervisor Signature:

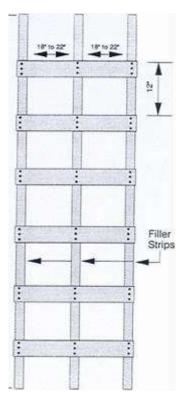
AERIAL & SCISSOR LIFT CHECKLIST FORM

DATE: JOB NAME / #:				
SERIAL NO.				
MODEL NO.				
RENTAL: ()YES ()NC)			
TYPE OF EQUIPMENT: () AERIAL LIFT () S	CISSOR LIFT			
A - Indicates Attention Needed X – Indicates	Acceptable N/A – Not Applicable			
DECALS: PROPER PLACEMENT & QUANTITY	BATTERY CHARGER SECURE & OPER.			
DECALS: LEGIBILITY	VALVE MANIFOLD (S) SECURE			
BENT BEAM MEMBERS	PUMPS SECURE			
BROKEN WELDS	FILTER SECURE, CHANGE DATE			
ALL FRAME BOLTS TIGHT	OIL LEVEL OK, CHANGE DATE			
WHEEL BOLTS & NUTS TIGHT & COTTERS	ALL WIRES TIGHT ON TERMINALS			
UPPER CYL. BARS IN PLACE & SECURE	ALL SWITCHES SECURE			
LOWER CYL. BARS IN PLACE & SECURE	ALL FUNCTIONS OPERATIONAL			
RETAINING RINGS SECURE ON PIVOTS	EMERGENCY STOP BREAKS ALL CIRCUITS			
EMERGENCY DOWN CABLE SECURE	SLOW SPEED LIMIT SWITCH SET PROPERLY			
EMERGENCY DOWN OPERATIONAL	STEERING PRESSURE SET PROPERLY			
MAINTENANCE LOCKS SECURE & OPERATE	LIFT PRESSURE SET PROPERLY			
BOLTS ON SCISSORS MOUNTING BLOCKS	CHECK ALL FITTINGS & HOSES FOR LEAKS			
ALL RAILS IN PLACE	ALL ROLLERS TURN FREELY			
BROKEN WELDS OR BENT RAILS	BATTERIES FULLY CHARGED			
ENTRANCE GATE CLOSES FREELY	110V OUTLET SAFE & WORKING			
CHAINS IN PLACE & LATCH PROPERLY	D/C MOTOR SECURE			
EXT. PLAT. LOCKS IN STOWED POSITION	CONTRACTOR (S) SECURE			
EXT. PLAT. ROLLS FREELY	GENERATOR & PULLEYS SECURE			
EXT. PLAT. CABLES IN PLACE & SECURE	ENGINE MOUNTS TIGHT			
EXT. PLAT. LOCKS IN EXT. POSITION	FUEL LINES SECURE & FREE OF LEAKS			
POTHOLD BARS OPERATE SMOOTHLY	FUEL TANKS SECURE			
POTHOLE BARS LOCK IN PLACE	REPLAYS SECURE			
POTHOLE BAR LIMIT SWITCHES ADJUSTED	HOUR METER OPERATIONAL			
PLAT. PINS INSTALLED & SECURE	GENERATOR/CONVERTER OPERATIONAL			
STEERING CYL. PINNED	BATTERY INDICATOR OPERATIONAL			
THE ROD SECURE	ENGINE OIL LEVEL OK			
BRAKE PADS SECURE	ENGINE OIL & FILTER CHANGE DATE			
BRAKE CYL. PINNED	ALL SHIELDS & GUARDS IN PLACE			
BRAKES OPERATIONAL	OPERATORS, SERVICE & MAINT. MANUAL			
BRAKES ADJUSTED PROPERLY	FULL BODY HARNESS			
BRAKE LOCK OPERATIONAL	LANYARDS			
BATTERY HOLDS DOWN SECURE	TIRES			
OUTRIGGERS	LOCKING DEVICES			
LOAD TEST	STABILITY TEST			
COMMENTS:				

APPENRIX F

JOB MADE LADDER REQUIREMENTS

SINGLE CLEAT LADDER



DOUBLE CLEAT LADDER

TABLES OF MATERIAL SIZES SIDE RAILS			
LENGTH OF LADDER	THICKNESS	DEPTH	
(FEET)	(NOMINAL)	(NOMINAL)	
UP TO & INCLUDING 16	2"	4"	

TABLES OF MATERIAL SIZES SIDE RAILS				
LENGTH OF LADDER	THICKNESS	DEPTH		
(FEET)	(NOMINAL)	(NOMINAL)		
UP TO 12	2"	4"		
12 TO 24	2"	6"		

8. LENGTH BETWEEN SUPPORTS (BASE AND TOP LANDING) NOT TO EXCEED 24 FEET FOR A SINGLE RUNG LADDER OR A DOUBLE RUNG LADDER.

- 9. 2SLOPE OF GRAIN IN SIDE RAILS TO BE NOT STEEPER THAN 1 IN 12. KNOTS OF 1/2" OR LESS ACCEPTABLE ONLY ON WIDE FACE AT LEAST 1/2" FROM EDGE.
- 10. CLEATS SHALL BE 1X4 NOMINAL OR 2X4 STRESS GRADE MATERIAL THAT IS CLEAR, STRAIGHT-GRAINED AND FREE OF KNOTS.
- 11. SECURE CLEATS TO EACH RAIL WITH THREE 10d COMMON WIRE NAILS FOR 1X4 CLEATS OR THREE 12D COMMON WIRE NAILS FOR 2X4 CLEATS.
- 12. FILLER STRIPS ARE ³/₄" STOCK-WIDTH OF RAIL AND LENGTH TO SUIT.

APPENDIX G

ASSOCIATE VIOLATION WARNING NOTICE

Ass	ociate		Warn	ing Date:	
Loc	ation:		Job Name:		
	ATTENDAN	CE:	PERSONAL /		/ REFUSAL TO WORK OVERTIME
	CARELESSN	IESS	SAFETY		
	CONDUCT			TARDINES	S
	INSUBORDINATION			WILLFUL D	DAMAGE TO COMPANY PROPERTY
	UNAUTHORIZED ABSENCE			OTHER	
	WORK QUALITY				

PREVIOUS WARNINGS

WARNING #:	DATE	ORAL	WRITTEN	SIGNED
1				
2				
3				

COMPANY STATEMENT

ASSOCIATE STATEMENT

		I AGREE WITH COMPANY STATEMENT
		I DISAGREE WITH COMPANY STATEMENT
	RE/	ASONS:
SIGNED:		
TITLE/DATE:		

I have read this Warning Notice and understand it.

ASSOCIATE'S SIGNATURE: _____

DATE: _____

SUPERVISOR:

This form was refused by Associate

DATE: _____

* If the Associate Warning Notice, after completion, contains information on the medical condition or history of an associate, then it must be maintained in a separate medical file and treated as confidential in accordance with applicable law and regulations.

ASSOCIATE EMERGENCY NOTIFICATION FORM

C&C Group is sincerely interested in your safety. This is your personal copy of the Safety Procedures Manual. You are required to read, understand, and keep this manual for future reference. You are expected to cooperate with our safety manual and abide by its rules.

Please complete the following Associate Emergency Notification Information:

(Please Print) NAME: CURRENT MAILING ADDRESS: CITY: _____ STATE: _____ ZIP: _____ SOCIAL SECURITY NUMBER: HOME PHONE: ______ BIRTHDATE: HEIGHT: WEIGHT: DO YOU OR HAVE YOU HAD ANY PHYSICAL IMPAIRMENTS WHICH WOULD PREVENT YOU FROM PERFORMING YOUR JOB? IF YES PLEASE EXPLAIN: IN CASE OF AN ACCIDENT PLEASE NOTIFY: NAME: RELATIONSHIP: DAYTIME TELEPHONE NUMBER (S): AFTER 5:00 P.M. TELEPHONE NUMBER (S) I HAVE READ OR HAVE HAD READ TO ME THE SAFETY PROCEDURES MANUAL AND I UNDERSTAND THE INFORMATION IT CONTAINS. I HAVE REVIEWED THIS COMPANY'S DRUG AND ALCOHOL POLICY AND IT IS UNDERSTOOD THAT THE USE OF DRUGS AND ALCOHOL IS ABSOULTELY PROHIBITED AND ALL DRUG TESTS WILL BE COMPLETED AS STATED IN THIS MANUAL. PRINTED SIGNATURE: DATE: SIGNED SIGNATURE: ______Journeyman / Apprentice (Circle One)



POWERED INDUSTRIAL TRUCK NSPECTION FORM

Truck ID#: _ Make: ____ Date: _____

Hour meter reading: Start: _

End: _____

Start of Specific Comments if Item **During Shift** End of Shift Shift not O.K. Lights Tires Brakes-Service/Parking Horn Hour Meter & Gauges Steering Hydraulic Controls Mast Forks Seat Belt Other (list): If applicable: Battery or Charge Fuel level Oil Level & Pressure Water Level Fan Belt Other (list):

Place an O.K. in the correct column if the item is without defect.

DEFECTS REPORTED TO:

DO NOT OPERATE AN UNSAFE LIFT TRUCK!



OSHA INSPECTION QUESTIONNAIRE

"Confidential Attorney Work Product - Made in Anticipation of Litigation." (Also, include this phrase at the top of any notes taken.)

1.	Jobsite:	Job #:	
	Date of Inspection:	Time:	
	Name of Compliance Officer:		
	Office Address of Compliance Officer:		
	Your Name:		
2.	Opening Conference: Date:	Time:	
	Persons in attendance and company affiliation:		
	1)		
	2)		
	3)		
	4)		
3.	Did you attempt to contact the Safety Director?		
	What was the result?		
4.	Did the Compliance Officer have a search warrant?	Yes	No
	Was the inspection based on an associate complaint?	Yes	No
	If yes, what was the compliant relating to?		
5.	How long did the inspection take?		

APPENDIX J

6.	Were there any photographs, videos, or samples taken? (Monitoring of air/noise or other substance? Yes No
	Details:
7.	Were you advised of any apparent violations? Yes No
8.	Did the Compliance Officer state that a citation would be issued? Yes No
9.	List the specific standard number(s) that was stated by the Compliance Officer:
	1)
	2)
	3)
	4)
10.	Other problems that were noticed by you but not by the Compliance Officer: 1)2)
	3)
	4)
11.	Your general comments about the inspection and the Compliance Officer:
12.	Closing Conference Date:Time:
	Persons in attendance and company affiliation: 1)
	2)
	3)

APPENDIX K

Daily Scaffolding Checklist

		Job #:
YES	NO	COMMENTS / ABATEMENTS MADE:
_	—	
_		

APPENRIX L

Associates Information for Using Respirators When Not Required Under the OSHA Standard Appendix D to Sec. 1910.134 (Mandatory)

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

- 1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
- 2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- 3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
- 4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

APPENDIX M

PPE ASSESSMENT FORM HAZARD REPORTED

Received (time and date):		
Action: Immediate:	In Process:	
Expected Completion Date:		
Signed (Safety Director)	Associate	

PPE HAZARD ASSESSMENT LOG

BASED ON THE HAZARD ASSESSMENT FOR:

(Job description)

THE FOLLOWING PPE IS RECOMMENDED.

- Name the HAZARDOUS TASK.
- Identify the SOURCE: Biohazard, Radiation, Compressed Gas, Heat, Hydraulics, Electrical, Chemical, Mechanical.
- Identify the HAZARD: Eye, Head, Foot, Hand, or Other (specify).
- Indicate the recommended PPE.

HAZARDOUS TASK	SOURCE	HAZARD	PPE

APPENDIX N

HOT WORK PERMIT

Date of Issue: _____ Permit Expiration: _____

1. Location Where Work Will be Performed: _

2. Purpose of Work:

3. Persons Authorized to Conduct Hot Work: _

4. Person(s) Responsible for Safety Procedures:

 5. List of Potential Hazards: () Oxygen Deficiency () Toxic Gas or Fumes () Explosive Atmosphere () Fire () Engulfment () Entrapment () Uncontrolled Hazardous Energy () Wind () Other 	<u>Controls</u>
6. Safety Procedures Required:	

7. Results of any Testing: _

(Record time of Testing and Initial)

8. Results of Periodic Testing:

(Record time of Testing and Initial)

9. Identity of Rescue or other Emergency Services to call:

Telephone #



- 10. Identify Equipment or Service Required:
- () Oxygen Meter
- () Toxic Gas Meter
- () LEL Meter
- () Lockout / Tagout Procedures
- () Gas Mask
- () Fire Watch
- () Protective Clothing

- () Warning Signs
 () Warning Flagging
 () Wind Barriers
 () Portable Fire Extinguishers
- () Goggles or Face shields
- () Safety Glasses
- () Other

- 11. Other Permits Required: _
- 12. Other Information Necessary for Work to be accomplished:
- 13. Signature of Authorized Supervisor:

APPENDIX O

Associate Safety & Health Orientation Documentation Form

General Safety	Fire Prevention Program
Information:	Respiratory Protection
Safety and Health Statement	Program Traffic Safety
Jobsite Safety and Health Program Mgmt.	Program
Hazard Reporting	Review of Safe Work Practice
Substance Abuse	Lifting Practices
Policy	Back Injury Prevention
Health and Safety Requirements	Hand And Finger Injury Preven
First Aid Procedures	Housekeeping
Workers'	Machine Guarding
Compensation	Ergonomics
Associate Safety Rights and Responsibilities_	Fire Prevention
Access to Medical and Exposure Records	Safety Audits/Inspections
OSHA Inspection Procedures	Slip / Trip / Falls Prevention
Safety and Health Rules	
Review of Safety Programs:	
Hazardous Communication Program	
Emergency Action Plan	Miscellaneous Safety Items:
Personal Protective Equipment	
Fall Protection	
Ladder Safety Program	

-

_____ _____

APPENDIX P

А. В.

ASBESTOS PRE-PROJECT CHECKLIST

<u>Y or N</u>

Abate	ment Contractor (AC) is pre-qualified with our insurance carrier.	
AC ha	s submitted the following information:	
1.	Complete insurance and bonding documents	
2.	EPA registration	
3.	Proof of supervisor qualifications	
4.	Proof of Worker Training in Abatement	
5.	Physician's certification of each worker as fit to wear a respirator	
6.	Proof of respirator training	
7.	Baseline associate medical information, including	
	X-ray, spirometry, and pulmonary function	
8.	Landfill to be used - operator and location	
9.	Hygienist providing sampling services	
10.	Laboratory to be used for analysis	

- C. AC agrees all work and related activity will meet or exceed all standards and/or requirements set by the U.S. Government, Local Authorities, National Institute of Building Sciences, ANSI, American Industrial Hygiene Association, and other recognized standards organizations.
- D. AC agrees to provide general contractor with records of all sampling, negative pressure readings, leakages, and other significant events such as may occur.

roject Manager:	_
batement Contractor:	_
ate:	

APPENDIX Q

Asbestos-Containing Materials Found in Buildings

Subdivision:	Generic Name	Asbestos (%)	Dates of Use	Binder/Sizing
Surfacing mat	orial			
Surfacing mat	sprayed-on	1 – 95	1935 - 1970	sodium silicate
	troweled-on	x	1000 1070	Portland cement organic
		~		binders
Preformed the	ermal			
	batts, blocks, and pipe	15	1926-1949	magnesium carbonate
	calcium silicate	6 - 8	1949-1971	calcium silicate
Textiles: cloth				
	blankets (fire)	100	1910 - Present	None
	felts:	90 - 95	1920 - Present	cotton/wool
	blue stripe	80	1920 - Present	cotton
	red stripe	90	1920 - Present	cotton
	green stripe	95	1920 - Present	cotton
	sheets	50 - 95	1920 - Present	cotton/wool
	cord/rope/yarn	80 - 100	1920 - Present	cotton/wool
	tubing	80 - 85	1920 - Present	cotton/wool
	tape/strip	80 - 85	1920 - Present	cotton/wool
	curtains			
	(theatre, welding)	60 - 65	1945 - Present	cotton
Cementitious:				
	extrusion panels	8	1965 - 1977	Portland cement
Concrete-like	panels:			
	corrugated	10 - 45	1930 - Present	Portland cement
	flat	40 - 50	1930 - Present	Portland cement
	flexible	30 - 50	1930 - Present	Portland cement
	perforated	30 - 50	1930 - Present	Portland cement
	laminated	35 - 50	1930 - Present	Portland cement
(outer surface)			
	roof tiles	20 – 30	1930 - Present	Portland cement
	clapboard	12 - 15	1944 - 1945	Portland cement
	shingles	12 - 15	1944 - 1945	Portland cement
	siding shingles	12 - 14	? - Present	Portland cement
	roofing shingles	20 - 32	? - Present	Portland cement
	pipe	20 - 15	1935 - Present	Portland cement
Paper product		1		
	corrugated			
	high temperature	90	1935 - Present	Sodium silicate
	mod temperature	35 - 70	1920 - Present	
	starch indented	95	1935 - Present	cotton and organic binder
	millboard	80 - 85	1925 - Present	starch, lime, clay
Roofing felts		1 1		
	smooth surface	10 - 15	1910 - Present	asphalt
	mineral surface	10 - 15	1910 - Present	asphalt
	shingles	1	1971 - 1974	asphalt
	pipeline	10	1920 - Present	asphalt

APPENDIX Q

Asbestos-Containing Materials Found in Buildings (cont.)

Subdivision:	Generic Name	Asbestos (%)	Dates of Use	Binder/Sizing
Asbestos-con	taining caulking putties			
		30	1930 - Present	linseed oil adhesive (cold
		5 - 25	1945 - Present	asphalt joint compound
			1945 - 1975	asphalt roofing asphalt
			unknown-Present	asphalt mastics
		5 - 25	1920 - Present	asphalt
	asphalt tile cement	13 - 25	1959 - Present	asphalt roof putty
		10 - 25	unknown – Present	asphalt
	plaster stucco	2 - 10	unknown – Present	Portland cement
	spackles	3 - 5	1930 - 1975	starch, casein, synthetic
	resins sealants fire water	50 - 55	1935 - Present	caster oil or polyisobutylene
				cement, insulation
		20 - 100	1900 - 1973	clay
	cement finishing	5	1920 - 1973	clay
	cement magnesia	15	1926 - 1950	magnesium carbonate
	Asbestos ebony products	50	1930 - Present	Portland cement
Flooring tile a	nd Sheet goods			
	vinyl/asbestos tile	21	1950 – Present	polyvinylchloride
	asphalt asbestos tile	26 – 33	1920 – Present	asphalt
	sheet goods/resilient	30	1950 – Present	dry oils
Wallcovering				
	vinyl wallpaper	6 – 8	unknown - Present	
Paints and co	atings			
	roof coating	4 – 7	1900 - Present	asphalt
	air tight	15	1940 - Present	asphalt

APPENDIX R

Restricted Duty Form

Date:	
Recipient Name:	
Street Address:	
(City, State, Zip)	
· · ·	

:

Dear

On ______ you suffered a work related injury. We have been notified by the authorized treating physician (Physician's Name/Or clinic name): _______) that you have been released to return to work on restricted duty. This letter is a Return to Work Job Offer for you to return to work consistent with information and restriction provided herein. Our office will abide by the physical limitations as outlined by the authorized treating physician. The office will only assign tasks consistent with your physical abilities, knowledge, and skills, and will provide training if necessary. Should you have any questions, please contact Human Resources.

- 1. Title of Position Offered:
- 2. Hours of duty: (Start Time) ______ a.m./p.m. until (End Time) ______ a.m./p.m.
- 3. Pay Rate: \$ (Dollar Amount)
- 4. Job description, including duty hours, and maximum physical requirements of the position (lifting and approximate weight, approximate time stooping, pushing, standing, sitting, etc.)
- 5. (Enter description here):
- 6. Location of position offered: (Location)
- 7. When assignment begins: (Beginning and ending dates):

Failure to report to work as stated above will result in a forfeiture of your temporary disability benefits. You are expected to work all available hours and will not be compensated for lost time that has not been approved by your treating physician. We will not ask you to work outside of your restrictions, and you must not perform any work outside of your restrictions.

□ I have read and understand the requirements of the position and accept the position.

□ I have read and understand the requirements of the position but DO NOT accept the position.

Associate Signature

Date

HR/Supervisor

Date

*Work status form should be attached

SILICA WRITTEN EXPOSURE CONTROL PLAN

C&C Group is committed to the health and safety of our Associates. We believe in providing a safe and healthy work space for each Associate and therefore have created this Exposure Control Plan (ECP) to protect our number one asset, the Associate. The below listed plan shall be implemented for all activities where cutting or drilling of concrete filled access floor panels is required.

- 1) Task that involves exposure to respirable crystalline silica: drilling or cutting of concrete filled access floor tiles
- 2) Required Engineering Controls Cutting Tile:
 - a. HEPA filtered dust collection system must be attached to the saw
 - b. Operate and maintain the tool in accordance with the manufacturer's instructions to minimize dust emissions
 - c. All cutting must be performed outdoors
 - d. Our basis for the engineering controls is based upon the objective data found in the attached SDS. The SDS indicates tests were performed without any engineering controls to determine the exposure levels to workers. The exposure levels were found to below the OSHA PEL for this task without engineering controls. In an effort to go beyond this data we have equipped our band saws with appropriate vacuum systems to further reduce the risk.
 - e. Silica can only be detected by air sampling measures. The engineering controls mentioned above are our effort to control the release of silica. The presence of visible dust is a sign that the engineering control needs to be re-evaluated or is not working properly. If you begin to see visible dust gathering please stop the procedure immediately and inform the competent person on site.
- 3) Required Engineering Controls Hammer Drilling Tile:
 - a. Follow table 1 instructions which include
 - b. Use drill equipped with commercially available shroud or cowling with dust collection system
 - c. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions
 - d. Dust collector must provide the air flow recommended by the tool manufacturer or greater and have a filter with 99% or greater efficiency and filter-cleaning mechanism
 - e. Use a HEPA-filtered vacuum when cleaning holes
 - f. Silica can only be detected by air sampling measures. The engineering controls mentioned above are our effort to control the release of silica. The presence of visible dust is a sign that the engineering control needs to be re-evaluated or is not working properly. If you begin to see visible dust gathering please stop the procedure immediately and inform the competent person on site.
- 4) Housekeeping Measures:
 - a. No dry sweeping, dry brushing or compressed air is allowed for housekeeping purposes. Only wet sweeping or the use of a HEPA-filtered vacuum is allowed for housekeeping

- 5) When necessary to eliminate exposure to others the use of a cutting room can be implemented. The room would need to be marked as restricted access and closed off to the general public and all other trades on the site. Anyone entering the room would be required to wear the proper PPE.
- 6) Hazardous information concerning the tile and all items containing hazardous materials is contained the SDS. SDS information on the tile is attached to this document. All wishing detailed information concerning the product itself should reference this document
- 7) On-site competent person is Rob DeVaul 816-679-4802

As mentioned above the safety and well-being of our Associates is our number one priority on construction sites. Should you have any concerns, questions, etc. please stop work immediately and discuss these with the competent person. Listed below are other resources inside the company should you feel that additional personnel are required. Stay safe!

Director of Human Resources Mary Baragary 913-529-6282 mbaragary@c-cgroup.com

Chief Information Officer Chad Cillessen 913-529-6240 ccillessen@c-cgroup.com

APPENDIX T

Stop Work Authority				
ATTACHMENT A				
SECTION 1: STOP WORK				
DATE:			TIME:	
LOCATION:				
NAME:			DEPARTMENT:	
ENVIRONMENTAL IMPACT	YES	NO		
DETAILED DESCRIPTION OF WORK BEING PERFORMED:				
DETAILED DESCRIPTION OF STOP WORK ISSUE(S):				
SECTION 2: STOP WORK ISSUE RESOLUTION				
IMMEDIATE CORRECTIVE ACTION(S):				

SECTION 3: LONG TERM CORRECTIVE ACTIONS

Please click below to submit your signature that you have read and agree to the terms of C&C Group safety manual.