

# Regional Conveyor Services, Inc.

## Safety Manual

Revised: August 11, 2015





**SAFETY MANUAL**  
*Regional Conveyor Services, Inc.*  
*215 Maple Street*  
*Salem, VA 24153*

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- b. Employees will:
  - (1) Follow all company rules, regulations and policies.
  - (2) Report all recognized unsafe and unhealthful conditions.
  - (3) Report all job related injuries, illnesses, suspected injuries and near misses.

3. **COMPLIANCE:**

- a. Failure by employees to comply with company safety policies will result in the following steps being taken:
  - (1) An employee observed violating safety policies will be contacted by his/her supervisor and given, as a minimum, a verbal contact. This contact will consist of a discussion of the incident, its significance, actions to prevent recurrence and a statement by the supervisor that compliance with the safety and health program is a condition of employment. This first step documented consulting corrective action notice will be written and placed in the employee's file, showing that he/she has been made aware of the problem.
  - (2) If the documented counseling fails to correct the problem, or if there is a problem in another area, the supervisor will discuss with the employee what corrective measures are needed. A second step verbal warning will be given to the employee by the supervisor and the action recorded in the employee's file.
  - (3) If the verbal warning proves insufficient and if the problem(s) continues, the employee will be given a written letter or reprimand by the immediate supervisor indicating the nature of the problem and the corrective measures necessary to be taken by the employee. The supervisor will discuss the matter with his/her supervisor. The written letter of reprimand will be placed in the employee's file.
  - (4) If the employee fails to take immediate corrective measures after receiving the letter of reprimand, he/she may be given a disciplinary suspension or second letter of reprimand in lieu of suspension. A suspension or second letter places the employee's job in jeopardy. The employee must immediately correct the deficiency, and continue to maintain an acceptable level of performance in order to continue his/her employment. The supervisor must have company approval prior to terminating any employee.

- (5) In the event of a serious incident, the supervisor may temporarily suspend the employee until he/she has sufficient time to investigate the details. Major safety violations may result in the issuance of multiple corrective action steps.
- b. In each of the first steps above, the supervisor will solicit comments from the employee as to what he/she thinks can be done to prevent violations.
- c. Supervisors must exercise the corrective action procedure to improve employee performance and separation should be a last resort.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator

## *Regional Conveyor Services, Inc.*

Number: 10-1

DATE: April 29, 2002

### EMPLOYEE SAFETY

#### 1. GENERAL:

- a. Regional Conveyor Services, Inc. will comply with all applicable federal, state and local health and safety regulations and provide a work environment as free as feasible from recognized hazards.
- b. Employees are expected to comply with all safety and health requirements, including government regulations and company rules.

#### 2. RESPONSIBILITIES:

- a. Management will:
  - (1) Monitor compliance with company safety policies and applicable safety and health standards established as a result of the Occupational Safety and Health Act of 1970 (OSHA) and any other applicable federal, state and local employee safety and health laws and regulations.
  - (2) Investigate, correct, and eliminate recognized unsafe and unhealthy working conditions.
  - (3) Conduct periodic safety and health inspections of all work areas, machinery, equipment, warehouses, grounds, job sites and other company facilities.
  - (4) Represent the company during investigations conducted by the Occupational Safety and Health Administration (OSHA) or any other federal, state or local safety and health or insurance carrier personnel.
  - (5) Organize and conduct training and retraining as required.
  - (6) Ensure proper record keeping and posting of notices as required.

## ***Regional Conveyor Services, Inc.***

**Number:** 10-2

**DATE:** April 29, 2002

### **NEW EMPLOYEE SAFETY ORIENTATION**

#### **1. GENERAL:**

- a. All new employees must be given a safety orientation prior to being placed on the job. The new employee safety orientation is only the beginning of the employee safety training. Supervisors are responsible to continue to provide specific job and equipment safety training. Safety training will be documented.

#### **2. PROCEDURES:**

- a. The following procedures will be reviewed by new employees prior to being placed on any job assignment:
  - (1) Safety and health philosophy.
  - (2) General safety rules.
  - (3) Emergency Action Plan.
  - (4) Reporting and handling job incurred injuries (including bloodborne pathogens).
  - (5) Hazard Communication Programs.
  - (6) Housekeeping standards.
  - (7) Drug Policy.
  - (8) Panel of physicians.

- b. The following procedures must be covered with all new employees but may be done after the employee is assigned to a specific assignment. However, all procedures must be covered and documented before the new employee is exposed to a job when the below listed rules are applicable:
- (1) Hand tool safety.
  - (2) Ladder safety.
  - (3) Reporting unsafe conditions.
  - (4) Forklift operations.
  - (5) Respirator program and fit test.
  - (6) Confined space training program.
  - (7) Hearing conservation program.
  - (8) Lockout/Tagout program.
  - (9) Personal protective equipment requirements.
  - (10) Materials handling.
  - (11) Danger and caution signs.
  - (12) Fire protection.
  - (13) Other areas as deemed necessary.
- c. New employees may be required to receive additional safety orientation upon the discretion of the supervisor.

APPROVED: \_\_\_\_\_

*Kevin Cadd*

Kevin Cadd  
Safety Coordinator

## *Regional Conveyor Services, Inc.*

Number: 10-3

DATE: April 29, 2002

### MAINTENANCE OF WORK AREAS

1. GENERAL:

- a. It is the policy of the company that work areas are to be kept clean and orderly at all times.

2. RESPONSIBILITIES:

a. Employees:

- (1) All employees are responsible for maintaining their work areas in a clean and orderly condition at all times. To fulfill this responsibility, each employee should, at a minimum do the following:
- (a) Prior to the end of the workday, clean and store all tools and equipment and properly secure any items, papers, or information of value.

b. Supervisors:

- (1) Supervisors are responsible for making sure that employees maintain their work areas in accordance with the requirements of this policy and provide corrective action where appropriate. Each supervisor will:
- (a) Make sure that aisles, floors, and walls are free of debris and other unnecessary items and that all end of the shift tasks have been performed.
- (b) Monitor the facilities and equipment and issue maintenance requests where appropriate.
- (c) Arrange for removal of any items from the workplace that are not needed for the flow of business.
- (d) Report the existing or potential workplace hazards to the appropriate supervisor.

- (e) Ensure that all trash, waste, and scrap are properly disposed of.

3. **INSPECTIONS:**

- a. Periodic inspections will be made of work sites. Each site superintendent is responsible for his/her own site. Good housekeeping not only promotes a better working environment but also a safer one.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator



## *Regional Conveyor Services, Inc.*

Number: 10-4

DATE: April 29, 2002

### REPORTING AND HANDLING OF JOB-INCURRED INJURIES

1. GENERAL:

- a. Proper reporting and handling of injuries are an important part of interacting with appropriate personnel and providing necessary care.

2. INJURIES:

- a. When an employee receives any on-the-job injury, no matter how slight, he/she must report it promptly to his/her supervisor.
- b. In the event a physician's services are required, the appropriate supervisor must authorize and make the necessary arrangement. In certain emergency situations, the supervisor may authorize medical care; otherwise, all doctor's appointments for the on-the-job injuries must be arranged through the administrative staff. All medical care for on-the-job injuries requiring a doctor's treatment will be done by physicians listed by the insurance company. A list of pertinent physicians will be posted.
- c. In the event someone is severely injured on the job, the most important thing is to get the injured person medical treatment as quickly as possible. In cases where the employee should not be moved (loss of consciousness, suspected head, back or neck injury, suspected fractures, etc.) the Rescue Squad (First Aid Crew) should be summoned to the scene of the accident. The phone number to call normally is 911. The emergency number should be verified prior to starting work.
- d. First aid treatment (band aid, eye wash, etc.) administered at the job site is to be recorded by attending first aid person at the site.
- e. In the event of a serious injury requiring hospitalization, the Safety Manager should be notified as soon as possible.

APPROVED:

Kevin Cadd

Kevin Cadd  
Safety Coordinator

## *Regional Conveyor Services, Inc.*

Number: 10-5

DATE: April 29, 2002

### GENERAL SAFETY & CONDUCT RULES

#### 1. GENERAL:

- a. In order to ensure a safe and healthy working environment, safety & conduct rules have been established and will be enforced with progressive discipline as needed.
- b. The following safety & conduct rules will be followed by all employees:
  - (1) In case of injury or illness, no matter how slight, the supervisor should be notified immediately.
  - (2) Equipment will not be operated without all the guards in place.
  - (3) Running and horseplay are not permitted on company and customer's property.
  - (4) Equipment will not be operated unless employees are authorized and trained.
  - (5) Hard hats and safety shoes will be worn at all times at each job site.
  - (6) Tools, ladders, powered vehicles, protective equipment or any other device are not permitted to be used if they are not in a safe operating condition.
  - (7) Emergency equipment, exits, stairs, power panels, and aisles will be kept clear at all times.
  - (8) Work areas will be kept free of trash, excess material, liquids on the floor, and anything that would be a tripping hazard.
  - (9) Employees will be trained on when and how to use fire extinguishers as well as their locations.
  - (10) Proper lifting techniques will be used and if the load is considered to be too heavy for one person, additional help will be requested.

- (11) The Lockout/Tagout Program will be followed when isolation of an energy source is necessary.
- (12) Employees are not allowed to place themselves under a suspended load.
- (13) When doubt arises about proper safety procedures, the supervisor should be contacted prior to performing the task.
- (14) All employees have the responsibility to protect themselves and his/her fellow workers by following all rules and advising others of known potential hazards.
- (15) When working around powered equipment such as lathes, mills, power presses, shears, etc. employees should never place hand and fingers in a position where the rotating parts, shavings, sheared pieces, moving parts, etc. could cause an injury.
- (16) It is a condition of employment that all employees read safety bulletins, obey safety warning signs, attend weekly safety tool box meetings, and follow all safety rules.
- (17) All employees will conduct themselves in a professional and respectful manner. Any discriminatory remarks or sexual harassment will not be tolerated.

2. **CHECKLIST:**

- a. A "Job Safety Checklist" has been devised to ensure safety awareness at each job site. This checklist will be utilized by management as appropriate.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator

1. Attachment
1. Job Safety Checklist

## ***Regional Conveyor Services, Inc.***

Number: 10-7

DATE: April 29, 2002

### **EMPLOYEE DISCIPLINE SCHEDULE**

1. **GENERAL:**

- a. Good discipline and adherence to safety practices are essential in ensuring a safe working environment for all personnel. Therefore, an "***Employee Discipline Schedule***" has been incorporated which applies to all employees who violate good safety practices.

2. **PROCEDURES:**

- a. Employee discipline will be handled as follows:
- (1) The "***first***" violation of a company safety rule will lead to a verbal warning with documentation or a note in the employee's personnel file indicating date, violation and what was addressed with the employee.
  - (2) Upon the "***second***" violation of a company safety rule, a written warning will be given to the employee. Both the employee and his/her supervisor will discuss the issues of the violation, sign and date the form. The written warning will be placed in the employee's personnel file. A written warning will be given to anyone who has repeatedly been given verbal warnings or notice of disobeying company safety rules.
  - (3) The "***third***" and final form of discipline will be given after an employee has been warned verbally of violating company safety rules and has also been issued a written warning of violating the rules repeatedly. Upon the third violation, the employee will be excused from work (**WITHOUT PAY**) for one to five days depending on the seriousness of the violation. Documentation of the third violation will be inserted in the employee's personnel file.
  - (4) If the situation warrants, an employee may be "***terminated***" or "***suspended***" for a longer period of time. Termination will only take place after a complete managerial review of all the circumstances.

3. **RESPONSIBILITIES:**

- a. It is the responsibility of each supervisor to enforce good safety discipline and it is the responsibility of each employee to obey all safety rules.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator

1. Attachment
1. Employee Written Notice

## REGIONAL CONVEYOR SERVICES, INC.

### DRUG AND ALCOHOL ABUSE POLICY AND TESTING PROCEDURES

NUMBER: 14-4

APRIL 29, 2012

#### I. BACKGROUND:

- A. Regional Conveyor Services, Inc. has long been committed to safe and healthful work environments for its employees. Additionally, we have an obligation to our customers and the general public to conduct our operations safely and efficiently. With this commitment and obligation in mind, the Company is reaffirming its position on alcohol and drugs.
- B. Alcohol and drug abuse are major health problems in this country. Such abuse can adversely affect an employee's job performance, and it can endanger other employees, members of the public and Company or private property, both immediately and long range. The Company's goal is to help ensure a safe, healthy and productive work environment. The Company is all reaffirming its willingness to assist employees with alcohol or drug-related problems to find the appropriate treatment for rehabilitation and recovery. Employees with need are encouraged to request such assistance through the Company's Employee Assistance Program or through community agencies.

#### II. DEFINITION OF TERMS:

- A. For purposes of this policy, the below-listed terms are defined as follows:
  - 1. "Alcohol" and "drug(s)" include any substance with the potential to produce the effects of intoxication and/or behavioral change, which may adversely affect a person's ability to safely and efficiently perform his/her job.
  - 2. "Abuse" includes the use of any substance that deviates from the intent of this policy or from specified medical direction.
  - 3. "Company premises" is used in its broadest sense, and includes all land (including leaseholds, easements and other job sites), property, buildings, and other structures, vehicles and equipment owned by or leased to the Company, and personal vehicles while used on Company business.
  - 4. The term "on the job" includes paid and unpaid meal periods during the business day, including any overtime, in addition to all other working time or time for which the employee is compensated by the Company.

### III. POLICY:

#### A. Alcohol:

1. The use, possession or having a detectable presence of alcohol in one's system (except where specifically authorized), being under the influence, or the manufacture, distribution or sale of alcohol on Company premises or on the job, is prohibited.
2. Off-the-job abuse of alcohol which adversely affects an employee's job performance, or adversely affects or threatens to adversely affect other interests of the Company, is prohibited.

#### B. Drugs:

1. The use, possession or having a detectable presence of drugs in one's system (except where specifically authorized), being under the influence, or the manufacture, distribution or sale of drugs on the job or on Company premises, is prohibited.
2. Illegal drugs will be confiscated if found and may be turned over to the appropriate law enforcement agency, which may also result in criminal prosecution.
3. The off-the-job abuse or illegal possession, manufacture, or sales of drugs which adversely affects an employee's job performance, or adversely affects or threatens to affect other interests of the Company, is prohibited.

#### C. Prescriptions and Over-the-Counter Drugs:

1. Employees taking prescription drugs issued by a licensed physician or over-the-counter drugs are responsible for being aware of any effects such drugs may have on the performance of their duties, reporting the use of such substances to their supervisor prior to reporting for work and obtaining Company authorization to possess or use such drugs while working or on Company premises. An employee may continue to work, even though taking a legal drug, if management has determined, after consulting with medical personnel and Human Resources, that the employee does not pose a threat to his or her own safety or the safety of co-workers and that the employee's job performance is not significantly affected by the legal drug. Otherwise, the employee may be required to take a leave of absence or comply with the appropriate action determined by management.

2. Where an employee does not comply with these requirements, a physician's prescription will not be an acceptable excuse for violation of the above policy, and the employee may be subject to disciplinary action.
3. Medications prescribed for another individual or relative of the employee shall be considered to be improperly used and shall subject the employee to discipline for violation of the above policy.

D. Independent Contractors and Temporary Agency Employees:

Employees of independent contractors and temporary agency employees who violate this policy will not be allowed on Company premises or otherwise to perform services in behalf of the Company.

IV. ELEMENTS OF THE EMPLOYEE ASSISTANCE PLAN ("EAP"):

A. Eligibility:

Employees with alcohol or drug related problems who voluntarily request assistance ("come forward") are eligible to participate in the Regional Conveyor Services, Inc. Employee Assistance Program ("EAP"). The Company will take no disciplinary action against an employee who voluntarily comes forward. However, participation in the EAP does not relieve any employee from overall compliance with the Company's drug and alcohol abuse policy or attendance, performance and other work rules and standards generally applicable to employees. In the interest of providing an employee the greatest incentive to recover, the Company will generally permit an employee to participate in a drug or alcohol rehabilitation program only once.

- B. Employees who are subject to discipline for violation of this policy may be offered participation in the Company's EAP program as an alternative to discharge. Such employees will not be permitted to participate in the EAP more than once in order to preserve employment.

C. Rehabilitation Procedures and Standards:

The EAP program experts will determine actual program procedures and standards. Program assistance will be outsourced to establish institutions and/or organizations chosen by the company. Such institutions and/or organizations authorized to administer the Company's EAP shall recommend a course of in-patient treatment and/or outpatient counseling after evaluating each individual employee's case. Eligible employees must agree to participate in and successfully complete any recommended in-patient treatment and/or outpatient counseling at their expense as a condition of continued employment with the Company.



D. Continued Employment While in EAP:

Eligible employees participating in any recommended out-patient counseling program pursuant to the Company's EAP are eligible to return to work in their regular job (at conclusion of any disciplinary suspension) as soon as appropriate EAP counselors recommend that the employee can safely return to duty, and the employee signs a statement agreeing to satisfactorily complete recommended out-patient counseling and to post-rehabilitation and alcohol testing as hereinafter outlined. Such employees admitted to in-patient treatment pursuant to the Company's EAP are eligible to return to their regular jobs after they have satisfactorily completed their in-patient course of treatment and have signed a statement agreeing to continue any recommended aftercare program and to participate in post-rehabilitation drug and alcohol testing as hereinafter outlined.

E. Back-pay and Benefits:

There will be no entitlement to back-pay for any EAP program participants. Such participants will be entitled to use vacation and sick leave (at conclusion of any disciplinary suspension) and leave of absence without pay for periods of EAP participation during which they are off work. They will also be entitled to continue participation in the Company's benefit programs and to accrue the same benefits as any other employee on sick leave or leave without pay as provided in applicable Company policies.

V. POLICY VIOLATIONS:

- A. Distribution, sale, use, manufacture, or possession of any illegal drug or alcohol on the job or on Company premises will result in immediate discharge.
- B. Depending on the circumstances surrounding other violations of this policy, an employee may be referred to an appropriate treatment source for assessment and possible treatment. However, the company reserves the right to take corrective discipline, which may include termination of employment, even for a first offense.

VI. ALCOHOL AND DRUG TESTING:

Regional Conveyor Services, Inc. asserts its legal right to test any employee for substance abuse. Employees may be asked to submit to a medical examination and/or to submit urine, blood, saliva, breath, and/or hair testing for drugs or alcohol. Employee acceptance of medical examinations and testing is a mandatory condition of employment. Refusal to

submit to such examinations or tests will be considered a violation of Company policy and will be grounds for adverse employment action up to and including discharge. Furthermore, adulterating testing specimens or otherwise engaging in conduct that interferes with the collection and analysis procedures herein shall constitute a refusal to submit to testing.

Testing of Employees:

1. An Employee may be required to submit urine, blood, saliva, breath, and/or hair specimens for alcohol and drug testing under justifiable circumstances, including but not limited to the following:
  - a. Where state or federal regulations require such testing.
  - b. Where management has reasonable cause to believe that an employee is using alcohol or performance-altering drugs on the job or on Company premises.
  - c. Where management has reasonable cause to believe that the abuse of alcohol or drugs is adversely affecting an employee's job performance.
  - d. When an employee is injured or may have caused a significant work related accident resulting in appreciable damage to property or equipment or injury requiring a doctor's treatment.
  - e. Where an employee has been referred to treatment for alcohol and/or drug abuse, the employee shall be subject to post-rehabilitation testing, at his own expense, for two years after the employee returns to work. The employee will also be required to furnish the Company with a copy of the treatment facility's prescribed aftercare program and proper verification of the employee's compliance with the aftercare program or revisions thereto.
  
2. The Company designates Kevin Cadd as the Designated Management Official (DMO) who will be responsible for determining whether an employee shall be subject to drug and/or alcohol testing. Supervisors that have reason to believe that a particular employee should be tested should contact the DMO who will make a final determination in the matter.

3. Testing Agreements:

- a. An employee required to submit to alcohol and/or drug testing will be requested to sign a testing agreement.
- b. An employee who refuses to sign the requested testing agreement, or who refused to submit to testing after signing the agreement, shall be deemed to be in violation of this policy and will be accordingly be terminated.

4. Laboratory Testing:

The Company shall select a qualified laboratory.

5. Chain of Custody Procedures:

Persons obtaining samples from employees for laboratory testing will follow the normal chain of custody procedures established by the laboratory.

6. Testing Methodology and Confirming Testing:

Alcohol and drug testing will be conducted through methods with proven reliability and in strict compliance with appropriate methodology. If an employee fails to pass the initial drug screening test, the original test sample will be further analyzed using gas chromatography/mass spectrometry before any action is taken.

7. Stipulated Minimum Levels for Positive Results:

a. Urine Specimen

Drug	Presumptive Screen	GC/MS
Amphetamines	1,000 ng/ml	500 ng/ml
Barbiturates	200 ng/ml	200 ng/ml
Benzodiazepines	300 ng/ml	300 ng/ml
Cannabinoids	100 ng/ml	15 ng/ml
Cocaine	300 ng/ml	150 ng/ml

Methaqualone	750 ng/ml	200 ng/ml
Opiates	300 ng/ml	300 ng/ml
Phencylidine	25 ng/ml	25 ng/ml

c. Alcohol Testing:

An employee who is tested for alcohol and has an alcohol concentration greater than 0.02 shall not be permitted to continue to work for the remainder of the shift. If an employee tests greater than 0.02, the Company reserves the right to take whatever adverse disciplinary action it deems appropriate up to and including discharge.

d. Other Testing:

In the event the Company tests for other drugs or alcohol or conducts other testing, the Company, with the advice of its testing laboratory, shall determine minimum levels for positive results.

8. Test Results:

- a. Positive test results shall be reported to a Medical Review Officer (MRO) who shall confer with the subject employee to determine if there is any authorized reason for the positive test result. The MRO will then consult with the DMO regarding the positive test result.
- b. Any employee who, as a result of testing, is found to have unauthorized alcohol or drugs in his or her system in excess of established standards, regardless of when or where the substance entered the employee's system, will be considered in violation of this policy. However, testing is not a prerequisite for a management finding that an employee has used alcohol or drugs in violation of this policy.

9. Specimen Retention:

- a. All specimens deemed "positive" by the laboratory, according to prescribed testing procedures, must be retained, for identification and reconfirmation purposes, at the laboratory for a period of at least one year.

- b. If the results of an employee's drug test are positive, the employee may request that the Company's testing laboratory transfer a portion of the original specimen(s) to another lab. Any costs related to the transporting or testing of such specimen(s) will be the sole responsibility of the employee.

10. Confidentiality

All records and information obtained by the Company regarding alcohol and drug testing, the test results and treatment of employees for chemical dependency will be confidentially maintained by restricting access on a need to know basis to those designated by management.

**VII. COMPANY INSPECTIONS**

The Company reserves the right to carry out reasonable inspections of Company premises (including offices and lockers) and individuals, their personal affects, and vehicles when entering Company premises, while on Company premises and when leaving Company premises. The objective of these inspections is to deter the use, possession, distribution, sale or transportation of illegal drugs and alcohol in order to provide a safe work environment. Such inspections may be initiated by the Company without prior announcement and will be conducted at such times and locations as deemed appropriate.

Approved: Kevin Cadd  
Kevin Cadd  
Safety Coordinator

1 Attachment:  
1) Test Notification



## Non-DOT Drug and Alcohol Policy

## Regional Conveyor Services, Inc.

## SECTION I. INTRODUCTION AND GENERAL INFORMATION

A. Drug and Alcohol Prohibition Policy

1. Policy. RC S, Inc. has a long-standing commitment to maintain the highest standards possible for the health and safety of its employees, customers, clients, and the public at large. The use of or impairment by drugs and/or alcohol during work time is contrary to these high standards and will not be tolerated.
2. Purpose. The purpose of this Drug and Alcohol Policy ("Policy") is to maintain the highest safety, health, and work performance standards possible, and to reduce work-related accidents, injuries, and damage which may be caused by drug or alcohol use or impairment. This policy is also intended to ensure the maintenance of productivity, the quality of products and services, and the security of property.
3. Prohibited Conduct. The following conduct is prohibited, and may result in discipline, up to and including dismissal:
  - a. The unauthorized use, possession, manufacture, distribution or sale of an illegal drug, controlled substance or drug paraphernalia on or in Company-owned property (including Company-supplied vehicles) or while on Company business, or during working hours.
  - b. Storing any illegal drug, drug paraphernalia, or any controlled substance whose use is unauthorized, in or on Company-owned or supplied property (including vehicles).
  - c. Reporting to work, working, or acting or appearing on behalf of the Company while under the influence of illegal drugs or a controlled substance whose use is unauthorized.
  - d. Failing to notify the employee's supervisor before beginning work that the employee is taking medications or drugs which may interfere with the safe and effective performance of duties. Refusing to immediately submit to a drug or alcohol test when requested by the Company, in accordance with this policy.
  - e. Failing to adhere to the requirements of any drug or alcohol treatment or rehabilitation program in which the employee is participating, either: (1) as a condition of continued employment, or (2) pursuant to a written agreement between the Company and employee.

- g. Violating any criminal drug or alcohol law or statute while working.
  - h. Failing to notify the Company of any arrest or conviction under any criminal drug or alcohol law or statute by the next work day following the arrest or conviction.
  - i. Testing positive for drugs or alcohol in violation of this policy.
  - j. Tampering with, adulterating, altering, substituting or otherwise obstructing any drug or alcohol testing process required under this policy.
  - k. Reporting to work or remaining on duty requiring the performance of a safety sensitive function while having an alcohol concentration of [.02 or .04] Note see section II B. 6) or greater, or if the employee is otherwise impaired by or under the influence of alcohol.
  - l. Consuming or using alcohol while on duty, or while performing a safety sensitive function.
  - m. Performing a safety sensitive function within eight hours of consuming or using alcohol. An on-call employee who consumes alcohol within four hours of being called in to perform a safety sensitive function must acknowledge the use of alcohol and may not report for duty.
4. This policy does not include consuming alcohol at social or business functions that we sponsor where alcohol is served. Even at these functions, however, employees may not consume alcohol to the point of intoxication or to the point where they endanger their own safety or the safety of others. In addition, employees involved in security and employees who work with heavy or dangerous machinery or materials may not consume any alcohol at these functions if they will be returning to work that same day. This policy does not prohibit employees from consuming alcohol while entertaining clients or prospective clients. However, employees may not consume alcohol to the point of intoxication, nor may they consume alcohol if they are going to drive. In addition, employees must always conduct themselves professionally and appropriately while on Company business.

**B. Effective Date of Policy.**

- 1. This policy will become effective on January 1, 2010.
- 2. Each manager shall post the Policy in a prominent location readily accessible to all covered employees.
- 3. A copy of this Policy will be distributed to each employee, who will be required to sign a statement acknowledging receipt of said Policy and his/her agreement to comply with same.

**C. Applicability**

- 1. Individuals Subject to Drug and Alcohol Policy: Any prospective employee or employee of Colville
- 2. RCS reserves the right, within the limits of federal and state laws, to examine and test for the presence of drugs. Under the conditions of this Policy, at the sole discretion of your company, applicants or employees may be required to take a medical examination and/or take a urine, blood, oral fluids, or hair test. Testing will be conducted with industry standard processes and procedures ... including the use of QuickInstant tests. Hair or



Saliva testing will be administered when required by contract, or for any other reason the company may deem necessary. Federal Drug Testing procedures will be utilized to the extent as reasonably possible.

3. Substances Tested For and Positive Results. The Company shall test for alcohol and the following drugs based on the following criteria:

**Urine Testing Screening and Confirmation Levels**

Initial Test Analyte	Initial Test Cutoff Concentration	Confirmatory Test Analyte	Confirmatory Test Cutoff Concentration
Marijuana metabolites	50 ng/mL	THCA1	15 ng/mL
Cocaine metabolites	150 ng/mL	Benzoylcegonine	100 ng/mL
Opiate metabolites Codeine/Morphine2	2000 ng/mL	Codeine Morphine	2000 ng/mL 2000 ng/mL
6-Acetylmorphine	10 ng/mL	6-Acetylmorphine	10 ng/mL
Phencyclidine.	25 ng/mL	Phencyclidine	25 ng/mL
Amphetamines3 AMP/MAMP4	500 ng/mL	Amphetamine Methamphetamine5	250 ng/mL 250 ng/mL
MDMA6	500 ng/mL	MDMA MDA7 MDEA8	250 ng/mL 250 ng/mL 250 ng/mL

1 Delta-9-tetrahydrocannabinol-9-carboxylic acid (THCA).

2 Morphine is the target analyte for codeine/morphine testing.

3 Either a single initial test kit or multiple initial test kits may be used provided the single test kit detects each target analyte independently at the specified cutoff.

4 Methamphetamine is the target analyte for amphetamine/methamphetamine testing.

5 To be reported positive for methamphetamine, a specimen must also contain amphetamine at a concentration equal to or greater than 100 ng/mL.

6 Methylendioxyamphetamine (MDMA).

7 Methylendioxyamphetamine (MDA).

8 Methylendioxyethylamphetamine (MDEA).

**Alcohol Testing by Evidential Breath Testing Device**

Alcohol Screening - .02-.039 (out of service)

Alcohol Confirmation - .04 or greater (positive)

\* SAMHSA specified threshold

Test results at or above the confirmation level will be considered a positive test.

**Hair Screening and Confirmation Levels:**

Hair 5-Panel (Standard)	Screening Cutoff	Confirmation Cutoff
Amphetamines Amphetamine, Methamphetamine & Ecstasy	500pg/mg hair	500pg/mg hair
Cocaine Cocaine & benzoylecgonine	500pg/mg hair	500pg/mg hair
Opiates Codeine, Morphine & 6-MAM (Heroin metabolite)	500pg/mg hair	500pg/mg hair
Phencyclidine PCP	300pg/mg hair	300pg/mg hair
Marijuana Carboxy- THC	1pg/mg hair	0.3pg/mg hair

D. Circumstances Under Which Testing May be Conducted.

The Company will test employees for drugs and/or alcohol under the following conditions:

1. Pre-Employment Testing (Drugs Only).

A pre-employment drug test of all prospective employees will be conducted. A positive test result is grounds for denying employment and a negative result is required prior to reporting for work.

Pre-employment urinalysis, blood, saliva or hair tests are valid for 30 days and must be re-taken if the individual is not hired within this timeframe. For positions that require hair testing as a condition of employment, the inability to provide a hair test specimen because of insufficient volume will result in the individual not being hired, and the employment offer will be rescinded.

2. Post-Accident Testing

a. Persons Subject to Post-Accident Testing.

Employees whom the Company reasonably believes may have contributed to an accident in the workplace or during work time may be required to undergo drug and/or alcohol impairment testing. Such a test will be conducted as soon as practicable after the accident, but not later than 32 hours after the accident for drugs and not later than 8 hours for alcohol. Colville will make reasonable attempts to obtain a sample from an employee after an accident, as defined below, but any injury should be treated first.

An accident may involve any of the following:

- Loss of human life,

\* Issuance of a moving traffic citation under state or local law.

- \* Medical treatment other than first aid administered away from the scene, or
- \* Significant property damage

b. Obligations of Employee Subject to Post-Accident Testing

1. An employee who is subject to post-accident testing shall not consume alcohol for 8 hours after the accident, or until s/he has taken an alcohol test, whichever occurs first.
2. An employee who is subject to post-accident testing must remain readily available for such testing and may not take any action to interfere with the testing or the results of testing.
3. Employees who do not comply with the post-accident testing requirements, or who fail or refuse to provide a sample for testing, will be considered to have refused to submit to testing and will be subject to appropriate disciplinary action, including termination.

3. Random Testing

All employees shall be subject to drug and alcohol testing on an unannounced and random basis. The primary purposes of unannounced random testing are to deter illegal drug and alcohol use which may affect work performance or safety, and to ensure a drug free workforce.

Fifty percent of the testing pool will be randomly selected for drug testing each year and 25 percent will be selected for alcohol testing. The selections will be spread reasonably over a 12-month period.

In addition:

- (1) Random tests will only be administered just before, during, or shortly after an employee's work time.
- (2) Employees must remain in the random selection pool at all times, regardless of whether or not they have been previously selected for testing.
- (3) Employees shall be selected for testing by using a computer-based random number generator.
- (4) No advance warning will be given to employees regarding the dates and times of random testing.

4. Reasonable Suspicion Testing

Any employee whom the Company reasonably suspects may be affected by the use of drugs or alcohol which may adversely affect job performance, safety or the work environment may

be required to submit to a drug and/or alcohol test. Reasonable suspicion testing is done to identify drug and alcohol affected employees who may pose a danger to themselves or others in their job performance.

Trained supervisors will make the decision whether there is reasonable suspicion to believe an employee is impaired by or under the influence of a drug or alcohol while on duty in violation of this policy.

a. When Reasonable Suspicion Exists

The decision to test must be based on a reasonable and articulable suspicion or belief that the employee is under the influence of an unauthorized drug or alcohol. Reasonable suspicion is a belief based on contemporaneous articulable observations concerning the employee's appearance, behavior, speech or body odors, or other reliable evidence or information that the employee is under the influence of or impaired by drugs or alcohol. For example, any of the following, either alone or in combination, may constitute reasonable suspicion:

1. Slurred speech;
2. Irregular or unusual speech patterns;
3. Impaired judgment;
4. Alcohol odor on breath;
5. Uncoordinated walking or movement;
6. Unusual or irregular behavior such as inattentiveness, listlessness, hyperactivity, hostility or aggressiveness;
7. Possession of drugs or alcohol;
8. Observation of drug or alcohol use prior to reporting to work or during working hours.

Reasonable suspicion determinations will be made by supervisory personnel who have received training concerning the signs and symptoms of drug and alcohol use.

The observing supervisor shall document the events and record the behavioral signs and symptoms that support the reasonable suspicion. If possible, a second supervisor should also observe the employee to verify that there is a reasonable basis to believe that a drug or alcohol violation has occurred.

b. Events After Determination Is Made

When a determination is made that reasonable suspicion exists that an employee is under the influence of drugs or alcohol in violation of this policy, the employee shall be immediately relieved of his/her duties, pending further action.

The observing supervisor shall immediately notify the department head or other appropriate supervisor if reasonable suspicion is found to exist. Upon review, the department head or other appropriate supervisor may direct or authorize that the employee in question immediately submit to a drug and/or alcohol test.

c. Reports of Possible Violation by Supervisory Personnel

If a non-supervisory employee has reason to believe that a supervisor subject to this policy is under the influence of drugs or alcohol at work in violation of this policy, then s/he shall report such potential violation to the Company Drug

Program Manager who will thereafter take appropriate action.

5. Return-to-Duty Testing

An employee who refuses to take or fails a drug test and whose employment is not terminated may not return-to-duty until s/he is evaluated by the Substance Abuse Professional (SAP), passes a drug test, and the Drug Program Manager has determined that the employee may return to work.

An employee who refuses to take or fails an alcohol test and whose employment is not terminated may not return to work until the employee is evaluated by a Substance Abuse Professional and has completed the recommended treatment.

6. Follow-Up Testing

An employee who is referred for assistance related to drug or alcohol misuse may be subject to unannounced follow-up testing for a period not to exceed 60 months, as directed by the SAP. The number and frequency of follow-up testing will be determined by the SAP and the Company, but will not be less than six tests in the first 12 months following the employee's return to duty. Follow-up testing will be conducted immediately prior to, during or immediately preceding work time for that employee.

E. Search of Property.

Because of health and safety concerns, RCS has determined that it is necessary to conduct periodic searches. Please read the following carefully. RCS reserves the right to search an employee's immediate work area including, but not limited to, the employee's locker, footlocker and also bunk house at any time. Searches may be conducted if there is any reason to believe drugs, alcohol, other prohibited substances, or weapons may be found. Searches may also be conducted for no reason other than to perform periodic searches and in order to encourage employees to obey RCS's rules. Lockers and other areas of RCS facilities and property may be opened and/or examined by RCS at any time if there is reason to suspect something harmful, illegal, or dangerous is contained therein. Searches may be conducted for health and safety reasons, to determine if property has been damaged, to locate lost items, or for other permissible purposes. Employees should not bring, keep or store valuables while on RCS premises.

Discretion, good judgment and common sense will be exercised in all cases of search and seizure. The search shall take place in the presence of the employee and a third party if each can be located. The search may be videotaped. Before searching an employee's possessions, RCS will seek, but need not receive, the freely offered consent of the employee. If employee consent is not obtained, RCS may be forced to break locks. Consent need not be sought if the suspected item(s) poses a threat to life or property.

RCS also has the authority to detain and search any employee (or property in the possession of the employee) when he/she is on RCS's premises if there is reason to believe that there is something, harmful, illegal or dangerous in the possession of the employee or concealed in their property.

F. Search of Employee.

Searches of the person of an employee shall, if reasonably possible, be conducted in a private room by a person of the same sex as the employee being searched and witnessed by one other person of the same sex as the employee being searched. Any such search will be conducted with the utmost respect for the employee's privacy and dignity. If, after conducting an initial



search by a "pat down" of the exterior of the employee's clothing, the RCS official conducting the search still has reasonable grounds for suspecting that specific illegal, dangerous, disruptive, stolen or prohibited items are present on the employee, the official may request the employee to remove or adjust clothing to the degree necessary to ascertain whether the employee does in fact possess such items. Depending upon the circumstances, including the cooperativeness of the employee or lack thereof, the official may also suspend the search, refer the matter to a law enforcement officer, and request that the search be conducted by the law enforcement officer.

## SECTION II. CONSEQUENCES OF VIOLATING POLICY

### A. General.

Compliance with this policy is a condition of employment. Refusal to take a required drug or alcohol test, a positive drug or alcohol test, or engaging in an activity or behavior which otherwise violates this Policy shall, at a minimum, result in removal from performing assigned functions. Additional disciplinary action may follow, including termination. Any employee in violation of this policy will not be allowed to work on-site at any customer until successfully completing a company designed program discussed in this policy.

### B. Violations and Discipline.

1. Violations: The Company may take adverse employment action, up to and including dismissal, based on
  - a. a positive drug or alcohol test result;
  - b. a prospective employee or employee's refusal to provide a drug or alcohol testing sample,
  - c. An employee's failure to notify the employee's supervisor, before beginning work, that the employee was taking medications or drugs which might interfere with the safe or effective performance of duties;
  - d. Verification of valid current prescription or legal use of such drug is not provided upon request by the next scheduled work day;
  - e. Misuse of the prescription or recommended drug.
  - f. Otherwise violating the terms and requirements of this policy.
2. Potential adverse employment action may include one or more of the following:
  - a. A requirement that the employee enroll in a Company-provided or approved rehabilitation, treatment or counseling program. This program may include additional drug and alcohol testing. Participation in such a program is a condition of employment. Costs of participating in such a program will be borne by the employee; We believe that employees who have a substance abuse problem can help themselves by enrolling in a rehabilitation program. Not only will overcoming their problem help these employees in their personal lives, it will help them to be more effective and productive workers.
    - b. Although we cannot guarantee that we will grant this leave to all employees who request it, employees who would like to participate in a rehabilitation program may, subject to approval, be able to use leave of absence from work to attend the program.
    - ii. At the General Manager's discretion, the leave of absence may be with pay.
    - iii. Employees will not be entitled to health and other benefits while on unpaid leave.
    - iv. At the end of the rehabilitation leave, we will require proof that the

employee successfully completed the program.

- v. To learn more about this type of leave, including whether you qualify for it, the circumstances under which we will grant it, and the requirements that you must meet, contact your General Manager.
  - vi. We will keep all conversation regarding employee substance abuse problems as confidential as possible.
  - vii. Please note that even as you might be seeking assistance for your substance abuse problem, we still expect you to meet the same standards of performance, productivity, and conduct that we expect of all employees, including our prohibition on alcohol and illegal drug use at work. We reserve the right to discipline you-up to and including termination-for failing to meet those standards.
- b. Suspension, with or without pay;
  - c. Termination of employment;
  - d. In the case of drug testing, refusal to hire the prospective employee; and/or
  - e. Other or additional adverse employment action, at the election and discretion of the Company.

C. Disposal of Items Found in a Search.

Illegal or dangerous items (firearms, drugs, weapons) or other items reasonably determined to be a threat to the safety or security of others may be seized and kept in a secure place by RCS and admitted as evidence in any disciplinary action against the employee. When such items are no longer needed as evidence, they shall be turned over to law enforcement authorities, unless law enforcement authorities require possession of the items at an earlier time.

D. Requirements For Return-To-Duty.

An employee who is not terminated for violating this policy may be given the opportunity to return to work provided s/he first:

1. Receive a recommended return to work evaluation by a SAP and the Medical Review Officer;
2. Passes a Return to Work drug and/or alcohol test;
3. Continues to receive negative drug or alcohol test results in follow-up tests after returning to duty; and
4. Participates in and successfully completes any applicable company approved evaluation/rehabilitation program with proof of successful completion.

**SECTION III. SAMPLE COLLECTION AND SAMHSA TESTING PROCEDURES**

A. Collection of Samples

1. Testing under this policy is a urinalysis (for drugs) and an evidential breath testing device (for alcohol) administered under approved conditions and procedures conducted for the sole purpose of detecting drugs or alcohol. Other on-site methods to detect the presence of alcohol may also be used, including blood/alcohol and saliva tests.

The test will be conducted by a Company-appointed medical laboratory and paid for by the Company. Sample collection and testing will be performed under reasonable and sanitary conditions.

5. The collection site shall have all necessary trained personnel, materials, equipment, facilities, and supervision to provide for the collection, security, temporary storage, and shipping or transportation of specimens to a certified drug-testing laboratory designated by RCS. An independent medical facility may also be utilized as a collection site.
6. All drug test samples will be collected by the split sample collection method. However, if a split sample is not collected, the single sample will be collected and sent to the laboratory for testing.
7. The person collecting the drug sample will document the sample, including labeling the sample to preclude to the extent reasonable the possibility of misidentification of the person tested in relation to the test result provided.
8. Sample collection, storage, and transportation to the testing place shall be performed in a manner reasonably designed to preclude the possibility of sample contamination, adulteration or misidentification.
9. An employee designated for testing must provide reliable individual identification to the person collecting the sample.
10. Drug and alcohol tests will normally be scheduled during, or immediately before or after, the employee's regular work period or work time. Testing under this policy is considered work time and will be compensated at the employee's normal rate of pay.
11. Sample collection will be performed in a manner which ensures the individual employee's privacy to the maximum extent consistent with ensuring that the sample is not contaminated, adulterated, or misidentified.
12. The Company will pay the entire actual costs for drug and alcohol testing required of employees and prospective employees. The Company shall also pay reasonable transportation costs to an employee if the required test is conducted at a location other than the normal work site.

**B. Testing Procedures**

1. Unless testing is conducted on-site, RCS shall use a drug-testing laboratory approved or certified by the Substance Abuse and Mental Health Services Administration (SAMHSA).
2. *If Non-Instrumented Drug tests are used then the Collector must perform the on site tests in the presence of the donor.* In on-site testing, an employer may only use products approved by the Food and Drug Administration for employee testing and shall use the products in accordance with the manufacturer's instructions. *All presumptive positive tests results must be sent to the SAMSHA Laboratory for confirmation testing before any employment action can be taken.*
3. The laboratory shall permit inspections RCS's Drug Program Manager.
4. The Company may at times use a rapid test kit. If the rapid test is positive, the sample will be sent to the designated laboratory for confirmation.



5. Positive drug tests will be confirmed by a gas chromatography mass spectrometry. The Company will not rely on a positive drug test unless the confirming drug test results have been reviewed by a licensed physician or doctor of osteopathy.
6. Alcohol testing will be performed by a breath alcohol technician (BAT). If the result of an alcohol screening test is an alcohol concentration of 0.02 [or .04] or greater, a confirmation test will be performed. The confirmation test will generally be done within 15, but not more than 30, minutes of the screening test. The results of these tests will be reported directly to the Company.

C. Review of Drug Test Results.

1. Medical Review Officer.

RCS shall contract the services of a Medical Review Officer (MRO). The MRO shall be a licensed physician or doctor of osteopathy. The MRO shall review all confirmed positive drug test results and interview individuals tested positive to verify the laboratory report. The MRO in conjunction with the Substance Abuse Professional may also evaluate and recommend to Colville whether and when an employee who either refuses to test or tests positive may return to work.

2. Reporting and Review of Results.

- a. The MRO shall review confirmed positive test results. This review shall be performed by the MRO prior to the transmission of results to the Company's Drug Program Manager.
- b. The MRO shall contact the employee within 48 hours and offer an opportunity to discuss the confirmed test result.
- c. The MRO will inform the employee that s/he has 72 hours to request a re-test of the split or single sample. A re-test is an analysis of the second split sample bottle or an aliquot of the original sample. The re-test can be sent to a laboratory approved or certified by the Substance Abuse and Mental Health Services Administration. The employee will be responsible for the costs of the re-test and will be reimbursed by the Company only if the sample comes back negative.

3. Legal Drug Use.

If the MRO determines there is a legitimate medical explanation for the positive test result, the MRO shall report the test as negative. Test results that have been caused by prescription medication will be reported as negative.

4. Written Test Results.

An employee may obtain a copy of the written test results only upon written request made within six months of the date of the test. The Company will provide the written test results to the employee pursuant to that request within five working days of its receipt.

5. Explanation of Positive Test by Employee.

An employee who would like an opportunity to explain a positive tests result in a confidential setting must make such a request in writing within 10 working days of being notified of the test result. An employee who submits such a timely written request will be

given the opportunity, within 72 hours after its receipt or before taking adverse employment action, to explain the positive test in a confidential setting.

#### SECTION IV. EMPLOYEE ASSISTANCE PROGRAM (EAP)

##### A. Scope of Program

1. Because we care about health and welfare of our employees, your benefits package includes an Employee Assistance Program (EAP) that provides assistance to employees who suffer substance abuse problems, personal problems, or emotional problems.
2. If you would like assistance in dealing with your substance abuse problem, you're your General Manager or their designee, for information about our EAP Program. Your request for assistance will be kept as confidential as possible.
3. Please note that even as you might be seeking assistance for your substance abuse problem, we still expect you to meet the same standards of performance, productivity, and conduct that we expect of all employees, including our prohibition on alcohol and illegal drug use at work. We reserve the right to discipline or terminate you for failing to meet those standards.
4. The Employee Assistance Program will provide education and training on drug and alcohol use to all employees. The education shall include:
  - a. Informational material distributed to employees as well as displayed on bulletin boards, employee break rooms, locker rooms, etc;
  - b. A community service hot line telephone number for employee assistance displayed on bulletin boards and distributed to employees; and,
  - c. Distribution of RCS's policy regarding the use of prohibited drugs and alcohol to all new employees. The policy shall be displayed in prominent places throughout RCS's (i.e., employee bulletin board, break room, locker rooms).

##### B. Supervisor Training

Supervisory personnel will receive training regarding the DRUG AND ALCOHOL POLICY. The training shall include at least 60 minutes of training on the use of controlled substances, and at least 60 minutes of training on alcohol misuse. This training shall be for all supervisors who may determine whether an employee will be drug and alcohol tested for reasonable suspicion.

#### SECTION V. CONFIDENTIALITY OF RESULTS

##### A. General

1. All records relating to drug and alcohol testing will be maintained in a confidential medical file in a secure location with controlled access, separate from personnel files.
2. Any communication received by the Company relevant to drug or alcohol test results and received through the Company's testing program is confidential and privileged, and will not be disclosed by the Company except:
  - a. To the tested employee, prospective employee or another person designated in writing by the employee or prospective employee;
  - b. An individual designated by an employer to receive and evaluate test results or

hear the explanation from the employee or prospective employee;

- c. As ordered by a court or governmental agency; or In any proceeding initiated by or on behalf of the individual and arising from a positive test.

## SECTION VI. DEFINITIONS.

Alcohol means ethanol, isopropanol, or methanol.

Alcohol concentration means the alcohol in a volume of breath expressed in terms of grams of alcohol - per 210 liters of breath-as indicated by an evidential breath test.

Alcohol Use means the consumption of any beverage or mixture, including any medication or mouthwash containing alcohol.

Breath Alcohol Technician (BAT) means an individual who operates an EST and instructs and assists individuals in the alcohol testing process.

Collection Site Person is an individual authorized by RCS to collect samples in accordance with this policy and trained in procedures for such collections. RCS has chosen to follow the highest industry standards for work place collection, testing, and reporting of test results; therefore, Colville procedures will attempt to follow, as a guide only, the federal drug testing procedures.

Drug(s) means a substance considered unlawful under AS 11.71 or under federal law, or the metabolite of the substance.

Drug Testing means testing for evidence of the use of a drug.

Evidential Breath Testing Device (EST) is a device approved by the National Highway Traffic Safety Administration (NHTSA) for the evidential testing of breath, and is placed on NHTSA's "Conforming Products List" (CPL) of evidential breath measurement devices.

Employee Assistance Program (EAP) means a confidential counseling referral service for employees and their dependents. EAP is designed to provide assistance to employees and their families to deal with personal problems which may affect their productivity, health, or continued employment. All counseling, assessment, and referral services will be provided by qualified, experienced clinicians with special training in short-term counseling and in assessing and treating substance abuse problems (See SAP).

Failing A Drug Test shall mean the test results show positive evidence of the presence of a drug or drug metabolite in an employee's system in amounts that exceed cutoff levels established by this policy.

Medical Review Officer (MRO) is the licensed physician or doctor of osteopathy who is responsible for reviewing positive laboratory results generated by the RCS testing program.

Prospective Employee means a person who has made application to an employer, whether oral or written, to become an employee.

Random means a scientifically valid method that ensures that all covered employees have an equal chance of being selected.

Sample means urine or breath from the person being tested.

Screening Test or Initial Test means an analytic procedure to determine whether an employee may have a prohibited concentration of drugs or alcohol in a specimen.

Rapid Test means a test designed to provide an instant screened test result.

Refusal to submit means failure to cooperate and provide a drug or alcohol sample, after receiving notice of the test in accordance with Colville's Drug and Alcohol Policy. A refusal will be treated the same

as a positive test result. A refusal to test for alcohol occurs when a covered employee fails to provide an adequate breath for testing without a valid medical explanation after receiving notice of the requirement to be tested in accordance with the provisions of RCS's alcohol misuse prevention plan or engages in conduct that clearly obstructs the testing process.

**Substance Abuse Professional (\$AP)** means a licensed physician (medical doctor or doctor of osteopathy), or a licensed or certified psychologist, social worker, employee assistance professional, or addiction counselor ("Certified by the National Association of Alcoholism and Drug Abuse Counselors Certification Commission or by the International Certification Reciprocity Consortium/ Alcohol & Other Drug Abuse") with knowledge of and clinical experience in the diagnosis and treatment of alcohol and controlled substance related disorders.

I understand the company's Non-DOT Drug and Alcohol Policy and Procedures Manual and consent to the terms set forth in the policy. I further acknowledge that the policy has been posted in an appropriate place on the company's premises and copies are available for inspection during regular business hours.

I acknowledge that I have read this policy and fully understand that the company can establish other work rules related to possession, use, sale or solicitation of drugs, including policies concerning arrests or convictions for drug or alcohol-related offenses, and can suspend, or terminate, or deny employment for such conduct.

I have carefully read the foregoing and fully understand its contents. I agree that my signing of this Consent, Release and Acknowledgement of Understanding form is voluntary.

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**Printed Name**

---

**Signature**

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**Date**

*Regional Conveyor Services, Inc.*

Number: 20-1

DATE: April 29, 2002

ACCESS TO MEDICAL RECORDS

1. GENERAL:

- a. Certain types of medical or medical monitoring records are kept by the company.

2. RETENTION:

- a. Medical records required by the Occupational Safety and Health Administration (OSHA) are maintained for different periods of time based on the appropriate OSHA standard. As a minimum, records will be maintained for the length of employment plus 30 years.

3. LOCATION:

- a. Medical records are kept at the main office and at the physician's office.

4. ACCESS:

- a. Employees can have access to and make copies of their medical records for personal use. The supervisor should be contacted for access to these records.

APPROVED:



Kevin Cadd  
Safety Coordinator



## INJURY/ILLNESS RECORD KEEPING

**SCOPE** - Federal regulations provide for recording and reporting of certain occupational injuries and illnesses by employer. This record keeping can be used to display the occurrence, extent, and outcome of cases recorded during the year.

**AUTHORITY/REFERENCE** - OSHA 29 CFR 1904

**ACCOUNTABILITY** – Regional Conveyor Services, Inc. (RCS) shall maintain a log, supplementary record, and summary of all recordable cases. Each recordable injury or illness shall be entered within seven (7) calendar days after receiving notification of the occurrence. For this purpose the OSHA 300 log and the 301 forms (or equivalent) shall be used.

**PROGRAM ELEMENTS** – RCS will follow necessary requirements to maintain and retain the occupational injury and illness log and supplementary report as follows:

1. Maintain a copy of the log and report for each place of employment.
2. Update the log within seven days after being informed of the injury or illness.
3. Conduct accident/illness (incident) investigations.
4. Post the annual summary (300 A) from February 1 to April 30 each year.
5. Keep the records for five years plus the current calendar year.
6. Make the log and reports available to every employee.
7. Report any catastrophic incident within 8 hours orally to OSHA.
8. Develop a procedure for employees to report all accidents and illnesses and train them on that procedure.

**TRAINING** – RCS will follow instructions for the completion of the OSHA 300 Log, 300-A Summary, and 301 forms found on OSHA's web page at [www.osha.gov](http://www.osha.gov).

### **DEFINITIONS**

**First Aid** - anyone time treatment, and any follow-up visit for the purpose of observation, of minor scratches, cuts, burns, splinters and so forth, which do not ordinarily require medical care.

**Lost Work Days** - the number of calendar days (consecutive or not) after, but not including, the day of injury or illness that the employee was not able to work.

**Medical Treatment** - the management and care of a patient to combat disease or disorder.



**REGIONAL CONVEYOR SERVICES, INC.  
HAZARD IDENTIFICATION AND RISK ASSESSMENT**

**Purpose**

- To provide guidelines for identifying, assessing and controlling workplace hazards,
- To ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace.
- To identify the jobs/tasks which require risk assessment.

**Key Responsibilities**

As specified within this program:

Regional Conveyor Services, Inc. (RCS) must assess a work site and identify existing or potential hazards before work begins at the work site or prior to the construction of a new work site.

**Hazard and Risk Identification**

The hazard identification process is used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable.

The Safety Manager shall conduct a baseline worksite hazard assessment which is a formal process in place to identify the various tasks that are to be performed and report the identified potential hazards.

The results are included in a report of the results of the hazard assessment and the methods used to control or eliminate the hazards identified. The hazard assessment report must be signed and have the date on it.

Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work;
- Legal and other requirements;  
Previous incidents and non-conformances;  
Sources of energy, contaminants and other environmental conditions that can cause injury;  
Walk through of work environment.

Hazards identifications (as examples) are to include:

- Working Alone
- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Musculoskeletal Disorders
- Bloodborne Pathogens
- Confined Spaces
- Driving
- General Safety Precautions
- And any other established policy or procedure by RCS
- Any other site specific work scope

RCS has a formal process for identifying potential hazards. Processes are in place to identify potential hazards by the use of specific analysis/inspections.

All identified hazards are assessed for risk and risk controls are assigned within the worksite hazard assessment for that specific hazard.

Employees and/or sub-contractors are actively involved in the hazard identification process. The RCS program provides processes to ensure employees and/or sub-contractors are actively involved in the hazard identification process and hazards are reviewed with all employees concerned.

Employees are trained in the hazard identification process. Employees will be trained in the hazard identification process including the use and care of proper PPE.

Unsafe hazards must be reported immediately and addressed by the supervisor. The supervisor discusses the worksite hazard assessment with employees at the respective work location during the employee's documented orientation.

#### Review of Hazard Assessment

Existing worksite hazard identifications are formally reviewed annually or repeated at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions and specifically updated when new tasks are to be performed that have not been risk assessed, when a work process or operation changes, before the construction of a new site or when significant additions or alterations to a job site are made.

The respective supervisor or project manager advises the Safety Manager when additional hazards are introduced into the work place in order to revise planning and assessment needs.

#### Risk Assessment

Hazards are classified and ranked based on severity. The program identifies hazards are classified/prioritized and addressed based on the risk associated with the task. (See the risk analysis matrix outlining severity and probability).

RCS may use a combination of engineering controls, administrative controls, and personal protective equipment if there is a greater level of worker safety because a combination is used.

#### REGIONAL CONVEYOR SERVICES, INC. RISK ASSESSMENT MATRIX

Severity	CONSEQUENCE				PROBABILITY				
	People	Assets	Environment	Reputation	A Not Done	B Rarely	C Once a week	D Several Times in a Week	E Multiple Times in a Day
0	No health effect	No damage	No effect	No impact					
1	Slight health effect	Slight damage	Slight effect	Slight impact					
2	Minor health effect	Minor damage	Minor effect	Limited impact					
3	Major health effect	Localized damage	Localized effect	Considerable impact					
4	Single fatality	Major damage	Major effect	National impact					
5	Multiple fatalities	Extensive damage	Massive effect	Global impact					
<b>Key</b>	Manage for continuous improvement (Low)				Incorporate risk reduction measures (Medium)				Intolerable (High)

#### Risk Controls/Methods to Ensure Identified Hazards Are Addressed and Mitigated

The following describes how identified hazards are addressed and mitigated:

- Risk assessed hazards are complied with and addressed and mitigated through dedicated assignment, appropriate documentation of completion, and implemented controls methods including engineering or administrative controls and PPE required into the worksite hazard assessment of the site specific HSE plan. No work will begin before the worksite assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.
- If an existing or potential hazard to workers is identified during a hazard assessment RCS must take measures to eliminate the hazard, or if elimination is not reasonably practicable, control the hazard. If reasonably practicable, RCS must eliminate or control a hazard through the use of engineering controls. If a hazard cannot be adequately controlled using engineering controls, RCS must use administrative controls that control the hazard to a level as low as reasonably achievable. If the Hazard cannot be adequately controlled using engineering and/or administrative controls, RCS must ensure that the appropriate personal protective equipment (PPE) is used by workers affected by the hazard.

**Emergency Control of Hazards**

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. RCS will make every possible effort to control the hazard while the condition is being corrected or under the supervision of client emergency response personnel in every emergency.

**Certification of Hazard Assessment**

The Safety Manager completes and signs the certification of hazard assessment for the worksite hazard assessment (also see PPE Program) and includes it within the site specific HSE plan. Hazard assessments are reviewed annually and updated when new tasks are to be performed that have not been risk assessed.

**Job Safety Analysis (JSA)**

For those jobs with the highest injury or illness rates, jobs that are new to our operation, jobs that have undergone major changes in processes and procedures or jobs complex enough to require written instructions will have a Job Safety Analysis performed. Completed JSAs are available from the Safety Manager.

**Site Specific HSE Plan (SSSP)**

Each work location has a site specific HSE plan. Each employee reporting to a location shall receive a documented orientation from a RCS supervisor that includes the SSSP for that site. The SSSP contains the RCS Health and Safety Policy, site specific safety requirements as well as a PPE matrix and a signed site specific worksite hazard assessment for that location, which the RCS has a responsibility to provide.

**Review Process**

The hazard assessment program will be reviewed to ensure no new hazards derived from the corrective measures. The review shall include a management of change consideration as well.

The safety committee shall be involved in the review process as well.



## JOB SAFETY ANALYSIS FORM

<b>Location / Dept.</b>	<b>Date:</b>	<b>New?</b>	<b>Revision</b>	<b>JSA NO:</b>
<b>Task</b>		<b>Supervisor:</b>		
<b>Team</b>		<b>Analysis By:</b>		
<b>Members</b>		<b>Reviewed By:</b>		
		<b>Approved By:</b>		
<p>Specific rules and procedures to be followed (Safe Work Practices Number <u>  1  </u>):</p>				
<b>Sequence of Basic Job Steps</b>	<b>Potential Injury or Hazards</b>	<b>Recommendations to Eliminate or Reduce Potential Hazards</b>		

CHECK ITEMS REQUIRED TO DO THIS JOB

Safety Glasses	Leather Gloves	Face Shield	Fire Extinguisher	Atmospheric Testing
Hard Hats	Work Vest	Goggles (type?)	Lockout/Tagout	Traffic Control
Safety Shoes	Fall Harness	Flame Resistant Clothing	Warning signs	Other

## **INSTRUCTIONS FOR COMPLETING THE JOB SAFETY ANALYSIS FORM**

Select an employee to help you with the JSA: someone who is experienced in the job, willing to help and a good communicator. The employees play an important role in helping you identify job steps and hazards. In summary, to complete this form you should consider the purpose of the job, the activities it involves, and the hazards it presents. In addition, observing an employee performing the job, or "walking through" the operation step by step may give additional insight into potential hazards. Here's how to do each of the three parts of a Job Safety Analysis:

## SEQUENCE OF BASIC JOB STEPS

Examining a specific job by breaking it down into a series of steps or tasks, will enable you to discover potential hazards employees may encounter.

Each job or operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity, change in direction or movement.

Picking up the box from the conveyor and placing it on a hand truck is one step. The next step might be to push the loaded hand truck to the storage area (a change in activity). Moving the boxes from the truck and placing them on the shelf is another step. The final step might be returning the hand truck to the receiving area.

Be sure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the carters on the hand truck. However, if that step is generally part of the job it should be listed.

## POTENTIAL HAZARDS

A hazard is a potential danger. The purpose of the Job Safety Analysis is to identify ALL hazards - both those produced by the environment or conditions and those connected with the job procedure. To identify hazards, ask yourself these questions about each step:

Is there a danger of the employee striking against, being struck by, or otherwise making injurious contact with an object?

Can the employee be caught in, by or between objects? Is there a potential for slipping, tripping, or falling?

Could the employee suffer strains from pushing, pulling, lifting, bending, or twisting?

Is the environment hazardous to safety and/or health (toxic gas, vapour, mist, fumes, dust, heat, or radiation)?

Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards - the actions, conditions, and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents.

## RECOMMENDED ACTION OR PROCEDURE

Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury or occupational illness.

Begin by trying to: (1) engineer the hazard out; (2) provide guards, safety devices, etc.; (3) provide personal protective equipment; (4) provide job instruction training; (5) maintain good housekeeping; (6) ensure good ergonomics (selecting the person in relation to the machine or other elements).

List the required or recommended personal protective equipment necessary to perform each step of the job.

Give a recommended action or procedure for each hazard.

Serious hazards should be corrected immediately. The JSA should then be changed to reflect the new conditions.

Finally, review your input on all three columns for accuracy and completeness with affected employees. Determine if the recommended actions or procedures have been put in place. Re-evaluate the job safety analysis as necessary.



## 30-1

### Ladder Safety Program

#### **Policy**

All ladders used by Regional Conveyor Services, Inc. in-house or on jobsites are covered by this program.

#### **Authority and Responsibility**

*Safety Director is responsible for:*

1. Ensuring that ladder safety measures are in place according to this program and the applicable OSHA standards;
2. Ensuring that workers are trained in ladder safety;
3. Maintaining training records;
4. Ensuring that ladders meet OSHA regulations; and
5. Periodically evaluating program implementation.

*Supervisors are responsible for:*

1. Ensuring that all ladders used by Regional Conveyor Services, Inc. are free from defects and all moving parts are working properly;
2. Ensuring that all affected employees using ladders have been trained;
3. Ensuring that all affected employees comply with this program;
4. Taking ladders out of service if they are defective; and
5. Conducting periodic inspections of work areas.

*Employees are responsible for:*

1. Complying with the requirements of this program;
2. Attending required training programs;
3. Inspecting ladders for defects or possible hazards prior to use;
4. Tagging any defective ladder as out of service; and
5. Reporting any ladder defects to their supervisor.

## **Types of Portable Ladders**

*Stepladder:* Self-supporting portable ladder, non-adjustable in length, having flat steps and a hinged back.

*Single Ladder:* A non self-supporting portable ladder, nonadjustable in length, consisting of one section.

*Extension Ladder:* A non self-supporting portable ladder adjustable in length, consisting of multiple sections.

The American National Standards Institute (ANSI) requires that a duty rating sticker be placed on the side of the ladder. When selecting a ladder, be sure to use the proper duty rating to carry the combined weight of the user and material. The ladder duty ratings are as follows:

- Type 1A (Extra Heavy Duty Industrial): 3-20 feet for heaving duty, such as utilities, contractors, and industrial use. Load capacity not to exceed 300 pounds.
- Type I (Industrial): 3-20 feet for heavy duty, such as utilities, contractors, and industrial use. Load capacity not to exceed 250 pounds.
- Type II (Commercial): 3-12 feet for medium duty, such as painters, offices, and light industrial use. Load capacity not to exceed 225 pounds.
- Type III (Household): 3-8 feet for light duty, such as light household use. Load capacity not to exceed 200 pounds.

## **Selection of Ladders**

Ladders are generally available in three material compositions: wood, fiberglass, and metal.

### *Wood Ladders*

Wood Ladders are electrically non-conductive and are the best natural insulator against heat. They can be electrically conductive if wet. Wood ladders are heavier than metal. They are susceptible to drying and rotting and need a clear finish to protect them.

### *Fiberglass Ladders*

Fiberglass ladders are strong, lightweight, and electrically non-conductive. They do not dry out and split like wood. They are slow to conduct heat, so they are able to withstand heat exposure without losing strength. They are heavier than wood or metal and are not available in longer extension ladders. Fiberglass may chip or crack under severe impact. When overloaded, fiberglass does not bend, it cracks and fails.

### ***Metal Ladders***

Metal ladders are very strong and lightweight. They dent, but do not chip or crack when subjected to severe impact. They do not require a protective varnish for protection. They do conduct heat rapidly. If they are exposed to heat, they will lose their tensile strength. They must not be used when working on or near electrical wires or when working around energy sources. Metal ladders must be labeled with a DANGER warning sticker indicating electrocution hazard.

### **Ladder Care and Maintenance**

Ladders shall be maintained in good condition at all times by ensuring the following:

1. The joint between the steps and side rails shall be tight;
2. All hardware and fittings shall be securely attached;
3. Movable parts shall operate freely without binding or excessive play;
4. Locks, wheels, pulleys, and other bearings shall be frequently lubricated;
5. Frayed or badly worn rope shall be replaced;
6. Safety feet and other auxiliary equipment shall be kept in good condition;
7. Ladders shall be inspected frequently;
8. Ladders with defects shall be taken out of service and tagged as "Dangerous, Do Not Use.";
9. Ladder repairs must restore the ladder to its original design criteria before the ladder may be returned to use;
10. Rungs shall be kept free of grease and oil;
11. Metal steps and rungs shall be grooved or roughened to prevent slipping; and
12. Wood ladders shall not be painted with an opaque finish or coated with any material that may hide defects. Use only clear varnish.

### **Ladder Storage**

When not in use, ladders shall be stored in a designated location out of direct sunlight and not exposed to harmful elements that may cause decay/damage. Never store materials on a ladder. Straight and extension ladders should be stored in storage racks. Be sure that ladders are secured when in transit. Vibration and bumping against other objects may cause damage.

### **Ladder Inspection**

The user shall inspect the ladder prior to use. Ladders shall be inspected by a department supervisor or designee for visible defects on a semi-annual basis and after any incident that could affect their safe use. The person performing the semi-annual inspection shall complete the Regional Conveyor Services, Inc. Portable Ladder Inspection Checklist. The checklist is found in Appendix A of this program. The Safety Director shall maintain a record of the inspection report.

If a ladder tips over, immediate inspection of the following is required:

1. Inspect for side rail dents or bends or excessively dented rungs;

2. Check all rung-to-side-rail connections;
3. Check hardware connections; and
4. Check rivets for shear.

### Ladder Set-up

Prior to climbing a ladder, it shall be set up according to the following:

1. Position the ladder so that the side rails extend at least 3 feet above the landing;
2. Secure the side rails at the top to a rigid support and use a grab device when 3 foot extension is not possible;
3. Extension ladders shall be extended from the ground only;
4. Make sure the weight on the ladder will not cause it to slip off its support;
5. Portable ladders shall be used so that the base is a distance from the vertical wall equal to one-fourth the working length of the ladder;
6. The ladder base must be placed with secure footing;
7. The ladder shall be placed or held in place to prevent slipping;
8. Ladders shall not be used in a horizontal position as a platform, a runway, or scaffold;
9. Ladders shall not be placed in front of doors opening toward the ladder unless the door is blocked upon, locked, or guarded;
10. Ladders shall not be placed on boxes, barrels, or other unstable bases to obtain additional height;
11. No ladder shall be used to gain access to a roof unless the top of the ladder extends at least 3 feet above the point of support, at eave, gutter, or roofline;
12. The user shall equip all portable rung ladders with non-slip bases or secure the ladder when there is a hazard of slipping;
13. The area around the ladders must remain clear from debris, equipment, etc.;
14. The minimum overlap for the two-sections on extension ladders shall be:

Size of ladder (feet)	Overlap (feet)
Up to and including 36	3
Over 36 up to and including 48	4
Over 48 up to and including 60	5

15. Never place a ladder near electrical wiring or against operational piping (chemical, gas, sprinkler systems) where damage may occur;
16. When two or more ladders are used to access a work area, they must offset with a landing or platform between the ladders; and
17. Always check for stability prior to climbing.

To set up a straight or extension ladder,

1. Lay the ladder on the ground with the base resting against the bottom of the wall and the top pointing away from the wall;
2. Starting at the top, lift the ladder over your head and walk under the ladder to the wall. Move hands from rung to rung as you go.
3. When the ladder is vertical and the top touches the wall, pull the base out so that the distance from the wall is one-fourth the height to the point of support; and
4. Reverse the process to remove the ladder.

## Climbing and Standing

When climbing or standing on a ladder, the following safety precautions shall be followed:

1. Make sure shoes are free of mud, soil, or anything slippery;
2. When ascending or descending, the user must face the ladder;
3. Use at least one hand to grasp the ladder when climbing. Maintain at least three points of contact with the ladder (two feet and one hand or two hands and one foot);
4. The top rest for portable rung and cleat ladders shall be rigid and have strength to support the load;
5. The top two steps of a stepladder shall not be used for standing. The highest working height shall be clearly marked;
6. Do not stand on the pail shelf of a stepladder;
7. Do not straddle the front and back of a stepladder;
8. The bracing on the back legs of step ladders is designed solely for increasing stability and not for climbing;
9. Never stand on the top two rungs of a straight or extension ladder;
10. Supplies or equipment shall not be hand carried by the worker on the ladder; instead, a rope, block, or pulley system shall be used to move the equipment;
11. To help prevent loss of balance, carry small items such as hammers, nails, pliers, etc. in a tool belt;
12. When working to the side of a ladder, the centerline of the body must be maintained between the side rails;
13. Do not overreach or lean too far to one side;
14. No more than one person shall be on a ladder at a time unless the ladder is manufactured to support an additional person;
15. Do not move, shift, or extend ladders while in use;
16. Never climb onto a ladder from one side;
17. Never slide down a ladder;
18. Never sit on ladder rails; and
19. If you feel sick or dizzy while climbing or standing on a ladder, do not try to climb down in a hurry. Drape your arms around the rungs and rest your head against the ladder until you feel better. Then climb down slowly.

## Proper Use

The following are requirements when using portable ladders:

1. Ladders shall be used by one person at a time;
2. When use by more than one person is needed, ladder jacks or scaffold planks shall not be used. Instead, specifically designed ladders with larger dimensions shall be used;
3. Ladders shall not be loaded beyond the maximum intended load for which they were built, nor beyond their manufacturer's rated capacity;
4. Only use ladders that comply with OSHA design standards;

5. Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment shall not be used;
6. Improvised repairs shall not be made;
7. Short ladders shall not be spliced together to provide long sections;
8. Ladders made by fastening cleats across a single rail shall not be used;
9. Ladders shall not be used as guys, braces, skids, or for other than their intended purposes;
10. Portable rung ladders with reinforced rails shall be used only with the metal reinforcement on the under side;
11. Do not leave a placed ladder unattended for extended periods;
12. Metal spreader or locking devices must be provided on stepladders to hold the front and back sections in an open position during use;
13. Stepladders shall not exceed 20 feet in length;
14. Single Ladders shall not exceed 30 feet in length;
15. Two section ladders shall not exceed 48 feet in length for metal ladders and 60 feet in length for wood ladders;
16. Individual sections of extension ladders shall exceed 30 feet in length;
17. Ladders with more than two sections shall not exceed 60 feet in length; and
18. Do not use ladders outdoors during strong winds.

### **Securing the Ladder**

The following are required to secure ladders:

1. Single and extension ladders shall be secured at the top and bottom to prevent movement. To secure the ladder at the bottom, flip the ladder shoes so that the spurs poke the ground. If setting up a ladder on hard surfaces, tie ropes to both ladder legs beneath the lowest rung and tie the other end of the ropes to a solid anchored object at or near the base of the wall. If possible, nail a cleat behind the ladder's feet to prevent the ladder from slipping. To secure the ladder at the top, use roof hooks, tie it to a solid anchor, use rubber or soft plastic "mitts", or use a ladder stabilizer. If the ladder cannot be secured at both the top and bottom, it shall be secured at the base. If this still is not possible, an employee must stand at the base and secure it manually;
2. Step ladders shall be opened completely and ensure that the spreader is locked prior to use. Never use a stepladder in an unfolded position;
3. Never use ladders on slippery surfaces or on snow or ice unless secured or the ladder is equipped with non-slip or spike feet; and
4. Ladders shall not be placed in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded.

### **Use On or Near Electrical Equipment**

Safety-related work practices shall prevent electric shock or other injuries from electrical contact when work is performed on or near equipment or circuits that are or may be energized. These work practices shall be consistent with the nature and extent of the associated electrical hazards.

Metallic or metal-type ladders shall NOT be used around electrical energy, components, and sources. Portable ladders shall have nonconductive side rails if used where the employee or ladder could contact exposed energized parts. The requirements found in OSHA 29 CFR 1910.333 shall be followed. Additional training, such as lockout tagout

and electrical safety training, is required for this application.

### **Training Requirements**

All employees shall be trained prior to portable ladder use to recognize hazards and procedures to minimize hazards. Employees shall be trained in the following:

- The recognition of possible hazards associated with ladder use, maintenance, and safety precautions;
- The proper use and placement of ladders; and
- The maximum intended load capacities of ladders used.

Employees shall be retrained as necessary to maintain their understanding and knowledge on the safe use of ladders.

## Scaffold Safety Program

### **Purpose**

The purpose of this safety policy and procedure is to establish guidelines for the protection of Regional Conveyor Services, Inc. employees who work on scaffold work surfaces.

### **Applicability**

Scaffolding has a variety of applications. It is used in new construction, alteration, routine maintenance, renovation, painting, repairing, and removal activities. Scaffolding offers a safer and more comfortable work arrangement compared to leaning over edges, stretching overhead, and working from ladders. Scaffolding provides employees safe access to work locations, level and stable working platforms, and temporary storage for tools and materials for performing immediate tasks. Scaffolding accidents mainly involve personnel falls and falling materials caused by equipment failure, incorrect operating procedures, and environmental conditions. Additionally, scaffolding overloading is a frequent single cause of major scaffold failure. This safety policy and procedure provides guidelines for the safe use of scaffolds. It includes training provisions and guidelines for scaffold erection and use.

### **Reference**

This safety policy and procedure is established in accordance with Occupational Safety and Health Standards for General Industry (29 CFR 1910.28) and Occupational Safety and Health Standards for Construction Industry (29 CFR 1926.451).

### **Policy**

Scaffolds shall be erected, moved, dismantled, or altered only under the supervision of a competent person and will have guardrails and toeboards installed. When scaffolding hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, Personal Protective Equipment (PPE), and proper training regarding Scaffolds will be implemented. These measures will be implemented to minimize those hazards to ensure the safety of employees and the public.

### **Responsibilities**

It is the responsibility of each manager/unit head, supervisor, and employee to ensure implementation of Regional Conveyor Services safety policy and procedure on Scaffolds. It is also the responsibility of each employee to report immediately any unsafe act or condition to his or her supervisor. Specific responsibilities are found in Section 6.3.



## Procedure

This section provides applicable definitions, establishes general provisions, and identifies specific responsibilities required by Regional Conveyor Services safety policy and procedure on Scaffolds.

### Definitions

**Brace:** A tie that holds one scaffold member in a fixed position with respect to another member. Brace also means a rigid type of connection holding a scaffold to a building or structure.

**Coupler:** A device for locking together the component tubes of a tube and coupler scaffold.

**Harness:** A design of straps which is secured about the employee in a manner to distribute the arresting forces over at least the thighs, shoulders, and pelvis, with provisions for attaching a lanyard, lifeline, or deceleration device.

**Hoist:** A mechanical device to raise or lower a suspended scaffold. It can be mechanically powered or manually operated.

**Maximum Intended Load:** The total load of all employee, equipment, tool, materials, transmitted, wind, and other loads reasonably anticipated to be applied to a scaffold or scaffold component at any one time.

**Mechanically Powered Hoist:** A hoist which is powered by other than human energy.

**Outriggers:** The structural member of a supported scaffold used to increase the base width of a scaffold in order to provide greater stability for the scaffold.

**Platform:** The horizontal working surface of a scaffold.

**Safety Belt:** A strap with means for securing about the waist or body and for attaching to a lanyard, lifeline, or deceleration device.

**Scaffold:** Any temporary elevated or suspended platform and its supporting structure used for supporting employees or materials or both, except this term does not include crane or derrick suspended personnel platforms.

### Training

Affected employees will receive instruction on the particular types of scaffolds which they are to use. Training should focus on proper erection, handling, use, inspection, and care of the scaffolds. Training must also include the installation of fall protection, guardrails, and the proper use and care off all arrest equipment.

This training should be done upon initial job assignment. Retraining shall be done when job conditions change. Periodic refresher training shall be done at the discretion of the supervisor.

Company designated Supervisors will receive additional training regarding the selection of scaffolds, recognition of site conditions, recognition of scaffold hazards, protection of exposed personnel and public, repair and replacement options, and requirements of standards.

### **Safe Scaffold Erection and Use**

Safe scaffold erection and use is important in minimizing and controlling the hazards associated with their use. Scaffold work practices and rules should be based on:

- Sound design
- Selecting the right scaffold for the job
- Assigning personnel
- Fall protection
- Guidelines for proper erection
- Guidelines for use
- Guidelines for alteration and dismantling
- Inspections
- Maintenance and storage

### **Types of Scaffolds**

The three major categories are:

- Self-supporting scaffolds
- Suspension scaffolds
- Special use scaffolds

**Self-supporting scaffolds** are one or more working platforms supported from below by outriggers, brackets, poles, legs, uprights, posts, frames, or similar supports. The types of self-supporting scaffolds include:

- Fabricated Frame
- Tube and Coupler
- Mobile
- Pole

**Suspension scaffolds** are one or more working platforms suspended by ropes or other means from an overhead structure(s). The types of suspension scaffolds include:

- Single-Point Adjustable (Boatswain's Chairs)
- Two-Point Adjustable (Swing Stage)
- Multiple-Point Adjustable
- Multi-Lend
- Category
- Float (Ship)
- Interior Hung
- Needle Beam

**Special use scaffolds** and assemblies are capable of supporting their own weight and at least 4 times the maximum intended load. The types of special use scaffolds include:

- Form and Carpenter Bracket
- Roof Bracket
- Outrigger
- Pump Jack
- Ladder Jack
- Window Jack
- Horse
- Crawling Boards
- Step, Platforms, and Trestle Ladder

### **Responsibilities**

#### **Safety Director**

The Safety Director will identify the employees affected by this safety policy and procedure. The Safety Director will obtain and coordinate the required training for the affected employees. The Safety Director will also ensure compliance with this safety policy and procedure through their auditing process.

#### **Supervisors**

Supervisors will not allow any employee who has not received the required training to perform any of the tasks or activities related to scaffold erection and/or dismantling. Supervisors will communicate appropriate needs to managers/unit heads and/or supervisors. Supervisors will ensure that employees are provided with PPE as necessary for their job. Supervisors will ensure that a competent person is in charge of scaffold erection according to the manufacturer's specifications.

#### **Competent Person**

The competent person will oversee the scaffold selection, erection, use, movement, alteration, dismantling, maintenance, and inspection. The competent person will be knowledgeable about proper selection, care, and use of the fall protection equipment. Additionally, the competent person shall assess hazards.

#### **Employees**

Employees shall comply with all applicable guidelines contained in this safety policy and procedure. Employees will report damaged scaffolds, accessories, and missing or lost components. Employees will assist with inspections as requested.

#### **Safety Department**

The Safety Director will provide prompt assistance to managers/unit heads, supervisors, or others as necessary on any matter concerning this safety policy and procedure. The Safety Director will assist in developing or securing required training. The Safety Director will also work with supervisors to ensure that all newly purchased scaffolds comply with current safety regulations and this safety policy and procedure. Safety Engineers will provide consultative and audit assistance to ensure effective implementation of this safety policy and procedure.

## Safety Requirements for Scaffolds

- The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose brick, or concrete blocks shall not be used to support scaffolds or planks.
- No scaffold shall be erected, moved, dismantled, or altered except under the supervision of competent persons or as requested for corrective reasons by Supervisors.
- Guardrails and toeboards shall be installed on all open sides and ends of platforms more than 10 feet above the ground or floor, except needle beam scaffolds and floats. Scaffolds 4 feet to 10 feet in height having a minimum horizontal dimension in either direction of less than 45 inches shall have standard guardrails installed on all open sides and ends of the platform.
- Guardrails must be 2 X 4 inches, or the equivalent, not less than 36 inches or more than approximately 42 inches high, with a midrail, when required, of 1 X 4 inch lumber, or the equivalent. Supports must be at intervals not to exceed 8 feet. Toeboard and the guardrail shall extend along the entire opening.
- Scaffolds and their components must be capable of supporting without failure at least 4 times the maximum intended load.
- Any scaffold, including accessories such as braces, brackets, trusses, screw legs, ladders, couplers, etc., damaged or weakened from any cause must be repaired or replaced immediately, and shall not be used until repairs have been completed.
- All load-carrying timber members of scaffold framing shall be a minimum of 1,500 fiber (Stress Grade) construction grade lumber.
- All planking must be Scaffold Grades, or equivalent, as recognized by approved grading rules for the species of wood used. The maximum permissible span for 2 X 9 inch or wider planks is shown in the following:
  - The maximum permissible span for 1-114 X 9 inch or wider plank of full thickness shall be 4 feet with medium duty loading of 50 p.s.i.
- All planking or platforms must be overlapped (minimum 12 inches) or secured from movement.
- An access ladder or equivalent safe access must be provided.
- Scaffold plank must extend over their end supports not less than 6 inches or more than 18 inches.
- The poles, legs, or uprights of scaffolds must be plumb and securely and rigidly braced to prevent swaying and displacement.
- Overhead protection must be provided for men on a scaffold exposed to overhead hazards.

- Slippery conditions on scaffolds shall be eliminated immediately after they occur.
- No welding, burning, riveting, or open flame work shall be performed on any staging suspended by means of fiber or synthetic rope. Only treated or protected fiber or synthetic ropes shall be used for or near any work involving the use of corrosive substances or chemicals.
- Wire, synthetic, or fiber rope used for scaffold suspension shall be capable of supporting at least 6 times the intended load.
- Scaffolds shall be provided with a screen between the toeboard and guardrail, extending along the entire opening, consisting of No. 18 gauge U.S. Standard wire one-half inch mesh or the equivalent, when personnel are required to work or pass underneath the scaffolds.
- A safe distance from energized power lines shall be maintained.
- Tag lines shall be used to hoist materials to prevent contact.
- Suspension ropes shall be protected from contact with heat sources (welding, cutting, etc.) and from acids or other corrosive substances.
- Scaffolds shall not be used during high wind and storms.
- Ladders and other devices shall not be used to increase working heights on scaffold platforms.
- Scaffolds shall not be moved while employees are on them.
- Loose materials, debris, and/or tools shall not be accumulated to cause a hazard.
- Employees working on suspended scaffolds shall employ a fall-arrest system.
- Scaffold components shall not be mixed or forced to fit which may reduce design strength.
- Scaffolds and components shall be inspected at the erection location. Scaffolds shall be inspected before each work shift, after changing weather conditions, or after prolonged work interruptions.
- Casters and wheel stems shall be pinned or otherwise secured in scaffold legs. Casters and wheels must be positively locked if in a stationary position.
- Tube and coupler scaffolds shall be tied to and securely braced against the building at intervals not to exceed 30 feet horizontally and 26 feet vertically.
- Repair tags must be attached to any damaged, defective, or otherwise unsafe scaffolding structure

## REGIONAL CONVEYOR SERVICES, INC. ELEVATED WORK POLICY

### 1.0 PURPOSE

The purpose of this program is to prevent accidents and injuries to workers from falls and to provide employees with the information for the safe use of fall protection and ladders in elevated work environments. This program is intended to comply with the requirements in NC OSHA's standards 1910 Subpart D and 1926 Subpart M Fall Protection Codes.

### 2.0 DEFINITIONS

Aerial Lift- a generic term for elevated work platforms which include certain designs such as a scissors lift, cherry picker, bucket truck, etc.

Competent Person- one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, dangerous to employees, and who has authority to take prompt action to correct them.

Connectors- used to couple or connect components of a personal fall arrest system or positioning device; only double locking snap hook connectors with 5,000 lbs of tensile strength will be used; D-ring connectors must also meet the 5,000 lb tensile strength criteria.

Construction- work for construction, alteration, and/or repair, including painting and decorating

Fall Restraint System- system consisting of full body harness, lanyard and connectors designed to prevent employee from falling. Body belts **cannot** be used as part of Personal Fall Arrest System.

Full Body Harness- A full body harness means a design of straps which may be secured about the employee in a manner to distribute the fall arrest forces over at least the thighs, pelvis, chest and shoulders with means for attaching it to other components of a personal fall arrest system.

Guardrails- railings installed along elevated work surfaces in compliance with applicable building codes used to prevent fall accidents.

Ladder- is an appliance usually consisting of two side rails joined at regular intervals by cross pieces called steps, rungs or cleats on which a person may step in ascending or descending order. Ladders may be fixed or portable, free standing or non-self supporting in design.

Lanyard- means a flexible line of wire, rope, or strap, suitable for supporting one person. One end is fastened to a harness and the other end is secured to a deceleration device, lifeline or anchorage. The lanyard will have a maximum length at a level to provide for a fall of no greater than 6 feet and comply with current CFR 1926 Fall Protection Standards.

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

Personal Fall Arrest System (PFAS) - system consisting of full body harness, impact absorbing lanyard, anchor and connectors designed to arrest an employee's fall; system must be set up so that an employee can neither free fall more than 6 feet, nor contact any lower surface.

Safety Net- approved safety nets will be provided when work places are more than 30 feet above the ground, water or other surfaces where the use of ladders, scaffolds, platforms, or body harnesses and lifelines are impractical. Maximum size of each safety net mesh opening must not exceed 36 square inches, and the opening cannot be longer than 6 inches on any side or center-to-center. The safety net must be installed as close as possible below the work surface.

Safety Monitoring System- set of monitoring procedures assigned to a competent person for warning workers when they appear unaware of fall hazards or when they are acting in an unsafe manner. These systems do not provide a physical means of preventing or arresting falls.

Standard guardrail system- guardrail system consisting of top rail (42 inches plus or minus 3 inches), a mid-rail and toeboard; guardrail must be able to withstand 200 pounds of applied force.

Toeboards- a vertical barrier at floor level erected along exposed edges of a floor opening, wall opening, platform, runway or ramp to prevent falls of materials.

Warning Line Systems- consist of ropes, wires, or chains and supporting stanchions that form a barrier to warn workers they are near an unprotected roof sided or leading edges.

### **3.0 RESPONSIBILITIES OF REGIONAL CONVEYOR SERVICES, INC. (RCS)**

The responsibilities of RCS include the following:

- Develop a written elevated work policy and ensure that the program is periodically reviewed and updated as necessary.
- Develop employee training programs pursuant to the program.
- Conduct periodic work practice audits and inspections to ensure compliance with the program.
- Review Contractor Fall Protection Procedures as part of the award process.

#### **3.1 Area Manager/Supervisors**

The responsibilities of Area Managers and Supervisors include the following:

- Ensure that employees are properly trained in fall protection procedures and that appropriate and safe work practices and procedures are followed at all times.
- Periodically inspect area ladders and work platforms for evidence of wear or damage and initiates repair procedures as appropriate.

#### **3.2 Facilities Engineering and Maintenance**

The responsibilities of Facilities Engineering and Maintenance include the following:

- Perform preventative and remedial maintenance procedures on equipment as necessary.
- Perform routine inspections on ladders, manlifts, and elevated platforms and initiates repair procedures as appropriate.



## 4.0 PROCEDURES

### 4.1 Ladder Safety

- Only portable ladders meeting OSHA requirements are acceptable for use by RCS personnel.
- Only ladders rated for load and type of use (as indicated on the manufacturer's label) shall be used in accordance with work performed.
- Ladders are inspected daily or before each use.
- Ladders found to be damaged or in need of repair will be immediately taken out of use and marked "Dangerous-Do Not Use". This label will remain on the ladder until it can be fixed or replaced. If a wooden ladder has a broken rung or siderail, the ladder shall be discarded.
- Ladders are not to be painted to prevent the covering of damaged or weakened areas.
- Ladders shall be equipped with proper feet.
- Never stand on the top two rungs of a ladder.
- When using a straight or extension ladder, the 4:1 ratio for distance from the support is used. (ex. If the distance from the ground to your work level is 20 feet, the ladder should be 5 feet away from the base of the structure.)
- The ladder is blocked at the base, secured at the top and extended 3 feet above the landing.
- Workers must always face the ladder when ascending or descending and must not carry loads by hand
- Never overreach or use ladders to support airlines, welding leads and hoses.
- Use at least one hand to grasp the ladder when ascending or descending.
- Use barricades or other appropriate means needed to prevent unexpected collisions with ladder being used in doorways and/or high traffic areas.
- Never use metal or wet wooden ladders when there is a potential for electrical shock.
- Never stand on the top of a stepladder or used it folded and leaning against a wall
- Contractors are not allowed to use RCS ladders.

### 4.2 Elevated Working Platform Safety

#### Scaffolds and Aerial Lifts

- Scaffolds work levels above 10 feet must be equipped with standard guardrails systems or individuals must utilize a Personal Fall Arrest System.
- Fall protection must be used when erecting and dismantling scaffolding when feasible.
- Independent vertical lifelines must always be utilized while on suspended scaffolds at heights greater than 10 feet.
- Scissors lifts must be equipped with surrounding guardrail system and closing gate or latch chain.
- When operating an articulating boom lift, employees must be tied off inside the basket with a lanyard and harness (fall restraint system) in addition to surrounding standard guardrail system.

#### Floor Openings

- Hole covers must be secured in place so as not to be dislodged.
- Covers must be labeled with high visible working such as "cover" or "hole".
- Covers must be able to withstand 2 times the intended weight of traffic or load. This includes equipment traffic.
- A standard guardrail system may also be used as protection for floor openings.
- All floor and wall openings, open-sided floors, platforms, and runways 4 feet (general industry) or 6 feet (construction) or more above the ground will be guarded with



standard railings and toeboards on all exposed sides.

#### Safety Monitoring System

- Monitoring systems may only be used for roofing operations on low-sloped roofs when the roof is 50 feet or less and must be used in conjunction with a warning line system (see below).
- Safety monitors must be located on the same surface as the workers they are monitoring.
- Monitors must be able to see workers at all times, be close enough to verbally warn them of fall hazards, and not have any other duties that could distract them from monitoring.
- Only persons engaged in roofing work on low-sloped roofs or covered by a fall protection plan are permitted in areas defined by safety monitoring systems.

#### Warning Line System

- A warning line system marks off an area within which persons may do roofing work without using guardrails, Personal Fall Arrest System or safety nets.
- Warning lines must be erected around all sides of the roof work area and must not be less than 6 feet from the roof edge.
- Lines must be flagged with high visibility material every 6 feet and be between 39" and 45" in height from the working surface.
- No employee shall be allowed in the area between a warning line and a roof edge unless the employee is performing roofing work in that area.
- Warning lines may only be used on low-slope roofs.

#### 4.3 Personal Fall Protection Systems

- Personal Fall Arrest Systems (PFAS) will be used under the following conditions:
  - When working/walking on a surface with an unprotected side or edge which is 6 feet or more above a lower level;
  - When working on a scaffold greater than 10 feet above lower work area (see 4.2);
  - When working on roofs with unprotected edges 6 feet or greater above lower levels; or
  - When specified by the supervisor or foreman.
- Personal fall protection systems will be inspected before each use.
- Damaged harnesses, lanyards, lifelines or anchor points will be immediately removed from service, labeled "Dangerous- Do Not Use". Equipment which cannot be repaired will be destroyed.
- Personal Fall Arrest Systems must limit a worker's free-fall distance to six feet without contacting a lower level.
- Any PFAS or component subjected to a fall must be immediately removed from service until the designated competent person determines it is undamaged and can be used again.
- Personal fall arrest systems must be inspected for wear, damage or deterioration prior to each use. Defective components must be removed from service.
- Most lanyards cannot be clipped or tied back to itself.

#### 5.0 EMPLOYEE TRAINING

- Fall protection training will be provided to employees who may be exposed to fall hazards.

- • The training will enable employees to identify fall hazards and the procedures to follow to reduce the risk of a fall.
- • Training conducted must be in compliance with 1926.454(a) and 1926.503(a).
- • Training records will be certified and include the employee name and signature, date of training, name and signature of trainer and summary of material covered.
- • The latest training certificate shall be maintained.
- • Retraining will be conducted when deficiencies in the program are noted, changes in the workplace render previous training obsolete, or changes in types of fall protection systems or equipment to be used render the previous training obsolete.

## 40-1

### EMERGENCY ACTION PLAN

#### INTRODUCTION:

This document is a plan to prepare for workplace emergencies. By auditing the workplace, training employees, obtaining and maintaining the necessary equipment, and by assigning responsibilities, human life and company resources will be preserved. The intent of this plan is to ensure all employees a safe and healthful workplace. Those employees assigned specific duties under this plan will be provided the necessary training and equipment to ensure their safety. This plan applies to emergencies that could be reasonably expected in our workplace such as fire/smoke, tornadoes, bomb threats, leaks, etc.

#### EMERGENCY PLAN COORDINATORS:

Building/Department	Name/Title	Phone #
Safety Director	Roger Wickham	540-387-9060

Coordinators are responsible for the proper inventory and maintenance of equipment. They may be contacted by employees for further information on this Plan.

#### PLAN OUTLINE/DESCRIPTION:

1. **Means of Reporting Emergencies:** All fires and emergencies will be reported by one or more of the following means as appropriate:
  - a. Verbally to the Coordinator during normal working hours.
  - b. By telephone if after hours/weekends.
  - c. By the building alarm system.

Note: The following numbers will be posted throughout the facility:

Call 911

III. Alarm System Requirements: Alarm system requirements for notifying employees during an emergency are as follows:

- a. Provides warning for safe escape.
- b. Can be perceived by all employees.
- c. Alarm is distinctive and recognizable.
- d. Employees have been trained on the alarm system.
- e. Emergency phone numbers are posted.
- f. Emergency alarms have priority over all other communications.
- g. Alarm system is properly maintained.

IV. Evacuation Plans: Emergency evacuation escape route plans (see Appendix A) are posted in key areas of the facility. All employees shall be trained on primary and secondary evacuation routes.

V. Employee Accountability: In the event of an evacuation, all occupants shall promptly exit the building via the nearest exit. Go to your designated assembly point and report to your supervisor. Each supervisor (or designee) will account for each assigned employee via a head count. All supervisors shall report their head count to Roger Wickham who will be located at and accessible via cell phone # 540-798-4118

VI. Building Re-Entry: Once evacuated, no one shall re-enter the building. Once the Fire Department or other responsible agency has notified us that the building is safe to re-enter, then personnel shall return to their work areas.

VII. Hazardous Weather: A hazardous weather alert consists of alerts from the National Weather Service. When a hazardous weather alert is made, all employees shall immediately report to the closest tornado refuge area (see Appendix A). Stay in this area until given the all-clear signal.

VIII. Training: The personnel listed below have been trained to assist in the safe and orderly emergency evacuation of employees.

Task	Building/Department	Name/Title/Phone#
Fire Extinguisher/Hoses	Safety Director	Roger Wickham
Evacuation Assistant		
Emergency Shut-down	Safety Director	Roger Wickham

Employee training is provided when this plan is initiated, when employees required responsibilities change, when the plan changes, initially for new hires, and annually for all employees. Subjects to be covered include:

- a. Emergency escape procedures/routes
- b. Fire extinguisher locations and proper use
- c. Head count procedures
- d. Major facility fire hazards
- e. Fire prevention practices
- f. Means of reporting fires/emergencies (use of alarm systems)
- g. Names/titles of Coordinators
- h. Availability of the plan to employees
- i. Housekeeping practices
- J. No smoking areas
- k. Hazardous weather procedures
- l. Special duties as assigned to Coordinators and those listed above.

Written records shall be maintained of all Emergency Action Plan training.

# **FIRE PREVENTION PROGRAM**

(Ref: 1910.39)

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# FIRE PREVENTION PLAN

## I. Policy

Established \_\_\_\_\_

(date)

(Executive officer)

It is the policy of Regional Conveyor Services, Inc. (RCS) to provide to employees the safest practical workplace free from areas where potential fire hazards exist. The primary goal of this fire protection program is to reduce or eliminate fire in the workplace by heightening the fire safety awareness of all employees. Another goal of this plan is to provide all employees with the information necessary to recognize hazardous conditions and take appropriate action before such conditions result in a fire emergency.

This fire prevention plan complies with the requirements of 29 CFR 1910.39.

This plan details the basic steps necessary to minimize the potential for fire occurring in the workplace. Prevention of fires in the workplace is the responsibility of everyone employed by the company but must be monitored by each supervisor overseeing any work activity that involves a major fire hazard. Every effort will be made by the company to identify those hazards that might cause fires and establish a means for controlling them.

The fire prevention plan will be administered by Roger Wickham who will compile a list of all major workplace fire hazards, the names or job titles of personnel responsible for fire control and prevention equipment maintenance, names or job titles of personnel responsible for control of fuel source hazards and locations of all fire extinguishers in the workplace. The plan administrator, or safety officer, must also be familiar with the behavior of employees that may create fire hazards as well as periods of the day, month, and year in which the workplace could be more vulnerable to fire.

This fire prevention plan will be reviewed annually and updated as needed to maintain compliance with applicable regulations and standards and remain up-to-date with the state of the art in fire protection. Workplace inspection reports and fire incident reports will be maintained and used to provide corrections and improvements to the plan.

This plan will be available for employee review at any time during all normal working hours.

## II. CLASSIFICATION

Fire is a chemical reaction involving the rapid oxidation or burning of a fuel. It needs four elements to occur as illustrated below in the tetrahedron. This is described by the following illustration:





The first component of the tetrahedron is fuel. Fuel can be any combustible material such as: solid (such as wood, paper, or cloth), liquid (such as gasoline) or gas (such as acetylene or propane). Solids and liquids generally convert to gases or vapors before they will burn.

Another component of the tetrahedron is oxygen. Fire only needs an atmosphere with at least 16 oxygen.

Heat is also a component of the tetrahedron. Heat is the energy necessary to increase the temperature of the fuel source to a point in which sufficient vapors are emitted for ignition to occur.

The final side of the tetrahedron represents a chemical chain. When these components are brought together in the proper conditions and preparations, fire will develop. Take away anyone of these elements, and the fire cannot exist or will be extinguished if it was already burning.

Fires are classified into four groups according to sources of fuel: Class A, B, C, and D based on the type of fuel source. Table 1 below describes the classifications of fire which can be used in making hazard assessment.

- |         |   |
|---------|---|
| Class A | Ordinary combustible materials such as paper, wood, cloth and some rubber and plastic materials.                        |
| Class B | Flammable or combustible liquids, flammable gases, greases and similar materials, and some rubber and plastic materials |
| Class C | Energized electrical equipment and power supply circuits and related materials.   |
| Class D | Combustible metals such as magnesium, titanium, zirconium, sodium, lithium and potassium.                               |

### III. DETERMINING FIRE HAZARDS

This section consists of two steps: first, identifying the existing fire hazards in the workplace and, second, taking action to resolve them. The inspection checklist, in Appendix A, provides a guide for precise fire-safe practices that must be followed. The location of these major fire hazards are denoted in Appendix C. Also included in Appendix C is a listing of the personnel responsible for the maintenance of the equipment and systems installed to prevent or control fires.

Material hazards shall be identified, as evident on the specific Material Safety Data Sheets (MSDS), and labeled on containers as soon as they arrive in the workplace. The identification system shall also include incorporation into the company's hazard communication program.

### **OXYGEN-ENERGIZED ATMOSPHERES**

Oxygen-enriched atmospheres involve operating rooms and anesthesia machines, oxygen tents as used by ambulances, fire and police or rescue squads; hospitals and laboratory supply systems; cutting and welding. If practical, nonflammable anesthetic agents will be used. To prevent dangerous adiabatic heating of flammable anesthetic gases, the cylinder valves will be opened very slowly to allow the gradual introduction of the high pressure gas downstream from the cylinder valve. This will permit a slow buildup of pressure and hence temperature. An aid to the identification of hazards associated with medical agents and gases in NFP A 704, Standard Systems for the Identification of the Fire Hazards of Materials.

### **INDUSTRIAL TRUCKS**

The type of industrial truck being used shall be approved for use within any building storing hazardous materials. All refueling operations shall be conducted outside and away from storage of flammable materials. Areas that are used for maintenance and battery charging of electrical trucks should be separated from storage areas.

## **IV. STORAGE AND HANDLING PROCEDURES**

The storage of material shall be arranged such that adequate clearance is maintained away from heating surfaces, air ducts, heaters, flue pipes, and lighting fixtures. All storage containers or areas shall prominently display signs to identify the material stored within. Storage of chemicals shall be separated from other materials in storage, from handling operations, and from incompatible materials. All individual containers shall be identified as to their contents.

Only containers designed, constructed, and tested in accordance with the U. S. Department of Transportation specifications and regulations are used for storage of compressed or liquefied gases. Compressed gas storage rooms will be areas reserved exclusively for that purpose with good ventilation and at least 1 hour fire resistance rating. The gas cylinders shall be secured in place and stored away from any heat or ignition source. Pressurized gas cylinders shall never be used without pressure regulators.

### **ORDINARY COMBUSTIBLES**

- Wooden pallets will not be stacked over 6 feet tall. If feasible, extra pallets will be stored outside or in separate buildings to reduce the risk of fire hazards.
- Piles of combustible materials shall be stored away from buildings and located apart from each other sufficiently to allow fire fighting efforts to control an existing fire.

## FLAMMABLE MATERIALS

- Bulk quantities of flammable liquids shall be stored outdoors and away from buildings. Smaller quantities are subsequently brought into a mixing room where they are prepared for use. The mixing room shall be located next to an outside wall equipped with explosion relief vents. The room shall also have sufficient mechanical ventilation to prevent the accumulation of flammable vapor concentration in the explosive range.
- Small quantities (limited to amount necessary to perform an operation for one working shift) of flammable liquids shall be stored in, and also dispensed from, approved safety containers equipped with vapor-tight, self-closing caps, screens or covers.
- Flammable liquids shall be stored away from sources that can produce sparks.
- Flammable liquids shall only be used in areas having adequate and, if feasible, positive ventilation. If the liquid is highly hazardous, the liquid shall only be used in areas with a local exhaust ventilation.
- Flammable liquids shall never be transferred from one container to another by applying air pressure to the original container. Pressurizing such containers may cause them to rupture, creating a serious flammable liquid spill.
- When dangerous liquids are being handled, a warning sign will be posted near the operation, notifying other employees and giving warning that open flames are hazardous and are to be kept away.
- The storage and usage areas will include fire-resistive separations, automatic sprinklers, special ventilation, explosion-relief valves, separation of incompatible materials, and the separation of flammable materials from other materials.

## V. POTENTIAL IGNITION SOURCES

- Ensure that utility lights always have some type of wire guard over them.
- Don't misuse fuses. Never install a fuse rated higher than specified for the circuit.
- Investigate any appliance or equipment that smells strange. Space heaters, microwave ovens, hot plates, coffee makers and other small appliances shall be rigidly regulated and closely monitored.
- The use of extension cords to connect heating devices to electric outlets shall be prohibited. If a hot or under inflated tire is discovered, it should be moved well away from the vehicle. As an alternative, the driver should remain with the vehicle until the tire is cool to the touch, and then make repairs. If a vehicle is left with a hot tire, the tire might burst into flames and destroy the vehicle and load.

Table 2 below lists common sources of ignition that cause fires in the workplace, gives examples in each case, and suggests preventive measures.

<b>Sources of Ignition</b>	<b>Examples</b>	<b>Preventive Measures</b>
Electrical equipment	Electrical defects, generally due to poor maintenance, mostly in wiring, motors switches, lamps and hot elements.	Use only approved equipment. Follow National Electrical Code. Establish regular maintenance.
Friction	Hot bearings, misaligned or broken machine parts, poor adjustment.	Follow a regular schedule of inspection maintenance and lubrication.
Open flames	Cutting and welding torches, gas oil burners, misuse of gasoline torches.	Follow established welding precautions. Keep burners clean and properly adjusted. Do not use open flames near combustibles.
Smoking and matches	Dangerous near flammable liquids and in areas where combustibles are stored or used.	Smoke only in permitted areas. Make sure matches are out. Use appropriate receptacles.
Static electricity	Occurs where liquid flows from pipes.	Ground equipment. Use static eliminators. Humidify the atmosphere.
Hot surfaces	Exposure of combustibles to Furnaces, electric lamps or irons.	Provide ample clearances, insulation, air circulation. Check heating apparatus prior to leaving it unattended.

### WELDING AND CUTTING

Welding and cutting will not be permitted in areas not authorized by management.

If practical, welding and cutting operations shall be conducted in well-ventilated rooms with a fire-resistant floor. If this practice is not feasible, shall ensure that the work areas have been surveyed for fire hazards; the necessary precautions taken to prevent fires; and issue a hot permit. This hot permit shall only encompass the area, item and time which is specified on it.

If welding is to be performed over wooden or other combustibles type floors, the floors will be swept clean, wetted down, and covered with either fire-retardant blankets, metal or other noncombustible coverings.

Welding will not be permitted in or near areas containing flammable or combustible materials (liquids, vapors, or dusts). Welding will not be permitted in or near closed tanks that contain or have contained flammable liquids unless



they have been thoroughly drained, purged and tested free from flammable gases or vapors. Welding shall not begin until all combustible materials have been removed at least 35 feet from the affected areas, or if unable to relocate, covered with a fire retardant covering. Openings in walls, floors, or ducts shall be covered if located within 35 feet of the intended work area. Welding will not be permitted on any closed containers.

Fire extinguishers will be provided at each welding or cutting operation. A trained watcher will be stationed at all times during the operation and for at least 30 minutes following the completion of the operation. This person will assure that no stray sparks cause a fire and will immediately extinguish fires that do start.

#### OPEN FLAMES

No open flames will be permitted in or near spray booths or spray rooms. If indoor spray-painting work needs to be performed outside of standard spray-painting booths, adequate ventilation will be provided. All potential ignition sources will also be eliminated.

Gasoline or alcohol torches shall be placed so that the flames are at least 18 inches away from wood surfaces. They will not be used in the presence of dusts, vapors, flammable combustible liquids, paper or similar materials. Torches shall never be left unattended while they are burning.

The company has a specific policy regarding cigarette/cigar/pipe smoking in the workplace. Smoking and no-smoking areas will be clearly delineated with conspicuous signs. Rigid enforcement will be maintained at all times. The plan administrator will enforce observance of permissible and prohibited smoking areas for employees and outside visitors to the workplace. Fire-safe, metal containers will be provided where smoking is permitted. No-smoking areas will be checked periodically for evidence of discarded smoking materials.

#### STATIC ELECTRICITY

The company recognizes that it is impossible to prevent the generation of static electricity in every situation, but the company realizes that the hazard of static sparks can be avoided by preventing the buildup of static charges. One or more of the following preventive methods will be used: grounding, bonding, maintaining a specific humidity level (usually 60-70 percent), and ionizing the atmosphere.

Where a static accumulating piece of equipment is unnecessarily located in a hazardous area, the equipment will be relocated to a safe location rather than attempt to prevent static accumulation.

## VI. HOUSEKEEPING PREVENTIVE TECHNIQUES

The following are housekeeping techniques and procedures to prevent occurrences of fire.

- Keep storage and working areas free of trash.
- Place oily rags in covered containers and dispose of daily.
- Do not use gasoline or other flammable solvent or finish to clean floors.
- Use noncombustible oil-absorptive materials for sweeping floors.
- Dispose of materials in noncombustible containers that are emptied daily.
- Remove accumulation of combustible dust.
  
- Don't refuel gasoline-powered equipment in a confined space, especially in the presence of equipment such as furnaces or water heaters.
- Don't refuel gasoline-powered equipment while it is hot.
- Follow proper storage and handling procedures.
  
- Ensure combustible materials are present only in areas in quantities required for the work operation.
  
- Clean up any spill of flammable liquids immediately.
  
- Ensure that if a worker's clothing becomes contaminated with flammable liquids, these individuals change their clothing before continuing to work.
  
- Post "No Smoking" caution signs near the storage areas.
  
- Report any hazardous condition, such as old wiring, worn insulation and broken electrical equipment, to the supervisor.
  
- Keep motors clean and in good working order.
  
- Don't overload electrical outlets.
  
- Ensure all equipment is turned off at the end of the work day.
  
- Maintain the right type of fire extinguisher available for use.

- Use the safest cleaning solvents (nonflammable and nontoxic) when cleaning electrical equipment.
- Ensure that all passageways and fire doors are unobstructed. Stairwell doors shall never be propped open, and materials shall not be stored in stairwells.
- Periodically remove over spray residue from walls, floors, and ceilings of spray booths and ventilation ducts.
- Remove contaminated spray booth filters from the building as soon as replaced, or keep immersed in water until disposed.
- Don't allow material to block automatic sprinkler systems, or to be piled around fire extinguisher locations. To obtain the proper distribution of water, a minimum of 18 inches of clear space must be maintained below sprinkler deflectors. If there are no sprinklers, a 3 foot clearance between piled material and the ceiling must be maintained to permit use of hose streams. These distances must be doubled when stock is piled higher than 15 feet.
- Check daily for any discard lumber, broken pallets or pieces of material stored on site and remove properly.
- Re-pile immediately any pile of material which falls into an aisle or clear space.
- Use weed killers that are not toxic and do not pose a fire hazard.

## VII FIRE PROTECTION EQUIPMENT

Every building will be equipped with an electrically managed, manually operated fire alarm system. When activated, the system will sound alarms that can be heard above the ambient noise levels throughout the workplace. The fire alarm will also be automatically transmit to the fire department. Any fire suppression or fire detection system will automatically actuate the building alarm system.

The automatic sprinkler system, if applicable, will adhere to NFPA 13, Standard for the Installation of Sprinkler Systems. The sprinkler system and components will be electrically supervised to ensure reliable operation. This includes gate valve tamper switches with a local alarm at a constantly attended site when the valve is closed. If a single water supply is provided by a connection to the city mains, a low pressure monitor is included. If pressure tanks are the primary source of water, air pressure, water level, and temperature shall be supervised. If fire pumps are provided to boost system pressure, supervision will monitor loss of pump power, pump running indication, low system pressure, and low pump suction pressure. In hospitals, every patient sleeping room will be provided with an outside window or door that can be opened from the inside; this will allow venting of products of combustion if there is a fire. A specially designed smoke control system can be a substitute for an outside window.

Portable fire extinguishers are placed in a building. Fire extinguishers must be kept fully charged and in their designated places. The extinguishers will not be obstructed or obscured from view. A map indicating the locations of all fire extinguishers for this company is located in Appendix E. The fire extinguishers will also be inspected by Danny Rippee, at least monthly, to make sure that they are in their designated places, have not been tampered with or actuated, and are not corroded or otherwise impaired. Attached inspection tags shall be initialed/dated each month.

The location of all hydrants, hose houses, portable fire extinguishers, or other fire protective equipment should be properly marked with arrows and signs painted on the pavement.

## **VII. TRAINING**

All employees shall be instructed on the locations and proper use of fire extinguishers in their work areas. Employees shall also be instructed as to how to operate the building's fire alarm system, and be familiar with evacuation routes. The training of all employees shall include the locations and types of materials and/or processes which pose potential fire hazards. The training program shall also emphasize the following:

1. Use and disposal of smoking materials
2. The importance of electrical safety
3. Proper use of electrical appliances and equipment
4. Unplugging heat-producing equipment and appliances at the end of each work day
5. Correct storage of combustible and flammable materials
6. Safe handling of compressed gases and flammable liquids (where appropriate)

Ongoing training shall include regularly scheduled fire drills. Training documentation shall be placed in Appendix D.



**Appendix A**  
**FIRE PREVENTION CHECKLIST**

*This checklist should be reviewed regularly and kept up-to-date.*

**ELECTRICAL EQUIPMENT**

- No makeshift wiring
- Extension cords serviceable
- Motors and tools free of dirt and grease
- Lights clear of combustible materials
- Safest cleaning solvents used
- Fuse and control boxes clean and closed
- Circuits properly fused or otherwise protected
- Equipment approved for use in hazardous areas (if required)

**FRICTION**

- Machinery properly lubricated
- Machinery properly adjusted and/or aligned

**SPECIAL FIRE-HAZARD MATERIALS**

- Storage of special flammable isolated
- Nonmetal stock free of tramp metal

**WELDING AND CUTTING**

- Area surveyed for fire safety
- Combustible removed or covered
- Permit issued

**OPEN FLAMES**

- Kept away from spray rooms and booths
- Portable torches clear of flammable surfaces
- No gas leaks

**PORTABLE HEATERS**

- Set up with ample horizontal and overhead clearances
- Secured against tipping or upset
- Combustibles removed or covered
- Safely mounted on noncombustible surfaces
- Use of steel drums prohibited
- Not used as rubbish burners

**HOT SURFACES**

- Hot pipes clear of combustible materials
- Ample containers available and serviceable
- Soldering irons kept off combustible surfaces
- Ashes in metal containers

**SMOKING AND MATCHES**

- "No smoking" and "smoking" areas clearly marked
- Butt containers available and serviceable
- No discarded smoking materials in prohibited areas

**SPONTANEOUS IGNITION**

- Flammable waste material in closed, metal containers
- Flammable waste material containers emptied frequently
- Piled material, dry, and well ventilated
- Trash receptacle emptied daily

**STATIC ELECTRICITY**

- Flammable liquid dispensing vessels grounded and bonded
- Proper humidity maintained
- Moving machinery grounded

**HOUSEKEEPING**

- No accumulation of rubbish
- Safe storage of flammables
- Premises free of unnecessary combustible materials
- No leaks or dripping of flammables and floor free of spills
- Passageways clear of obstacles
- Automatic sprinklers unobstructed
- Fire doors unblocked and operating freely

**FIRE PROTECTION**

- Proper type of fire extinguisher
- Fire extinguisher in proper location
- Access to fire extinguishers unobstructed
- Access to fire extinguishers clearly marked
- Fire protection equipment turned on
- Extinguishing system in working order
- Service date current
- Personnel trained in use of equipment
- Personnel exits unobstructed and maintained

**APPENDIX B**  
**INSPECTION LOGS AND FIRE INCIDENT REPORTS**

**APPENDIX C**  
**IDENTIFIED FIRE HAZARDS AND RESPONSIBLE PERSONNEL**



**APPENDIX D  
TRAINING RECORD**

Name

Department

Date

**APPENDIXE**  
**FIRE EXTINGUISHER LOCATION**

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### **Fire Safety Policy**

**RESPONSIBILITY:** The company Safety Director is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of the program. The Safety Officer is the sole person authorized to amend these instructions and is authorized to halt any operation of the company where there is danger of serious personal injury.

#### **Fire Extinguisher Program for Incipient Fires**

- 1. Written Program.**
- 2. Selection and Distribution of Fire Extinguishers.**
- 3. Labeling Of Fire Extinguishers.**
- 4. General Requirements.**
- 5. Master List of Fire Extinguishers.**
- 6. Inspection, Maintenance, And Testing.**
- 7. Training And Education.**

## Fire Extinguisher Program for Incipient Fires

1. **Regional Conveyor Services, Inc.** will review and evaluate this standard practice instruction:

- On an annual basis
- When changes occur to 29 *CFR*, that prompt revision of this document
- When facility operational changes occur that require a revision of this document
- When there is an accident or close-call that relates to this area of safety
- Review the program any time these procedures fail

Effective implementation of this program requires support from all levels of management within this company. This written program will be communicated to all personnel that are affected by it. It encompasses the total workplace, regardless of the number of workers employed or the number of work shifts. It is designed to establish clear goals and objectives.

2. **Selection and Distribution.** Portable fire extinguishers shall be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of the hazard which would affect their use. Fire extinguishers used by this company are for four classes of fires:

**Class A Fire Extinguishers.** Use on ordinary combustibles or fibrous material, such as wood, paper, cloth, rubber and some plastics. Travel distance for employees to any extinguisher is 75 feet (22.9 m) or less.

**Class B Fire Extinguishers.** Use on flammable or combustible liquids such as gasoline, kerosene, paint, paint thinners and propane. Travel distance from the Class B hazard area to any extinguisher is 50 feet (15.2 m) or less.

**Class C Fire Extinguishers.** Use on energized electrical equipment, such as appliances, switches, panel boxes and power tools. Travel distance from the Class C hazard area to any extinguishing agent is 50 feet (15.2 m) or less.

**Class D Fire Extinguishers.** Use on combustible metals, such as magnesium, titanium, potassium and sodium. Travel distance from the combustible metal working area to any extinguishing agent is 75 feet (22.9 m) or less.

3. **Labeling Of Fire Extinguishers.** All fire extinguishers used by this company will be labeled in accordance with NFPA 10, Standard for Portable Fire Extinguishers. Locations where fire extinguishers are mounted will also comply with NFPA 10 for labeling purposes.

4. **General Requirements:** Regional Conveyor Services, Inc. has provided portable fire extinguishers for employee use in the event of an incipient fire. All fire extinguishers shall be mounted no higher



and no lower than four (4) feet from the floor. The following key personnel have specific responsibilities.

**A. Safety Director**

- Manage the Fire Extinguisher Program.
- Schedule the proper training for employees.
- Update the program when necessary.
- Record and maintain training records.
- Ensure monthly/annual inspections are being conducted.
- Replace used and damaged fire extinguisher(s).
- Reporting to the Management that the fire extinguisher has been used or damaged.
- Ensure all fire extinguishers are accessible.
- Ensure employees are aware of where extinguishers are located.
- Make sure extinguishers are clean and are free from obstructions.

All fire extinguishers shall be maintained as follows:

- Numbered to identify their proper location (see attached master list)
- Fully charged and in operable condition
- Clean and free of defects
- Readily accessible at all times

Note: Regional Conveyor Services, Inc. will not use portable fire extinguishers using carbon tetrachloride or chlorobromomethane extinguishing agents. Portable fire extinguishers that have soldered or riveted shell self-generating soda acid or self-generating foam or gas cartridge water type portable fire extinguishers which are operated by inverting the extinguisher to rupture the cartridge or to initiate an uncontrollable pressure generating chemical reaction to expel the agent shall be removed from the facility permanently.

## 5. Master List of Fire Extinguishers

Master List of Fire Extinguishers			
No.	Type	Location	Remarks
1	D-A D-B D-C D-D		
2	D-A D-B D-C D-D		
3	D-A D-B D-C D-D		
4	D-A D-B D-C D-D		
5	D-A D-B D-C D-D		
16	D-A D-B D-C D-D		
17	D-A D-B D-C D-D		
18	D-A D-B D-C D-D		
19	1 D-A D-B D-C D-D	1	
10	D-A D-B D-C D-D		
11	D-A D-B D-C D-D		
12	D-A D-B D-C D-D		
113	D-A D-B D-C D-D		
14	D-A D-B D-C D-D		
15	D-A D-B D-C D-D		
16	D-A D-B D-C D-D		
17	D-A D-B D-C D-D		
18	D-A D-B D-C D-D		
119	D-A D-B D-C D-D		
120	D-A D-B D-C D-D		1 1
121	D-A D-B D-C D-D		
122	D-A D-B D-C D-D		
123	D-A D-B D-C D-D		
124	D-A D-B D-C D-D		
25	D-A D-B D-C D-D		
26	D-A D-B D-C D-D		
27	D-A D-B D-C D-D		
28	D-A D-B D-C D-D		
129	D-A D-B D-C D-D	1	1
130	D-A D-B D-C D-D		
31'	D-A D-B D-C D-D		



**6. Inspection, Maintenance, And Testing.** Regional Conveyor Services, Inc. or an authorized certified subcontractor is responsible for the inspection, maintenance, and testing for all fire extinguishers on the premises.

Regional Conveyor Services, Inc. will assure that all portable tire extinguishers are subject to the following:

- Monthly visual inspections
- Annual maintenance check
- Six (6) year tear down maintenance
- Twelve (12) year hydrostatic test
- Extinguishers are promptly recharged
- Extinguishers are compatible

**7. Training and Education.** The purpose of this section is to establish training procedures which are necessary for the proper use and understanding of a fire and extinguishing the fire. Selected employees will be provided with an educational program to familiarize them with the general principles of fire extinguisher use and the hazards involved with incipient stage fire-fighting. Training will require annual updating to ensure the proper procedures are being followed.

#### **Initial Training Outline**

- A. General principles of a fire.
- B. Hazards employed with an incipient stage fire(s).
- C. When to "back off (evacuate) of an incipient stage fire(s).
- D. General fire principles of a fire extinguisher.
- E. Hazards employed with the use a fire extinguisher.
- F. Use of a fire extinguisher (hands-on).

**Retraining.** Retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary. Retraining shall be provided for all authorized and affected employees whenever there is:

- A change in job assignment.
- A change in machines, equipment or processes that present a new potential fire hazard.
- There is a change in the fire prevention procedures.
- Employer has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of fire extinguishers or fire prevention procedures.

#### **Training Documentation**

All training will be documented and each employee's understanding will be subject to a "hands-on" test. Documentation will consist of as a minimum, the employee's name, the trainer's name, the date of the training, and an outline of training provided.

Certification. This employer shall certify that employee training has been accomplished and is being kept up to date.

## PPE Policy

The purpose of the Regional Conveyor Services, Inc. Personal Protective Equipment Policy is to protect the employees from exposure to work place hazards and the risk of injury through the use of personal protective equipment (PPE). PPE is not a substitute for more effective control methods and its use will be considered only when other means of protection against hazards are not adequate or feasible. It will be used in conjunction with other controls unless no other means of hazard control exist.

Personal protective equipment will be provided, used, and maintained when it has been determined that its use is required to ensure the safety and health of our employees and that such use will lessen the likelihood of occupational injury and/or illness.

This section addresses general PPE requirements, including eye and face, head, foot and leg, hand and arm, body (torso) protection, and protection from drowning. Separate programs exist for respiratory protection and hearing protection as the need for participation in these programs is established through industrial hygiene monitoring.

The Regional Conveyor Services Personal Protective Equipment Policy includes:

- Responsibilities of supervisors and employees
- Hazard assessment and PPE selection
- Employee training
- Cleaning and Maintenance of PPE

# Responsibilities

The Safety Director is responsible for the development, implementation, and administration of Regional Conveyor Services PPE policies. This involves

1. Conducting workplace hazard assessments to determine the presence of hazards which necessitate the use of PPE.
2. Selecting and purchasing PPE.
3. Reviewing, updating, and conducting PPE hazard assessments whenever
  - a job changes
  - new equipment is used
  - there has been an accident
  - a supervisor or employee requests it
  - or at least every year
4. Maintaining records on hazard assessments.
5. Maintaining records on PPE assignments and training.
6. Providing training, guidance, and assistance to supervisors and employees on the proper use, care, and cleaning of approved PPE.
7. Periodically re-evaluating the suitability of previously selected PPE.
8. Reviewing, updating, and evaluating the overall effectiveness of PPE use, training, and policies.

### **Supervisors (leads, etc., and/or designated persons)**

Supervisors (leads, etc., and/or designated persons) have the primary responsibility for implementing and enforcing PPE use and policies in their work area. This involves

9. Providing appropriate PPE and making it available to employees.
10. Ensuring that employees are trained on the proper use, care, and cleaning of PPE.
11. Ensuring that PPE training certification and evaluation forms are signed and given to the Safety Director.
12. Ensuring that employees properly use and maintain their PPE, and follow Regional Conveyor Services PPE policies and rules.
13. Notifying Regional Conveyor Services management and the Safety Person when new hazards are introduced or when processes are added or changed.
14. Ensuring that defective or damaged PPE is immediately disposed of and replaced.

### **Employees**

The PPE user is responsible for following the requirements of the PPE policies. This involves

15. Properly wearing PPE as required.
16. Attending required training sessions.
17. Properly caring for, cleaning, maintaining, and inspecting PPE as required.
18. Following Regional Conveyor Services PPE policies and rules.
19. Informing the supervisor of the need to repair or replace PPE.

Employees who repeatedly disregard and do not follow PPE policies and rules will be disciplined per the company Safety Disciplinary Policy.



# Procedures

## A. Hazard Assessment for PPE

The Safety Director, in conjunction with Supervisors, will conduct a walk-through survey of each work area to identify sources of work hazards. Each survey will be documented using the Hazard Assessment Certification Form, which identifies the work area surveyed, the person conducting the survey, findings of potential hazards, and date of the survey. The Safety Director will keep the forms at 224 W. 4<sup>th</sup> St. Salem, Virginia.

The Safety Director will conduct, review, and update the hazard assessment for PPE whenever

- a job changes
- new equipment or process is installed
- there has been an accident
- whenever a supervisor or employee requests it
- or at least every year

Any new PPE requirements that are developed will be added into Regional Conveyor Services written accident prevention program.

## B. Selection of PPE

Once the hazards of a workplace have been identified, the Safety Director will determine if the hazards can first be eliminated or reduced by methods other than PPE, i.e., methods that do not rely on employee behavior, such as engineering controls (refer to Appendix B - Controlling Hazards).

If such methods are not adequate or feasible, then the Safety Director will determine the suitability of the PPE presently available; and as necessary, will select new or additional equipment which ensures a level of protection greater than the minimum required to protect our employees from the hazards (refer to Appendix C - Selection of PPE). Care will be taken to recognize the possibility of multiple and simultaneous exposure to a variety of hazards. Adequate protection against the highest level of each of the hazards will be recommended for purchase.

All personal protective clothing and equipment will be of safe design and construction for the work to be performed and will be maintained in a sanitary and reliable condition. Only those items of protective clothing and equipment that meet NIOSH or ANSI (American National Standards Institute) standards will be procured or accepted for use.

Newly purchased PPE must conform to the updated ANSI standards which have been incorporated into the PPE regulations, as follows:

- Eye and Face Protection ANSI Z87.1-1989
- Head Protection ANSI Z89.1-1986
- Foot Protection ANSI Z41.1-1991
- Hand Protection (There are no ANSI standards for gloves, however, selection must be based on the performance characteristics of the glove in relation to the tasks to be performed.)

Affected employees whose jobs require the use of PPE will be informed of the PPE selection and will be provided PPE by Regional Conveyor Services at no charge. Careful consideration will be given to the comfort and proper fit of PPE in order to ensure that the right size is selected and that it will be used.

## **C. Training**

Any worker required to wear PPE will receive training in the proper use and care of PPE before being allowed to perform work requiring the use of PPE. Periodic retraining will be offered to PPE users as needed. The training will include, but not necessarily be limited to, the following subjects:

- When PPE is necessary to be worn
- What PPE is necessary
- How to properly don, doff, adjust, and wear PPE
- The limitations of the PPE
- The proper care, maintenance, useful life, and disposal of the PPE

After the training, the employees will demonstrate that they understand how to use PPE properly, or they will be retrained.

Training of each employee will be documented using the Personal Protective Equipment Training Documentation Form and kept on file. The document certifies that the employee has received and understood the required training on the specific PPE he/she will be using.

The PPE Training Quiz will be used to evaluate employees' understanding and will be kept in the employee training records.

## Retraining

The need for retraining will be indicated when

- an employee's work habits or knowledge indicates a lack of the necessary understanding, motivation, and skills required to use the PPE (i.e., uses PPE improperly)
- new equipment is installed
- changes in the work place make previous training out-of-date
- changes in the types of PPE to be used make previous training out-of-date

## **D. Cleaning and Maintenance of PPE**

It is important that all PPE be kept clean and properly maintained. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. Employees must inspect, clean, and maintain their PPE according to the manufacturers' instructions before and after each use. Supervisors are responsible for ensuring that users properly maintain their PPE in good condition.

Personal protective equipment must not be shared between employees until it has been properly cleaned and sanitized. PPE will be distributed for individual use whenever possible.

If employees provide their own PPE, make sure that it is adequate for the work place hazards, and that it is maintained in a clean and reliable condition.

Defective or damaged PPE will not be used and will be immediately discarded and replaced.

***NOTE:** Defective equipment can be worse than no PPE at all. Employees would avoid a hazardous situation if they knew they were not protected; but they would get closer to the hazard if they erroneously believed they were protected, and therefore would be at greater risk.*

It is also important to ensure that contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.

## **E. Safety Disciplinary Policy**

Regional Conveyor Services believes that a safety and health Accident Prevention Program is unenforceable without some type of disciplinary policy. Our company believes that in order to maintain a safe and healthful workplace, the employees must be cognizant and aware of all company, State, and Federal safety and health regulations as they apply to the specific job duties required. The following disciplinary policy is in effect and will be applied to all safety and health violations.

The following steps will be followed unless the seriousness of the violation would dictate going directly to Step 2 or Step 3.

1. A first time violation will be discussed orally between company supervision and the employee. This will be done as soon as possible.
2. A second time offense will be followed up in written form and a copy of this written documentation will be entered into the employee's personnel folder.
3. A third time violation will result in time off or possible termination, depending on the seriousness of the violation.

## Lockout/Tagout Policy

### Purpose

This establishes Regional Conveyor Services policy for protecting employees who must do service or maintenance on machines or equipment and who could be injured by an unexpected start-up or release of hazardous energy. Service or maintenance includes erecting, installing, constructing, repairing, adjusting, inspecting, unjamming, setting up, trouble-shooting, testing, cleaning, and dismantling machines, equipment or processes.

This policy will ensure that machinery or equipment is stopped, isolated from all hazardous energy sources, and properly locked or tagged out.

### Scope

This policy applies to all Regional Conveyor Services, Inc. employees who may be exposed to hazardous energy during service or maintenance work. Uncontrolled energy includes potential, kinetic, flammable, chemical, electrical, and thermal sources.

### Employer and employee responsibilities

Regional Conveyor Services, Inc. is responsible for implementing and enforcing this policy.

All employees must comply with this policy.

Supervisors must enforce the use of lockout and tagout devices when employees do service or maintenance work and may be exposed to hazardous energy.

Employees who do service and maintenance work must follow the lockout/tagout procedures described in this policy.

Employees who work in areas where lockout/tag out procedures are used must understand the purpose of the procedures and are prohibited from attempting to restart machines or equipment that are locked or tagged out.

### Lockout and tag out devices

Lockout and tagout devices must meet the following criteria to ensure that they are effective and not removed inadvertently:

- Lockout devices must work under the environmental conditions in which they are used. Tagout device warnings must remain legible even when they are used in wet, damp, or corrosive conditions.
- Lockout and tagout devices must be designated by color, shape, or size. Tagout devices must have a standardized print and warning format.
- Lockout devices and tagout devices must be strong enough that they can't be removed inadvertently. Tagout devices must be attached with a single-use, self-locking material such as a nylon cable tie.

- Any employee who sees a lockout or tagout device must be able to recognize who attached it and its purpose.
- Each lock must have a unique key or combination.

Energy-isolating devices are the primary means for protecting Regional Conveyor Services employees who service equipment and must be designed to accept a lockout device. Energy isolating devices must clearly identify function.

Electrical energy sources. Lockout or tag out of electrical energy sources must occur at the circuit disconnect switch. Electrical control circuitry does not effectively isolate hazardous energy. See also, Alternative methods.

## Exposure survey

The crew leader will conduct a hazardous-energy survey to determine affected machines and equipment, types and magnitude of energy, and necessary service and maintenance tasks. Each task will be evaluated to determine if it must be accomplished with lockout or tagout procedures.

## Energy control procedures

Authorized employees who lockout or tagout equipment or do service and maintenance must follow specific written energy-control procedures. The procedures must include the following information:

- The intended use of the procedure
- Steps for shutting down, isolating, blocking, and securing equipment
- Steps for placing, removing, and transferring lockout devices
- Equipment-testing requirements to verify the effectiveness of the energy-control procedures

When re-energizing equipment is necessary - when power is needed to test or position the equipment, for example - temporary removal of lockout or tagout devices is allowed. This applies only for the time required to perform the task and the procedure must be documented.

Employees must do the following before they begin service or maintenance work:

1. Inform all affected employees of equipment shutdown.
2. Shut down equipment.
3. Isolate or block hazardous energy.
4. Remove any potential (stored) energy.
5. Lockout or tagout the energy sources.
6. Verify the equipment is isolated from hazardous energy and de-energized.

Employees must do the following they remove lockout or tagout devices and re-energize equipment:

1. Remove tools and replace machine or equipment components.
2. Inform coworkers about energy-control device removal.
3. Ensure all workers are clear of the work area.
4. Verify machine or equipment power controls are off or in a neutral position.
5. Remove the lockout or tag out device.
6. Re-energize equipment.

## **Specific energy-control procedures**

This company has developed specific energy-isolation procedures for all machines and equipment that have energy-isolating devices.

## **Special lockout/tagout situations**

### **Energized testing**

When an energy-isolating device is locked or tagged and it is necessary to test or position equipment, do the following:

1. Remove unnecessary tools and materials.
2. Ensure that all other employees are out of the area.
3. Remove locks or tags from energy isolating devices.
4. Proceed with test.
5. Deenergize equipment and lockout or tagout energy-isolating devices.
6. Operate equipment controls to verify that the equipment is de-energized.

### **Contract service and maintenance**

Regional Conveyor Services and contractors must be aware of their respective *lockout/tagout* procedures before the contractor does on site work. Regional Conveyor Services employees must understand and comply with the contractor's energy-control procedures.

### **Group lockout**

When authorized employees must service equipment that has several energy sources and several energy-isolating devices, the employees must follow group lockout procedures.

### **Shift changes and long-term shutdowns**

Employees must follow Regional Conveyor Services specific written procedures when it is necessary to continue lockout/tagout when work shifts change and during long-term shutdowns. A job manager is responsible for monitoring lockout and tagout devices that control the energy to equipment during long-term shutdowns

## Alternative methods

When lockout or tagout is *not* used for tasks that are routine, repetitive, and integral to the production process, or prohibits the completion of those tasks, then an alternative method must be used to control hazardous energy.

Selection of an alternative control method must be based on a risk assessment of the machine, equipment, or process. The risk assessment must consider existing safeguards provided with the machine, equipment or process that may need to be removed or modified to perform a given task.

For example, when control circuits are used as part of the safeguarding system, the system must be designed to ensure protection as effective as a mechanical disconnect switch or master shut-off valve. A control-reliable dual channel hardwired circuit of industrially-rated components that satisfies the design features as specified in ANSI B 11.19, with a safety relay or safety PLC to ensure integrity and performance of the safeguarding system, must be used.

Under all circumstances, the individual must have exclusive personal control over the means to maintain the state of the control circuit in a protective mode.

## Training

Employees who may be exposed to hazardous energy will receive training before assignment to ensure that they understand Regional Conveyor Services energy-control policy and have skills to apply, use, and remove energy controls. The training will include the requirements of 1910.147 and the following:

- Affected employees will be trained in the purpose and use of energy-control procedures. *An affected employee uses equipment that is being serviced under lockout or tagout procedures or works in an area where equipment is being serviced.*
- Authorized employees will be trained to recognize hazardous energy sources, the type and magnitude of energy in the workplace, the methods and means necessary for isolating and controlling energy, and the means to verify that the energy is controlled. *An authorized employee locks out or tags out equipment to do service work. An affected employee becomes an authorized employee when that employee's duties include service or maintenance work on equipment.*
- Employees whose jobs are in areas where energy-control procedures are used will be trained about the procedures and the prohibition against starting machines that are locked or tagged out.
- Employees will be retrained annually to ensure they understand energy-control policy and procedures.
- Authorized and affected employees will be retrained whenever their job assignments change, energy-control procedures change, equipment or work processes present new hazards, or when they don't follow energy-control procedures.

Current training records will be maintained for each authorized and affected employee including the employee's name and the training date



## Inspections of written energy-control procedures

The Safety Director will perform and document annual inspections of energy-control procedures to ensure that employees understand and use them effectively. Documentation will include the following:

- The equipment on which the procedure is used.
- The date of the inspection.
- The employees included in the inspection.
- The inspector.

If an inspector finds that employees are not following an energy-control procedure or that the procedure is not protecting them, employees must be retrained and the procedure's deficiencies corrected.

The inspector must understand the procedure and must be someone other than those following the procedure at the time of the inspection. Each procedure's accuracy, completeness, and effectiveness must be verified.

If the inspection covers a procedure for equipment with an energy-isolating device that can be *locked out*, the inspector must review the procedure with the employees who use it to service the equipment. The inspector can review the procedure with the employees individually or in a group.

If the inspection covers a procedure for equipment with an energy-isolating device that can only be *tagged out*, the inspector must review the procedure with the authorized employees who service the equipment and with affected employees who may work in the area when the equipment is serviced. The inspector can review the procedure with the employees individually or in a group.

## Definitions

**Affected employee** A person who uses equipment that is being serviced under lockout or tagout procedures, or who works in an area where equipment is being serviced.

**Authorized employee** A person who locks out or tags out equipment to do service or maintenance work. An affected employee becomes an authorized employee when that employee's duties include service or maintenance work on equipment.

**Capable of being locked out** An energy-isolating device that is designed with a hasp or other means of attachment to which, or through which a lock can be affixed, or if it has a locking mechanism built into it. Other energy-isolating devices will also be considered to be capable of being locked out, if lock out can be achieved without the need to dismantle, rebuild, or replace the energy-isolating device or permanently alter its energy-control capability.

**Disconnect** A switch that disconnects an electrical circuit or load (motor, transformer, or panel) from the conductors that supply power to it. An open circuit does not allow electrical current to flow. Under a lockout procedure, a disconnect must be capable of being locked in the open position.

**Energized** Connected to an energy source or containing potential energy.

**Energy source** Any source of energy. Examples: electrical, mechanical, hydraulic, pneumatic, chemical, and thermal.

**Energy-isolating device** A mechanical device that physically prevents transmission or release of energy.

**Hazardous energy** Any of the types of energy existing at a level or quantity that could be harmful to workers or cause injury through inadvertent release or start-up of equipment.

**Lockout device** A device that locks an energy-isolating device in the safe position.

**Lockout** Placing a lockout device on an energy-isolating device, under an established procedure, to ensure the energy-isolating device and the equipment it controls can't be operated until the lockout device is removed. (An energy-isolating device is capable of being locked out if it has a hasp that accepts a lock or if it has a locking mechanism built into it.)

**Procedure** A series of steps taken to isolate energy and shut down equipment.

**Servicing or maintenance** Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining machines or equipment. Also includes lubricating, cleaning, unjamming, and making adjustments or tool changes if a worker may be exposed to the unexpected startup of the equipment during such activities.

**Tagout device** A prominent warning sign, such as a tag, that can be securely fastened to an energy-isolating device to indicate that the energy-isolating device and the equipment it controls can't be operated until the tagout device is removed.

**Tagout** Placing a tagout device on an energy-isolating device, under an established procedure, to indicate that the energy-isolating device and the equipment it controls can't be operated until the tagout device is removed.

## *Regional Conveyor Services, Inc.*

Number: 60-2

DATE: April 29, 2002

### CONFINED SPACE ENTRY

1. PURPOSE:

Regional Conveyor Services, Inc., Inc. is committed to providing a safe and healthful work environment for all employees. In pursuit of this endeavor, a written safety policy concerning confined spaces is established in order to first identify any Permit-Required Confined Spaces and to eliminate or control hazards associated with tasks performed in these spaces.

2. REFERENCES:

- a. 29 CFR 1910.146.
- b. 29 CFR 1926.21.

3. RESPONSIBILITIES:

- a. The overall responsibility for the Confined Space Program has been delegated to Kevin Cadd, the Safety Coordinator.
- b. Employees who are assigned to work where confined space entry is required will have the responsibilities related to the work they perform. These responsibilities are identified as follows:
  - (1) Authorized Entrants:
    - (a) Know the hazards associated with the permit space and their effects.
    - (b) Properly use the equipment required for entry.
    - (c) Maintain a continuous means of communication with the attendant.
    - (d) Alert the attendant in the event of an emergency.
    - (e) Evacuate the space if an emergency occurs.
  - (2) Attendants:
    - (a) Know the hazards associated with the permit space and their effects.

- (b) Maintain an accurate account of the authorized entrants.
  - (c) Remain at their assigned station until relieved by another attendant or until permit space entry is complete.
  - (d) Monitor conditions in and around the permit space.
  - (e) Summon rescue and applicable medical services in the event of an emergency.
  - (f) Perform non-entry rescue procedures.
  - (g) Perform appropriate measures to prevent unauthorized personnel from entering the permit space.
- (3) Entry Supervisors:
- (a) Know the hazards associated with the permit space and their effects.
  - (b) Verify that safeguards required by the permit have been implemented.
  - (c) Verify that rescue services are available and that means for summoning them are operable.
  - (d) Cancel the written permit and terminate the permit space entry when required.
  - (e) Remove personnel who are not authorized to enter the permit space during entry operations.
  - (f) Periodically determine that entry operation is being performed in a manner consistent with requirements of permit-space entry procedures, and that acceptable entry conditions are maintained.

#### 4. PERMIT SPACE IDENTIFICATION:

- a. The Safety Coordinator will review all contract specifications to determine if the potential for confined space situations exists. The host employer will be required to provide information regarding the confined spaces using the *Host Work Sheet*. A conference will be held to exchange information and to determine the confined space procedures to be used (host or contractor plans).
- b. If confined spaces exist, the spaces will be classified as one of the following:
  - (1) Permit-Required Confined Space.
  - (2) Hazardous Atmosphere Only Space.
  - (3) Reclassified Space.

- c. A Hazardous Atmosphere Only Space may be entered without implementing the full Permit-Required Confined Space Program. The Safety Coordinator, however, will ensure that atmosphere testing and continuous ventilation are in place. If the hazards can be eliminated before entry into a space, the space is a Reclassified Space. The Safety Coordinator will certify that all hazards are eliminated before entry. All entrants will receive training before entering any classification of confined space.

5. **PERMIT-REQUIRED CONFINED SPACE:**

- a. Notices will be posted at the entrance of all permit-confined spaces prohibiting entry.
- b. Employees will obtain a permit from the host or Safety Coordinator before entering these spaces. An entry supervisor will be assigned to the space. All equipment required by the permit and procedures described in this program and on the permit will be followed.

6. **TRAINING:**

- a. All employees will be trained to observe confined space signs, warnings and the purpose of permit entry procedures. All individuals involved in confined space permit entry operations will be trained on the following topics (as needed):
  - (1) Types of confined space hazards.
  - (2) Components of the written Permit-Required Confined Space program and entry permit system.
  - (3) Components of the hot work permit.
  - (4) Need for guarding entrance opening.
  - (5) Atmospheric testing equipment and protocol (use, calibration, and maintenance).
  - (6) Oxygen, combustibles, and toxics.
  - (7) Pre-entry, frequent or continuous testing.
  - (8) Methods for the control or elimination of any atmospheric hazards.
  - (9) Inerting, draining, rinsing, purging, and cleaning.
  - (10) Continuous forced air ventilation.
  - (11) Procedures to follow if a hazard is detected.
  - (12) The evaluation process to be used for reentry if hazards are detected.

- (13) The use of entry equipment (ladders, communication devices, etc.)
- (14) The use of personal protective equipment required (Full body harness, respiratory protection, chemical protective clothing, eye and face protection, etc.)
- (15) Procedures to coordinate with rescue team, on or off site rescue, rescue plan and practice rescues.
- (16) Basic first-aid and cardiopulmonary resuscitation certification.
- (17) Procedures for annual review of permits.
- (18) Any other information needed to ensure safety during permit space entry operation.

#### RESUE AND EMERGENCY SERVICES:

- a. The precautions and procedures outlined the Permit-Required Confined Space program are designed to ensure that all employees are safe while working in permit spaces. Under no circumstances will employees be expected to enter a permit-space where hazards have not been eliminated or effectively controlled.
- b. Unexpected situations could arise that prevent entrants from self-rescue. In this event, the following rescue and emergency action plan has been developed and will be strictly enforced:
  - (1) On-site non-entry rescue procedures.
  - (2) Off-site entry rescue services.
    - (a) Arrangements will be made with the local rescue and emergency services to include confirmation that services will be available when needed.
    - (b) Rescue services will be informed of the hazards they may encounter if they are summoned. They will also be provided access to the permit-space so they can make a proper evaluation and establish rescue plans.
    - (c) If rescue and emergency services are needed, the names, telephone number, location and approximate response times of the rescue services will be made available to the entry team.
    - (d) Rescue services will be summoned via telephone.

8. PERMIT-REQUIRED CONFINED SPACE PROGRAM REVIEW:

- a. Upon completion of each job involving a permit-required confined space, a debriefing conference will be held to inform the host employer of any hazards confronted or created.
- b. Within one year of any entry operation, the Safety Coordinator will conduct a review of the program using the canceled entry permits to identify any deficiencies in the program. A review will be conducted sooner if there is reason to believe that the program does not adequately protect all employees. Any corrective measures will be documented by a revision of the program. Employees will be trained on any changes. Additionally, employees who note any inadequacies with the program should contact the Safety Coordinator.
- c. If permit space entry operations are not conducted during the year, no review is needed.

9. ENFORCEMENT:

In order to ensure proper compliance with this policy, progressive discipline will be administered in situations where employees compromise safety practices.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator

Attachments:

1. Definitions
2. Initial
3. Decision Flow Chart
4. Duties of Entry Supervisor
5. Duties of Attendant
6. Duties of Entrant
7. Entry Permit (Sample)



**CONFINED SPACE GLOSSARY**  
(To be used with Pre-Entry Checklists and Entry Permit)

**Acceptable entry conditions:** The conditions that must exist in a permit-space to allow entry and to ensure that employees involved with a permit-required confined space entry can safely enter into and work within the space.

**Attendant:** An individual stationed outside one or more permit-spaces who monitors the authorized entrants and who performs all attendant's duties assigned in the employer's permit-space program.

**Authorized entrant:** An employee who is authorized by the employer to enter into a permit-space.

**Blanking or blinding:** The absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skirt blind) that completely covers the bore and is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.

**Confined space:** A space that:

1. is large enough and so configured that an employee can bodily enter and perform assigned work; and
2. has limited or restricted entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry), and
3. is not designed for continuous employee occupancy.

**Double block and bleed:** The closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.

**Emergency:** Any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permit space that could endanger entrants.

**Engulfment:** The surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be inhaled in and can cause death by filling or plugging the respiratory system, or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

**Entry:** The action by which a person passes through an opening into a permit-required space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.

**Entry permit:** The written or printed document that is provided by the employer to allow and control entry into the permit-space and contains the information of the permit-required confined space program.

**Entry supervisor:** The person (such as the employer, foreman, or crew chief) responsible for determining if acceptable entry conditions are present at a permit-space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this program.

**NOTE:** An entry supervisor also may serve as an attendant or as an authorized entrant, as long as that person is trained and equipped as required by this program for each role he or she fills. Also, the duties of the entry supervisor may be passed from one individual to another during the course of an entry operation.

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

1. flammable gas, vapor, or mist in excess of 10% of its lower flammable limit (LFL)
2. airborne combustible dust at a concentration that meets or exceeds its LFL.

**NOTE:** This concentration may be approximated as a condition in which the dust obscures vision at a distance of 5 feet (1.5m) or less.

3. atmospheric oxygen concentration below 19.5% or above 23.5%
4. atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in Subpart A, Toxic and Hazardous Substances and in Subpart G, Occupational Health and Environmental Control, and that could result in employee exposure in excess of its dose or permissible exposure limit.

**NOTE:** An atmospheric concentration of any substance that is not capable of causing death, incapacitation, impairment of ability to self-rescue, injury, or acute illness due to its health effects is not covered by this provision.

5. any other atmospheric condition that is immediately dangerous to life or health
- NOTE:** For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Material Safety Data Sheets that

comply with the Hazard Communication Standard, 29 CFR 1910.1208, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

**Hot work permit:** The employer's written authorization to perform operations (for example, cutting, welding, cutting, burning, and heating) capable of providing a source of ignition.

**Immediately dangerous to life or health (IDLH):** Any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit-space.

**NOTE:** Some materials - hydrogen fluoride gas and cadmium vapor, for example - may produce immediate transient effects that, even if severe, may pass without medical attention, but are followed by sudden, possibly fatal collapse 12 to 72 hours after exposure. The victim "feels normal" from recovery from transient effects until collapse. Such materials in hazardous quantities are considered to be "immediately" dangerous to life or health.

**Inerting:** The displacement of the atmosphere in a permit-space by a non-combustible gas (such as nitrogen) to such an extent that the resulting atmosphere is non-combustible.

**NOTE:** This procedure produces an IDLH oxygen-deficient atmosphere.

**Isolation:** The process by which a permit-space is removed from service and completely protected against the release of energy and material into the space by such means as blanking or blinding, misaligning or removing sections of lines, pipes, or ducts; a double block and bleed system; lock-out or tag-out of all sources of energy; or blocking or disconnecting all mechanical linkages.

**Line breaking:** The intentional opening of a pipe, line, or duct that is or has been carrying flammable, corrosive, or toxic material, an inert gas, or a fluid at a volume, pressure, or temperature capable of causing injury.

**Non-permit confined space:** A confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

**Oxygen-deficient atmosphere:** An atmosphere containing less than 19.5% oxygen by volume.

**Oxygen-enriched atmosphere:** An atmosphere containing more than 23.5 oxygen by volume.

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

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

**Permit-required confined space program (permit-space program):** The employer's overall program for controlling and, where appropriate, for protecting employees from permit-space hazards or for regulating employee entry into permit-spaces.

**Permit system:** The employer's written procedure for preparing and issuing permits for entry and for returning the permit-space to service following termination of entry.

**Prohibited condition:** Any condition in a permit-space that is not allowed by the permit during the period when entry is authorized.

**Rescue services:** The personnel designated to rescue employees from permit-spaces.

**Retrieval system:** The equipment (including retrieval line, chest or full body harness, wristlets (if appropriate), and lifting device or anchor) used for non-entry rescue of persons from permit-spaces.

**Testing:** The process by which the hazards that may confront entrants of a permit-space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit-space.

**NOTE:** Testing enables the employer both to devise and implement adequate control measures for the protection of authorized entrants and to determine if acceptable entry conditions are present immediately before and during entry.

## ENTRY SUPERVISOR

### RESPONSIBILITIES

1. Know the hazards associated with the permit space and their effects.
2. Verify that safeguards required by the permit have been implemented.
3. Verify that rescue services are available and that means for summoning them are operable.
4. Cancel the written permit and terminate the permit space entry when required.
5. Remove personnel who are not authorized to enter the permit space during entry operations.
6. Periodically determine that entry operation is being performed in a manner consistent with requirements of permit-space entry procedures, and that acceptable entry conditions are maintained.

**ATTENDANT**  
**RESPONSIBILITIES**

1. Know the hazards associated with the permit space and their effects.
2. Maintain an accurate account of the authorized entrants.
3. Remain at their assigned station until relieved by another attendant or until permit space entry is complete.
4. Monitor conditions in and around the permit space.
5. Summon rescue and applicable medical services in the event of an emergency.
6. Perform non-entry rescue procedures.
7. Perform appropriate measures to prevent unauthorized personnel from entering the permit space.

**ENTRANT**  
**RESPONSIBILITIES**

1. Know the hazards associated with the permit space and their effects.
2. Properly use the equipment required for entry.
3. Maintain a continuous means of communication with the attendant.
4. Alert the attendant in the event of an emergency.
5. Evacuate the space if an emergency occurs.

## INITIAL DETERMINATION FLOWCHART FOR 1910.146

**If you have an...**

Can it be bodily entered by an individual?

Does it have a limited or restricted means of entry and egress?

Is the space unsuitable (i.e., not designed) for continuous employee occupancy?

**Then it is a...**

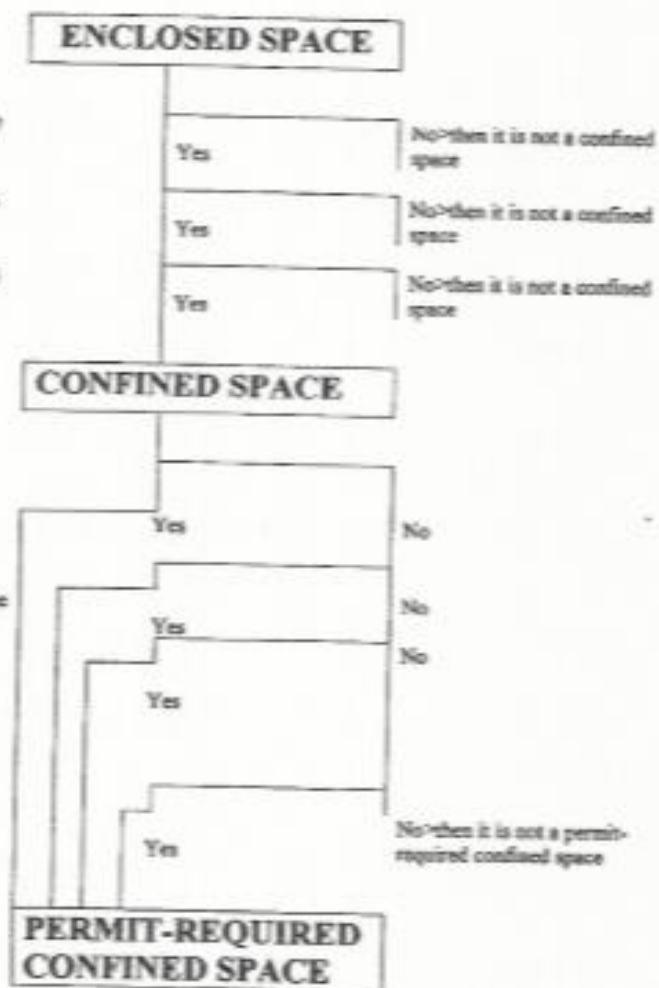
Does it contain or have the potential to contain a hazardous atmosphere?

Does it contain a material that has the potential for engulfing an entrant?

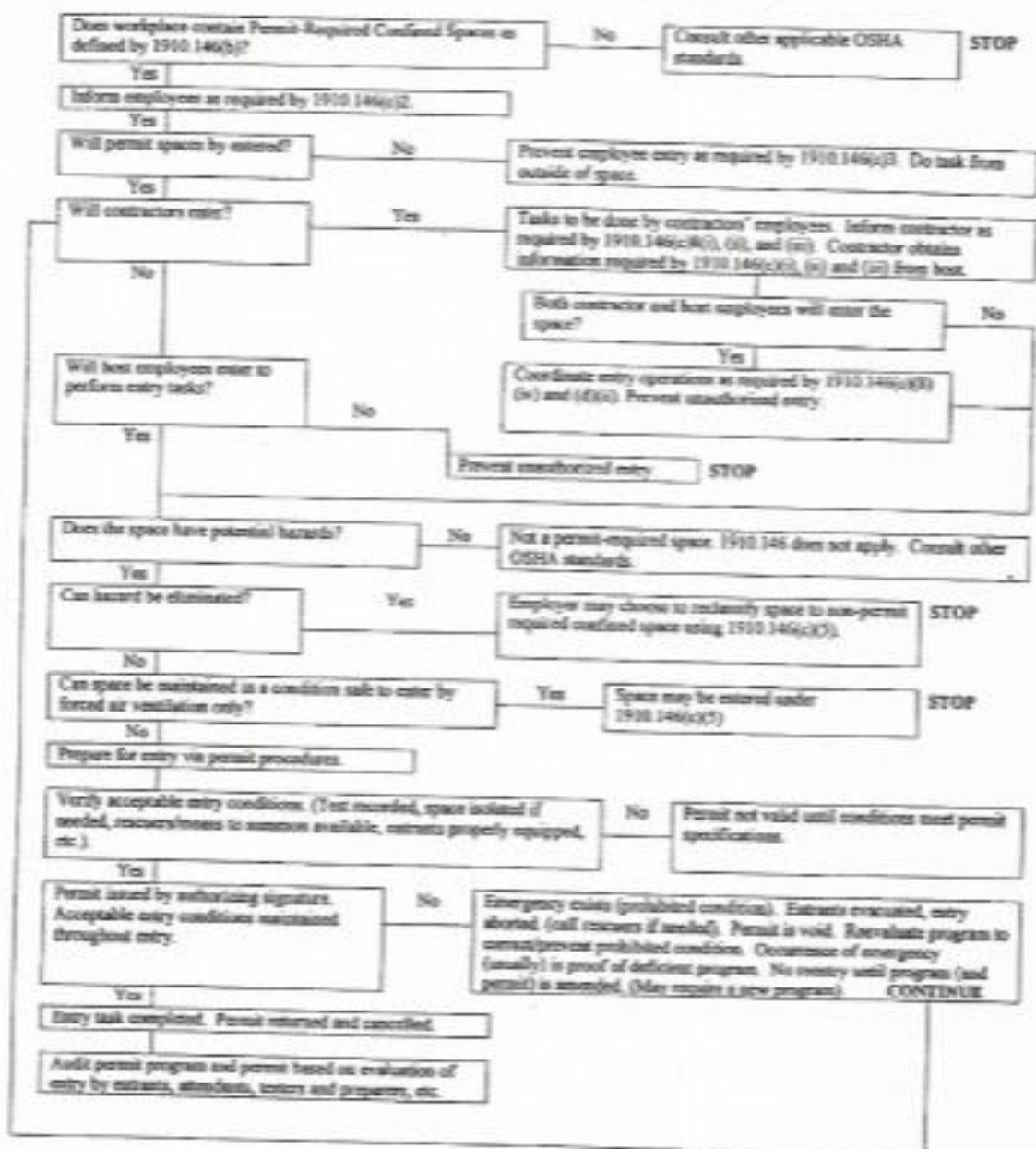
Does it have an internal configuration which could trap or asphyxiate an entrant due to inwardly converging walls or downward sloping floor tapering into a smaller cross-section?

Does it contain any other recognized serious safety or health hazard?

**Then it is a...**



## CONFINED SPACE FLOW CHART





1. **General Waste Management Plan:** These Guidelines aim to provide a tool for waste management planning and promote the development of more coherent and appropriate planning throughout Regional Conveyor Services, Inc. (RCS) When implementing waste management planning it is the responsibility of each individual to follow RCS policies and procedures.

Waste management plans have a key role to play in achieving sustainable waste management. Their purpose is to give an outline of waste streams and treatment options. More specifically, they aim to provide a planning framework for the following:

- A. RCS shall estimate the waste that will be generated prior to work being performed so that the need for containers and waste removal can be determined. Trash and scrap materials will be considered waste.
  - B. Waste materials shall be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles will be covered with a tarp to prevent dispersion of waste materials and to control the potential for run-off.
  - C. RCS will properly segregate waste materials to ensure opportunities for reuse or recycling.
  - D. All RCS employees will be instructed on the proper disposal method for wastes. This will include general instruction on disposal of non-hazardous wastes, trash, and scrap materials. If wastes generated are classified as hazardous, employees will be trained to ensure proper disposal. This training will be conducted at the beginning of each shift and conducted by the supervisor.
2. Waste management planning is continuously reviewed and revised at RCS to match increasing complexity of waste issues and sustainability standards. The solution too many waste management problems require the involvement of several participants/ authorities and coherent planning to help avoid the unnecessary duplication effort and thus benefits all participants to work together.



## Welding, Cutting and Hot Work Program

This plan is designed to reduce the likelihood of a fire and other hazards through basic fire prevention and awareness techniques. The personal safety of each employee of our company is and always will be of primary importance.

### GENERAL PROGRAM MANAGEMENT

The Health and Safety Director responsible for all facets of this plan and has full authority to make necessary decisions to ensure success of this plan. This authority includes both determining personnel activities and equipment purchases necessary to implement and operate this plan. The Health and Safety Director and Job Superintendent will audit the program as necessary to insure its effectiveness.

As with all RCS, Inc.'s programs, our employees have the most important role in the success of the program. The items required by this role are:

- a. Training: Attend the fire prevention training sessions, including the fire watch training program. The fire watch training program will address methods of extinguishing fires, sounding alarms, use of welding equipment, removal or guarding of fire hazards to prevent fires.
- b. Awareness of any potential fire hazards in the work area and following the proper fire prevention procedures.
- c. Becoming familiar with any applicable emergency procedures and evacuation procedures.
- d. Practicing good housekeeping procedures.

### HAZARD RECOGNITION - FIRE WATCH

Fire watch personnel, along with welders and supervisors are trained to recognize potential fire hazards, including the equipment used and the potential for fire and explosion hazards. If removing fuel sources or guarding cannot make the situation safe, then the work cannot proceed.

The areas where fire hazards may exist include:

1. Combustible materials closer than 35 feet to the operation
2. Easily ignited combustibles more than 35 feet from the operation
3. Wall or floor openings within 35 feet radius of exposed combustible materials
4. Combustible materials adjacent to the opposite wall of metal partitions, ceilings or roofs
5. Flammable gases, liquids and vapors

### GENERAL DUTIES - FIRE WATCH

A fire watch is a properly trained employee who is stationed at all welding sites in order to provide a first line of defense against fires.

Prior to commencing of hot work, the assigned fire watch, along with the welder and the immediate supervisor will inspect the area for hazards and eliminate or guard the potential hazards. Written hot work permits may be required at visiting locations and details of precautions, how they are to be issued, and by whom must be determined prior to commencement of activities.

Selection of the proper fire extinguisher is based on the type of hazards present. The fire hazard classifications and fire extinguisher types are located in Appendix A. To prevent fires, the fire watch must be maintained at least thirty (30) minutes after hot work has been completed to insure no flare-ups occur.

### **WELDING IN CONFINED SPACES**

Prior to entry into a confined space, all of the procedures required for the entry must be followed. They can be found in this manual under the Confined Space Awareness Chapter.

Some of the basics include testing the air prior to entry, addressing possible hazards encountered, determining who is responsible for entry, rescue, attendant, and supervisor status, appropriate PPE, local exhaust ventilation requirements, warning signs, etc. In addition, specific respiratory protection may be required for welding on certain metals or paints, such as lead-based paints, etc.

### **SPECIAL CONSIDERATIONS FOR OXYGEN-FUEL WELDING AND CUTTING**

All welders must have specific training, conducted by Shop Superintendent on the care and use of the torches, hoses and compressed gas cylinders. Shop Superintendent will have the additional responsibility of refresher training, as necessary, for the welders and for overseeing the operations.

Compressed gas cylinders must be secured and stored in a vertical position. They must be stored at least 20 feet from combustible and flammable materials. When these cylinders are transported from one site to another, the gauges must be removed and the safety caps installed. When working in confined spaces, the gas supply must be shut off when welders leave the area for lunch, etc.

### **SPECIAL CONSIDERATIONS FOR ARC WELDING**

Due to the variety of metals used in the welding rods, the electrical currents used, the intense ultraviolet radiation generated, and the types of metals welded on, the use of arc welding can create specific hazards to the welders and the personnel nearby. These items are also addressed in the training program as well as the Hazard Communication Program provided by RCS, Inc.

Prior to use, the authorized welders should inspect their equipment thoroughly and insure that there are no exposed wires or splices within 10 feet of the "hot" or "stinger" lead, or other potential problems. If a problem is detected during the inspection, the machines must be taken out of service until repaired. The repairs to the equipment should be made only by specifically trained personnel who are authorized to do so.

For work in confined spaces, when the welders leave the area, the machines must be turned off and disconnected, to prevent accidental electrocutions, etc.

### **OTHER CONSIDERATIONS**

Guarding shall be utilized to confine heat sparks and slag to protect immovable fire hazards when the item to be welded or cut cannot be moved. If this condition cannot be met the welding and cutting shall not be performed.

At all sites where welding occurs, first aid kits must be readily available. These can be found in company vehicles and tool boxes.

Certain welding operations may liberate metal fumes that contain toxic materials such as lead, cadmium, copper, zinc, hexavalent chromium etc. Abrasive blasting operations may also generate small particles of these metals and other potentially hazardous dusts. Every effort will be made to identify these materials. Where these are present or may be present, efforts to use local exhaust ventilation to remove these metal fumes will be used. When this is not effective or feasible, appropriate PPE including respiratory protection is required.

Employees assigned must be familiar with section 1910.254 and with 1910.252 (a), (b) & (c) and any gas shielding arc welding that maybe done. The employee must be familiar with American Welding Society Standard A6-1-1966. Operators of equipment should report any equipment defect or safety hazards and discontinue use of equipment until its safety has been assured. Repairs shall be made only by qualified personnel.

# HOT WORK PERMIT

1 Location of work: \_\_\_\_\_

2 Description of work: \_\_\_\_\_

3. Have appropriate personnel been notified of the work?  YES  NO  
Date/Time: \_\_\_\_\_ Person Notified: \_\_\_\_\_

4. Permit good: From: Time: \_\_\_\_\_ Date: \_\_\_\_\_  
To: Time: \_\_\_\_\_ Date: \_\_\_\_\_

\*Note - As soon as one of the following occurs the permit is void:  
- After 12 Hours - End of Shift - End of Job: or  
- Conditions change that alter the permit

5. Has line, vessel, or confined space been drained and cleaned?  YES  NO  
How?  Washing  Air Purging  Ventilating  Inert gas purging  Other  
Explain: \_\_\_\_\_

6. Isolation: \_\_\_\_\_  
 Blinding, blanking  Plugging (mud or other)  Parting lines  
 Dropping valves  Double block and bleed  
 Mechanical lockout  
 Electrical tag out

oOther Explain: \_\_\_\_\_

7. Fire detection systems secured, if applicable?  YES  NO  
8. a. Atmospheric testing results: \_\_ 02 (19.5 - 23.5) \_\_ LEL (safe <=10 LEL)  
\_\_ ppm Toxic gas and type (list) Testers initials & time: \_\_\_\_\_  
8. b. Atmospheric retesting results: \_\_ 02 (19.5 - 23.5) \_\_ LEL (safe <=10 LEL)

9. Is forced ventilation required?  YES  NO

10. PPE required:  Chemical impermeable clothing  Rubber boots  Haz protection  
Safety glasses Welders helmet/glasses Goggles  Face shield  
oHearing Protection  Safety harness  Lifeline  Skin creams  
 Retrieval line  Retrieval equipment  Hard hats  
 Respiratory protection (list types)  Other (Explain) \_\_\_\_\_

11. Is hot work area free from combustible and flammable vapors?  YES  NO

12. Is fire watch required and available?  
Required  YES  NO Available  YES  NO

13. Is fire extinguisher(s) at site of hot work?  YES  NO

14. Is area, vessel, or line ready for hot work?  YES  NO

15. Additional special precautions (Explain): \_\_\_\_\_

1. Signatures:

Person(s) Performing Work (Print Name)

Permit Initiator(s) (Print Name)

Signature, Title & Company

Signature & Title

Person(s) Performing Work (Print Name)

Permit Initiator(s) (Print Name)

Signature, Title & Company

Signature & Title

# APPENDIX A

## FIRE EXTINGUISHER SYSTEMS

Portable fire extinguishers have been called "First Aid" Fire Extinguishers. They contain a limited supply of an extinguishing agent that can be hand carried or moved on wheel carts. While portable extinguishers cannot be used as a substitute for fixed systems, they can provide an initial attack against fires.

In order to express the relative value of portable fire extinguishers, the Underwriters' Laboratories of the United States of America developed a classification system for fires that has been adopted by the National Fire Protection Association.

### General Rules:

1. Only fire extinguishers meeting recognized standards and approved by a nationally recognized testing laboratory should be used
2. The correct type of fire extinguisher should be provided for each class of fire that may occur in a particular area
3. The extinguisher should be of sufficient size to afford protection against the hazards in the area it is intended to protect
4. Fire extinguishers should be mounted where they will be readily accessible for immediate use
5. Fire extinguishers should be regularly inspected and properly maintained. They should be recharged as required and be suitably marked for their appropriate use
6. Employees should know the location of extinguishers and fire alarm boxes in their areas. They will be trained in the steps to take in during emergency. If expected to use fire extinguishers, they will be trained and periodically drilled in the proper, effective use of extinguishers.

## CLASSES OF FIRES AND EXTINGUISHERS

The National Fire Protection Association (NFPA) has four classifications of fires. They are listed below:

### CLASS "A" FIRES

Class "A" fires involve ordinary combustible solids and constitute the greatest bulk of property destroyed by fire annually. This class of fire is sometimes referred to as "surface burning fires". Some examples are, wood, paper, clothing, plastics, wax, etc. Water can be used for an extinguishing agent in this class.

### CLASS "B" FIRES

Class "B" fires involve gases, greases, flammable and combustible liquids. Some examples are gasoline, kerosene, alcohol, cooking oil, lubricating oils, etc. Carbon dioxide or dry chemical extinguishers can be used.

### CLASS "C" FIRES

Class "C" fires involve (or are near) "live" electrical equipment. Some examples are, transformers, electrical junction boxes, switch boxes, electrical wires, electrical motor, etc. A non-conducting extinguishing method must be used on this type of fire, **DO NOT USE WATER!** Dry chemicals can be used.

### CLASS "D" FIRES

Class "D" fires involve combustible metals that require special fire tactics and extinguishing agents. Some examples are, magnesium, potassium, powdered aluminum, zinc, sodium, titanium, and others. There are special agents for these metals.

## *Regional Conveyor Services, Inc.*

Number: 70-1

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### COMPRESSED GAS CYLINDERS

#### 1. GENERAL:

- a. Compressed gas cylinders are a necessary part of the inventory and should be handled with care.
- b. Compressed gas cylinders must be secured to prevent falling or being knocked over.
- c. Compressed gas cylinders' contents must be legibly marked on the cylinder. Markings on cylinders should not be removed or altered.
- d. All cylinders should be treated as full and handled with care.
- e. Cylinders are to be transported on a cart in a vertical position with the protective cap over the valve. Cylinders may be tilted and rolled only for loading/unloading.
- f. Cylinders should not be allowed to drop and bump together.
- g. Cylinders of non-compatible gases should not be stored together. For example, do not store oxygen cylinders with flammable gases unless separated by a fire resistant partition.
- h. Cylinders must be stored in well protected, well ventilated, dry location at least 20 feet from combustible material storage and heat sources such as radiators.
- i. Cylinders not in use must have the valve closed.
- j. Cylinders will be secured and gauges attached.

APPROVED: \_\_\_\_\_

*Kevin Cadd*

Kevin Cadd  
Safety Coordinator



## **Forklift Safety Policy**

### **INTRODUCTION**

The purpose of this policy is to define the requirements for safely operating an industrial forklift at Regional Conveyor Services, Inc. and on all jobsites. All employees shall operate these devices in accordance with this policy.

### **POLICY**

All departments using forklifts shall ensure that all operators are trained and certified in the safe operation of forklifts in accordance with this policy, the manufacturer's recommendations, OSHA CFR 1910.178, ANSI 92.2, and that these devices are maintained in accordance with the manufacturer's recommendations and sound safety practices. Contractors not under direct supervision of Regional Conveyor Services, Inc. staff are responsible for the inspection of their own equipment and the training and certification of their own operators in conformance with this policy and OSHA CFR 1910.178 and ANSI 92.2.

## RESPONSIBILITIES

### Training

All employees who operate a forklift shall be trained in the safe operation of the specific device they will operate. This training will be provided by the Safety Director, an authorized and qualified in-house staff member, or an outside qualified trainer. This training will include, but not be limited to:

- Classroom training on the specific forklift.
- A hands on test to prove competency
- Instructions on pre-use inspection
- Record keeping requirements

Training must conform to all OSHA requirements. A training course syllabus is available on request.

All employees who receive training will be issued a personal wallet size license card stating the equipment he/she is authorized to operate, the signature of the trainer and the expiration date of the license.

The trainer will submit documentation to the employee's supervisor verifying that the employee has successfully completed the training. Each employee will fill out and sign the form entitled "Operating Manual Acknowledgement Form and Training Record" (see Appendix A of this policy and return it to his/her supervisor.) These documents will be forwarded to the Department of Human Resources, which will maintain a copy of the records in the employee's personnel file for five years. The Safety Director will also maintain records of training for five years.

Refresher training is required every three years, whenever a new or different type of forklift is purchased, whenever the employee demonstrates a need for retraining, when new personnel are hired, or at the discretion of the employee's supervisor.

A copy of the manufacturer's operating and maintenance manual shall be kept in a pouch or compartment on the forklift so that the operator may easily consult the manual.

As specified in the OSHA standard (CFR 1910.178), PIT operators must receive initial training in the following truck-related and workplace-related topics:

#### Truck-related topics:

Operating instructions, warnings, and precautions for the type of truck the operator will be authorized to operate;

Differences between the truck and automobiles;

Truck controls and instrumentation;

Engine or motor operation;

Steering and maneuvering;



Visibility (including restrictions due to loading);  
Fork and attachment adaptation, operation, and use limitations;  
Vehicle capacity;  
Vehicle stability;  
Vehicle inspection and maintenance that the operator will be required to perform;  
Refueling and/or charging and recharging of batteries;  
Operating limitations; and  
Operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

**Workplace-related topics:**

Surface conditions where the vehicle will be operated;  
Composition of loads to be carried and load stability;  
Load manipulation, stacking, and unstacking;  
Pedestrian traffic in areas where the vehicle will be operated;  
Narrow aisles and other restricted places where the vehicle will be operated;  
Hazardous (classified) locations where the vehicle will be operated;  
Ramps and other sloped surfaces that would affect the vehicles' stability;  
Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust; and  
Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

**Equipment Security**

If the forklift is accessible to others, if the operator vacates the forklift and cannot see it, or if the operator is more than 25 ft. away from the forklift, the key shall be removed. If the key is to be left in the device, the forklift must be locked in a secure area in order to prevent unauthorized use.

### **Changes or Modifications to Original Equipment Design**

No change or modification to the OEM's design shall be made without the written permission of the manufacturer and the Regional Conveyor Services, Inc. Safety Director. This written permission from the manufacturer shall be kept on file in the equipment records.

### **Personal Protective Equipment**

The seat belt provided in the forklift operator's compartment shall be worn at all times while operating the forklift. The Safety Director should be consulted on a case-by-case basis to determine if additional personal protective equipment or other safety equipment is required when operating the forklift.

### **Maintenance of Equipment**

The Safety Director shall ensure that all forklifts are maintained in accordance with the manufacturer's recommendations. All maintenance and inspection records, including pre-use inspection records shall be maintained by the responsible department for as long as the Regional Conveyor Services, Inc. owns the equipment. These records shall physically be maintained on site.

A qualified inspector shall make an annual inspection. A copy of the inspection form and a certification document will be provided by the inspector and will be retained in the equipment file. Any forklift not inspected annually or inspected and found not to be in proper operating condition shall be immediately taken out of service and reported to the appropriate departmental supervisor. The forklift may be placed into service only after the necessary repairs have been made and/or the annual inspection has been successfully completed.

The operator(s) shall perform pre-use inspections on the forklifts using the form Appendix B of this policy. Such forms will be maintained by the responsible department. The operator(s) shall also conduct a work area inspection to ensure that the area in which the device will be operated is free of unsafe conditions, such as debris, floor or overhead obstructions, or the presence of unauthorized personnel.

## Appendix

### **Operating Manual Acknowledgement Form And Training Record**

By signing this document I certify that I have received a copy of the policy manual for the forklift shown below and have trained in its safe operation. I understand that it is my responsibility to review and understand the safe operation of this device based on the training I received and the manufacturer's recommendations. I understand that if, at any time, I have questions about the safe operations of this equipment, I may contact the Safety Director, my supervisor, or the manufacturer to obtain answers to my questions.

Forklift Make

Forklift Model

Employee Name (print)

Employee Department

User/Operator's signature

Date of Training

## Appendix B

### Safety and Operational Checks (Prior To Each Shift) Hyster Forklift, Model H45XM

Report any problems or malfunctions to your SUPERVISOR.

<b>ENGINE OFF CHECKS</b>	<b>OK</b>	<b>Correction Required</b>
Leaks - Fuel, Hydraulic Oil, Engine Oil, or Coolant		
Tires - Condition and Pressure		
Forks - Top Clip Retaining Pin and Heel- Condition		
Load Backrest - Securely Attached		
Hydraulic Hoses - Mast Chains, Cables and stops		
Overhead Guard - Attached Securely		
Propane Tank - Rust, Corrosion, or Damage		
Battery - Check water / electrolyte Level		
All Engine belts - Check Visually		
Hydraulic Fluid Level- Check Level		
Engine Oil Level- Check Dipstick		
Transmission Fluid Level - Check Dipstick		
Engine Air Cleaner - Check for Clog		
Radiator Coolant - Check Level		
Seat Belt - Functions Properly		
Hood Latch - Adjusted and Securely Fastened		
Brake Fluid - Check Level		
<b>ENGINE ON CHECKS - Unusual Noises Must be Reported Immediately</b>		
Accelerator Pedal - Functions Properly		
Service Brake - Functions Properly		
Parking Brake - Functions Properly		
Steering Operation - Functions Smoothly		
Drive Control- Forward / Reverse - Functions Smoothly		
Tilt Control- Forward / Back - Functions Smoothly		
Hoist and Lowering Control- Functions Smoothly		
Side shift Control- Left / Right - Functions Smoothly		
Horn and Lights - Functions Properly		
Gauges: Ammeter, Engine Oil Pressure, Hour Meter, Fuel Level, Temperature - Functions Properly		

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## *Regional Conveyor Services, Inc.*

Number: 80-2

DATE: April 29, 2002

### MONORAILS, HOISTS AND CHAIN FALLS

#### 1. GENERAL:

- a. Materials handling equipment such as monorails, trollies, hoists and chain falls are necessary in the safe and effective movement of supplies and equipment.

#### 2. LABELING:

- a. All monorails, trollies, hoists and chain falls must be labeled as to their capacity. Capacity must not be exceeded.

#### 3. INSPECTIONS:

- a. The Site Safety Manager and/or operator are responsible to establish the necessary controls to ensure that hoisting equipment is inspected and used safely.
- b. The Site Safety Manager and/or operator are responsible to inspect all hoists, chain falls, and come-alongs annually to ensure they are in a safe working condition. Chain falls and hoists in storage do not require a routine inspection but must be inspected prior to use.
- c. After a satisfactory inspection, this equipment will be appropriately tagged.
- d. Hoisting equipment with an expired inspection tag must be turned in for re-inspection and may not be used until a proper inspection is complete.

#### 4. USE:

- a. Before each use, chain falls will be visually inspected for:
  - (1) Condition of pull chain.
  - (2) Condition of load chain.
  - (3) Condition of load hook.
  - (4) Condition of mousing device.

- (5) Condition of casing.
  - (6) General appearance.
  - (7) Running condition.
  - (8) Guards in place.
- b. Mechanically damaged chain falls and hoists are not to be used and are to be turned in to maintenance for repair or replacement.
  - c. Hoisting equipment must not be used beyond its rated capacity.
  - d. Only one person at a time is allowed to pull the pull chain on a hoist or come-along.
  - e. Chain fall and come-along load chains must not be wrapped around the load to be lifted. Slings or chokers are required.
  - f. Slings and chokers must be in good condition and may not be used beyond their rated capacity. A pre-use inspection is required.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator

## *Regional Conveyor Services, Inc.*

Number: 80-3

DATE: April 29, 2002

### MATERIAL HANDLING

#### 1. GENERAL:

- a. The following precautions are intended to serve as a guide for safe manual lifting. Specific jobs may have more definitive rules or procedures.
  - (1) Limitations on safe lifting are governed by a combination of factors. Whether items can be safely lifted by one person or two or more people, or mechanical assistance is required, depends on several factors:
    - (a) Weight of the load.
    - (b) Size and shape of the item.
    - (c) Height it is to be lifted.
    - (d) Frequency of the lift.
    - (e) Distance from the body to the center of the load.
    - (f) Body movements required, such as twisting, turning, etc.
  - (2) Before attempting a manual material handling job certain questions should be asked. If the answer to either one of these is no, consideration should be given to using mechanical assistance to move the load.
    - (a) Can one, two, or more people handle the lift safely using normal caution, without incident?
    - (b) Is manual lifting the most efficient way to handle the load?
- b. Manual lifting:
  - (1) When manual lifting is required, follow proper lifting techniques.
    - (a) Keep the load close to the body. Bend the knees. Firmly grip the object with both hands, positioning feet properly – one foot along side the load and one behind. Keep the back in normal proper alignment.

Perform the lift smoothly and at average speed using the leg muscles for the main thrust of the lift. Avoid twisting or jerking during the lift. Do not lift excessively heavy items without assistance.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator



## *Regional Conveyor Services, Inc.*

Number: 90-1

DATE: April 29, 2002

### GRINDERS

#### PEDESTAL - BENCH - PORTABLE

##### 1. GENERAL:

- a. There are many types of grinders which are used by employees (pedestal, bench and portable) which require knowledge of the best and safest way to operate.

##### 2. INSPECTION:

- a. Before operating a grinder, the operator must make the following checks:
  - (1) Proper wheel rpm rating.
  - (2) Proper flanges and blotters (size and tightness).
  - (3) Tool rest and throat guard spacing (tool rest must not exceed 1/8" and throat guard must not exceed 1/4". Tool rest must not be below the center of the wheel).
  - (4) A check should be made for embedded material, rounded corners, grooves, uneven wear, and "out of round" wheel. Dress wheel as necessary before using it.

##### 3. LOCKOUT/TAGOUT:

- a. Before any repair or maintenance on grinders are to be made, the proper electrical/pneumatic disconnection procedures must be followed. (Reference the Lockout/Tagout program)

##### 4. INSTALLATION OF NEW WHEELS:

- a. All wheels should be visually inspected closely prior to installation to make sure that they have not been damaged by shipment, handling, or use.
- b. New wheels should be "ring" tested prior to installation. This is done by suspending the wheel with a string and tapping the wheel gently with a non-metallic hammer or other appropriate tool to see if the wheel gives a clear metallic ring. If it sounds cracked (dead) or is defective in any way, the wheel must be destroyed.

- (11) The Lockout/Tagout Program will be followed when isolation of an energy source is necessary.
- (12) Employees are not allowed to place themselves under a suspended load.
- (13) When doubt arises about proper safety procedures, the supervisor should be contacted prior to performing the task.
- (14) All employees have the responsibility to protect themselves and his/her fellow workers by following all rules and advising others of known potential hazards.
- (15) When working around powered equipment such as lathes, mills, power presses, shears, etc. employees should never place hand and fingers in a position where the rotating parts, shavings, sheared pieces, moving parts, etc. could cause an injury.
- (16) It is a condition of employment that all employees read safety bulletins, obey safety warning signs, attend weekly safety tool box meetings, and follow all safety rules.

**2. CHECKLIST:**

- a. A "Job Safety Checklist" has been devised to ensure safety awareness at each job site. This checklist will be utilized by management as appropriate.

APPROVED: Kevin Cadd  
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Safety Coordinator

1. Attachment
1. Job Safety Checklist

*Regional Conveyor Services, Inc.*

Number: 100-1

DATE: April 29, 2002

POWER TOOLS

1. GENERAL:

- a. The use of power tools to perform certain tasks is necessary and should be used in a safe manner. The following information pertains to the use of power tools:
- (1) Power tools shall not be operated without proper training.
  - (2) Material should be secured when drilling, sawing, etc. with powered tools.
  - (3) Powered tools must be inspected before use, for damaged parts, loose fittings, and frayed or cut electrical cords. Defective tools must not be used until repaired. Defective tools will be tagged for repair.
  - (4) Machines must be shut off and brought to a complete stop before removal of waste.
  - (5) All tools shall be used with the correct shield, guard or attachment recommended by the manufacturer. Tools or guards should not be altered.
  - (6) Electrical cords:
    - (a) Ground fault protection must be provided.
    - (b) Cords must be properly grounded.
    - (c) Damaged cords should be repaired and replaced.
- b. Employee owned tools must meet all applicable safety standards.

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Safety Coordinator

## **THE LANDIN COMPANIES**

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Self Insured and Retained Program

5. All covers in walking/working surfaces or roofs shall be color-coded or shall be marked with the word "HOLE" or "COVER" to provide warning of the hazard.
6. A standard railing with 4-inch toe boards or a floor hole cover that is secured against accidental displacement must guard floor holes.
7. A wall opening is an opening in which there is a drop of 4 or more feet.
8. Wall openings must be protected by standard top rail and mid-rail to reduce the danger of falling and by a 4-inch toe board where the danger of falling material is present.
9. Every open side floor or platform 4 feet or more above the adjacent floor or ground level must be guarded by a standard top rail and mid-rail or the equivalent except where there is an entrance to a ramp, stairway, or fixed ladder. The railing must have a 4 inch toe board whenever persons can pass beneath the open sides, or there is moving machinery with which falling material could create a hazard.
10. Runways must be guarded by a standard top rail and mid-rail on all open sides 4 feet or more above the floor or ground. Wherever tools, machine parts, or materials are likely to be used on the runway, a 4-inch toe board must be provided.

### **Tools-Hand and Powered**

#### **Hand Tools**

1. Wrenches, including adjustable, pipe-end and socket wrenches must not be used when jaws are sprung to the point that slippage occurs.
2. Impact tools, such as hammers, wedges, and chisels, must be kept free of mushroomed heads.
3. All tools, company issued and personal, must be inspected daily for splinters, cracks and loose joints. Any tools with defects must be removed from the work site and tagged "DO NOT USE."
4. Always use the proper tool for the job.

**Power Tools**

1. Power tools are designed to accommodate guards; they must be equipped with such guards when in use. Belts, gears, shafts, pulleys, sprockets, drums, fly wheels, chains or other reciprocating, rotating or moving parts of equipment must be guarded.
2. All manufacturer's warnings and safe operating procedures for tools will be followed.
3. The use of electrical cords for hoisting and/or lowering tools is not permitted.
4. Electric power tools must be industrial or heavy-duty grade, with approved double insulated wiring or grounded.
5. All portable, power-driven circular saws must be equipped with guards above and below the base plate or shoe.
  - a) The upper guard must cover the saw to the depth of the teeth, except for the minimum arc required to permit the base to be tilted for level cuts. The lower guard must cover the saw to the depth of the teeth, except for the minimum arc required to allow proper retraction and contact with the work.
  - b) When the tool is withdrawn from the work, the lower guard must automatically and instantly return to the covering position.
6. All pneumatically driven nailers, staplers, and other similar equipment provide with automatic fastener feed, which operate at more than 100 p.s.i., must have a safety device on the muzzle to prevent the tool from ejecting fasteners unless the muzzle is in contact with the work surface.
7. Compressed air must not be used for cleaning purposes.
8. All compressed air hoses exceeding 3/8 inch diameter must have a safety device at the source of supply to reduce pressure in case of hose failure.

**Powder-Actuated Tools**

1. Only employees, who have been trained and received a certificate of operation, are allowed to operate powder-actuated tools.
2. The tool must be tested each day before loading to see that safety devices are in proper working condition. The method of testing must be in accordance with the manufacturer's recommended procedure.

## **THE LANDIN COMPANIES**

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Self-Insured and Related Programs

3. Any tool found not in proper working order, or that develops a defect during use, must be immediately removed from the work site and tagged "Do Not Use" until properly repaired.
4. Tools must not be loaded until just prior to the intended firing time. Neither loaded nor empty tools are to be pointed at any employees. Hands must be kept clear of the open barrel end.
5. Loaded tools must not be left unattended.
6. Fasteners must not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface-hardened steel, glass block, face brick, or hollow tile.
7. Driving into materials easily penetrated must be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.
8. Tools must not be used in an explosive or flammable atmosphere.
9. All tools must be used with the correct shield, guard, or attachment recommended by the manufacturer.
10. The operator must warn those near his workplace that he is about to discharge the tool.

### **Material Handling**

#### **Storage**

1. Storage areas must be kept free from accumulation of materials that constitute hazards from tripping, fire, explosion, or pest harborage. Vegetation control will be exercised when necessary.
2. All materials stored in tires must be stacked, racked, blocked interlocked, or otherwise secured to prevent sliding, falling or collapse.
3. Aisles and passageways must be kept clear to provide for the free and safe movement of material handling equipment or employees. Such areas must be kept in good repair.
4. Materials must not be stored on scaffolds or runways in excess of supplies needed for immediate operations.

## *Regional Conveyor Services, Inc.*

Number: 100-2

DATE: April 29, 2002

### HAND TOOLS

1. GENERAL:

- a. Hand tools are an important part of the construction industry. Therefore, every effort will be made to inform employees of when and how to use hand tools.

2. RESPONSIBILITY:

- a. Management will be responsible for the safe condition of tools and equipment used by employees, including tools and equipment which may be furnished by employees.
- b. Employees are required to:
- (1) Use only the right tool for the job.
  - (2) Keep hand tools in good condition – sharp, clean, oiled, etc.
  - (3) Only exert the proper amount of force on the hand tool and not to force tools beyond their capacity.
  - (4) Keep pointed tools out of pockets.

APPROVED: *Kevin Cadd*  
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Safety Coordinator

- c. Spindle nuts should not be over tightened when installing wheels. Maximum torque to be applied to the spindle nut is 3/8" diameter spindle – 10 ft. lbs., 1/2" diameter spindle – 20 ft. lbs., 5/8" diameter spindle – 35 ft. lbs.
- d. The wheel should be visually checked by rotating by hand to ensure there is no deflection of the wheel and it does not strike the guard.
- e. While standing to the side, the grinder should be test run for approximately one minute.

5. **WHEEL STORAGE:**

- a. Wheels should be stored in a dry place with a constant temperature above freezing. They should be protected from physical damage that could cause cracking. A damaged wheel should never be used.

6. **OPERATION:**

- a. In order to operate grinders safely, the following rules should be followed:
  - (1) Soft metals such as aluminum, brass, copper, etc. should not be grinded on general purpose wheels.
  - (2) Only trained persons may operate grinders.
  - (3) Only one person at a time may use a grinder.
  - (4) Only proper size grinders are allowed to be used.
  - (5) Safety glasses, goggles or a face shield must be worn.
  - (6) Gloves may be worn except within 3" of the wheel.
  - (7) Work must be applied slowly to a cold wheel.
  - (8) Material must be moved back and forth against the grinding surface.
  - (9) The side of the wheel must not be used for grinding unless the wheel is designed for side grinding.
  - (10) Contact with a drifting wheel must be avoided.
  - (11) Because material that has just been ground may be hot, contact must be avoided.

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Safety Coordinator



6. REPAIRS:

- a. All damaged electrical equipment and tools will be tagged and removed from service.

7. CIRCUITS:

- a. All 15 to 20 amp temporary circuits will be ground fault protected.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator

Hearing Conservation Program

I. OBJECTIVE

The objective of the Regional Conveyor Services, Inc. Hearing Conservation Program is to minimize occupational hearing loss by providing hearing protection, training, and annual hearing tests to all persons working in areas or with equipment that have noise levels equal to or exceeding an eight-hour time-weighted average (TWA) sound limit of 85 dBA (decibels measured on the A scale of a sound level meter). A copy of this program will be maintained by the Safety Director. A copy of OSHA's Hearing Conservation Standard, 29 CFR 1910.95, can be obtained from the Safety Director. A copy of the standard will also be posted in areas with affected employees.

II. ASSIGNMENT OF RESPONSIBILITY

A. Management

1. Use engineering and administrative controls to limit employee exposure.
2. Provide adequate hearing protection for employees.
3. Post signs and warnings in all high noise areas.
4. Conduct noise surveys annually or when new equipment is needed.
5. Conduct annual hearing test for all employees.
6. Conduct hearing conservation training for all new employees.
7. Conduct annual hearing conservation training for all employees.

B. Employees

1. Use company-issued approved hearing protection in designated high noise areas.
2. Request new hearing protection when needed.
3. Exercise proper care of issued hearing protection.

III. PROCEDURES

A. Noise Monitoring

1. Monitoring for noise exposure levels will be conducted by the Safety Director or crew leader. It is the responsibility of the individual departments to notify the Safety Director or crew leader when there is a possible need for monitoring. Monitoring will be performed with the use of sound level meters and personal dosimeters at the discretion of the Safety Director or crew leader.

2. Monitoring will also be conducted whenever there is a change in equipment, process or controls that affect the noise levels. This includes the addition or removal of machinery, alteration in building structure, or substitution of new equipment in place of that previously used. The responsible supervisor must inform the Safety Director when these types of changes are instituted.

#### B. Employee Training

1. Affected employees will be required to attend training concerning the proper usage and wearing of hearing protection. The training will be conducted by the Safety Director, or a designated representative, within a month of hire and annually thereafter.

2. Training shall consist of the following components:

- a. how noise affects hearing and hearing loss;
- b. review of the OSHA hearing protection standard;
- c. explanation of audiometric testing;
- d. rules and procedures;
- e. locations within company property where hearing protection is required; and
- f. how to use and care for hearing protectors.

3. Training records will be maintained by the Safety Director.

#### C. Hearing Protection

Management, supervisors, and employees shall properly wear the prescribed hearing protection while working or traveling through any area that is designated as a high noise area.

1. Hearing protection will be provided at no cost to employees who perform tasks designated as having a high noise exposure and replaced as necessary. It is the supervisor's responsibility to require employees to wear hearing protection when noise levels reach or exceed 85 dBA. Those employees will have the opportunity to choose from at least two different types of hearing protection.

2. Personal stereo headsets, or "Walkmen," are not approved for hearing protection and are not permitted in any operating area of company property.

3. Signage is required in areas that necessitate hearing protection. It is the responsibility of the Safety Director to provide signage to the appropriate areas.
4. Preformed earplugs and earmuffs should be washed periodically and stored in a clean area. Foam inserts should be discarded after each use. Hands should be washed before handling preformed earplugs and foam inserts to prevent contaminants from being placed in the ear.
5. The Safety Director will keep a log of the areas or job tasks designated as requiring hearing protection, as well as the personnel affected by this Hearing Conservation Program.

#### D. Audiograms/Hearing Tests

1. Employees subject to the Hearing Conservation Program who have time-weighted average (TWA) noise exposures of 85 dBA or greater for an eight (8) hour work shift will be required to have both a baseline and annual audiogram. The audiograms will be provided by the Regional Conveyor Services, Inc. and conducted by an authorized person with no cost to the employee.
2. The baseline audiogram will be given to an employee within one (1) month of employment with Regional Conveyor Services and before any exposure to high noise levels. Annual audiograms will be performed within one year from the date of the previous audiogram. It is the responsibility of the individual and the Safety Director to schedule the annual audiogram.
3. If an annual audiogram shows that an employee has suffered a standard threshold shift, the employee will be retested within thirty (30) days of the annual audiogram. If the retest confirms the occurrence of a standard threshold shift, the employee will be notified in writing within twenty-one (21) days of the confirmation. Employees who do experience a standard threshold shift will be refitted with hearing protection and provided more training on the effects of noise.
4. An audiologist, otolaryngologist, or physician shall review problem audiograms and shall determine whether there is a need for further evaluation.

#### E. Mobile test van exception

Where mobile test vans are used to meet the audiometric testing obligation, the employer shall obtain a valid baseline audiogram within 1 year of an employee's first exposure at or above the action level. Where baseline audiograms are obtained more than 6 months after the employee's first exposure at or above the action level, employees shall wear hearing protectors for any period exceeding six months after first exposure until the baseline audiogram is obtained.

Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protectors may be used as a substitute for the requirement that baseline audiograms be preceded by 14 hours without exposure to workplace noise.

The Safety Director shall notify employees of the need to avoid high levels of non-occupational noise exposure during the 14-hour period immediately preceding the audiometric examination.

Attachment A

**Hearing Conservation Training Log**

**Training Date:** \_\_\_\_\_

**Topic:** \_\_\_\_\_

**Training Conducted by:** \_\_\_\_\_

**Employee Name (printed)**

**Employee Signature**

**Job Title**

Attach B

Record of Hearing Protection  
Needs

RCS Personnel in Hearing Conservation Program Date				
Hearing protection is required for and has been issued to the following personnel:				
Employee Name	Department	Job Description/ Equipment Being Used	Type of Hearing Protection Issued	Date Issued

# 111-1

## First Aid, CPR & Emergency

### Medical Response

#### 1 PURPOSE & SCOPE

- a) Personal injury is not uncommon in the pipeline construction and maintenance workplace. These injuries are usually minor cuts or burns but can be as severe as acute effects of chemical exposure or incidents such as heart attacks or strokes.
- b) This written plan and policy by Regional Conveyor Services, Inc., along with accompanying materials, shall be utilized by Site Supervisors and company employees to ensure that medical services and first aid are available at each work location.
- c) This policy applies to all employees and subcontractors at work locations that are controlled by Regional Conveyor Services.

#### 2 GENERAL REQUIREMENTS

- a) The company shall ensure the availability of medical personnel for advice and consultation on matters of occupational health.
- b) Provisions shall be made prior to commencement of the project for prompt medical attention in case of serious injury.
- c) In the absence of an infirmary, clinic, hospital, or physician, that is reasonably accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first aid training from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence, shall be available at the worksite to render first aid.
- d) First aid supplies shall be easily accessible when required.



- e) The contents of the first aid kit shall be placed in a weatherproof container with individual sealed packages for each type of item, and shall be checked by the company Safety Director before being sent out on each job, and at least weekly on each job by the Site Supervisor to ensure that the expended items are replaced.
- f) First aid supplies shall be readily available.
- g) An example of the minimal contents of a generic first aid kit is described in American National Standard (ANSI) Z308.1-1978 "Minimum Requirements for Industrial Unit-Type First-aid Kits." The contents of the kit listed in the ANSI standard should be adequate for small worksites. When larger operations or multiple operations are being conducted at the same location, employers should determine the need for additional first aid kits at the worksite, additional types of first aid equipment and supplies and additional quantities and types of supplies and equipment in the first aid kits.
- h) Work locations may have unique or changing first aid needs and may need to enhance the first aid kits maintained at these locations.
- i) In areas where 911 is not available, the telephone numbers of the physicians, hospitals, or ambulances shall be conspicuously posted by the Site Supervisor. *See Emergency Phone List form at Appendix 1 of this section.*
- j) Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use. Quick drenching may be accomplished by use of portable eyewash and body wash stations, or stations designed for this purpose that are plumbed into an appropriate water supply.

### **3 FIRST AID & EMERGENCY MEDICAL RESPONSE**

- a) Proper equipment for prompt transportation of the injured person to a physician or hospital, or a communication system for contacting necessary ambulance service, shall be provided. The Site Supervisor shall be responsible for confirming the availability of emergency medical services assistance should they be needed, and confirming that arrangements are in place for transporting injured persons to a physician or hospital.
- b) In most situations communication to obtain emergency medical assistance will be provided by land-line telephone, cellular telephone or two-way radio. The Site Supervisor shall ensure that such communications capabilities are available at the jobsite prior to commencing work.
- c) The initial responsibility for first aid rests with the first person(s) at the scene, who should react quickly but in a calm and reassuring manner.

- d) The person assuming responsibility should immediately summon medical help (be explicit in reporting suspected types of injury or illness, location of victim, and type of assistance required).
- e) Send people to meet the emergency medical services (EMS) personnel at highway intersections, entrance roadways or as needed to help direct them to scene. The injured person should not be moved except where necessary to prevent further injury.
- f) The names of persons on the jobsite who are trained in CPR and first aid should be posted by the telephone or other communications method when possible, or posted in a prominent place.
- g) The number to call for medical emergencies (911) shall also be posted by your telephone.
- h) All first aid, chemical exposures and medical emergencies shall be reported to the Site Supervisor so that immediate response can be made and proper accident reporting procedures followed.

#### **4 GENERAL FIRST AID FOR MINOR INJURIES**

- a) For purposes of this policy, general first aid is defined as anyone-time treatment and any follow up visit for the purpose of observation, treatment of minor scratches, cuts, burns, splinters, and so forth, which do not ordinarily require medical care.
- b) Minor injuries should be initially treated with self-administered first aid unless assistance of another person is required. This limits the exposure of other persons to potential pathogens in the blood, body fluids and tissues of the injured person.
- c) Minor injuries requiring general first aid should always be reported to a supervisor and recorded on the *First Aid Report* form maintained at each work location at the first aid station. This is important because a minor injury may indicate a hazardous situation that should be corrected to prevent a serious future injury. It is also important to document a minor injury as having been "work related" if the injury later leads to serious complications, such as from an infected cut.

#### **5 PERSONAL PROTECTION DURING FIRST AID**

- a) OSHA requires adherence to "Universal Precautions" when employees respond to emergencies which provide potential exposure to blood and other potentially infectious materials. "Universal Precautions" stresses that all patients should be assumed to be infectious for HIV and other bloodborne pathogens. *NOTE: See the company's written safety program on Bloodborne Pathogens.*

- b) Persons responding to a medical emergency should be protected from exposure to blood and other potentially infectious materials. Protection can be achieved through adherence to work practices designed to minimize or eliminate exposure and through the use of personal protective equipment (i.e., gloves, masks, and protective clothing), which provide a barrier between the worker and the exposure source.
- c) For most situations in which first aid is given, the following guidelines should be adequate:
  - d) For bleeding control with minimal bleeding and for handling and cleaning instruments with microbial contamination, disposable gloves alone should be sufficient.
- ii) For bleeding control with spurting blood, disposable gloves, a gown, a mask, and protective eye wear are recommended.
  - iii) For measuring temperature or measuring blood pressure, no protection is required.
- d) After emergency care has been administered, hands and other skin surfaces should be washed immediately and thoroughly with warm water and soap if contaminated with blood, other body fluids to which universal precautions apply, or potentially contaminated articles. Hands should always be washed after gloves are removed, even if the gloves appear to be intact.

## Requirement to Report Work-Related Injuries & Illnesses

ALL WORK-RELATED INJURIES AND ILLNESSES SHALL BE REPORTED AND TREATED AS SOON AS POSSIBLE AFTER OCCURRENCE!

If an employee of Regional Conveyor Services becomes injured or ill due to a work-related injury or illness and is in need of immediate medical assistance, this shall be reported to the Site Supervisor.

Failure to report minor injuries or to receive medical treatment may result in serious infections or complications to the health of the employee.

A *First Aid Station* is located at each work location and jobsite. Each *First Aid Station* shall be stocked with basic supplies specified in the inventory on the next page. Each *First Aid Station* will also contain *First Aid Report* forms.

When first aid is rendered, the supervisor will note treatment on the *First Aid Report* form. In the event the employee *REFUSES* first aid and/or examination by a doctor, this will be noted in the *First Aid Report*.

IMPORTANT:        *If an employee declines first aid and/or medical treatment for a reported on-the-job injury after the Site Supervisor recommends it, the employee will NOT be allowed to continue work. Site Supervisors will discuss each such situation with the company Safety Coordinator or the Personnel Dept. BEFORE allowing the employee to return to duty.*

The Site Supervisor or someone designated by the Site Supervisor will be responsible for checking and maintaining the *First Aid Station(s)* at the work location. This person will take a regular inventory of supplies and make sure that the station or kit remains adequately stocked. The following first aid supplies checklist shall be used as a guide to ensure proper stocking of the station.

# First Aid Supplies Checklist

The First Aid Station or First Aid Kit should contain:

	<u>Quantity</u>	<u>Needed</u>
Protective Rubber Gloves (Surgical Type)	2 pair	
Protective CPR Mask w/One-Way Valve	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 pair	
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 bio-hazard bags, red in color	4 each	
American Red Cross Pocket First Aid Guide		
First Aid Kit Inventory Checklist forms		
First Aid Report forms		

Date of order:

By: \_\_\_\_\_

For location:

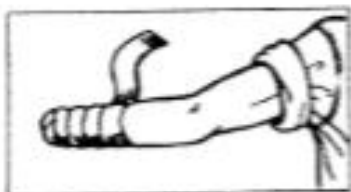
**Emergency Procedure for a Severed Body Part** Call 9-1-1 for Emergency Medical Service immediately. Transport the Patient and the severed part to the health care facility as quickly as possible.



Keep the Patient from eating and drinking in case he is later placed under anesthesia.



Do not allow the Patient to drink alcohol to "deaden" the pain.



**DRESSING THE REMAINING PART OF THE LIMB.** Wrap the end of the limb in a compressive dressing so bleeding is stopped. Do not wrap it so tightly that blood flow is cut off to healthy tissue.



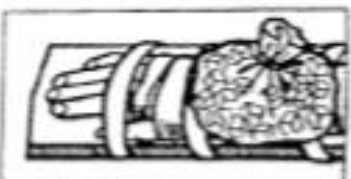
**CARING FOR THE SEVERED PART.** Wrap the severed part in a terrycloth towel, paper towel or piece of gauze.



**PLACE THE SEVERED PART** in a clean plastic bag or plastic container and seal it so that it is waterproof. Store plastic bag on ice.



**WHEN A LIMB OR DIGIT IS PARTIALLY SEVERED.** Wrap the injury with a compressive dressing tightly enough to stop blood flow.



**SPLINT THE INJURED AREA** by wrapping it securely to a piece of rigid material. Splints should only be used if you need to move a patient.

## Heat-Related Illnesses

Heat is a serious hazard outdoors in hot weather and indoors when the work exposes personnel to unusually hot temperatures and high humidity. A person's body builds up heat when at work, and sweats to get rid of extra heat.

But there are times when this cannot happen as it should - for example outdoors in the summer, on a humid day and without shade in an area where heat radiates from the surroundings. This may be a time when the body simply cannot cool off fast enough.

Too much heat can make a person tired, hurt job performance, and increase the chance of injury. Overheating can cause skin rash on the minor side, and progress into a range of conditions that can be life-threatening. Effects of physical overheating include:

- *Dehydration.* When the body loses water, a person cannot cool off fast enough, but will feel thirsty and weak.
- *Cramps.* The heat can cause muscle cramps, even after a person leaves work.
- *Heat exhaustion.* The victim feels tired, nauseous, headachy, and giddy (dizzy and silly). The skin is damp and looks ruddy or flushed. Fainting may occur.
- *Heat stroke.* This is a life-threatening condition. The victim may have hot, dry skin and a high temperature. The skin dryness is because the body's ability to sweat is compromised or has shut down. Victims may feel confused, suffer convulsions or lose consciousness. Heat stroke can kill quickly and emergency medical assistance is urgently needed.

A person's risk of developing heat stress depends on several factors. These include physical condition, the weather (temperature *AND* humidity), clothing worn, quickness of movement and how much physical demand is being placed on the body (lifting, heavy work), if there is air circulation over the body, whether the person is in direct sunlight, and whether they are taking medication. Evaluation of workplace conditions using the Wet-Bulb Globe Temperature Index is one precise way to estimate the risk of heat stress.

### TYPES OF HEAT SICKNESS (in a progressing order of seriousness)

- **HEAT RASH** is recognized by tiny, red, blister like eruptions on the skin and by a prickly, itchy, burning sensation. *First Aid:* Bathe skin to prevent infection and put on dry clothes.

- **SUNBURN** is caused by the exposure of unprotected skin to ultraviolet light. Symptoms of first degree sunburn are red, painful skin. Second degree sunburn causes blistering and/or peeling. *First Aid: Skin lotions, topical anesthetics and staying in a shaded area.*
- **HEAT CRAMPS** bring painful muscle spasms. *First Aid: Water and/or electrolyte replacement beverage. Get medical assistance.*
- **HEAT EXHAUSTION** results from loss of too much water or salt from the body. It causes cool, moist skin, obvious sweating and rapid pulse (more than 150 beats per minute). It may or may not cause fever. *First Aid: Water and/or electrolyte replacement beverage.*
- **HEAT STROKE** (thermoregulatory failure) is characterized by hot, dry skin, a flushed face, body temperature of 105 degrees F (40.6° C) or higher, rapid pulse and brain disorders such as headaches, confusion, delirium or unconsciousness. Usually, there is an absence of sweating because the body's "cooling system" has shut down. There may also be difficulty breathing, constricted pupils, high blood pressure, strange behavior, weakness, nausea or vomiting. *First Aid: This is a potentially **LIFE-THREATENING** condition. The victim must be removed from the heat source and the body temperature lowered as quickly as possible. Immerse in water (garden hose, shower, bath tub) or cover and massage the body with wet cool soaked towels or sheets. **DO NOT** give liquids to an unconscious person. Call/or emergency medical assistance immediately.*

#### PROTECTIVE MEASURE TO A VOID HEAT STRESS

Here is advice that employees can be given toward preventing heat-related illness:

- Drink a lot of cool water all day- before you feel thirsty. Every 15 minutes, you may need a cup of water (5 to 7 ounces).
- Keep taking rest breaks. Rest in a cool, shady spot. Use fans.
- Wear light-colored clothing, made of cotton.
- Do the heaviest work in the coolest time of the day.
- Work in the shade.
- For heavy work in hot areas, take turns with other workers, so some can rest.



- If you travel to a warm area for a new job, you need time for your body to get used to the heat. Be extra careful the first two weeks on the job.
- If you work in protective clothing, you need more rest breaks. You may also need to check your temperature and heart rate.

OSHA does not have a special rule for heat. But because heat stress is known as a serious hazard, workers are protected under the General Duty Clause of the Occupational Safety and Health Act. The clause says employers must provide "employment free from recognized hazards causing or likely to cause physical harm."

### ADMINISTRATIVE AND WORK PRACTICE CONTROLS

Heat stress often can be reduced by rescheduling work. Sometimes, strenuous tasks can be postponed until a cooler time of day or a cooler season. Heavy jobs will be spread out over longer periods of time, allowing employees to pace themselves appropriately and to take work breaks as needed.

Employees will be trained in the causes, symptoms, treatment and prevention of heat stress.

APPENDIX 1

## **JOBSITE EMERGENCY NUMBERS**

<b>CALLING FROM</b>
<b>FIRE</b>
<b>POLICE</b>
<b>AMBULANCE</b>
<b>DOCTOR</b>
<b>HOSPITAL</b>
<b>COMPANY SAFETY COORDINATOR</b>
<b>HELICOPTER AMBULANCE</b>

# 112-1

## Electrical Safety Policy

### I. Purpose

The purpose of this policy is to establish safe work practices at Regional Conveyor Services, Inc. that are intended to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized and to comply with the ILHR/OSHA Standard on electrical safe work practices 29 CFR 1910.331 through 1910.335.

### III. Application

This policy applies to both Qualified persons and Unqualified persons (See the definitions below) who are working on, near, or with the following electrical installations:

1. Premises Wiring. Installations of electrical conductors and equipment within or on buildings or other structures, and on other premises such as yards, carnival, parking and other lots and industrial substations;
2. Wiring For Connection To Supply. Installations of conductors that connect to the supply of electricity;
3. Other Wiring. Installations of other outside conductors on the premises;
4. Optical Fiber Cable. Installations of optical fiber cable where such installations are made along with electrical conductors; and
5. Exposed Energized Parts. Installations that involve work performed by unqualified persons on or near exposed energized parts.

#### **IV. Responsibility for Compliance**

The development and administration of this electrical safety policy will be the responsibility of the Safety Director.

The administrative responsibility of this individual will include:

1. Identification and location of hazardous exposures.
2. Supervision of employee training.
3. Selection and use of personal protective equipment.
4. Periodic evaluation of the policy to determine its continued effectiveness.

#### **V. Definitions**

Qualified Person - means a person permitted to work on or near exposed energized parts who has been trained in and familiar with:

1. The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment;
2. The skills and techniques necessary to determine the nominal voltage of exposed live parts;
3. The knowledge, skills and techniques to work safely on energized circuits;
4. The proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools; and
5. The clearance distances for work performed near overhead lines that are specified in the OSHA standard that appears in 29 CFR 1910.333(c) and the corresponding voltages to which the person will be exposed.

Unqualified Person - means a person with little or no training in avoiding the electrical hazards of working on or near exposed energized parts.

On or Near- means close enough to exposed line parts (by either personal contact or contact by tools or materials) for an employee to be exposed to any hazard they present.

## **VI. General Requirement**

Appropriate safe work practices will be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work is performed near or on equipment or circuits that are or may be energized. Those specific work practices will be consistent with the nature and extent of the associated electrical hazards.

## **VII. Work on or Near Exposed Deenergized Parts**

*Employees should always assume electrical parts to be live when working on or near deenergized parts.*

1. Live parts to which an employee may be exposed will be deenergized before any employee works on or near them, unless deenergizing will introduce additional or increased hazards or is not feasible due to equipment design or operational limitations (See below for examples).

Live parts that operate at less than 50 volts to ground need not be deenergized if there will be no increased exposure to electrical burns or to explosion due to electric arcs.

- a. Examples of increased or additional hazards include interruption of life support equipment, deactivation of emergency alarm systems, shutdown of hazardous location ventilation equipment, or removal of illumination for an area.
  - b. Examples of work that may be performed on or near energized circuit parts because of infeasibility due to equipment design or operational limitations include testing of electric circuits that can only be performed with the circuit energized and work on circuits that form an integral part of a continuous process that would otherwise need to be completely shut down in order to permit work on one circuit or piece of equipment.
2. Whenever any employee is exposed to contact with parts of fixed electric equipment or circuits that have been deenergized, the circuits energizing the parts will be properly locked out.
  3. Safe procedures for deenergizing circuits and equipment will be determined before circuits or equipment are deenergized.
  4. The circuits and equipment to be worked on will be disconnected from all electric energy sources. Control circuit devices, such as push buttons, selector switches, and interlocks, may not be used as the sole means for deenergizing circuits or equipment. Interlocks for electric equipment may not be used as a substitute for lockout procedures.

5. Stored electric energy that might endanger personnel will be released before starting work. Capacitors shall be discharged and high capacitance elements shall be short-circuited and grounded, if the stored electric energy might endanger personnel.
6. Stored non-electrical energy in devices that could reenergize electric circuit parts will be blocked or relieved to the extent that the circuit parts could not be accidentally energized by the device.
7. No work will be performed on or near deenergized live parts, circuits or equipment until their deenergized condition has been verified. Verification of the deenergized condition will be made as follows:
  - a. A qualified person will operate the equipment operating controls or otherwise verify that the equipment cannot be restarted.
  - b. A qualified person will use test equipment to test the circuit elements and electrical parts of equipment to which employees will be exposed and will verify that the circuit elements and equipment parts are deenergized.
  - c. The test shall also determine if any energized condition exists as a result of inadvertently induced voltage or unrelated voltage backfeed even though specific parts of the circuit have been deenergized and presumed to be safe.
8. Before any circuit or equipment is reenergized (even temporarily) the following requirements will be met in the order listed:
  - a. A qualified person will conduct tests and visual inspections, as necessary, to verify that all tools, electrical jumpers, shorts, grounds, and other such devices have been removed, so that the circuits and equipment can be safely energized.
  - b. Employees exposed to the hazards associated with reenergizing the circuit or equipment will be warned to stay clear of circuits and equipment.
  - c. Each lock will be removed by the employee who applied it or under his or her direct supervision.
  - d. If that employee is absent from the workplace, then the lock may be removed provided that it is certain that the employee who applied the lock is not available at the workplace, and that employee is made aware that the lock has been removed before he or she resumes work.
  - e. There will be a visual determination that all employees are clear of the circuits and equipment.

## **VIII. Work on or Near Exposed Energized Parts**

1. In those cases where the exposed live parts are not deenergized, either because of increased or additional hazards or because of infeasibility due to equipment design or operational limitations, other safety-related work practices must be used to protect employees who may be exposed to the electrical hazards involved.

The work practices used must protect employees against contact with energized circuit parts directly with any part of their body or indirectly through some other conductive object or where employees are near enough to be exposed to any hazard they present.

2. Only qualified persons may work on electric circuit parts or equipment that has not been deenergized. These employees must be familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools.
3. Whenever work is to be performed near overhead lines, the lines will be deenergized and grounded, or other protective measures will be provided before work is started.
4. When overhead lines are to be deenergized, arrangements to deenergize and ground them will be made with the organization that operates or controls the electrical circuits involved.
5. When protective measures are provided such as guarding, isolating, or insulating, those precautions shall prevent employees from contacting such lines directly with any part of their body or indirectly through conductive materials, tools, or equipment.
6. Only qualified employees will be permitted to install insulating devices on overhead power transmission or distribution lines.
7. Whenever an unqualified employee is working in an elevated position near overhead lines, the location will be such that the person and the longest conductive object he or she may contact cannot come closer to any unguarded, energized overhead line than the following distances:
  - a. For voltages to ground 50kV or below - 10ft.(305cm);
  - b. For voltages to ground over 50kV - 10 ft. (305cm) plus 4 inches (10 cm) for every 10kV over 50kV.

8. Whenever an unqualified employee is working on the ground in the vicinity of overhead lines, the person may not bring any conductive object closer to unguarded, energized overhead lines than the distances given above.
9. For voltages normally encountered with overhead power lines, objects which do not have an insulating rating for the voltage involved are considered to be conductive.
10. Whenever a qualified person is working in the vicinity of overhead lines, whether in an elevated position or on the ground, the person may not approach or take any conductive object without an approved insulating handle closer to exposed energized parts than that shown in **Table S-S** of 29 CFR 1910.333(c)(3) (see paragraph 11 below), unless:
  - a. The person is insulated from the energized part. Gloves, with sleeves if necessary, rated for the voltage involved, are considered to be insulation of the person from the energized part on which work is performed, or
  - b. The energized part is insulated both from all other conductive objects at a different potential and from the person, or
  - c. The person is insulated from all conductive objects at a potential different from that of the energized part.
11. The minimum safe approach distances are as follows:

<b><u>Voltage Range (Phase to Phase)</u></b>	<b><u>Minimum Approach Distance</u></b>
300V and less	Avoid Contact 1 ft. 0 in. (30.5 cm)
Over 300V, not over 750 V	1 ft. 6 in. (46 cm)
Over 750V, not over 2kV	2 ft. 0 in. (61 cm)
Over 2kV, not over 15kV	3 ft. 0 in. (91 cm)
Over 15kV, not over 37kV	3 ft. 6 in. (107 cm)
Over 37kV, not over 87.5kV	4 ft. 0 in. (122 cm)
Over 87.5V, not over 121kV	4 ft. 6 in. (137 cm)
Over 121kV, not over 140kV	

12. Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines will be operated so that a clearance of 10 ft. (305 cm) is maintained. If the voltage is higher than 50kV, the clearance will be increased 4 in. (10 cm) for every 10kV over that voltage. However, under any of the following conditions, the clearance may be reduced:
  - a. If the vehicle is in transit with its structure lowered, the clearance may be reduced to 4 ft. (122 cm). If the voltage is higher than 50kV, the clearance will be increased 4 in. (10 cm) for every 10kV over that voltage.



- b. If insulating barriers are installed to prevent contact with the lines, and if the barriers are rated for the voltage of the line being guarded and are not a part of or an attachment to the vehicle or its raised structure, the clearance may be reduced to a distance within the designed working dimensions of the insulating barrier.
  - c. If the equipment is an aerial lift insulated for the voltage involved, and if the work is performed by a qualified person, the clearance (between the uninsulated portion of the aerial lift and the power line) may be reduced to the distance given in said Table 5-5 (see paragraph no. 14, above).
- 13. Employees standing on the ground may not contact the vehicle or mechanical equipment or any of its attachments, unless:
  - a. The employee is using protective equipment rated for the voltage; or
  - b. The equipment is located so that no uninsulated part its structure (that portion of the structure that provides a conductive path to employees on the ground) can come closer to the line than permitted in paragraph number 12 (see above).
- 14. If any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines is intentionally grounded, employees working on the ground near the point of grounding will not stand at the grounding location whenever there is a possibility of overhead line contact.
- 15. Additional precautions, such as the use of barricades or insulation, will be taken to protect employees from hazardous ground potentials, depending on earth resistivity and fault currents that can develop within the first few feet or more outward from the grounding point.
- 16. Employees may not enter spaces containing exposed energized parts, unless illumination is provided that enables the employees to perform the work safely.
- 17. Where lack of illumination or an obstruction precludes observation of the work to be performed, employees may not perform tasks near exposed energized parts.
- 18. Employees must not reach blindly into areas which may contain energized parts.

19. Whenever an employee works in a confined or enclosed space (such as a manhole or vault) that contains exposed energized parts, he/she must be provided with, and he will use, protective shields, protective barriers, or insulating materials as necessary to avoid inadvertent contact with those parts.
20. Doors, hinged panels, and the like that are present in any confined or enclosed space will be secured to prevent their swinging into an employee and causing the employee to contact exposed energized parts.
21. Conductive materials and equipment that are in contact with any part of an employee's body will be handled in a manner that will prevent them from contacting exposed energized conductors or circuit parts.
22. Whenever an employee must handle long dimensional conductive objects (such as ducts and pipes) in areas with exposed live parts, appropriate work practices (such as the use of insulation, guarding and material handling techniques) shall be instituted which will minimize the hazard.
23. Only wooden ladders or ladders with nonconductive siderails if they are used where the employee or the ladder could contact exposed energized parts.
24. Conductive articles of jewelry and clothing (such as watch bands, bracelets, rings, keychains, necklaces, metalized aprons, cloth with conductive thread, or metal headgear) may not be worn if they might contact exposed energized parts. However, such articles may be worn if they are rendered nonconductive by covering, wrapping, or other insulating means.
25. Where live parts present an electrical contact hazard, employees may not perform housekeeping duties at such close distances to the parts that there is a possibility of contact, unless adequate safeguards (such as insulating equipment or arrears) are provided.
26. Electrically conductive cleaning materials (including conductive solids such as steel wool, metalized cloth, and silicon carbide, as well as conductive liquid solutions) may not be used in proximity to energized parts unless appropriate procedures are followed that will prevent electrical contact.
27. Only a qualified person following the requirements of the procedures set forth in this section of the policy may defeat an electrical safety interlock and then only temporarily while he or she is working on the equipment.
28. The interlock system will be returned to its operable condition when such work is completed.

## **VII. Portable Electric Equipment**

1. All cord- and plug- connected electric equipment, flexible cord sets (extension cords), and portable electric equipment will be handled in a manner that will not cause damage.
2. Flexible electric cords connected to equipment may not be used for raising or lowering the equipment.
3. Flexible cords may not be fastened with staples or otherwise hung in such a fashion as could damage the outer jacket or insulation.
4. Portable cord- and plug- connected equipment and flexible cord sets (extension cords) shall be visually inspected before use and missing pins, or damage to outer jacket or insulation) and for evidence of possible internal damage (such as pinched or crushed outer jacket). However, cord- and plug- connected equipment and flexible cord sets (extension cords) which remain connected once they are put in place and are not exposed to damage need not be visually inspected until they are relocated.
5. If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item will be removed from service, and no employee may use it until necessary repair and tests have been made to render the equipment safe.
6. Whenever an attachment plug is to be connected to a receptacle (including any on a cord set), the relationship of the plug and receptacle contacts will first be checked to ensure that they are of proper mating configurations.
7. A flexible cord used with grounding-type equipment will contain an equipment grounding conductor.
8. Attachment plugs and receptacles may not be connected or altered in a manner that would prevent proper continuity of the equipment grounding conductor at the point where plugs are attached to receptacles. Additionally, those devices may not be altered to allow the grounding pole of a plug to be inserted into slots intended for connection to the current carrying conductors.
9. Adapters that interrupt the continuity of the equipment grounding connection may not be used.
10. Portable electric equipment and flexible cords used in highly conductive work locations (such as those inundated with water or other conductive liquids), or in job locations where employees are likely to contact water or conductive liquids.

11. Employees' hands may not be wet when plugging and unplugging flexible cords and cord and plug-connected equipment, if energized equipment is involved.
12. Energized plug and receptacle connections may be handled only with insulating protective equipment if the condition of the connection could provide a conducting path to the employees hand (if, for example, a cord connector is wet from being immersed in water).
13. Locking-type connectors will be properly secured after connection.

#### **X. Electric Power and Lighting Circuits**

1. Load rated switches, circuit breakers, or other devices specifically designed as disconnecting means will be used for the routine opening, reversing, or closing of circuits under load conditions.
2. Cable connectors not of the load-break type, fuses, terminal lugs, and cable splice connections may not be used for such purposes, except in an emergency.
3. After a circuit is deenergized by a circuit protective device, the circuit may not be manually reenergized until it has been determined that the equipment and circuit can be safely energized. However, when it can be determined from the design of the circuit and the overcurrent devices involved that the automatic operating of a device was caused by an overload connected equipment is needed before the circuit is reenergized.
4. Repetitive manual reclosing of circuit breakers or reenergizing circuits through replaced fuses is prohibited.
5. Overcurrent protection of circuits and conductors may not be modified, even on a temporary basis, beyond that allowed by the ILHR/OSHA standard regulating the installation safety requirements for overcurrent protection (See 29 CFR 1910.304(e)).

#### **XI. Test Instruments and Equipment**

1. Only qualified persons may perform testing work on electric circuits or equipment.

4. Employees will wear nonconductive head protection wherever there is a danger of head injury from electric shock or burns due to contact with exposed energized parts.
5. Employees will wear protective equipment for the eyes or face wherever there is danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from electrical explosion.
6. When working near exposed energized conductors or circuit parts, each employee will use insulated tools or handling equipment if the tools or handling equipment might make contact with such conductors or parts. If the insulating capability of insulated tools or handling equipment is subject to damage, the insulating material will be protected.
7. Fuse handling equipment, insulated for the circuit voltage, will be used to remove or install fuses when the fuse terminals are energized.
8. Ropes and handlines used near exposed energized parts shall be nonconductive.
9. Protective shields, protective barriers, or insulating materials will be used to protect each employee from shock, burns, or other electrically related injuries while that employee is working near exposed energized parts which might be accidentally contacted or where dangerous electric heating or arcing might occur.
10. When normally enclosed live parts are exposed for maintenance or repair, they will be guarded to protect unqualified persons from contact with their live parts.
11. Alerting techniques will be used to warn and protect employees from hazards which could cause injury due to electric shock, burns, or failure of electric equipment parts as follows:
  - a. Safety Signs and Tags: Safety signs, safety symbols, or accident prevention tags will be used where necessary to warn employees about electrical hazards which may endanger them.
  - b. Barricades: Barricades will be used in conjunction with safety signs where it is necessary to prevent or limit employee access to work areas exposing employees to uninsulated energized conductors or circuit parts. Conductive barricades may not be used where they might cause an electrical contact hazard.
  - c. Attendants: If signs and barricades do not provide sufficient warning and protection from electrical hazards, an attendant will be stationed to warn and protect employees.

4. Employees will wear nonconductive head protection wherever there is a danger of head injury from electric shock or burns due to contact with exposed energized parts.
5. Employees will wear protective equipment for the eyes or face wherever there is danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from electrical explosion.
6. When working near exposed energized conductors or circuit parts, each employee will use insulated tools or handling equipment if the tools or handling equipment might make contact with such conductors or parts. If the insulating capability of insulated tools or handling equipment is subject to damage, the insulating material will be protected.
7. Fuse handling equipment, insulated for the circuit voltage, will be used to remove or install fuses when the fuse terminals are energized.
8. Ropes and handlines used near exposed energized parts shall be nonconductive.
9. Protective shields, protective barriers, or insulating materials will be used to protect each employee from shock, burns, or other electrically related injuries while that employee is working near exposed energized parts which might be accidentally contacted or where dangerous electric heating or arcing might occur.
10. When normally enclosed live parts are exposed for maintenance or repair, they will be guarded to protect unqualified persons from contact with their live parts.
11. Alerting techniques will be used to warn and protect employees from hazards which could cause injury due to electric shock, burns, or failure of electric equipment parts as follows:
  - a. Safety Signs and Tags: Safety signs, safety symbols, or accident prevention tags will be used where necessary to warn employees about electrical hazards which may endanger them.
  - b. Barricades: Barricades will be used in conjunction with safety signs where it is necessary to prevent or limit employee access to work areas exposing employees to uninsulated energized conductors or circuit parts. Conductive barricades may not be used where they might cause an electrical contact hazard.
  - c. Attendants: If signs and barricades do not provide sufficient warning and protection from electrical hazards, an attendant will be stationed to warn and protect employees.

#### **XIV. TRAINING**

1. Appropriate training will be provided for those employees who face a risk of electric shock in the form of classroom and/or on the job instruction.
2. Each employee required to be trained will become familiar with the safe work practices required by this policy and those sections of the ILHR/OSHA Electrical Standard that pertain to his/her respective job assignment(s).
3. Qualified persons (i.e. those persons permitted to work on or near exposed energized parts) will, at a minimum, be trained in the following:
  - a. The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment,
  - b. The skills and techniques necessary to determine the nominal voltage of exposed parts, and
  - c. The clearance distances specified in Table S-5 of 29 CFR 1910.333(c) (see paragraph #14 of Part VI of this Policy) and the corresponding voltages to which the qualified person will be exposed.

The degree of training will be determined by the risk likely to be encountered by the employee. The training given to "qualified persons" will be documented on Form # 1.

**NOTE:** When there is an asterisk (\*) placed in front of a guideline, then this program is not required by the Electrical Safety Policy.

Form #1

**"QUALIFIED" PERSON TRAINING CERTIFICATION**

Date of Training: \_\_ *1* \_\_ *1* \_\_

Instructor:

Signature:

The following employees have received "QUALIFIED" person training on electrical safe work procedures:

Employee Name (Please Print)

Employee Signature



## **ASSURED EQUIPMENT GROUNDING CONDUCTOR PROGRAM**

It is the policy of Regional Conveyor Services, Inc. to establish and implement an assured equipment grounding conductor program on construction sites covering all cord sets, receptacles which are not a part of the permanent wiring of the building or structure, and equipment connected by cord and plug which are available for use or used by employees. This policy shall apply to all construction sites not equipped with ground fault circuit interrupters in accordance with OSHA standard 1926.400 (h)

The Safety Director and Supervisors are designated to implement the assured equipment grounding conductor program: 1926.32 (f) defines competent person as one who is capable of identifying existing and predictable hazards in the surrounding area or working conditions which are unsanitary, hazardous or dangerous to employees, and who is authorized to take prompt corrective measures to eliminate them.

The Safety Director and Supervisors will be responsible and accountable for the following:

Each cord set, attachment cap, plug and receptacle of cord set and any equipment connected by cord and plug, except cord sets and receptacles which are fixed and not exposed to damage, shall be visually inspected before each day's use for external defects, such as deformed or missing pins, or insulation damage, and for indication of possible internal damage. Equipment found damaged or defective may not be used until repaired.

The Safety Director and Supervisors are responsible for tests on all cord sets, receptacles which are not a part of the permanent wiring of the building or structure, and cord and plug connected equipment repaired to be grounded. Tests shall be documented on the log for assured equipment grounding conductor program and shall be on the job site for inspection by OSHA officials and any affected employee. Equipment that does not meet prescribed test shall not be put into service. The following tests shall be performed:

- A. All equipment grounding conductors shall be tested for continuity and shall be electrically continuous.
- B. Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductor. The equipment grounding shall be connected to its terminal.

In accordance with OSHA Construction Safety and health Standards 1926.21 Safety Training and Education, supervisors shall attend such training sessions as the company may deem necessary.

A copy of this policy shall be at the job site for inspection and copy by OSHA officials and any affected employee. Management retains the authority to designate that certain jobs comply with regulation 1926.400 (h) by use of ground fault circuit interrupters in lieu of the program established above. A copy of the completed forms will be kept on each applicable job site for inspection purposes.

**WRITTEN DESCRIPTION**  
**ASSURED EQUIPMENT GROUNDING CONDUCTOR PROGRAM**

**I. Scope**

This procedure describes the requirements to assure the installation and maintenance of equipment grounding conductors for temporary wiring on construction sites in accordance with paragraph (c) (30) of part 1910.309 of the Occupational Safety and Health Standard and paragraph (h) (3) of part 1926.400 of the Safety and Health regulations for construction.

**II. Policy**

Ground fault circuit interrupters (GFCI's) are not required for 120 volt, single phase, 15- and 20-ampere receptacles outlets where all of the requirements of this procedure are implemented at the construction site. Employees shall not use any equipment which has not met the requirements of this procedure.

**III. Job site Information**

- A. Name or description of construction site: \_\_\_\_\_
- B. Employer complying with this procedure is \_\_\_\_\_
- C. Person designated to implement the procedure is \_\_\_\_\_

**IV. Requirements**

Equipment grounding conductors shall be installed and maintained in accordance with this procedure.

**A Installation - Equipment grounding conductors shall be installed as follows:**

1. All 120 volt, single phase, 15- and 20- ampere receptacles shall be of the grounding type and their contacts shall be grounded by connection to the equipment grounding conductor of the circuit supply the receptacle in accordance with the applicable requirements of the National Electrical Code.
2. All 120 volt cord sets (extension cords) shall have an equipment grounding conductor which shall be connected to the grounding contacts of the connector(s) on each end of the cord.
3. The exposed concurrent-carrying metal parts of the 120 volt cord and plug-connected tools and equipment that are likely to become energized shall be grounded in accordance with the applicable requirements of the National Electrical Code.

**B. Visual Inspection**

Employees shall be instructed to visually inspect receptacle, flexible cord sets (extension cords), except those that are fixed and not exposed to damage, and equipment connected by cord and plug before each day's use for external defects such as deformed or missing pins or insulation damage and for indication of possible internal damage. Where there is evidence of damage, the damaged item shall be taken out of service and tagged until tested and any required repairs have been made.

**C. All 120 volt, single phase, 15 and 20- ampere receptacles which are not a part of the permanent wiring of the building or structure, 1220 volt flexible cord sets, and 120 volt cord and plug connected equipment required to be grounded shall be tested as follows:**

1. All equipment grounding conductors shall be tested for continuity and shall be electrically continuous.
2. Each receptacle and attachment ca or plug shall be tested or correct attachment of the equipment grounding conductor. The equipment grounding conductor shall be connected to its proper terminal.

**D. Testing Schedule**

All required tests shall be performed:

1. Before first use
2. Before equipment is returned to service following any repairs.
3. Before equipment is used after any incident which can be reasonably suspected to have caused damage (for example, when a cord set is run over)
4. At intervals not to exceed 3 months, except that cord sets and receptacle which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months.

**E. Test Records**

Test verification shall be by means of numeric or color coded marking tape ion the receptacle, cord set or equipment to identify that it has passed the test and to indicate the date (month or quarter) in accordance with section 5.0 Coding Scheme.

**5. Color Scheme**  
 Coding schemes for assured equipment grounding conductor test record.

MONTH OR QUARTER	COLOR CODING SCHEME		NUMERIC CODING SCHEME MONTHLY
	QUARTERLY	MONTHLY	
JANUARY	WHITE	WHITE	1
FEBRUARY		WHITE/YELLOW	2
MARCH		WHITE/BLUE	3
APRIL	GREEN	GREEN	4
MAY		GREEN/YELLOW	5
JUNE		GREEN/BLUE	6
JULY	RED	RED	7
AUGUST		RED/YELLOW	8
SEPTEMBER		RED/BLUE	9
OCTOBER	ORANGE	ORANGE	10
NOVEMBER		ORANGE/YELLOW	11
DECEMBER		ORANGE/BLUE	12
REPAIR OR INCIDENT	BROWN	BROWN	0

## ASSURED EQUIPMENT GROUNDING CONDUCTOR PROGRAM

COMPANY  
NAME: \_\_\_\_\_

SHOP ADDRESS: \_\_\_\_\_

JOB NAME OR NUMBER \_\_\_\_\_

ID OF EQUIP TESTED	DATE TESTED	ACTION, IF ANY	REASON- A-B-C-D	TESTED BY (SIGNATURE)

- \*REASON FOR TEST:
- A. BEFORE FIRST USE.
  - B. BEFORE EQUIPMENT IS RETURNED TO SERVICE FOLLOWING ANY REPAIRS
  - C. BEFORE EQUIPMENT IS USED AFTER ANY INCIDENT WHICH CAN REASONABLE BE SUSPECTED TO HAVE CAUSED DAMAGE.
  - D. AT INTERVALS NOT TO EXCEED 3 MONTHS, EXCEPT THAT CORD SETS AND RECEPTACLES WHICH ARE FIXED AND NOT EXPOSED TO DAMAGE SHALL BE TESTED AT INTERVALS NOT EXCEEDING 6 MONTHS.

COMPANY AUTHORIZED SIGNATURE: \_\_\_\_\_

## EFFECTS OF AMOUNT OF AC CURRENT AT 60 CYCLES PER SECOND

More than 3 mA	-	Painful shock which can cause indirect accidents.
More than 10 mA	-	Muscle contraction, "No-Let-Go" danger.
More than 30 mA	-	Lung paralysis, usually temporary.
More than 50 mA	-	Possible ventricular fibrillation (Heart dysfunction, usually fatal)
100 mA to 4 A-		Certain ventricular fibrillation, fatal
Over 4 A	-	Heart paralysis, but may be temporary; severe burns. Usually caused by voltages above 600 Volts.

---

"mA" - Milli-amp

A = Ampere

1 mA = 1/1000 Ampere = .001 Ampere

## **Short Service Employee Management Regional Conveyor Services, Inc.**

### **Purpose**

The purpose of the Short Service Employee (SSE) Management program is to prevent work related injuries and illnesses to new hires and temporary workers. The Supervisors and co-workers must be able to readily identify Short Service Employee participants. Regional Conveyor Services, Inc. (RCS) will assign experienced employees to oversee the daily activities of those assigned to the SSE program.

### **Scope**

- Applies to all RCS employees in shop and field operations.
- Applies to all newly hired RCS employees (regardless of experience), temporary agency personnel or our independent contractors working on RCS or client locations/ facilities.

### **Definitions**

Short Service Employee (Who Is Covered Under the Short Service Employee Program) - An employee or sub-contractor employee with less than six months experience in the same job or with his/her present employer.

Mentor - An experienced employee, who has been assigned to help and work with a new Short Service Employee by his/her supervisor.

### **Key Responsibilities**

- Managers and Supervisors shall ensure that this program is implemented and followed.
- Employees shall follow the requirements of this program.

### **Monitoring of Short Service Employees at the Job Site**

RCS shall monitor its employees, including SSE personnel, for HES awareness. If, at the end of the six-month period, the SSE has worked safely, adhered to HES policies and has no recordable incident attributable to him/her, the SSE identifier may be removed at the discretion of RCS. RCS shall require any employee that does not complete the six-month period recordable free to get operator approval in writing prior to returning to operator property.

### **Processes for Managing Subcontractors**

RCS will manage its sub-contractors in alignment with this process. Any sub-contractor employee reporting to work must document his or her experience within their RCS for the work they are performing.

### **Procedure**

#### **General**

Supervisors will assure that all new, transferred and temporary employees have been through RCS Safety Orientation and have a complete knowledge of the expectations for their job function.

Supervisors will identify all employees and temporary personnel with less than 180 days of service, or those employees they desire to return to a mentoring status for improvement in job and/or safety performance. Any Short Service Employee experiencing an OSHA Recordable Injury during the initial 180 days will repeat the mentoring program or shall be dismissed for poor performance.

Managers and the Safety Department will randomly audit for process compliance. This will involve interviewing employees in the Short Service Employee program (documentation is not required).

**Mentoring Provisions and Processes**

Mentors will set the proper safety example for any Short Service Employee assigned them.

RCS must have in place some form of mentoring process, acceptable to the operator, designed to provide guidance and development for SSE personnel. A mentor can only be assigned one SSE per crew and the mentor must be on site with the SSE to be able to monitor the SSE.

**Short Service Employee Identification**

Short Service Employee participants will wear high visibility orange hard hats or an SSE decal to help identify them. The RCS shall comply with client designated hardhat color for SSE if orange is not acceptable.

**Crew Makeup and Restrictions**

A single person crew cannot be an SSE and crew sizes of less than five shall have no more than one SSE.

**Notification and Communication Processes**

Prior to the job mobilization RCS will communicate/notify the client project coordinator, contractor contact or on-site supervisor for all jobs containing SSE personnel. The project coordinator, contractor contact or on-site supervisor will determine approval status of the crew makeup.

Mentors will converse daily with those persons assigned to them, preferably at the start of the day. This will be in addition to other tailgate or daily safety meetings held in the work area.



## Fall Protection Program

### I. OBJECTIVE

The objective of the Fall Protection Program is to identify and evaluate fall hazards to which employees will be exposed, and to provide specific training as required by the Occupational Safety and Health Administration (OSHA) Fall Protection Standard, 29 CFR 1926, Subpart M.

### II. POLICY

It is the policy of Regional Conveyor Services, Inc, to protect its employees from occupational injuries by implementing and enforcing safe work practices and appointing a competent person(s) to manage the Fall Protection Program. The Fall Protection Program shall comply with the OSHA requirements. A copy of the OSHA Fall Protection Standard shall be made available to all employees, and may be obtained from the Safety Director.

### III. ASSIGNMENT OF RESPONSIBILITY

#### A. Employer

It is the responsibility of Regional Conveyor Services, Inc, to provide fall protection to affected employees, and to ensure that all employees understand and adhere to the procedures of this plan and follow the instructions of the Safety Director.

#### B. Program Manager

It is the responsibility of Roger Wickham, as the Safety Director to implement this program by:

1. performing routine safety checks of work operations;
2. enforcing company safety policy and procedures;
3. correcting any unsafe practices or conditions immediately;
4. training employees and supervisors in recognizing fall hazards and the use of fall protection systems;
5. maintaining records of employee training, equipment issue, and fall protection systems used at Regional Conveyor Services jobsites; and
6. Investigating and documenting all incidents that result in employee injury.

### C. Employees

It is the responsibility of all employees to:

1. understand and adhere to the procedures outlined in this Fall Protection Program;
2. follow the instructions of the Safety Director;
3. bring to management's attention any unsafe or hazardous conditions or practices that may cause injury to either themselves or any other employees; and
4. report any incident that causes injury to an employee, regardless of the nature of the injury.

## IV. TRAINING

A. All employees who may be exposed to fall hazards are required to receive training on how to recognize such hazards, and how to minimize their exposure to them. Employees shall receive training as soon after employment as possible, and before they are required to work in areas where fall hazards exist.

B. A record of employees who have received training and training dates shall be maintained by the Safety Director. Training of employees by the Safety Director shall include:

1. Nature of the fall hazards employees may be exposed to.
2. Correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems.
3. Use and operation of controlled access zones, guardrails, personal fall arrest systems, safety nets, warning lines, and safety monitoring systems.
4. Role of each employee in the Safety Monitoring System (if one is used).
5. Limitations of the use of mechanical equipment during roofing work on low-slope roofs (if applicable).
6. Correct procedures for equipment and materials handling, and storage and erection of overhead protection.
7. Role of each employee in alternative Fall Protection Plans (if used).
8. Requirements of the OSHA Fall Protection Standard, 29 CFR 1926, Subpart M.

9. Regional Conveyor Services requirements for reporting incidents that cause injury to an employee.

C. Additional training shall be provided on an annual basis, or as needed when changes are made to this Fall Protection Program, an alternative Fall Protection Plan, or the OSHA Fall Protection Standard.

## V. CONTROLLED ACCESS ZONES

A. Masons are the only authorized employees permitted to enter controlled access zones and areas from which guardrails have been removed. All other workers are prohibited from entering controlled access zones.

B. Controlled access zones shall be defined by control lines consisting of ropes, wires, tapes, or equivalent material, with supporting stanchions, and shall be:

1. Flagged with a high-visibility material at six (6) foot intervals.
2. Rigged and supported so that the line is between 30 and 50 inches (including sag) from the walking/working surface.
3. Strong enough to sustain stress of at least 200 pounds.
4. Extended along the entire length of an unprotected or leading edge.
5. Parallel to the unprotected or leading edge.
6. Connected on each side to a guardrail system or wall.
7. Erected between six (6) feet and 25 feet from an unprotected edge, except in the following cases:
  - a. when working with precast concrete members: between six (6) feet and 60 feet from the leading edge, or half the length of the member being erected, whichever is less; or
  - b. when performing overhand bricking or related work: between ten (10) feet and 15 feet from the working edge.

## VI. EXCAVATIONS

Fall protection will be provided to employees working at the edge of an excavation that is six (6) feet or deeper. Employees in these areas are required to use the fall protection systems as designated in this program.

A. Excavations that are six (6) feet or deeper shall be protected by guardrail systems, fences, barricades, or covers.

B. Walkways that allow employees to cross over an excavation that is six (6) feet or deeper shall be equipped with guardrails.

## VII. FALL PROTECTION SYSTEMS

### A. Covers

1. All covers shall be secured to prevent accidental displacement.
2. Covers shall be color-coded or bear the markings "HOLE" or "COVER".
3. Covers located in roadways shall be able to support twice the axle load of the largest vehicle that might cross them.
4. Covers shall be able to support twice the weight of employees, equipment, and materials that might cross them.

### B. Guardrail Systems

Guardrail systems shall be erected at unprotected edges, ramps, runways, or holes where it is determined by the crew leader that erecting such systems will not cause an increased hazard to employees. The following specifications will be followed in the erection of guardrail systems. Toprails shall be:

1. at least 1/2 inch in diameter (steel or plastic banding is unacceptable);
2. flagged every six (6) feet or less with a high visibility material if wire rope is used;
3. inspected by the crew leader as frequently as necessary to ensure strength and stability;
4. forty-two (42) inches (plus or minus three (3) inches) above the walking/working level; and
5. adjusted to accommodate the height of stilts, if they are in use.

Midrails, screens, mesh, intermediate vertical members, and solid panels shall be erected in accordance with the OSHA Fall Protection Standard.

Gates or removable guardrail sections shall be placed across openings of hoisting areas or holes when they are not in use to prevent access.

### C. Personal Fall Arrest Systems

1. Personal fall arrest systems shall be issued to and used by employees as determined by Responsible Person and may consist of anchorage, connectors, body harness, deceleration device, lifeline, or suitable combinations. Personal fall arrest systems shall:

- a. limit the maximum arresting force to 1800 pounds;
- b. be rigged so an employee cannot free fall more than six (6) feet or contact any lower level;
- c. bring an employee to a complete stop and limit the maximum deceleration distance traveled to three and a half (3.5) feet;
- d. be strong enough to withstand twice the potential impact energy of an employee free falling six (6) feet (or the free fall distance permitted by the system, whichever is less);
- e. be inspected prior to each use for damage and deterioration; and
- f. be removed from service if any damaged components are detected.

2. All components of a fall arrest system shall meet the specifications of the OSHA Fall Protection Standard, and shall be used in accordance with the manufacturer's instructions.

- a. The use of non-locking snaphooks is prohibited.
- b. Dee-rings and locking snaphooks shall:
  - i. have a minimum tensile strength of 5000 pounds; and
  - ii. be proof-tested to a minimum tensile load of 6600 pounds without cracking, breaking, or suffering permanent deformation.
- c. Lifelines shall be:
  - i. designed, installed, and used under the supervision of the crew leader;
  - ii. protected against cuts and abrasions; and
  - iii. equipped with horizontal lifeline connection devices capable of locking in both directions on the lifeline when used on suspended scaffolds or similar work platforms that have horizontal lifelines that may become vertical lifelines.

d. Self-retracting lifelines and lanyards must have ropes and straps (webbing) made of synthetic fibers, and shall:

- i. sustain a minimum tensile load of 600 pounds if they automatically limit free fall distance to two (2) feet; or
- ii. sustain a minimum tensile load of 5000 pounds (includes ripstitch, tearing, and deforming lanyards).

e. Anchorages must support at least 5000 pounds per person attached and shall be:

- i. designed, installed, and used under the supervision of the crew leader;
- ii. capable of supporting twice the weight expected to be imposed on it; and
- iii. independent of any anchorage used to support or suspend platforms.

#### D. Positioning Device Systems

Body belt or body harness systems shall be set up so that an employee can free fall no farther than two (2) feet, and shall be secured to an anchorage capable of supporting twice the potential impact load or 3000 pounds, whichever is greater. Requirements for snaphooks, dee-rings, and other connectors are the same as detailed in this Program under *Personal Fall Arrest Systems*.

#### E. Safety Monitoring Systems

In situations when no other fall protection has been implemented, the crew leader shall monitor the safety of employees in these work areas. The crew leader shall be:

- 1. competent in the recognition of fall hazards;
- 2. capable of warning workers of fall hazard dangers;
- 3. operating on the same walking/working surfaces as the employees and able to see them;
- 4. close enough to work operations to communicate orally with employees; and
- 5. free of other job duties that might distract them from the monitoring function.

No employees other than those engaged in the work being performed under the Safety Monitoring System shall be allowed in the area. All employees under a Safety Monitoring System are required to promptly comply with the fall hazard warnings of the crew leader.

#### F. Safety Net Systems

1. Safety net systems must be installed no more than 30 feet below the walking/working surface with sufficient clearance to prevent contact with the surface below, and shall be installed with sufficient vertical and horizontal distances as described in the OSHA Fall Protection Standard.
2. All nets shall be inspected at least once a week for wear, damage, or deterioration by crew leaders. Defective nets shall be removed from use and replaced with acceptable nets.
3. All nets shall be in compliance with mesh, mesh crossing, border rope, and connection specifications as described in the OSHA Fall Protection Standard.
4. When nets are used on bridges, the potential fall area from the walking/working surface shall remain unobstructed.
5. Objects that have fallen into safety nets shall be removed as soon as possible and at least before the next working shift.

#### G. Warning Line Systems

Warning line systems consisting of supporting stanchions and ropes, wires, or chains shall be erected around all sides of roof work areas.

1. Lines shall be flagged at no more than six (6) foot intervals with high-visibility materials.
2. The lowest point of the line (including sag) shall be between 34 and 39 inches from the walking/working surface.
3. Stanchions of warning line systems shall be capable of resisting at least 16 pounds of force.
4. Ropes, wires, or chains must have a minimum tensile strength of 500 pounds.
5. Warning line systems shall be erected at least six (6) feet from the edge, except in areas where mechanical equipment is in use. When mechanical equipment is in use, warning line systems shall be erected at least six (6) feet from the parallel edge, and at least ten (10) feet from the perpendicular edge.

### VIII. TASKS AND WORK AREAS REQUIRING FALL PROTECTION

Unless otherwise specified, crew leaders shall evaluate the worksite(s) and determine the specific type(s) of fall protection to be used in the following situations.

#### A. Framework and Reinforcing Steel

Fall protection will be provided when an employee is climbing or moving at a height of over 24 feet when working with rebar assemblies.

#### B. Hoist Areas

Guardrail systems or personal fall arrest systems will be used in hoist areas when an employee may fall six (6) feet or more. If guardrail systems must be removed for hoisting, employees are required to use personal fall arrest systems.

#### C. Holes

Covers or guardrail systems shall be erected around holes (including skylights) that are six (6) feet or more above lower levels. If covers or guardrail systems must be removed, employees are required to use personal fall arrest systems.

#### D. Leading Edges

Guardrail systems, safety net systems, or personal fall arrest systems shall be used when employees are constructing a leading edge that is six (6) feet or more above lower levels. An alternative Fall Protection Plan shall be used if the crew leader determines that the implementation of conventional fall protection systems is infeasible or creates a greater hazard to employees. All alternative Fall Protection Plans for work on leading edges shall:

1. be written specific to the particular jobsite needs;
2. include explanation of how conventional fall protection is infeasible or creates a greater hazard to employees;
3. explain what alternative fall protection will be used for each task;
4. be maintained in writing at the jobsite by the crew leader; and
5. meet the requirements of 29 CFR I 926.502(k).



## I. Wall Openings

Guardrail systems, safety net systems, or a personal fall arrest system will be provided to employees working on, at, above, or near wall openings when the outside bottom edge of the wall opening is six (6) feet or more above lower levels and the inside bottom edge of the wall opening is less than 39 inches above the walking/working surface. The type of fall protection to be used will be determined by the crew leader.

## J. Ramps, Runways, and Other Walkways

Employees using ramps, runways, and other walkways six (6) feet or more above the lower level shall be protected by guardrail systems.

## IX. PROTECTION FROM FALLING OBJECTS

When guardrail systems are in use, the openings shall be small enough to prevent potential passage of falling objects. The following procedures must be followed by all employees to prevent hazards associated with falling objects.

- A. No materials (except masonry and mortar) shall be stored within four (4) feet of working edges.
- B. Excess debris shall be removed regularly to keep work areas clear.
- C. During roofing work, materials and equipment shall be stored no less than six (6) feet from the roof edge unless guardrails are erected at the edge.
- D. Stacked materials must be stable and self-supporting.
- E. Canopies shall be strong enough to prevent penetration by falling objects.
- F. Toeboards erected along the edges of overhead walking/working surfaces shall be:
  1. capable of withstanding a force of at least 50 pounds; and
  2. solid with a minimum of three and a half (3 1/2) inches tall and no more than one quarter (1/4) inch clearance above the walking/working surface.
- G. Equipment shall not be piled higher than the toeboard unless sufficient paneling or screening has been erected above the toeboard.

## X. Rescue

When post-fall recovery is necessary and emergency responders aren't likely to arrive soon, there are some measures that you can take to protect both the fallen worker and rescuers:

- 1) Communicate with the fall victim and establish their level of consciousness and evaluate any injuries while comforting and monitoring the victim;
- 2) call emergency units, ambulance, and fire/rescue (too many responders is better than too few);
- 3) appoint a qualified person who can grasp the big picture, find weaknesses in your rescue plan, and order appropriate changes to oversee your operation's overall safety;

4) and evaluate the scene in order to determine if you can safely gain access with ladders, man-lifts, or hoists for rescuers □ who should be first-aid trained and calm under pressure □ to provide fall protection for the suspended worker and, if you can safely gain access, determine the response time for fire/rescue because, if it is longer than fifteen minutes, medical attention may become necessary.

XI. **ACCIDENT INVESTIGATIONS**

All incidents that result in injury to workers, as well as near misses, regardless of their nature, shall be reported and investigated. Investigations shall be conducted by the Safety Director as soon after an incident as possible to identify the cause and means of prevention to eliminate the risk of reoccurrence.

In the event of such an incident, the Fall Protection Program (and alternative Fall Protection Plans, if in place) shall be reevaluated by the Safety Director to determine if additional practices, procedures, or training are necessary to prevent similar future incidents.

## XII. CHANGES TO THE PLAN

Any changes to the Fall Protection Program (and alternative Fall Protection Plans, if in place) shall be approved by the Safety Director, and shall be reviewed by a qualified person as the job progresses to determine additional practices, procedures or training needs necessary to prevent fall injuries. Affected employees shall be notified of all procedure changes, and trained if necessary. A copy of this plan, and any additional alternative Fall Protection Plans, shall be maintained at the jobsite by the crew leader.

## XIII. GLOSSARY

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

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

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

Connector: A device that is used to couple (connect) parts of a personal fall arrest system or positioning device system together.

Controlled access zone: a work area designated and clearly marked in which certain types of work may take place without the use of conventional fall protection systems (guardrail, personal arrest, or safety net) to protect the employees working in the zone.

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

Deceleration distance: the additional vertical distance a falling person travels, excluding lifeline elongation and free fall distance, before stopping, from the point at which a deceleration device begins to operate.

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

Hole: a void or gap two (2) inches (5.1 centimeters) or more in the least dimension in a floor, roof, or other walking/working surface.

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

Leading edge: the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as a deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed.

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

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

Opening: a gap or void 30 inches (76 centimeters) or more high and 18 inches (46 centimeters) or more wide, in a wall or partition through which employees can fall to a lower level.

Personal fall arrest system: a system including but not limited to an anchorage, connectors, and a body harness used to arrest an employee in a fall from a working level.

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

Rope grab: a deceleration device that travels on a lifeline and automatically, by friction, engages the lifeline and locks to arrest a fall.

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

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

Snaphook: a connector consisting of a hook-shaped member with a normally closed keeper, or a similar arrangement, which may be opened to permit the hook to receive an object and, when released automatically, closes to retain the object.

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

Toeboard: a low protective barrier that prevents material and equipment from falling to lower levels and which protects personnel from falling.

Unprotected sides and edges: any side or edge (except at entrances to points of access) of a walking/working surface (e.g., floor, roof, ramp, or runway) where there is no wall or guardrail system at least 39 inches (1 meter) high.

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

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

Attachment A  
Sample Fall Protection Plan for jobsite.

This Fall Protection Plan is specific to the following project:

Job Location:
Date Plan Prepared:
Date Plan Modified:
Plan Prepared by:
Plan Approved by:
Plan Supervised by:

I. STATEMENT OF COMPANY POLICY

Regional Conveyor Services, Inc. is dedicated to the protection of its employees from occupational injuries. All employees have the responsibility to work safely on the job. The purpose of this Plan is to supplement our existing Fall Protection Program and to ensure that every employee who works for Regional Conveyor Services, Inc. recognizes workplace fall hazards and takes the appropriate measures to address those hazards.

This Fall Protection Plan addresses the use of conventional fall protection at a number of areas on the project, and identifies specific activities that require non-conventional means of fall protection.

In these cases, conventional fall protection systems may not be the safest choice for this project. This Plan is designed to enable employees to recognize fall hazards associated with this job and to establish safe procedures to prevent falls to lower levels through holes and openings in walking/working surfaces.

II. ASSIGNMENT OF RESPONSIBILITY

A. Employer

1. Ensure that all employees understand and adhere to the procedures of this Plan and the instructions of the crew supervisor or foreman.
2. Assign a competent person to be responsible for managing this Fall Protection Plan.
3. Provide appropriate fall protection to employees as detailed in this Plan.

#### B. Employee

1. Bring to the attention of management any unsafe or hazardous conditions or practices that may cause injury to themselves or other employees.
2. Report any incident which causes injury to self or a co-worker.
3. Each employee will be trained in these procedures and will be expected to strictly adhere to them except when doing so would expose him/her to a greater hazard. If, in the employee's opinion, the procedures in this Plan pose a risk, the employee is to notify the Safety Director and have their concern(s) addressed before proceeding with work.

#### C. Plan Manager

Roger Wickham shall function as Manager of this Fall Protection Plan and has the following responsibilities:

1. Implement this Fall Protection Plan.
2. Perform continual observational checks of work operations to identify hazards.
3. Enforce the company policy and the procedures of this Plan.
4. Coordinate with crew supervisors or foremen to correct any unsafe practices or conditions immediately.
5. Provide training on this Plan to all affected employees before work begins on this project.

### III. FALL PROTECTION TO BE USED ON JOBSITES

Many jobsites expose employees to fall hazards for a short period of time. This Plan details how Regional Conveyor Services, Inc. will minimize these hazards.

#### A. Controlled Access Zones

When using this Plan to implement the fall protection options available, workers must be protected through limited access to high hazard locations. Before any non-conventional fall protection systems are used as part of this work Plan, a controlled access zone (CAZ) shall be clearly defined by a crew leader as an area where a recognized hazard exists. The demarcation of the CAZ shall be communicated by the crew leader in a recognized manner, either through signs, wires, tapes, ropes, or chains.

Regional Conveyor Services shall take the following steps to ensure that the CAZ is clearly marked or controlled by a competent person.

1. All access to the CAZ shall be restricted to authorized entrants only.
2. All workers who are permitted in the CAZ must be listed in the appropriate sections of this Plan (or be visibly identifiable by the crew leader prior to implementation).
3. The crew leader shall ensure that all protective elements of the CAZ be implemented prior to the beginning of work.

#### IV. ENFORCEMENT

Constant awareness of and respect for fall hazards, as well as compliance with all safety rules, are considered conditions of employment with Regional Conveyor Services, Inc. The crew supervisor or foreman, as well as the Safety Director or company management, reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this Plan.

#### V. ACCIDENT INVESTIGATIONS

All incidents that result in injury to workers and near misses, regardless of their nature, shall be reported and investigated. All incidents shall be investigated as soon as possible by the Safety Director to identify the cause and means of prevention to prevent future occurrences.

In the event of such an incident, this Fall Protection Plan shall be reviewed to determine if additional practices, procedures, or training should be implemented to prevent similar incidents in the future.

#### VI. CHANGES TO THE PLAN

Any changes to this Plan will be made by the Safety Director. This Plan shall be reviewed by crew leaders as the job progresses to determine if additional practices, procedures, or training are needed to improve or provide additional fall protection. Affected employees shall be notified of changes to this Plan, and retrained, if necessary. A copy of this Plan and all approved changes shall be maintained at the jobsite by the crew leader.



# *Regional Conveyor Services, Inc.*

Number: 115-1

DATE: April 29, 2002

## **HAZARD COMMUNICATION**

### **1. PURPOSE:**

- a. It is the policy of Regional Conveyor Services, Inc. to ensure that all employees have a safe and healthy working environment. In order to accomplish this policy, a written program has been established to comply with the Hazard Communications Standard.

### **2. DESIGNATIONS:**

- a. Kevin Cadd is designated as the Hazard Communication Coordinator.
- b. All superintendents are designated as Assistant Hazard Communication Coordinators.

### **3. SCOPE:**

- a. All employees who are exposed or potentially exposed to hazardous chemicals are included within this program.

### **4. GENERAL:**

- a. Program accountability:
  - (1) Hazard Communication binders contain the following:
    - (a) Written policy.
    - (b) Material Safety Data Sheets.
    - (c) Request Letters.
    - (d) Hazardous Chemical List.
  - (2) The Hazard Communicator will ensure that the Hazard Communication Program binders are available and accounted for at all times.

- (3) If the Hazard Communication Program binders are removed from the designated location, proper accounting procedures will be maintained.
- b. Program Location:
- (1) The Hazard Communication Program binders are located at each job site, maintenance shop, and corporate office.
  - (2) Material Safety Data Sheets are filed in the "MSDS" binder at each job site, maintenance shop, and corporate office.
  - (3) The location of the Hazard Communication Program allows access to any interested employee.
- c. Training:
- (1) The Hazard Communication Coordinator will ensure that all affected personnel are orientated in health and safety concerning all appropriate requirements of the standard.
  - (2) Training will consist of the following:
    - (a) An overview of the requirements contained in the Hazard Communication Standard.
    - (b) Hazardous chemicals in the work place.
    - (c) Location and availability of hazardous chemicals in the workplace.
    - (d) Physical and health effects of the hazardous chemicals in the workplace.
    - (e) Methods and observation techniques used to determine the presence or release of hazardous chemicals in the workplace.
    - (f) How to lessen or prevent exposure to these chemicals through usage of control/work practices and personal protective equipment.
    - (g) Steps taken to lessen or prevent exposure to hazardous chemicals.
    - (h) Safety emergency procedures to follow if they are exposed to hazardous chemicals.
    - (i) How to read labels and review Material Safety Data Sheets (MSDS's) to obtain "appropriate" information.
  - (3) Prior to starting work, each new employee will be trained on the above information.

- (4) Prior to a new category of hazardous chemicals being introduced into the work place, each affected employee will be given information as outlined above.
  - (5) Trained employees will be required to sign a statement on their individual training record indicating that they are familiar with and understand the intent of the Hazard Communication Standard.
  - (6) Resources for training will include, but not limited to, the following:
    - (a) Written Hazard Communication Program.
    - (b) Available Material Safety Data Sheets.
    - (c) Hazard Chemical List.
    - (d) Samples of primary and secondary container labels.
- d. Hazard Determination:
- (1) Hazard determination of products used is made from available Material Safety Data Sheets.
- e. Material Safety Data Sheets (MSDS's):
- (1) Copies of Material Safety Data Sheets for all hazardous chemicals to which employees may be exposed will be kept in the binder marked "MSDS".
  - (2) If Material Safety Data Sheets are not available or new chemicals in use do not have MSDS's, the Hazard Communication Coordinator should be contacted as soon as possible by personnel aware of the discrepancy.
  - (3) Personnel who purchase/receive products and chemicals will request Material Safety Data Sheets, if necessary, from the supplier. If there is difficulty in obtaining the appropriate MSDS, the Hazard Communication Coordinator should be contacted in order to ensure that follow-up action is initiated.
  - (4) Copies of letters and other correspondence, notes, etc. pertaining to the requisition of Material Safety Data Sheets will be filed in the "REQUEST LETTER" section of the Hazard Communication Programs binder.
  - (5) The Hazard Communication Coordinator will ensure that Material Safety Data Sheets are accurate and placed in the appropriate section of the "MSDS" binder.
  - (6) In the event that Material Safety Data Sheets are found to be incomplete, every effort will be made to obtain Material Safety Data Sheets which comply with the requirements of the Hazard Communication Standard.

Documentation of these efforts will be kept in the "REQUEST LETTERS" section of the Hazard Communication Program binder.

- (7) Material Safety Data Sheets will be filed categorically and placed behind the appropriate tabs in the "MSDS" binder.
- (8) Material Safety Data Sheets will be coded in the upper right corner (A-1, B-1, etc.) for cross-reference to the Hazard Chemical List.
- (9) Material Safety Data Sheets will be retained for 30 years in accordance with 29 CFR 1910.20, "Access to Employee Exposure and Medical Records". When MSDS's are removed from the active file, the date of removal will be placed in the upper right corner and placed in the inactive file set up by calendar year.

c. Container Labels:

- (1) All employees who receive/buy inventory will ensure that all products received for use will be labeled with the following information:
  - (a) Be clearly labeled as to the contents.
  - (b) Note the appropriate hazard warning.
  - (c) List the name and address of the manufacturer, importer or responsible party.
- (2) Every effort will be made to ensure that no container will be released for use until the above information is verified.
- (3) The Hazard Communication Coordinator will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with the Hazard Materials Information System (HMIS).

f. List of Hazardous Chemicals:

- (1) A Table of Contents of hazardous chemicals will be set up by identifying the trade name (nomenclature) with the code on the Material Safety Data Sheet.

g. Hazard Non-Routine Tasks:

- (1) In the event that employees are required to perform hazardous non-routine tasks, the Hazard Communication Coordinator or supervisor will ensure that each affected employee will be given information about the hazardous chemicals to which he/she may be exposed during such activity before the work is started. This information will include:
  - (a) Specific chemical hazards.

- (b) Protective/safety measures the employees can take to protect themselves.
  - (c) Measures taken to lessen the hazards including ventilation, respirators, presence of another employee and emergency procedures.
- h. Employee products:
  - (1) Employees are not allowed to use any personal product to perform their jobs without prior approval of the Hazard Communication Coordinator.
- i. Chemicals in Unlabeled Pipes:
  - (1) In the event that employees are working around unlabeled pipes, the contents of those pipes will be conveyed to these employees by the Hazard Communication Coordinator or the responsible supervisor.
- j. Contractor Interaction:
  - (1) It is essential that all contractors comply with the practical application of the Hazard Communication Standard as well as the intent. Therefore, the Hazard Communication Coordinator will ensure that the following information is shared by outside contractors:
    - (a) Appropriate Material Safety Data Sheets.
    - (b) A list of hazardous chemicals utilized.
    - (c) Precautions necessary to protect employees during normal operating conditions and foreseeable emergencies.
    - (d) Labeling system utilized.
  - (2) The above information in paragraphs 4j(1)(a) through (d) above will be shared with all subcontractors.
  - (3) Subcontractors performing tasks at a job site will ensure that appropriate information is available at each job site. This will be accommodated by performing the following actions:
    - (a) Keep a binder containing Material Safety Data Sheets on their vehicle or in the job trailer.
    - (b) Mark each container used or stored on the job site with information concerning the name of the product/chemical degree of hazard.
    - (c) Have a list of all chemicals/products used on the job site.

- (4) Subcontractors will ensure that their employees are familiar with the environment in which they work in order to prevent an unsafe condition. For example, welding operations will not take place in close proximity to painters who are using flammable products because of a fire/explosion hazard.
  - (5) A letter will be sent to each subcontractor stating the importance of complying with paragraphs 4j(3) and (4) above. (See attached letter).
- k. Administrative Controls:
- (1) In order to maintain the safest working environment possible, all products will be screened and suitable substitutes obtained, whenever possible, which will reduce or eliminate hazardous chemical exposure.
- l. Labeling exemptions:
- (1) Chemicals regulated by Federal agencies, which require labeling, are exempted from the requirements of the Hazard Communication Standard.
- m. Items Exempted:
- (1) Any hazardous waste as such term is defined by the Solid Waste Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42. U.S.C. 6901 et seq.), when subject to regulations issued under that act by the Environmental Protection Agency.
  - (2) Tobacco or tobacco products.
  - (3) Wood or wood products.
  - (4) Articles. An article is defined as a manufactured item which:
    - (a) Is formed to a specific shape or design during manufacturing.
    - (b) Has end use function(s) dependent in whole or part upon its shape or design during end use.
    - (c) Does not release, or otherwise result in exposure to a hazardous chemical under normal conditions of use.
  - (5) Foods, drugs, cosmetics, or alcoholic beverages in retail establishments which are packaged for sale to consumers.
  - (6) Foods, drugs or cosmetics intended for personal consumption by employees while in the work place.
  - (7) Any consumer product or hazardous substance as those terms are defined in the Consumer Product Safety Act and Federal Hazardous Substances Act

respectively, where the employer can demonstrate it is used in the work place in the same manner as normal consumer use, and which use results in a duration and frequency of exposure which is not greater than exposures experienced by consumers.

- (8) Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act when it is in solid, final form for direct administration to the patient (i.e. tablets or pills).

n. Program Review:

- (1) The written Hazard Communication Program will be reviewed for accuracy and applicability by the Hazard Communication Coordinator. Documentation of this review will be accomplished and filed with this program.

o. Enforcement:

- (1) In order to hold all affected personnel accountable, appropriate disciplinary action will be administered and documented.

5. **RESPONSIBILITY:**

- a. It is the responsibility of the Hazard Communication Coordinator and each supervisor to ensure compliance with this policy which allows easier access to information on hazardous chemical substances present in the work place through the use of labels, Material Safety Data Sheets, training and access to written records.
- b. It is the responsibility of each employee to adhere to all policies and procedures.

APPROVED: Kevin Cadd  
Kevin Cadd  
Safety Coordinator

- 1. Attachment
- 1. Letter to Subcontractor

## 116-1-2

### Part 1 Bloodborne Pathogens Standard

#### POLICY

Regional Conveyor Services, Inc. is committed to providing a safe and healthful work environment for our entire staff. In pursuit of this goal, the following exposure control plan (ECP) is provided to eliminate or minimize occupational exposure to bloodborne pathogens in accordance with OSHA standard 29 CFR 1910.1030, "Occupational Exposure to Bloodborne Pathogens."

The ECP is a key document to assist our organization in implementing and ensuring compliance with the standard, thereby protecting our employees. This ECP includes:

- Determination of employee exposure
- Implementation of various methods of exposure control, including:
  - Universal precautions
  - Engineering and work practice controls
  - Personal protective equipment
  - Housekeeping
- Hepatitis B vaccination
- Post-exposure evaluation and follow-up
- Communication of hazards to employees and training
- Recordkeeping
- Procedures for evaluating circumstances surrounding exposure incidents

Implementation methods for these elements of the standard are discussed in the subsequent pages of this ECP.



#### PROGRAM ADMINISTRATION

□ Roger Wickham is responsible for implementation of the ECP. Roger Wickham will maintain, review, and update the ECP at least annually, and whenever necessary to include new or modified tasks and procedures. Contact location/phone number: (540)387-9080

□ Those employees who are determined to have occupational exposure to blood or other potentially infectious materials (OPIM) must comply with the procedures and work practices outlined in this ECP.

□ Roger Wickham will provide and maintain all necessary personal protective equipment (PPE), engineering controls (e.g., sharps containers), labels, and red bags as required by the standard. Roger Wickham will ensure that adequate supplies of the aforementioned equipment are available in the appropriate sizes. Contact location/phone number: 540-387-9080

□ Roger Wickham will be responsible for ensuring that all medical actions required by the standard are performed and that appropriate employee health and OSHA records are maintained. Contact location/phone number: 540-387-9080

□ Roger Wickham will be responsible for training, documentation of training, and making the written ECP available to employees, OSHA, and NIOSH representatives. Contact location/phone number: 540-387-9080

#### EMPLOYEE EXPOSURE DETERMINATION

The following is a list of all job classifications at our establishment in which all employees have occupational exposure:

<i>Job Title</i>	<i>Department/Location</i>
Conveyor Maintenance Worker	Conveyor - Salem
Fabrication Machine Worker	Fab Machine - Salem

The following is a list of job classifications in which some employees at our establishment have occupational exposure. Included is a list of tasks and procedures, or groups of closely related tasks and procedures, in which occupational exposure may occur for these individuals:

Example:

<i>Job Title</i>	<i>Department/Location</i>	<i>Task/Procedure</i>
Conveyor Maintenance Worker	Conveyor/Salem	Conveyor Maintenance
Fab/Machine Worker	Fab/Machine / Salem	Fab/Machine Duties

NOTE: Part-time, temporary, contract and per diem employees are covered by the bloodborne pathogens standard. The ECP should describe how the standard will be met for these employees.

#### **METHODS OF IMPLEMENTATION AND CONTROL**

##### **Universal Precautions**

All employees will utilize universal precautions.

##### **Exposure Control Plan**

Employees covered by the blood borne pathogens standard receive an explanation of this ECP during their initial training session. It will also be reviewed in their annual refresher training. All employees can review this plan at any time during their work shifts by contacting Roger Wickham. If requested, we will provide an employee with a copy of the ECP free of charge and within 15 days of the request.

Roger Wickham is responsible for reviewing and updating the ECP annually or more frequently if necessary to reflect any new or modified tasks and procedures that affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

##### **Engineering Controls and Work Practices**

Engineering controls and work practice controls will be used to prevent or minimize exposure to bloodborne pathogens. The

1.

specific engineering controls and work practice controls used are listed below:

DPPE

Sharps disposal containers are inspected and maintained or replaced by Roger Wickham whenever necessary to prevent overfilling.

This facility identifies the need for changes in engineering controls and work practices through OSHA regulations.

We evaluate new procedures and new products regularly by annual training.

Both front-line workers and management officials are involved in this process in the following manner: annual training

Roger Wickham is responsible for ensuring that these recommendations are implemented.

**Personal Protective Equipment (PPE)**

PPE is provided to our employees at no cost to them. Training in the use of the appropriate PPE for specific tasks or procedures is provided by Roger Wickham

The types of PPE available to employees are as follows: eye protection, hearing protection, respirators, steel toe boots, gloves.

PPE is located on premises and may be obtained through Roger Wickham.

All employees using PPE must observe the following precautions:

□ Wash hands immediately or as soon as feasible after removing gloves or other PPE.

□ Remove PPE after it becomes contaminated and before leaving the work area.

□ Used PPE may be disposed of in specified appropriate containers.

□ Wear appropriate gloves when it is reasonably anticipated that there may be hand contact with blood or OPIM, and when handling or touching contaminated items or surfaces; replace gloves if torn, punctured or contaminated, or if their ability to function as a barrier is compromised.

□ Utility gloves may be decontaminated for reuse if their integrity is not compromised; discard utility gloves if they show signs of cracking, peeling, tearing, puncturing, or deterioration.

- Never wash or decontaminate disposable gloves for reuse.
- Wear appropriate face and eye protection when splashes, sprays, spatters, or droplets of blood or OPIM pose a hazard to the eye, nose, or mouth.

□ Remove immediately or as soon as feasible any garment contaminated by blood or OPIM, in such a way as to avoid contact with the outer surface.

The procedure for handling used PPE is as follows:

Disposal in proper container

### Housekeeping

Regulated waste is placed in containers which are closable, constructed to contain all contents and prevent leakage, appropriately labeled or color-coded (see the following section "Labels"), and closed prior to removal to prevent spillage or protrusion of contents during handling.

2.

The procedure for handling sharps disposal containers is:

Dispose in proper container

The procedure for handling other regulated waste is: *dispose in proper container*

Contaminated sharps are discarded immediately or as soon as possible in containers that are closable, puncture-resistant, leak proof on sides and bottoms, and appropriately labeled or color-coded. Sharps disposal containers are available at designated areas on shop floor

Bins and pails (e.g., wash or emesis basins) are cleaned and decontaminated as soon as feasible after visible contamination.

Broken glassware that may be contaminated is only picked up using mechanical means, such as a brush and dustpan.

#### **Laundry**

The following contaminated articles will be laundered by this company:

Work uniforms

Laundering will be performed by the contracted uniform company

The following laundering requirements must be met:

- handle contaminated laundry as little as possible, with minimal agitation

Place wet contaminated laundry in leak-proof, labeled or color-coded containers before transport. Use specified container for uniforms for this purpose.

Wear the following PPE when handling and/or sorting contaminated laundry: eye protection, gloves

### **Labels**

The following labeling methods are used in this facility:

<i>Equipment to be Labeled</i>	<i>Label Type (size, color)</i>
<i>Uniform container</i>	<u>white container label</u>
<i>Metal container</i>	

Roger Wickham is responsible for ensuring that warning labels are affixed or red bags are used as required if regulated waste or contaminated equipment is brought into the facility. Employees are to notify the company's Safety Manager if they discover regulated waste containers, refrigerators containing blood or OPIM, contaminated equipment, etc., without proper labels.

### **HEPATITIS B VACCINATION**

The company's Safety Manager will provide training to employees on hepatitis B vaccinations, addressing safety, benefits, efficacy, methods of administration, and availability.

The hepatitis B vaccination series is available at no cost after initial employee training and within 10 days of initial assignment to all employees identified in the exposure determination section of this plan. Vaccination is encouraged unless: 1) documentation exists that the employee has previously received the series; 2) antibody testing reveals that the employee is immune; or 3) medical evaluation shows that vaccination is contraindicated.

However, if an employee declines the vaccination, the employee must sign a declination form. Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the vaccination is kept at Salem.

Vaccination will be provided by a qualified medical professional in Salem.

Following the medical evaluation, a copy of the health care professional's written opinion will be obtained and provided to the employee within 15 days of the completion of the evaluation. It will be limited to whether the employee requires the hepatitis vaccine and whether the vaccine was administered.

## POST-EXPOSURE EVALUATION AND FOLLOW-UP

Should an exposure incident occur, contact the company's Safety Manager at the following number (540)387-9060.

An immediately available confidential medical evaluation and follow-up will be conducted by a qualified medical professional. The following activities will be performed:

☐ Document the routes of exposure and how the exposure occurred.

☐ Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).

☐ Obtain consent and make arrangements to have the source individual tested as soon as possible to determine HIV, HCV, and HBV infectivity; document that the source individual's test results were conveyed to the employee's health care provider.

☐ If the source individual is already known to be HIV, HCV and/or HBV positive, new testing need not be performed.

☐ Assure that the exposed employee is provided with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).

☐ After obtaining consent, collect exposed employee's blood as soon as feasible after exposure incident, and test blood for HBV and HIV serological status

☐ If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

### ADMINISTRATION OF POST-EXPOSURE EVALUATION AND FOLLOW-UP

The company's Safety Manager ensures that health care professional(s) responsible for employee's hepatitis B vaccination and post-exposure evaluation and follow-up are given a copy of OSHA's blood borne pathogens standard.

The company's Safety Manager ensures that the health care professional evaluating an employee after an exposure incident receives the following:

• a description of the employee's job duties relevant to the exposure incident

- route(s) of exposure
- circumstances of exposure
- if possible, results of the source individual's blood test
- relevant employee medical records, including vaccination status

The company's Safety Manager provides the employee with a copy of the evaluating health care professional's written opinion within 15 days after completion of the evaluation.

### PROCEDURES FOR EVALUATING THE CIRCUMSTANCES SURROUNDING AN EXPOSURE INCIDENT

The company's Safety Manager will review the circumstances of all exposure incidents to determine:

- engineering controls in use at the time
- work practices followed
- a description of the device being used (including type and brand)

• protective equipment or clothing that was used at the time of the exposure incident (gloves, eye shields, etc.)

- location of the incident (O.R., E.R., patient room, etc.)
- procedure being performed when the incident occurred and employee's training

Roger Wickham will record all percutaneous injuries from contaminated sharps in a Sharps Injury Log.



If revisions to this ECP are necessary, the company's Safety Manager will ensure that appropriate changes are made. (Changes may include an evaluation of safer devices, adding employees to the exposure determination list, etc.)

#### EMPLOYEE TRAINING

All employees who have occupational exposure to bloodborne pathogens receive initial and annual training conducted by the company's Safety Manager. (Attach a brief description of their qualifications.)

All employees who have occupational exposure to bloodborne pathogens receive training on the epidemiology, symptoms, and transmission of bloodborne pathogen diseases. In addition, the training program covers, at a minimum, the following elements:

• a copy and explanation of the OSHA blood borne pathogen standard

- an explanation of our ECP and how to obtain a copy
- an explanation of methods to recognize tasks and other activities that may involve exposure to blood and OPIM, including what constitutes an exposure incident

• an explanation of the use and limitations of engineering controls, work practices, and PPE

• an explanation of the types, uses, location, removal, handling, decontamination, and disposal of PPE

• an explanation of the basis for PPE selection

• information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine will be offered free of charge

• information on the appropriate actions to take and persons to contact in an emergency involving blood or OPIM

• an explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available

• information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident

• an explanation of the signs and labels and/or color coding required by the standard and used at this facility

• an opportunity for interactive questions and answers with the person conducting the training session.

Training materials for this facility are available at 224 W 4<sup>th</sup> Street, Salem, VA.

## RECORD KEEPING

### Training Records

Training records are completed for each employee upon completion of training. These documents will be kept for at least three years at 224 W 4<sup>th</sup> Street, Salem, VA.

The training records include:

- the dates of the training sessions
- the contents or a summary of the training sessions
- the names and qualifications of persons conducting the training
- the names and job titles of all persons attending the training sessions

Employee training records are provided upon request to the employee or the employee's authorized representative within 15 working days. Such requests should be addressed to the company's Safety Manager.

### Medical Records

Medical records are maintained for each employee with occupational exposure in accordance with 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records."

The company's Safety Manager is responsible for maintenance of the required medical records. These confidential records are kept in Salem, Va for at least the duration of employment plus 30 years.

Employee medical records are provided upon request of the employee or to anyone having written consent of the employee within 15 working days. Such requests should be sent to:

Regional Conveyor Services, Inc.  
c/o Safety Manager  
224 W 4<sup>th</sup> Street  
Salem, Va 24153.

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### **OSHA Recordkeeping**

An exposure incident is evaluated to determine if the case meets OSHA's Recordkeeping Requirements (29 CFR 1904). This determination and the recording activities are done by the company's Safety Manager.

### **Sharps Injury Log**

In addition to the 1904 Recordkeeping Requirements, all percutaneous injuries from contaminated sharps are also recorded in a Sharps Injury Log. All incidences must include at least:

- date of the injury
- type and brand of the device involved (syringe, suture needle)
- department or work area where the incident occurred
- explanation of how the incident occurred.

This log is reviewed as part of the annual program evaluation and maintained for at least five years following the end of the calendar year covered. If a copy is requested by anyone, it must have any personal identifiers removed from the report.

### **HEPATITIS B VACCINE DECLINATION (MANDATORY)**

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to myself.

However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

establishment. format to tailor to the specific requirements of your :

## **Model Hazard Communication Program**

### **4. Company Policy**

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

This program applies to all work operations in our company where you may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. All work units of this company will participate in the Hazard Communication Program. Copies of the Hazard Communication Program are available at 224 W. 4<sup>th</sup> St., Salem for review by any interested employee.

Roger Wickham is the program coordinator, with overall responsibility for the program, including reviewing and updating this plan as necessary.

### **2. Container Labeling**

Roger Wickham will verify that all containers received for use will be clearly labeled as to the contents, note the appropriate hazard warning, and list the manufacturer's name and address.

Roger Wickham will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels marked with the identity and the appropriate hazard warning. For help with labeling, see Roger Wickham.

On the following individual stationary process containers, we are using signs rather than a label to convey the required information:

Metal, uniform and biohazard

We are using an in-house labeling system that relies on color designation.

The Roger Wickham will review the company labeling procedures annually and will update labels as required.

### 3. Material Safety Data Sheets (MSDSs)

Roger Wickham is responsible for establishing and monitoring the company MSDS program. He/she will ensure that procedures are developed to obtain the necessary MSDSs and will review incoming MSDSs for new or significant health and safety information. He/she will see that any new information is communicated to affected employees. The procedure below will be followed when an MSDS is not received at the time of initial shipment:

Contact appropriate vendor

Copies of MSDSs for all hazardous chemicals to which employees are exposed or are potentially exposed will be kept in shop area and individual vehicles.

MSDSs will be readily available to all employees during each work shift. If an MSDS is not available, contact Roger Wickham.

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

Paper copy

When revised MSDSs are received, the following procedures will be followed to replace old MSDSs:

Remove and replace old copy

#### 4. Employee Training and Information

Roger Wickham is responsible for the Hazard Communication Program and will ensure that all program elements are carried out.

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

- An overview of the OSHA hazard communication standard
- The hazardous chemicals present at his/her work area
- The physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Steps the company has taken to reduce or prevent exposure to hazardous chemicals
- Procedures to follow if employees are overexposed to hazardous chemicals
- How to read labels and MSDSs to obtain hazard information
- Location of the MSDS file and written Hazard Communication program

Prior to introducing a new chemical hazard into any section of this company, each employee in that section will be given information and training as outlined above for the new chemical hazard. The training format will be as follows:

Classroom training and copy of updated MSDS

#### 5. Hazardous Non-routine Tasks

Periodically, employees are required to perform non-routine tasks that are hazardous. Examples of non-routine tasks are: confined space entry, tank cleaning, and painting reactor vessels,

5.

Prior to starting work on such projects, each affected employee will be given information by Roger Wickham about the hazardous chemicals he or she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee should use, and steps the company is taking to reduce the hazards, including ventilation, respirators, the presence of another employee (buddy systems), and emergency procedures.

#### **6. Informing Other Employers/Contractors**

It is the responsibility of Roger Wickham to provide other employers and contractors with information about hazardous chemicals that their employees may be exposed to on a job site and suggested precautions for employees. It is the responsibility of (name of responsible person and/or position) to obtain information about hazardous chemicals used by other employers to which employees of this company may be exposed.

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

##### Paper copy

In addition to providing a copy of an MSDS to other employers, other employers will be informed of necessary precautionary measures to protect employees exposed to operations performed by this company.

Also, other employers will be informed of the hazard labels used by the company. If symbolic or numerical labeling systems are used, the other employees will be provided with information to understand the labels used for hazardous chemicals for which their employees may have exposure.

#### **7. List of Hazardous Chemicals**

A list of all known hazardous chemicals used by our employees is attached to this plan. This list includes the name of the chemical, the manufacturer, the work area in which the chemical is used, dates of use, and quantity used. Further information on each chemical may be obtained from the MSDSs, located in MSDS binder maintained by Roger Wickham.

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



procedures shall be followed:

Obtain and distribute paper copy of MSDS

The hazardous chemical inventory is compiled and maintained by Roger Wickham.

#### **8. Chemicals in Unlabeled Pipes**

Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee shall contact Roger Wickham for information regarding:

- The chemical in the pipes
- Potential hazards
- Required safety precautions.

Include here the chemical list developed during the inventory.

Arrange this list so that you are able to cross-reference it with your MSDS file and the labels on your containers. Additional useful information, such as the manufacturer's telephone number, an emergency number, scientific name, CAS number, the associated task, etc., can be included.

#### **9. Program Availability**

A copy of this program will be made available, upon request, to employees and their representatives.