

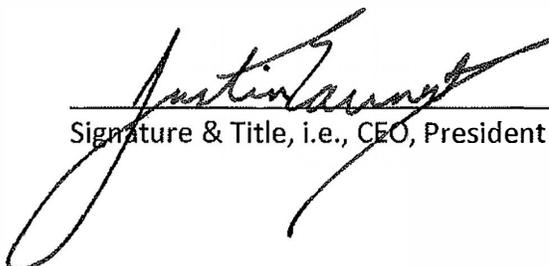


Health & Safety Manual



1) POLICY

- a. Management, staff, and hourly workers of EARNEST CONTRACTING must have a common objective to be successful. Our objective is the healthy, safe, environmentally sound, and productive operation of all Company activities. We have an obligation to preserve the human, physical, and financial resources of our company. In satisfying this obligation, worker safety and health will always be our #1 priority. As such, this basic policy must be considered in every phase of our business including acquisition, job planning, job setup, and performance.
- b. Accordingly, our principal objectives are to:
 - i. Provide a work environment that is free of unmitigated recognized hazards.
 - ii. Comply with all laws that regulate worker safety, health, and our environment.
 - iii. Recognize the priority of safety and health factors over purely economic considerations.
 - iv. Hold each worker accountable for the safe execution of all jobs assigned and full
 - v. compliance with all environmental, safety, and health related procedures and training.
 - vi. Train our workers in safe and proper job procedures and required compliance with established procedures, policies, and practices.
 - vii. Provide comprehensive new worker safety training to all new hires.
 - viii. Hire only those persons who demonstrate the capacity to comprehend and execute all jobs in a safe and healthful manner consistent with the policies and procedures of the company and the training and job instruction provided.
 - ix. Promote worker health and safety both on and off the job.
 - x. Maintain leadership in safety and accident/incident prevention by continuously improving safety performance and work methods and procedures.
- c. Supervisors have the greatest impact and thus the greatest opportunity to influence and promote safe work practices among our work force. The prevention of accidents/incidents requires everyone's concerted effort and daily attention. All workers have equal authority and responsibility to take appropriate action to correct unsafe acts/or conditions which may include stopping work.
- d. A properly planned and executed job will eliminate the chance for losses and return benefits that satisfy needs in each of these areas:
 - i. Health, Safety, & Environment
 - ii. Morale
 - iii. Cost
 - iv. Production
 - v. Quality
 - vi. Customer Satisfaction
- e. All workers will contribute to the company environmental, health, and safety program by following all policies and procedures, bringing unsafe conditions/acts to the attention of management, and recommending actions to improve the effectiveness of the program. Supervisors shall ensure that workers observe and obey every rule and regulation necessary for the safe conduct of work and shall take such action necessary to obtain compliance.



Signature & Title, i.e., CEO, President or Executive of the Company

05-01-24
Date



Health and Safety Program Manual

Issue Date: 02/15/2023

Philosophy Mission Statement

Revision Date:

Section:

1) PURPOSE

- a. To provide all operations with standardized safety programs and implementation guidelines to assure a uniform level of accident prevention, best management practices, and regulatory compliance, while recognizing local needs and individual operating cultures.

2) SCOPE

- a. The contents of this policy shall form the compliance standard for safely conducting company business at office facilities, projects, and operations under the direct control of EARNEST CONTRACTING, hereafter referred to as "The Company".

3) DEFINITIONS

- a. **Office Facilities, Projects, Work Sites and Operations** any location where workers of the company are assigned to perform work.
- b. **Direct Control of the Company** any work or activity performed by The Company workers or where The Company workers are directing the course of work.

4) PROCEDURES

- a. It is the policy and primary concern of The Company to develop and maintain safe and healthy worksite conditions for The Company workers, The Company subcontractors, and the public. This shall be accomplished through the application of The Company's written safety work practices, safety training courses and programs, and through procedures and policies as outlined in this manual. At The Company, safety shall take precedence over more expedient unsafe operations.
- b. The Company will make every attempt to provide equipment and create conditions that will make a safe workplace, and safety education shall be provided to workers as necessary.
- c. The Company requires compliance with this Health and Safety Policy and established work procedures. Failure on the part of any worker to comply with this policy may result in disciplinary action and possibly termination of employment. In addition, subcontractors shall be expected to abide by the applicable provisions of The Company safety policy.
- d. This written program supersedes previous health and safety programs and shall not be altered without approval of the Director of Health and Safety or delegate. It is intended that the Health and Safety Policy be reviewed and updated annually, or as needed to address changing situations and services.



Note: Guidance and criteria for Coronavirus Disease 2019 vary locally depending on current conditions. Check with your local health department for requirements specific to your location.

The health of our employees is of utmost importance, as they are our most valuable asset. The following policy has been implemented to protect our employees to the greatest of our ability from the spread of Coronavirus Disease 2019 (COVID-19).

COVID-19 is a respiratory disease that has spread from China to many other countries around the world, including the United States. Infection with SARS-CoV-2, the virus that causes COVID-19, can cause illness ranging from mild to severe and, in some cases, can be fatal.

Regardless of potential occupational exposures, the following Pandemic Response Plan will be implemented in order to limit the risk to our employees.

Our employees will be trained in all aspects of our plan, and the plan will be available for review by workers and their representatives.

Prevention and Precautions

Our employees' risk of exposure will be continually assessed and evaluated. Controls to prevent exposure will be selected and implemented as appropriate, and workers will be required to use them.

These include engineering controls such as physical barriers to control the spread of the virus; administrative controls such as no large meetings or gatherings and physical distancing; and appropriate personal protective equipment, hygiene, and cleaning supplies.

- a. Policies and practices, such as flexible worksites (e.g., telecommuting) and flexible work hours (e.g., staggered shifts), will be used if possible, to increase the physical distance among employees and between employees and others.
- b. The workplace will be modified to increase physical space between employees, and between employees and customers, to 6 feet or more, where feasible. Signs, tape marks, or other visual cues will be used to indicate where to stand when physical barriers are not possible.
- c. Signs will be posted reminding workers, customers, and visitors to maintain at least six feet between one another. Directional signs will be posted in hallways/corridors where the width restricts movement and limits social distancing.
- d. On-site safety meetings will be adjusted to ensure physical distancing guidelines. When possible, other meetings and interviews will be conducted via phone or digital platforms or held outside.
- e. Workers will be discouraged from using other workers' phones, desks, offices, and other work tools and equipment, whenever possible. Shared items will be cleaned and disinfected before and after each use.
- f. Daily health/temperature checks will be conducted and/or employees will be encouraged to self-monitor/self-screen and notify their supervisor when they are sick or experiencing symptoms of COVID-19. Workers will be required to stay home if they are sick.
- g. Any employee exhibiting signs and symptoms of COVID-19 at work will be immediately separated from others and sent home.
- h. Employees are restricted to only essential travel to known COVID-19 high risk areas, and employees who have recently visited restricted areas must follow quarantine protocols.

Signs and Symptoms

Symptoms of COVID-19 typically include fever, cough, and shortness of breath. Some people infected with the virus have reported experiencing other non-respiratory symptoms such as fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting, or diarrhea. Other people, referred to as *asymptomatic cases*, have experienced no symptoms at all.

According to the CDC, symptoms of COVID-19 may appear in as few as 2 days or as long as 14 days after exposure. It may be possible that a person can get COVID-19 by touching a surface or object that has SARS-CoV-2 on it and then touching their own mouth, nose, or possibly their eyes, but this is not thought to be the primary way the virus spreads. The virus is thought to spread mainly from person-to-person, including:

- a. Between people who are in close contact with one another (within about 6 feet).
- b. Through respiratory droplets produced when an infected person coughs or sneezes. These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.

Workers will be allowed and encouraged to wear face coverings over their nose and mouth to prevent them from spreading the virus when talking, coughing, and/or sneezing if the use of a mask does not present or increase a hazard. Employees will be instructed in the proper use of face masks.

Note: Cloth face coverings are not PPE, because they protect other people from the wearer's respiratory secretions, rather than protecting the wearer.

Procedures for a Confirmed Case

If an employee is confirmed to have COVID-19, fellow employees will be informed of their possible exposure to COVID-19 in the workplace, but confidentiality will be maintained as required by the Americans with Disabilities Act (ADA). Employees exposed to a co-worker with confirmed COVID-19 will be referred to **CDC guidance** for how to conduct a risk assessment of their potential exposure.

Communication/Notification Procedure

Important COVID-19 information will be communicated to our employees by small safety meetings, email, text, and/or telephone.

- a. A suspected employee illness will be communicated internally by the most effective, safe means possible using emails and/or phone messages.
- b. As the event evolves, we will communicate any necessary changes with our employees through workplace postings, emails, and/or phone messages.
- c. We will provide information on workforce readiness and precautionary measures for personnel reporting to 3rd party sites and projects via email and phone messages.

Team Member Hygiene

Frequent and thorough hand washing will be promoted, including by providing workers, customers, and worksite visitors with a place to wash their hands.

- a. If soap and running water are not immediately available, alcohol-based hand rubs containing at least 60% alcohol will be provided.
- b. Respiratory etiquette, including covering coughs and sneezes, will be required.
- c. Disposable gloves may be used to supplement frequent handwashing or use of hand sanitizer; examples are for workers who are screening others for symptoms or handling commonly touched items.

Facility Hygiene and Sanitation Procedures

Regular housekeeping practices, including routine cleaning and disinfecting of surfaces, equipment, and other elements of the work environment such as doorknobs, light switches, handles, toilets, faucets, etc., will be maintained.

- a. Cleaning products with EPA-approved emerging viral pathogens claims diluted household bleach solutions (5 tablespoons per gallon of water), or alcohol solutions with at least 70% alcohol that are appropriate for the surface will be used.
- b. Workers will be trained on the chemical hazards, manufacturer's directions (e.g., concentration, application method and contact time, PPE), ventilation, and requirements for safe use.

Sanitation and disinfection will need to happen after persons suspected/confirmed to have COVID-19 have been at the workplace. Areas visited by the ill persons will be closed off to all but those responsible for sanitation and disinfection.

- a. Outside doors and windows will be opened where possible and ventilating fans will be used to increase air circulation in the area. Cleaning and disinfection will begin at least 24 hours (or as long as possible) after appropriate ventilation.
- b. Cleaning staff should sanitize and disinfect all areas such as offices, bathrooms, common areas, shared electronic equipment like tablets, touch screens, keyboards, remote controls, and anything else used by the ill persons, focusing especially on frequently touched surfaces. If needed, the space will be vacuumed with a vacuum equipped with high-efficiency particulate air (HEPA) filter.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Motor Vehicle Safety Program	Revision Date: Section:

1) MOTOR VEHICLE SAFETY POLICY

a. Policy

i. Many employees operate company owned, leased, rental or personal vehicles as part of their jobs. Employees are expected to operate vehicles safely to prevent incidents which may result in injuries and property loss. It is the policy of Earnest Contracting to provide and maintain a safe working environment to protect our employees and the citizens of the communities where we conduct business from injury and property loss. The company considers the use of automobiles part of the working environment. The company is committed to promoting a heightened level of safety awareness and responsible driving behavior in its employees. Our efforts and the commitment of employees will prevent vehicle incidents and reduce personal injury and property loss claims. This program requires the full cooperation of each driver to operate their vehicle safely and to adhere to the responsibilities outlined in the Motor Vehicle Safety Program, while obeying all Federal, State and Local laws applying to the operation of motor vehicles. Elements of this program include:

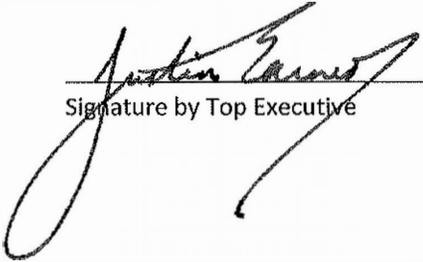
1. Assigning responsibilities at all levels of employment.
2. Vehicle use and insurance requirements.
3. Employee driver's license checks and identification of high risk drivers.
4. Incident reporting and investigation.
5. Vehicle selection and maintenance.
6. Training standards.
7. Safety regulations.

b. Responsibility

i. A system of responsibility and accountability shall be established throughout the organization to ensure effective implementation of the fleet safety program. Cooperative efforts from various departments should be employed when establishing accountability and disciplinary systems. Driver involvement should be encouraged. Management is responsible for successful implementation and on-going execution of this program. Supervisors and employees are responsible for meeting and maintaining the standards set forth in this program.

c. Scope

i. This policy applies to employees who operate vehicles on company business and will be reviewed by managers and supervisors to ensure full implementation and compliance.



 Signature by Top Executive

05-01-24
 Date

2) ORGANIZATION AND RESPONSIBILITIES

a. Company Top Executive

- i. The company's top executive has the ultimate responsibility for successfully managing the vehicle safety program. Another executive or top manager may be designated as the Vehicle Safety Coordinator with full authority to execute his/her responsibilities.

b. Management will

- i. Implement the Fleet Safety Management Program in their areas of responsibility.
- ii. Establish measurement objectives to ensure compliance with the program.
- iii. Provide assistance and the resources necessary to implement and maintain the program.
- iv. Audit and manage compliance with regulations, best management practices, and the effectiveness of the Fleet Safety Management Program.
- v. Assess the use of vehicles and nature of territory to be covered, and formally manage routes and schedules as needed.

c. Supervisors will

- i. Investigate and report all incidents involving a motor vehicle used in performing company business. Forward all incident reports to the Vehicle Safety Coordinator.
- ii. Be responsible for taking appropriate action to manage high risk drivers as defined by this program.
- iii. Provide driver training either internally or through external means for high risk drivers.

d. Vehicle Safety Coordinator

- i. Manage all elements set forth in the Fleet Safety Management Program. The coordinator will develop process charts that illustrate how the organization takes its required activities, organizes them and shows who in the organization owns the activity, how the information flows, how approvals are developed and ascertained, and how results are communicated internally and externally. Review motor vehicle incident reports. Issue periodic reports of losses for the president's review.
- ii. Revise and distribute changes to the Fleet Safety Management Program to managers, supervisors and drivers as necessary.
- iii. Maintain appropriate records.
- iv. Monitor federal, state and local regulations in order to comply with all regulations and implement any policy/procedure change in a timely manner.
- v. Monitor the effectiveness of the Fleet Safety Management Program.

e. Drivers will

- i. Always operate a motor vehicle in a safe manner as explained under the section titled, "Driver Safety Regulations".
- ii. Maintain a valid driver's license and minimum insurance requirements on personal vehicles used in company business.
- iii. Maintain assigned vehicles according to established maintenance standards.

3) VEHICLE USE

a. Company Owned Vehicles

- i. Passenger cars, SUVs, vans and pick up trucks

1. Employees authorized by their supervisors will be permitted to operate a passenger car, SUV, van or pick up truck. When the vehicle is driven for personal use, only the employee or the employee's spouse will be permitted to operate the vehicle. No one under the age of 21 will be permitted to operate the vehicle.
 - ii. Commercial Vehicles
 1. Employees with appropriate commercial driver's license (if required by the state), authorization from their supervisor and qualified by state and Federal DOT when applicable will be permitted to operate the vehicle.
 - iii. Use of Company Vehicles for Personal Use
 1. Personal use of company vehicles is prohibited unless permission is granted by upper management. Personal use poses a high degree of added liability to our organization, and will be discouraged.(???) If personal use is granted, the driver will be required to sign a Personal Use Policy.
- b. Personal Vehicles on Company Business**
- i. Employees who drive their personal vehicles on company business are subject to the requirements of this program including:
 1. Maintain auto liability insurance with minimum limits of \$1,000,000 for bodily injury and \$1,000,000 for property damage with combined single limit of \$1,000,000. (NOTE: Organizations should consult with their insurance broker or other insurance consultant to determine appropriate levels of minimum insurance on personal vehicles operated on company business).
 2. Maintain current state vehicle inspections when required.
 3. Maintain their own vehicle in a safe operating condition when driven on company business.
 4. Proof of insurance (copy of declaration page) will be sent to the Vehicle Safety Coordinator.
 5. Acceptable Motor Vehicle Report (MVR).
 6. No 'business use' exclusion on personal insurance policy.
 7. Compliance with the policies and rules set forth in this fleet safety program.
- c. Rental Vehicles**
- i. Vehicles may be rented for organizational business in certain circumstances. This includes out of town travel, replacement while a company vehicle is being repaired, transportation of business guests, special events, and unexpected shortage of transportation resources. While renting a vehicle, all requirements of the vehicle safety program apply.
 - ii. Rental vehicles will be leased from ABC Rentals Inc. which provides nationwide access to rental vehicles.
 - iii. Drivers should decline the optional coverage offered by the rental car company (If the organization carries rental vehicle coverage).
- d. Unauthorized Use of Vehicles**
- i. Assigned drivers and other authorized employees will not allow an unauthorized individual to operate a company vehicle. Disciplinary action may be taken for violation of this policy. Additionally, if unauthorized use results in an incident, the responsible employee may be required to make restitution for the damages.
- e. Contractors and Temporary Hire Employees**
- i. Contractors and temporary employees will be treated as company employees and will comply with the requirements of this program. Failure to meet all requirements will result in the immediate loss of driving privileges.

4) DRIVER SELECTION

a. Driver Evaluation

- i. Job descriptions will be maintained for each type of position that requires driving, and include the driver's license required for that position. Consideration will be given to educational and physical requirements of the job.
- ii. In addition to meeting the requirements of the job description, drivers will be recruited and selected based on their driving ability, past driving history, and compliance with the Fleet Safety Management Program. To evaluate employees as drivers, management will:
 1. Review past driving performance and work experience through previous employer reference checks. In addition to the company-wide general job application, all new employees, and current employees recently assigned to driving duties. will be required to complete the "Application Addendum For Employment Requiring Driving".
 2. Review the employee's Motor Vehicle Record (MVR) in accordance with applicable privacy laws. Compare the MVR with the guidelines listed in the Driver Qualification section below. Ensure the employee has a valid driver's license.
 3. Ensure the employee is qualified to operate the type of vehicle he/she will drive. A road test is recommended.

b. Driver Qualification

- i. Effective driver qualification controls are important elements of a successful Fleet Safety Management Program. Management should develop and incorporate standards into this program, which reflect the skills necessary for satisfactory job performance, while taking into consideration applicable Federal and state regulations. Written job descriptions and selection criteria should be designed to help in the selection of safe drivers. The selection process should be addressed periodically to ensure the process is effective.
- ii. At least on an annual basis, review a current MVR for each driver. A procedure should be established to perform more frequent background checks if at-risk driver behaviors are identified. Corrective action, such as retraining or restriction of driving privileges, should be instituted on a consistent basis.
- iii. All drivers should be monitored for regular compliance with the procedures, policies and rules in this vehicle program. In addition to a MVR review, the organization may conduct direct observation of driving skills, review of information on trip recorders on vehicles, and feedback from the general public.
 1. The company has implemented four levels of driver qualification criteria. Use of any or all of these criteria is dependent upon the nature and scope of the driving requirements.
 - a. State-regulated driver qualification parameters must be met. Regulatory information will be obtained from applicable state departments of transportation and motor vehicle services.
 - b. Where applicable, drivers will comply with DOT (or FMCSA?) Commercial Driver License (CDL) regulations.
 - c. Drivers involved in interstate or foreign commerce in vehicles with Gross Motor Vehicle Weight Rating (GMVR) of 10,001 pounds or more, designed to transport 16 or more passengers, including the driver, or used in the transportation of hazardous materials in a quantity requiring placarding under the DOT Hazardous Materials Regulations, are subject to the requirements of the DOT Federal Highway Administration's Federal Motor Carrier Safety Regulations.
 - d. Drivers involved in intra or interstate operations with GMVR of 26,001 pounds or more must have a CDL license and be enrolled in a DOT Drug and Alcohol Testing Program.
- iv. The following criteria was established to identify acceptable drivers.

Acceptable Driver			
Minors*	Majors*	Serious Events**	Incidents*
3	0	0	0
1	0	0	1
0	0	0	2
0	1	0	0

*Indicates the review period for minor and major incidents and incidents is 3 years from the date of conviction.

** Indicates the review period of serious events is 5 years from the date of conviction.

v. A driver is unacceptable when:

Unacceptable Driver			
Minors*	Majors*	Serious Events**	Incidents*
4+	0	0	0
2+	0	0	1
1+	0	0	2
0+	0	0	3+
1+	1	0	0
0+	1	0	1+
0+	2+	0	0+
0+	0+	1+	0+

vi. Minor incidents: minor moving violations such as minimal speeding or failure to stop at a stop sign.

1. Major incidents: major moving violations such as excessive speeding (10 miles over speed limit) and reckless driving.
2. Serious events: severe moving violation or events such as driving under the influence of alcohol or drugs (DWI/DUI), hit and run, failure to report an incident, negligent homicide arising out of the use of a motor vehicle, operating during a period of suspension or revocation, using a motor vehicle for the commission of a felony, operating a motor vehicle without the owner's authority, or permitting an unlicensed person to drive.

vii. Drivers identified "high risk" are those whose qualifications and driving history falls between the acceptable and unacceptable levels. Drivers who are identified as high risk are subject to several actions from management including, but not limited to:

1. Driver may be required to attend a Defensive or Safety Driving course on their own time & expense.
2. Driver may have their driving privileges suspended or revoked.

- viii. Documentation of the qualification of each driver will be maintained. Also, records will be kept regarding the driver's training. Examples of items to be kept in the driver's qualification and/or personnel files include:
1. Job application
 2. Copy of MVRs
 3. Previous employer inquiries and reference checks
 4. Training records
 5. Copy of current driver's license
 6. Copy of current medical card
 7. Annual certification of Violation form (with current MVR)
 8. Other items specific to drivers with a CDL

5) INCIDENT RECORDKEEPING, REPORTING AND ANALYSIS

- a. **This company considers elimination of motor vehicle incidents as a major goal.** This pertains to incidents under the operation of company-owned or leased vehicles, whether the vehicle is being driven on organizational business or for personal use, and the operation of rental or driver-owned vehicles used for business purposes. To meet this objective, all incidents will be reported to management, investigated, documented and reviewed by the Company Incident Review Board. The investigation identifies need for:
- i. A more intensive driver training and/or remedial training.
 - ii. Improved driver selection procedures.
 - iii. Improve vehicle inspection and/or maintenance activities.
 - iv. Changes in routing
 - v. Determination of preventability
 - vi. Identification of root cause in order to prevent future occurrences
- b. **Motor vehicle incident recordkeeping procedures consist of the following components.**
- i. Documentation of causes and corrective action.
 - ii. Management review to expedite corrective action.
 - iii. Analysis of incidents to determine trends, recurring problems and the need for further control measures.
- c. **Responsibility**
- i. Implementation of these procedures remains the responsibility of both the driver and manager.
- d. **Driver**
- i. The driver shall be required to report all incidents to the company, regardless of severity. All incidents should be reported as soon as possible, preferably within 24 hours or by the end of the business day. Since the driver is the first person at the incident scene, he/she will initiate the information-gathering process as quickly and thoroughly as is feasible.
- e. **Management**
- i. The company management shall establish and notify drivers of procedures for reporting all motor vehicle incidents. Management will identify the person or office which the driver should report the incident; identify responsibilities of that person or office; and provide instructions for actions to be taken by the driver in the event of an incident. Management will obtain incident data from the driver through the Transportation Incident Report form and/or by verbal communication. It is important for management to determine the extent of the incident, especially if it involves injury or death to the driver, passengers, or other parties.

- ii. Management will proceed with a formal investigation to determine the underlying causes as well as what can be done to prevent similar occurrences. The incident report will be forwarded to the insurance claims office along with any additional support data (e.g., witness statements, photographs, police reports, etc.).

f. Driver Participation in Repair Costs

- i. If a vehicle is involved in an incident which is determined preventable, driver reimbursement to the company should be as follows:
 - 1. The first 50% of the repair cost, up to a maximum reimbursement of \$250 per incident, if the vehicle is repairable, will be charged back to the driver.
 - 2. If the vehicle is a total loss, the driver will be charged \$250.

g. Preventable/Non-Preventable Incidents

- i. The following definitions relate to motor vehicle incidents:
 - 1. A motor vehicle incident is defined as "any occurrence involving a motor vehicle which results in death, injury or property damage, unless such vehicle is properly parked. Who was injured, what property was damaged and to what extent, where the incident occurred, or who was responsible, are not relative factors".
 - 2. A preventable incident is defined as "any incident involving the vehicle, unless properly parked, which results in property damage or personal injury and in which the driver failed to do everything he/she reasonably could have done to prevent or avoid the incident".
 - 3. Note 1: A properly parked motor vehicle is one that is completely stopped and parked where it is legal and prudent to park such a vehicle or to stop to load/unload property. Vehicles stopped to load/unload passengers is not considered parked.
 - 4. Note 2: Parking on private property will be governed by the same regulations that apply on public streets and highways. A vehicle stopped in traffic in response to a sign, traffic signal or the police is not considered parked.
- ii. The determination of preventability of an incident is the function of the Company Incident Review Board.
 - 1. Note 3: See attached "Guide For Preventable and Nonpreventable Incidents " in Appendix.

h. Data Analysis

- i. The company will collect data on vehicle incidents and identify frequency and severity trends in order to track safety performance over time. The company will use such items as loss history, benchmarking, available data from incident management services, tracking devices and event recorders, and any other sources available to identify the most appropriate rates based on patterns of vehicle use and the nature of motor vehicle operations. Incident rates shall be continuously maintained in order to compare historical or industry experience, and to track progress over time. Appendix F has examples of incident rate calculations.

6) EMPLOYEE INCIDENT REPORTING PROCEDURE

a. Employees will take the following actions when there are injuries to persons and/or damage to other vehicles or property

- i. If possible, move the vehicle to a safe location out of the way of traffic. Call for medical attention if anyone is hurt.
- ii. Secure the names and addresses of drivers and occupants of any vehicles involved, their operator's license numbers, insurance company names and policy numbers, as well as the names and addresses of injured persons and witnesses. Record this information on the Incident Report form (in the reporting packet). Do

not discuss fault with, or sign anything for anyone except an authorized representative of Earnest Contracting, a police officer, or a representative of the Earnest Contracting Insurance Company.

- iii. Immediately notify the Vehicle Safety Coordinator and your supervisor.
- iv. You will be contacted by the Vehicle Safety Coordinator to advise you how to arrange for repairs to the vehicle. Do not have the vehicle repaired until you receive authorization from the Vehicle Safety Coordinator.
- v. All external communications (e.g. to the media, regulatory agencies) should be performed by authorized personnel within the company.

b. When there is theft of or damage to your vehicle only

- i. If you did not witness the damage to the vehicle, you must notify the local police department immediately.
- ii. Immediately notify Vehicle Safety Coordinator
- iii. You will be contacted by the Vehicle Safety Coordinator to advise you how to arrange for repairs or replacement of the vehicle. Do not have the vehicle repaired until you receive authorization from the Vehicle Safety Coordinator.
- iv. Send a copy of the police report along with a memo outlining any additional information to the Vehicle Safety Coordinator.

c. Incident Reporting Kit

- i. Every foreman will have access to the incident report form. This should include an incident report form and pen or pencil.

7) COMPANY INCIDENT REVIEW BOARD

- a. All vehicle collisions should be analyzed, and a written report submitted to management for review. The objective of this process is to determine preventability, identify root cause and any contributing factors that led to the incident, to prevent future occurrences. The reviewer shall identify and examine any factor or circumstance before, during and after the incident that may have influenced the outcome of the severity. Appendix E has a list of possible contributing factors that may be considered. Where the collision was preventable by the company driver, the driver should be counseled, given additional training, given time off without pay, placed on probation, transferred to non-driving duties, disciplined in other ways, or employment (or services for independent contractors) terminated according to corporate, union, and governmental guidelines.
 - i. However, this does not absolve management from improving safety of the work and driving environment. The Vehicle Safety Coordinator, drivers and management personnel should each participate in the analysis. Management deficiencies and/or lack of management action should also be part of the incident review. Management has an obligation to support not only for driver safety, but the safety of the general public as well.
 - ii. To determine preventability an incident review board has been established. Members consists of both management and field personnel. Their main charge, of the review board, is to determine whether the fleet incident was preventable or nonpreventable by the company's vehicle driver.
 - iii. The attached material, "Guide For Preventable and Nonpreventable Incidents", will be used as a guide for this determination. Majority vote rules.

b. Guidelines

- i. The committee will report to the Vehicle Safety Coordinator within 3 working days the results of their review. The report will document the causal and contributing factors to the incident, which led to the decision on preventability. The Vehicle Safety Coordinator will take the appropriate steps and communicate the results to the affected driver and supervisor, and implement the changes necessary to

prevent the incident from recurring. The driver should receive a copy of the Incident Review Board's decision report. Corrective action for incidents deemed Preventable by the driver shall be developed, implemented and documented in a timely manner. These corrective actions should consider the driver, the vehicle, and the operating environment. Special emphasis should be placed on the improvement of driving skills and behaviors judged to have been associated with the incident. The Incident Review Board and Vehicle Safety Coordinator should consider whether similar corrective actions will increase the safety of motor vehicle operations throughout the organization. If this is the case, countermeasures should be implemented.

8) VEHICLE SELECTION, INSPECTION AND MAINTENANCE

a. Introduction

i. Proper selection and maintenance of equipment are important aspects of this program. Reduced operational costs and incidents from vehicle defects are the direct result of a well implemented maintenance policy.

b. Vehicle Selection

i. Selection of vehicles begins with understanding the wrong equipment can result in excessive breakdowns, create hazards to personnel, incur costly delays and contribute to poor service and customer complaints. The company will purchase vehicles designed for their intended use, and consider crashworthiness, cargo capacity and load position, towing capacity, ergonomics and safety features when making vehicle acquisitions.

c. Vehicle Modifications

i. Employees should not modify company vehicles without written permission from management. Modifications may create an unsafe condition and/or circumvent the function of any safety device. This pertains to trailer hitches, stereo equipment, window tinting, navigation systems, security systems, accessibility aids, cargo containment means or racks, material handling means, mobile telephone attachments, changing tire or rim size, changing body configuration, and increasing the carrying/hauling capacity of the vehicle trailer.

d. Vehicle Inspection

i. The employee responsible for the vehicle will inspect the vehicle on a regular basis using the Vehicle Inspection Report form (see appendix) and in accordance with the organizational policies and procedures. Vehicles requiring a Commercial Drivers License are required to have a daily vehicle inspection report completed using the FMCSA approved format. More frequent inspections and reports may be required based on heavy use. Vehicle inspections should consider, at a minimum, the vehicle manufacturer's recommendations, regulatory requirements (e.g. CDL-required vehicles) and recognized best management practices. In addition to the regular documented vehicle inspections, the drivers should make regular visual checks each time the vehicle is to be operated.

e. Emergency Equipment

i. Vehicles shall be equipped with appropriate emergency equipment in the event the driver experiences mechanical difficulty, loss or shifting of load, or a crash on the road. Examples of emergency equipment to be considered include reflective triangles, truck mounted construction lights, fire extinguisher, first aid kit, flashlight, light sticks, and reflective safety vest. In addition to the vehicle being equipped with these items, the drivers shall be trained in the correct placement and use of the devices.

f. Vehicle Maintenance

i. Institute a formal vehicle maintenance program, including record keeping, that meets or exceeds manufacturer's recommendations. At a minimum, vehicles should be inspected in accordance with the

vehicle manufacturer's recommendations, after notice of a manufacturer recall, and in accordance with regulatory requirements and best management practices.

- ii. All vehicles shall be maintained by qualified automotive technicians with the requisite skills obtained through experience and/or training. The maintenance should be done at regular intervals based upon miles driven, hour of operation and/or calendar time. When defects are reported, the vehicle should be repaired before the vehicle is placed back in service with appropriate records maintained.
- iii. Vehicle maintenance can take the form of three distinct programs: preventive maintenance, demand maintenance, and crisis maintenance. While all three types have their role in the Fleet Safety Management Program, the most cost effective control is preventive maintenance. The groundwork for a good preventive maintenance program starts with management. A review of manufacturer's specifications and recommendations for periodic preventive maintenance should be integrated with the actual experience of the vehicles.
- iv. Preventive maintenance (PM) is performed on a mileage or time basis. Typical PM includes oil/filter changes, lubrication, tightening belts and components, engine tune-ups, brake work, tire rotation, hose inspection/replacement and radiator maintenance.
- v. Demand maintenance is performed only when the need arises. Some vehicle parts are replaced only when they actually fail. These include light bulbs, window glass, gauges, wiring, air lines, etc. Other "demand maintenance" items involve vehicle components that are worn based on information from the vehicle condition report. These include tires, engines, transmissions, universal joints, bushings, batteries, etc. Since these situations are identified through periodic vehicle inspection, they can actually be classified within the PM program.
- vi. Crisis maintenance involves a vehicle breakdown while on the road. While situations of this type may happen regardless of the quality of the PM program, it is an expensive alternative to not having an effective preventive maintenance program at all. Crisis maintenance situations should be minimized through proper PM procedures.

g. Approved Service Providers

- i. All vehicles will be maintained either by our own maintenance staff or approved vendors with the appropriate facilities and service equipment necessary to perform the required tasks. When maintenance is performed by vendors, the company shall assess the vendor's ability to adequately perform the required service.

h. Vehicle Replacement

- i. The company will attempt to replace all company-operated vehicles on a regular basis. Consideration for replacement will be based on total mileage, maintenance cost and frequency, condition of vehicle, operational requirements, operating environment, hours of service, and safety of the vehicle.

i. Recordkeeping

- i. This company's vehicle selection, inspection and maintenance program is only as good as its recordkeeping procedures. Employees will forward all vehicle maintenance records for maintenance performed each quarter to the Vehicle Safety Coordinator.

j. Driver Training

i. Basic Skills

- 1. Drivers hired by this company to operate a motor vehicle will have the basic skills and credentials necessary to perform this function as confirmed through the driver selection process. This includes new hire orientation, and continuing education for existing drivers, and instances where remedial training shall be required.

ii. New employees, Contractor, and Temporary Hires

1. Will receive a copy of this program as part of their initial orientation. A formal orientation program is established to help assure all drivers are presented with the company policy, understand their responsibilities and are familiarized with their vehicle. Training should include both classroom and behind-the-wheel training. Areas that must be addressed, with the driver, include:

- | | |
|--|--|
| a. Review and assure that the driver understands the Motor Vehicle Safety Policy and the accompanying safety regulations | g. Hours of service requirements and log book maintenance (if applicable). |
| b. Have the driver sign the Vehicle Assignment Agreement. | h. Defensive driving techniques and other best management practices. |
| c. Review individual Motor Vehicle Report (MVR). | i. Distracted driving |
| d. Incident reporting & emergency procedures | j. Aggressive driving |
| e. Operation and controls of vehicle being assigned | k. Substance and alcohol abuse |
| f. Vehicle inspection and maintenance | l. Commodity-specific training (e.g. hazardous materials) |
| | m. Emergency equipment |
| | n. Security procedures |

k. License Suspension

- i. Drivers must notify the Vehicle Safety Coordinator immediately if their license is suspended or revoked.

l. Remedial Training

- i. Drivers may be required to attend a company sponsored training program/course or safe driving school (National Safety Council Defensive Driving course or equivalent) or an alcohol/drug abuse program on their own time and at their own expense if a review of the driver's MVR indicates:
1. One or more violation convictions within any one-year period, or
 2. A conviction for driving while under the influence of alcohol or drugs.
 3. Also, depending on the severity of the conviction, the employee's driving privileges may be revoked and/or may result in employment termination.

9) SAFE DRIVER RULES

a. Key Rules

- i. Our organization has developed some key driver safety rules that all employees who drive for company business need to comply with. These rules may be modified, or additional driver rules may be created, as the need is identified. Drivers found to be in violation of these rules will be counseled, retrained and/or disciplined in a fair and consistent manner.
- ii. Safety belts:
1. The driver and all occupants are required to wear safety belts when the vehicle is in operation or while riding in a vehicle. The driver is responsible for ensuring passengers wear their safety belts. Children must be secured in an appropriate child passenger restraint as mandated by State law.
- iii. Impaired driving:
1. The driver must not operate a vehicle at any time when his/her ability to do so is impaired, affected, influenced by alcohol, illegal drugs, prescribed or over-the-counter medication, illness, fatigue or injury.

- iv. Traffic laws:**
 - 1.** Drivers must abide by the federal, state and local motor vehicle regulations, laws and ordinances.
- v. Vehicle condition:**
 - 1.** Drivers are responsible for ensuring the vehicle is maintained in safe driving conditions. Drivers of daily rentals should check for obvious defects before leaving the rental office/lot and, if necessary, request another vehicle if the first vehicle is deemed unsafe by the employee.
- vi. Cellular telephones, pagers and other electronic communications devices:**
 - 1.** Use of a cell phone or other electronic communications device by the driver while the vehicle is moving is prohibited and should only be used in emergency situations.
- vii. Other Distracted Driving Items**
 - 1.** In addition to limiting the use of cell phones and other electronic communications devices, our company recognizes that there are other distractions in vehicles that can lead to crashes. The following could be considered distractions, and should be minimized while your vehicle is in motion:
 - a.** Eating or drinking
 - b.** Grooming
 - c.** Smoking
 - d.** Reading
 - e.** Use of technology, such as GPS and computers (location details should be programmed in prior to the start of the trip so that the driver does not need to adjust while driving)
 - f.** Attending to passengers, children and pets
- viii. Aggressive Driving**
 - 1.** Aggressive driving by you, or another vehicle on the road, can lead to a crash. Aggressive driving includes speeding, tailgating, failure to signal a lane change, running red lights and stop signs, weaving in traffic, yelling, making obscene gestures and excessive use of the horn. The behaviors can escalate to road rage, which can increase the frequency and severity of auto crashes.
- ix. Motorcycles:**
 - 1.** Due to increased risk of personal injury, employees are prohibited from using motorcycles when traveling on company business.
- x. General Safety Rules:**
 - 1.** Employees are not permitted to:
 - a.** Pick up hitchhikers.
 - b.** Accept payment for carrying passengers or materials.
 - c.** Use any radar detector, laser detector or similar devices.
 - d.** Push or pull another vehicle or tow a trailer.
 - e.** Transport flammable liquids or gases unless a DOT or Underwriters' Laboratories approved container is used, and only then in limited quantities.
 - f.** Use of burning flares will be discouraged. The preferred method is the use of reflective triangles.
 - g.** Assist disabled motorists or incident victims beyond their level of medical expertise. If a driver is unable to provide the proper medical care, he/she must restrict his/her assistance to calling the proper authorities. Your safety and well-being is to be protected at all times.
- xi. Company and Personal Property:**
 - 1.** Employees are responsible for company property such as computers, workpapers and equipment under their control. The company will not reimburse the employee for stolen personal property.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Motor Vehicle Safety Program - Appendix	Revision Date:
		Section:

Cell Phone/ Handheld Device Use Policy

Earnest Contracting, LLC herein referred to as “Company” is committed to providing a safe work environment for all employees. As part of this commitment, the company has developed this “Cell Phone/Handheld Device Use Policy”. The Company reserves the right to modify or update these policies at any time.

Purpose:

Driver/Operator/Workman inattention is a factor in a majority of job site accidents. This includes the inattentiveness of other drivers on the road due to these distractions. We are not only concerned about your welfare as an employee, but also the welfare of others who could be put in harm’s way by these distractions.

As a Driver/Operator/Workman, your first responsibility is to pay attention to the road and job site. When driving or working on Company business or driving while conducting business on behalf of the company in any other manner, the following applies:

Procedures:

Definition – Mobile Handheld Units: Handheld Devices may include cell phones, pagers, palm pilots, faxes, iPods, MP3 Players, and other communication devices.

NOTE: For this policy only, the Company radio does not follow these “handheld device” rules of use or definition; however, it is Company policy to use these radios in a safe and professional manner.

- The Company prohibits the use of personal cell phones or similar devices while at any work site at which the operation of such device would be a distraction to the user and/or create an unsafe work environment. To ensure effectiveness, employees are asked to leave all personal cell phones in their vehicles.
- Company cell phones are for Company business only. The Company prohibits the use of a cell phone while driving unless a hand free device is utilized for placing and conduction the phone call. This prohibition also includes text messaging, surfing the Internet, receiving, or responding to e-mail, or any purpose related to Company employment.
- The Company receives an itemized bill from Verizon with all calls listed. Calls that are not company related may be charged to you.
- Any violation of these rules and regulations are subject to termination.

Obey the Law:

The Company is not responsible for any moving traffic violations, parking tickets, or any other city ordinances or state/federal laws regarding your driving habits and operation/care of your personal motor vehicle. Any tickets issued are the employee’s responsibility, even if the ticket is issued while conducting business for the Company.

Vehicle Use Policy

The following policy has been established to encourage safe operation of vehicles and clarify insurance issues relating to drivers and all employees issued company vehicles. All drivers must adhere to safety policies including the vehicle use and cell phone/handheld device use policy.

- All drivers must have a valid driver’s license.
- Motor Vehicle Records will be checked periodically. Driving privileges may be suspended or terminated if your record indicates an unacceptable number of accidents or violations. Should your record fall into our insurance carrier’s guidelines of an ‘unacceptable driver’, your employment may be terminated.
- Your supervisor must be notified of any change in your license status or driving record.

This policy applies to:

- Vehicles owned, leased, or rented to Company

- Personally owned vehicles driven by employees on behalf of Company.

By signing this document, you have read and understood the above and will comply with this policy.

Employee Signature: _____ **Date:** _____

GUIDE FOR PREVENTABLE OR NONPREVENTABLE INCIDENTS

An incident is preventable if the driver could have done something to avoid it. Drivers are expected to drive defensively. Which driver was primarily at fault, who received a traffic citation, or whether a claim was paid has absolutely no bearing on preventability. If there was anything the driver could have done to avoid the collision, then the incident was preventable.

An incident is nonpreventable when the vehicle was legally and properly parked, or when properly stopped because of a law enforcement officer, a signal, stop sign, or traffic condition.

If a stationary object is struck, then it is usually a preventable incident. If the driver rearends another vehicle then it is usually a preventable incident. It should be noted there are exceptions to any rule, but they are just that - exceptions!

It should be the objective of any person discussing or judging incidents to obtain as many facts as possible and to consider all conceivable conditions. Adverse weather conditions, actions of other drivers, or other such excuses must not influence the judgment of preventability. If procedures, scheduling, dispatching, or maintenance procedures out of the control of the driver were found to be factors, that should be taken into account. The company must take responsibility for the work environment and recognize that drivers cannot control some aspects. It is critical that drivers have the ability to refuse to operate an unsafe vehicle without reprisal from management.

Professional drivers are expected to drive in a manner which allows them to avoid conflicts when they arise. Whether a driver has a 25-year safe driving record, or started driving the day before has no bearing on whether an incident is or is not preventable. Taking a fair attitude does not mean leniency. If an incident is judged nonpreventable and the drivers know the incident could have been avoided, they will lose respect for the safety program.

QUESTIONS TO CONSIDER - GENERAL

When judging or discussing preventable incidents, these are some questions to consider:

- Does the report indicate that the driver considers the rights of others or is there evidence of poor driving habits which need to be changed?
- Does the report indicate good judgment? Such phrases as "I did not see," "I didn't think," "I didn't expect," or "I thought" are signals indicating there is something wrong. An aware driver should think, expect, and see hazardous situations in time to avoid collisions.
- Was the driver under any physical handicap which could have been contributory? Did the incident happen near the end of a long and/or hard run? Does the driver tend to overeat? Did the driver get sufficient sleep before the trip? Is the driver's vision faulty?
- Was the vehicle defective without the driver's knowledge? A gradual brake failure, a car which pulls to the left or right when the driver applies the brakes, faulty windshield wipers, and similar items are excuses, and a driver using them is trying to evade responsibility. Sudden brake failure, loss of steering, or a blowout may be considered defects beyond the driver's knowledge; however, the inspection and maintenance program should work to prevent these hazards.
- Would taking a route through less congested areas reduce the hazardous situations encountered?

QUESTIONS TO CONSIDER for SPECIFIC TYPES OF INCIDENTS

Intersection Collisions

Failure to yield the right-of-way, regardless of stop signs or lights, is preventable. The only exception to this is when the driver is properly proceeding at an intersection protected by lights or stop signs and the driver's vehicle is struck in the extreme rear, side, or back.

Regardless of stop signs, stop lights, or right-of-way, a professional driver should recognize that the right-of-way belongs to anyone who assumes it and should yield accordingly. In addition, a professional driver is expected to know the turning radius of the vehicle and be able to avoid damaging others. These incidents are normally considered preventable.

IF THE ANSWER TO ANY QUESTION IS NO, THE INCIDENT SHOULD BE DEEMED PREVENTABLE

1. Did the driver approach the intersection at a speed safe for conditions?
2. Was the driver prepared to stop before entering the intersection?
3. At a blind corner, did the driver pull out slowly, ready to apply the brakes?
4. Did the driver operate the vehicle correctly to keep from skidding?

Sideswipes

Sideswipes are often preventable since drivers should not get into a position where they can be forced into trouble. A driver should pass another vehicle cautiously and pull back into the lane only when he or she can see the other vehicle in the rearview mirror. A driver should also be ready to slow down and let a passing vehicle into the lane. A driver should not make a sudden move that may force another vehicle to swerve. Unless the driver is swerving to avoid another car or a pedestrian, sideswiping a stationary object is preventable.

Drivers are expected to be able to gauge distances properly when leaving a parking place and enter traffic smoothly.

A driver is expected, whenever possible, to anticipate the actions of an oncoming vehicle. Sideswiping an oncoming vehicle is often preventable.

The doors of a vehicle should never be opened when it is in motion. and should not be opened on the traffic side, unless clear of traffic, when it is parked.

A parked vehicle can be seen from a sufficient distance; therefore, the operator of an approaching vehicle should be prepared in case the doors of the parked vehicle are opened. This type of incident is nonpreventable only when the door is opened after the driver has passed it.

IF THE ANSWER TO ANY QUESTION IS NO, THE INCIDENT SHOULD BE DEEMED PREVENTABLE

- Did the driver look to front and rear for approaching and overtaking traffic immediately before starting to pull away from the curb?
- Did the driver signal before pulling away from the curb?
- Did the driver look back rather than depend only upon rearview mirrors?
- Did the driver start into traffic only when this action would not require traffic to change its speed or direction in order to avoid his or her vehicle?

Skidding

Many skidding conditions are caused by rain, freezing rain, fog, and snow, which all increase the hazard of travel. Oily road film, which builds up during a period of good weather, causes an especially treacherous condition during the first minutes of a rainfall.

Loss of traction on a grade can be anticipated, and these incidents usually are preventable. Chains or other suitable traction devices should be used, if they are available.

IF THE ANSWER TO ANY QUESTION IS NO, THE INCIDENT SHOULD BE DEEMED PREVENTABLE

1. Was the driver operating at a safe speed considering weather and road conditions?
2. During inclement weather was the driver keeping at least twice the safe following distance used for dry pavement?
3. Were all actions gradual?
4. Was the driver anticipating ice on bridges, gutters, ruts, and near the curb?
5. Was the driver alert for water, ice or snow in shaded areas, loose gravel, sand, ruts, etc.?
6. Did the driver keep out of other vehicle tracks or cross them at wide angles?

Pedestrian and Animal Collision

All types of pedestrian incidents, including collision with pedestrians coming from between parked cars, are usually considered preventable. There are few instances where the action of pedestrians is so unreasonable that the operator could not be expected to anticipate such an occurrence.

Collisions with animals are normally preventable, unless the movement on the part of an animal was unusual and unexpected. This is also taking into consideration the fact that the driver was aware of animals in the vicinity.

IF THE ANSWER TO ANY QUESTION IS NO, THE INCIDENT SHOULD BE DEEMED PREVENTABLE

- 1) Did the driver go through congested sections expecting that pedestrians would step in front of the vehicle?
- 2) Was the driver prepared to stop?

- 3) Did the driver keep as much clearance between his or her vehicle and parked vehicles, as safety permitted?
- 4) Did the driver stop when other vehicles had stopped to allow pedestrians to cross?
- 5) Did the driver wait for the green light or stop for the caution light?
- 6) Was the driver aware of children and prepared to stop if one ran into the street?
- 7) Did the driver give all pedestrians the right-of-way?
- 8) Did the driver stop for a school bus which was stopped and properly signaling that passengers were loading or unloading?

Parked or Stopped

Incidents occurring when vehicles are properly and legally parked are considered nonpreventable. Incidents occurring while the vehicle was double parked or in a "No Parking" zone are preventable.

IF THE ANSWER TO ANY QUESTION IS NO, THE INCIDENT SHOULD BE DEEMED PREVENTABLE

1. Was the vehicle parked on the proper side of the road?
2. Was it necessary to park near the intersection?
3. Did the driver have to park on the traveled part of the highway, on the curve, or on the hill?
4. When required, did the driver warn traffic by emergency warning devices?
5. Did the driver park parallel to the curb?
6. Was it necessary to park so close to an alley or directly across from a driveway?

Non-collision Vehicle Damage, Mechanical Failure, and Miscellaneous Problems

The incident should be considered preventable if the investigation shows a mechanical defect of which the driver was aware, a defect the driver should have found by inspecting the vehicle, or the driver caused by rough and abusive handling.

When a mechanical failure is sudden or unexpected, not resulting from abuse or ordinary wear, it may be considered nonpreventable. Bad brakes should not be considered a mechanical failure unless the failure was sudden and the driver could have had no previous knowledge of the condition. However, this type of failure cannot excuse a driver who does not know how to properly pre-trip inspect the vehicle or is too lazy to do the inspection correctly.

It is a driver's responsibility to keep the cargo in mind and be aware of any sudden vehicle movements which may cause damage to the cargo. Driving off the highway to avoid a collision may be preventable. Drivers should try not to place themselves in such a position. "U" turns are a monkey wrench in the smooth flow of traffic. Incidents which occur while this maneuver is attempted are considered preventable.

IF THE ANSWER TO ANY QUESTION IS NO, THE INCIDENT SHOULD BE DEEMED PREVENTABLE

1. Could the driver have done anything to avoid the incident?
2. Was the driver's speed safe for conditions?
3. Did the driver obey all traffic signals?
4. Was the driver's vehicle under control?
5. Did the driver follow the routing and delivery instructions?

VEHICLE INSPECTION REPORT

DRIVER'S VEHICLE INSPECTION REPORT

AS REQUIRED BY THE D O T. FEDERAL MOTOR CARRIER SAFETY REGULATIONS, I SUBMIT THE FOLLOWING:

CARRIER: B Y B TRUCKING, LLC - 3820 W. 70TH STREET - SHREVEPORT, LA 71108

DATE: _____ TRACTOR/TRUCK NO.: _____ TRAILER(S) NO.(S): _____

A
D
P
P
R
O
X
C
H
E
C
K
E
R
I
A
T
E

- I detect no defect or deficiency in this motor vehicle as would be likely to affect the safety of its operation or result in its mechanical breakdown.
- I detect the following defects or deficiencies in this motor vehicle as would be likely to affect the safety of its operation or result in its mechanical breakdown.

Indicate whether defects are on TRACTOR/TRUCK or TRAILER - Use sufficient detail to locate for mechanic

DRIVER'S SIGNATURE: _____

- Above defects corrected
- Above defects need not be corrected for safe operation of vehicle

MECHANIC'S SIGNATURE: _____

DRIVER'S SIGNATURE: _____

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ORIGINAL

19436

FACTORS TO BE CONSIDERED DURING AN INCIDENT REVIEW

During a review of a motor vehicle incident, possible contributing factors may be considered using the following framework:

Driver:

- Driver's work schedule for at least the week preceding the incident
- Length of time on duty since the previous break prior to the incident
- Fatigue
- Scheduling demands on driver
- Motor vehicle record (MVR) history
- Physical condition of the driver at the time of the incident
- Physical limitations of the driver at the time of the incident
- Training history
- Driver's emotional state

Vehicle:

- Maintenance and inspection records
- Vehicle condition
- Damage to the vehicle from the incident
- Suitability and safety of the vehicle for the work task
- Vehicle control layout
- Modifications to the vehicle that may have contributed to the incident

Operating Environment:

- Weather
- Road conditions
- Traffic conditions
- Route planning
- Delivery or service schedules

SAMPLE INCIDENT RATES AND METHODS OF CALCULATION

Incident rates should be based on all motor vehicle incidents occurring during the reporting period. Rates should be updated periodically as revisions are made to the database. Incidents may be tracked on a rolling interval (e.g. rolling 12-month) in order to accumulate additional exposure units.

Incident rate based on number of vehicles operated: This rate is derived by multiplying the number of incidents by 100 and dividing by the number of vehicles operated

$$\text{Incident Rate} = (\text{Number of incidents} \times 100) \text{ divided by Number of vehicles}$$

Incident rate based on vehicle mileage: This rate is derived by multiplying the number of incidents by 1,000,000 and dividing by the mileage driven.

$$\text{Incident Rate} = (\text{Number of incidents} \times 1,000,000) \text{ Divided by Vehicle mileage}$$

Injury incident rate based on vehicle mileage: Injury incident rates, the most frequently used indicator of incident severity, are useful for tracking events that have the potential to affect financial or operational performance of the operating unit.

The injury incident rate is calculated by multiplying the number of incidents that result in an injury by 1,000,000 (or other mileage multiplier) and dividing by the actual mileage:

$$\text{Injury Incident Rate} = \frac{\text{Number of incidents with injury} \times 1,000,000}{\text{Vehicle mileage}}$$

Incident rates based on service activity: Motor vehicle operations that pose injury risks other than those associated with driving should also use the service activity as the basis of a safety performance rate. The number of deliveries, stops, or loads should be considered as appropriate indicators of performance.

These rates are calculated by multiplying the number of incidents by 10,000 (or other appropriate multiplier) and dividing by the number of service activities, such as:

$$\text{Incidents per 10,000 Deliveries} = \frac{\text{Number of incidents} \times 10,000}{\text{Number of loads}}$$

$$\text{Incidents per 10,000 Loads} = \frac{\text{Number of incidents} \times 10,000}{\text{Number of loads}}$$

Motor vehicle passenger injury rates: Organizations that transport passengers for a fee should calculate passenger injury rates as a part of assessing safety performance.

An injury rate based on number of passengers transported should be used by operations such as motor coach fleets, limousine services, or ambulance services. The passenger injury incident rate per million passengers is

derived by multiplying the number of incidents that result in passenger injuries by 1,000,000 and dividing by the number of passengers carried:

$$\text{Passenger Injury Incident Rate} = \frac{\text{No. of incidents resulting in passenger injury} \times 1,000,000}{\text{No. of passengers carried}}$$

Passenger carriers may also use a passenger-based rate based on vehicle mileage:

$$\text{Passenger Injury Rate per Million Miles} = \frac{\text{No. of passenger injuries} \times 1,000,000}{\text{Vehicle mileage}}$$

For services such as urban transit operations, it is also appropriate to calculate the passenger injury rate based on the number of fares collected, including transfers.

Motor vehicle injury rates based on work hours:

Motor vehicle operations whose drivers have high levels of exposure to driving should consider tracking incidents based on hours of exposure. The rate of vehicle incidents per 100 full time equivalent workers is calculated by multiplying the number of incidents by 200,000 and dividing by the number of hours actually worked:

$$\text{Vehicle Incidents per 200,000 hours} = \frac{\text{Number of incidents} \times 200,000}{\text{Number of hours worked}}$$

PERSONAL USE POLICY

Vehicles are provided primarily for use on organization business. However, certain reasonable use is permitted. Examples of such use include:

- Personal errands while in route to or from a business related activity, provided that the errand is done on the driver's own time (e.g. authorized break or lunch hour)
- When authorized in advance by the employee's immediate supervisor
- Commuting to and from home

In addition, the following requirements pertain to all organization vehicles:

- No one except for an authorized employee may drive an organizational vehicle. This includes immediate family members and friends, except in emergency situations. (Note: some organizations permit driving by family members, but typically limit it to spouse or significant other living in the same household in a committed relationship). All requirements for driver qualification (e.g. MVR standards) and training (e.g. defensive driving classes must also apply to the family members).
- Drivers must comply with all applicable federal, state and local laws and regulations
- No alterations of vehicles are permitted. For example, no installation of stereos, radar detectors, trailer hitches, bike or kayak racks, window tinting, running boards, bug deflectors, visors, or personalized vanity license plates.
- Personal trailers are prohibited except as approved by the immediate supervisor.

The organization reserves the right to withdraw this privilege at any time.

I, _____, have read and understand the *Personal Use Policy* established by Earnest Contracting. I agree to abide by the provisions of this policy. I understand that violation of this policy will result in disciplinary action, up to and including termination of employment.

Driver Signature

Date

Supervisor Signature

Date

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Cell Phone Policy	Revision Date:
		Section:

Cell Phone/ Handheld Device Use Policy

Earnest Contracting, LLC herein referred to as “Company” is committed to providing a safe work environment for all employees. As part of this commitment, the company has developed this “Cell Phone/Handheld Device Use Policy”. The Company reserves the right to modify or update these policies at any time.

Purpose:

Driver/Operator/Workman inattention is a factor in a majority of job site accidents. This includes the inattentiveness of other drivers on the road due to these distractions. We are not only concerned about your welfare as an employee, but also the welfare of others who could be put in harm’s way by these distractions.

As a Driver/Operator/Workman, your first responsibility is to pay attention to the road and job site. When driving or working on Company business or driving while conducting business on behalf of the company in any other manner, the following applies:

Procedures:

Definition – Mobile Handheld Units: Handheld Devices may include cell phones, pagers, palm pilots, faxes, iPods, MP3 Players, and other communication devices.

NOTE: For this policy only, the Company radio does not follow these “handheld device” rules of use or definition; however, it is Company policy to use these radios in a safe and professional manner.

- The Company prohibits the use of personal cell phones or similar devices while at any work site at which the operation of such device would be a distraction to the user and/or create an unsafe work environment. To ensure effectiveness, employees are asked to leave all personal cell phones in their vehicles.
- Company cell phones are for Company business only. The Company prohibits the use of a cell phone while driving unless a hand free device is utilized for placing and conduction the phone call. This prohibition also includes text messaging, surfing the Internet, receiving, or responding to e-mail, or any purpose related to Company employment.
- The Company receives an itemized bill from Verizon with all calls listed. Calls that are not company related may be charged to you.
- Any violation of these rules and regulations are subject to termination.

Obey the Law:

The Company is not responsible for any moving traffic violations, parking tickets, or any other city ordinances or state/federal laws regarding your driving habits and operation/care of your personal motor vehicle. Any tickets issued are the employee’s responsibility, even if the ticket is issued while conducting business for the Company.

	Safety Policies and Procedures Manual	
ISSUED 08/13/2025	SMART CELL PHONE POLICY - SHOP	

1.0 PURPOSE

While cell phones are a necessary convenience in the business world, we require that our employees follow the guidelines listed below for their own and others' safety.

2.0 SCOPE

All employees working under company supervision will comply with all elements of the Smart Cell Phone Policy.

3.0 DEFINITIONS

Smart Cell phone – A cell phone with access to a cellular radio system so it can be used over a wide area, without physical connection to a network and used for other purposes than just communications (social media, videos, Google search, etc.).

4.0 RESPONSIBILITY

4.1 Employees

- If a smart phone needs to be used, remove yourself from all work/activity areas of the shop to prevent distractions.
- Make sure to secure your phone with management prior to starting work to eliminate a distraction hazard.
- Only management will have access to their phones during working hours to conduct ECON business.

4.2 Supervisors

- Implement the Smart Phone policy.

5.0 PROCEDURE

Employees' smart phones will be secured by management prior to starting work to ensure that employees are not distracted from their job duties and eliminate the hazards of distraction that can result in an accident or fatality in the shop.

Smart Phone usage in the shop/maintenance areas is prohibited by employees and should never be used while operating or moving a piece of equipment on ECON premises to eliminate the hazards of distraction.

	Safety Policies and Procedures Manual	
ISSUED 08/13/2025	SMART CELL PHONE POLICY-SHOP	

5.1 Zero Tolerance for Shop Employees Using a Smart Phone

ECON is concerned with the safety of our employees while working in the shop/maintenance areas or on the premises. Therefore, the use of smart phones or other devices by an employee or any authorized operator while driving a company owned vehicle on the premises or equipment is prohibited, unless that vehicle is legally parked and/or you are not in the shop vicinity.

This policy applies to all employees working in the shop/maintenance areas that can be a distraction and could result in an accident or fatality.

This policy applies to non-management employees that work in the shop or other employees that may enter the shop in a hazardous environment due to active work conducted by employees to eliminate the hazards of distraction.

6.0 TRAINING REQUIREMENTS

Training will include the date, the name of the trainer/instructor, and the signatures of those attending as documented verification of knowledge.

7.0 TRAINING FREQUENCY

This training will be initially conducted and a refresher as needed by ECON.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Access to Employee Medical And Exposure Records	Revision Date:
		Section:

1) PURPOSE

- a. The purpose of this section is to provide workers and their designated representatives a right of access to relevant exposure and medical records to fulfill responsibilities under the Occupational Safety and Health Act (OSHA). Access by workers and their representatives, is necessary to yield both direct and indirect improvements in the detection, treatment, and prevention of occupational disease.

2) SCOPE

- a. This section applies to all worker exposure and medical records, and analyses thereof, made, or maintained in any manner, including an in-house or contractual basis. EARNEST CONTRACTING; hereafter referred to as "The Company" shall assure that the preservation and access requirements of this section are complied with regardless of the manner in which records are made or maintained.
 - i. The entire section pertaining to records retention is available for worker review by contacting the Safety Representative, Human Resources, or delegate.

3) RECORD KEEPING

- a. The Human Resources Manager is responsible for maintaining and providing access to workers' occupational medical records. These records are kept separately from other worker records. All medical records will be retained following local, company and jurisdictional requirements. The entire section pertaining to records retention is available for worker review by contacting the Safety Representative, Human Resources, or delegate.
- a. The medical records of workers who have worked for less than (1) year for the employer need not be retained beyond the term of employment if they are provided to the worker upon the termination of employment.
- b. Medical records are records concerning the health status of a worker which is made or maintained by a physician, nurse or other health care provide or technician.
- c. Medical records consist of:
 - i. Medical and employment questionnaires or histories (including job description and occupational exposures),
 - ii. The results of medical examinations (pre-employment, pre-assignment, periodic, or episodic) and laboratory tests (including chest and other X-ray examinations taken for the purposes of establishing a baseline or detecting occupational illness, and all biological monitoring not defined as an "employee exposure record"),
 - iii. Medical opinions, diagnoses, progress notes, and recommendations,
 - iv. First aid records,
 - v. Descriptions of treatments and prescriptions,
 - vi. Employee medical complaints.
- d. Worker exposure records shall be maintained for the duration of employment and for 30 years thereafter and should include the following:
 - i. Environmental (workplace) monitoring including personal, area, grab, swipe (wipe over a designated area), etc. type samples.
 - ii. Biological monitoring—level of chemical in the blood, urine, hair, fingernails, etc.

- iii. Safety data sheets or a chemical inventory or any other record which reveals where and when used and the identity (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.
- e. Upon written request from an approved requestor such as a local or federal jurisdiction The Company will remove all personal identifiers before releasing the medical/exposure records.

4) ACCESS

- a. Each worker or designated representative has the right to request access to his/her records. The company shall assure that access is provided in a reasonable time, place, and manner. The company will provide a copy of the medical records within fifteen (15) working days.
- b. The worker may access his/her records by making a request to the **Human Resources Manager or Safety Representative or delegate**. The company will release a worker's medical records only if the worker has given specific, written consent (see Attachment).
- c. If the company cannot reasonably provide access to the record within fifteen (15) working days, the company shall within the fifteen (15) working days apprise the worker or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available.
- d. In the case of an original X-ray, the employer may restrict access to on-site examination or make other suitable arrangements for the temporary loan of the X-ray.
- e. Records or copies will be provided at no cost to the worker.
 - i. Whenever a record has been previously provided without cost to a worker or designated representative, the company may charge reasonable, non-discriminatory administrative costs (i.e., search and copying expenses but not including overhead expenses) for a request by the worker or designated representative for additional copies of the record.
 - ii. No charge for an initial request for a copy of new information that has been added to a record which was previously provided.
 - iii. No charge for an initial request by a recognized or certified collective bargaining agent for a copy of a worker exposure record or an analysis using exposure or medical records.

5) TRANSFER OF RECORDS

- a. Whenever ceasing to do business, the company shall transfer all records subject to this section to the successor employer. The successor employer shall receive and maintain these records.
- b. Whenever ceasing to do business and there is no successor employer to receive and maintain the records subject to this standard, the company shall notify affected workers of their rights of access to records at least three (3) months prior to the cessation of business.

6) REFERENCES

- a. Code of Federal Regulation, Title 29, Part 1910.1020



3820 W. 70th St., Shreveport, LA 71108

Authorization to Release or Obtain Health Information

(including paper, oral, and electronic information)

Name: _____ Request Date: _____

Mailing Address: _____ Date of Birth: _____

City/State/Zip: _____ Medicaid # or Social Security #: _____

I authorize:

Name: _____

Mailing Address: _____

City, State, Zip Code: _____

Relationship: _____ Phone Number: _____

RELEASE Information TO or **OBTAIN Information FROM**

(Place an "X" in the box that indicates if the information is being released OR requested.)

Name: _____

Mailing Address: _____ City, State, Zip

Code: _____

Relationship: _____ Phone Number: _____

The Purpose of this Authorization is indicated in the box(es) below.

(Place an "X" in the box(es) that apply.)

Further Medical Care Personal Legal Investigation/Action Change of Physicians Research related treatment

Creating health information for disclosure to a third party. Other:

(Specify) _____

I authorize the release of the following protected health information:

(Place an "X" in the box(es) that apply to the information you want released or you want to obtain.)

Entire Record Medical History, Examination, Reports Surgical Reports Treatment or Tests

Prescriptions Immunizations Hospital Records including Reports Laboratory Reports

X-ray Reports MR/DD Records Other: _____

In compliance with state and/or federal laws which require special permission to release otherwise privileged information, please release the following records.

Alcoholism Drug Abuse Mental Health Vocational Rehabilitation HIV(AIDS) Sexually Transmitted Diseases

Genetics Psychotherapy Notes

Other _____

This authorization shall expire on _____ (date or event) and is needed for the period beginning _____ and ending _____.

I understand that if I do not specify an expiration date, this authorization will expire six (6) months from the date on which it was signed. I acknowledge that I have read both pages 1 and 2 of this form. I authorize a copy (including electronic or faxed copy) of this form for the disclosure of the information described above.

Signature of Individual or Personal Representative authorized by law

Date

Please submit medical information to:

Agency or Representative

Title

Date

Telephone

Fax

Email

Important Information about Authorization

We may need your authorization to use, disclose or obtain your health information for some of our services.

You do not have to sign this form. If you agree to sign this authorization to release or obtain information you will be given a copy of the signed form, upon request

A separate signed authorization form is required for the use and disclosure of health information for:

- ✓ Psychotherapy notes
- ✓ Employment-related determinations by an employer
- ✓ Research purposes unrelated to your treatment

When required by law or policy, DHH may only obtain, use and disclose your health information if the required written authorization includes all the required elements of a valid authorization.

- ✓ Psychotherapy notes
- ✓ An authorization is voluntary. You will not be required to sign an authorization as a condition of receiving treatment services or payment for health care services. If your authorization is required by law or policy, DHH will use and disclose your health information as you have authorized on the signed authorization form.
- ✓ You may be required to sign an authorization before receiving research-related treatment.
- ✓ You may be required to sign an authorization form for the purpose of creating protected health information for disclosure to a third party. *Example:* In a juvenile court proceeding where a parent is required to obtain a psychological evaluation on their minor child by DHH, the parent may be required to sign an authorization to release the evaluation report (but not the psychotherapy notes) to DHH.
- ✓ You may cancel an authorization in writing at any time. DHH cannot take back any uses or disclosures already made before an authorization was cancelled.
- ✓ Information used or disclosed by this authorization may be re-disclosed by the recipient and will no longer be protected by DHH privacy policies.

Your right to file a privacy complaint

You may contact the Privacy Office listed below if you want to file a complaint or to report a problem about how DHH has used or disclosed information about you. Your benefits will not be affected by any complaints you make. DHH cannot punish or retaliate against you for filing a complaint, cooperating in any investigation, or refusing to agree to something that you believe to be unlawful. Your Privacy office contact is: State of Louisiana, Department of Health and Hospitals, Office of Secretary, *Privacy Office, P.O. Box 629, Baton Rouge, LA 70821-0629.* Phone: 1-877-559-9664. E-mail: privacy-bhsf@la.gov

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Assured Grounding Program	Revision Date: Section:

1) PURPOSE

- a. The purpose of this policy is to specify procedures and guidelines to eliminate all injuries resulting from possible malfunctions, improper grounding, and/or defective electrical tools pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as "The Company".

2) PROCEDURES

- a. Ground Fault Protection - The Company will use ground fault circuit interrupters or assured equipment grounding conductor program to protect workers on the job site. These requirements are in addition to any other requirements for equipment grounding conductors.
- b. Ground-fault circuit interrupters (GFCI) - All 120-volt, single phase, 15, and 20 ampere receptacle outlets on the job site, which are not part of the permanent wiring of the building or structure, and which are in use by employees, shall have approved GFCI for personnel protection. Receptacles on a two wire, single phase portable or vehicle mounted generator rated not more than 5kw, where the circuit conductors of the generator frame and all other grounded surfaces, need not be protected with ground fault circuit interrupters.
- c. Assured equipment grounding conductor program - The Company has established the following assured equipment grounding conductor program on the job site covering all cord sets, receptacles which are not part of the building or structure, and equipment connected by cord and plug which are available for use or used by workers. This program will comply with the following minimum requirements:
 - i. A written description of the program, including the specific procedures adopted by the company, shall be available at the job site for inspection and copying by any worker.
 - ii. The manager and/or designated worker responsible to implement the program as defined by local and regulatory requirements.
 - iii. Each cord set, attachment cap, plug and receptacle of cord sets, 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 indications of possible internal damage. Damaged or defective items shall be tagged "DO NOT USE" and removed from service until repaired and tested.
- d. A Volt/OHM meter will be used to test continuity of each set. The following tests shall be performed on all cord sets, receptacles which are not part of the permanent wiring of the building or structure, and cord and plug connected required to be grounded:
 - i. All equipment grounding conductors shall be tested for continuity and shall be electrically continuous.
 - ii. Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductor. The equipment grounding conductor shall be connected to its proper terminal.
- e. All required tests shall be performed:
 - i. Before first use
 - ii. Before equipment is returned to service following any repairs
 - iii. Before equipment is used after any incident which can be reasonably suspected to cause damage (for example, when the cord set has been run over)
 - iv. At intervals not to exceed 3 months, except cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months

- f.** Tests performed as required will be recorded. This test record shall identify each receptacle, cord set, and cord and plug connected equipment that passed the test and shall indicate the date it was tested or the interval for which it was tested. The equipment will be identified with a nonconducting tag or other means of identification. This record shall be kept by means of logs, color coding, (e.g., colored plastic tape) or other effective means and shall be maintained until replaced by a more current record. The record shall be made available on the job site for inspection by any worker.
- g.** The Company will not make available or permit the use by workers of any equipment which has not met the above requirements.
- h.** The Company will use a different color plastic tape for each quarterly inspection. Common color coding is as follows:
 - i.** White for winter (January, February, and March)
 - ii.** Green for spring (April, May, and June)
 - iii.** Red for summer (July, August, and September)
 - iv.** Orange for autumn (October, November, and December)
- i.** A written record will be maintained on all cords sets and news sets as they are added.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Benzene Awareness	Revision Date:
		Section:

1) PURPOSE

- a. This Bloodborne Pathogen Exposure Control Plan has been established to ensure a safe and healthful working environment and act as a performance standard for all workers. This program applies to all occupational exposure to blood or other potentially infectious materials pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as "The Company".

2) SCOPE

- a. This program addresses all occupational exposure to blood or other potentially infectious materials. Certain Regulatory Agencies and Client Sites requires that all employers that can "reasonably anticipate exposure" of workers to infectious material to prepare and implement a written exposure control plan.

3) RESPONSIBILITIES

- a. Managers and Supervisors will have an overall responsibility for developing and implementing exposure control procedures for all facilities.
- b. Workers will know what tasks they perform that have an occupational exposure, plan, and conduct all operations in accordance with The Company work practices, and develop good personal hygiene habits.

4) PROCEDURES

- a. All workers will have access to a copy of the exposure control plan. Access to a copy of the exposure control plan shall be provided in a reasonable time, place, and manner. The procedure is reviewed annually and updated whenever there are establish new functional positions within our facility that may involve exposure to biohazards.

b. Exposure Determination

- | | |
|--|--|
| <ol style="list-style-type: none"> i. There are no job classifications in which some or all workers have occupational exposure to bloodborne pathogens that may result from the performance of their routine duties. ii. Designated workers are trained to render first aid and basic life support. Rendering first aid or basic life support will expose workers to bloodborne pathogens and will require them to adhere to this program. | <ol style="list-style-type: none"> iii. In addition, no medical sharps or similar equipment is provided to, or used by, workers rendering first aid or basic life support. iv. This exposure determination has been made without regards to the Personal Protective Equipment (PPE) that may be used by workers. v. A listing of all first aid and basic life support trained workers in this work group shall be maintained at each work site and at each first aid kit. |
|--|--|

c. Methods of Compliance

i. Universal Precautions

1. Under circumstances in which differential between body fluids is difficult or impossible, all body fluids will be considered potentially infectious.

ii. Engineering Controls

1. Engineering and work practice controls shall be used to eliminate or minimize worker exposure in accordance with local jurisdiction. Engineering controls should be examined and maintained or replaced on a regular schedule to ensure their effectiveness. Hand washing facilities shall be readily available at all work locations. If provision of hand washing facilities is not feasible, then an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes shall be provided by The Company.
2. Containers for contaminated reusable sharps that our clients provide have the following characteristics:

Puncture-resistant; Color-coded or labeled with a biohazard warning label; Leak-proof on the sides and bottom.

3. Secondary containers which are: Leak-proof; Color-coded or labeled with a biohazard warning label; Puncture-resistant, if necessary.

d. Work Practice Controls

- i. Workers shall wash their hands immediately, or as soon as feasible, after removal of potentially contaminated gloves or other PPE.
- ii. Following any contact of body areas with blood or any other infectious materials, workers wash their hands and any other exposed skin with soap and water as soon as possible.
- iii. Hand washing facilities shall be available. If hand washing facilities are not feasible The Company will provide either an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes.
- iv. Contaminated needles and other contaminated sharps should not be handled if you are not AUTHORIZED or TRAINED to do so. Contaminated needles and other contaminated sharps are not bent or recapped.
- v. Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas where there is potential for exposure to biohazardous materials.
- vi. Food and drink are not kept in refrigerators, freezers, on countertops or in other storage areas where potentially infectious materials are present.
- vii. All equipment or environmental surfaces shall be cleaned and decontaminated after contact with blood or other infectious materials.
- viii. Specimens of blood or other potentially infectious materials must be put in leak proof bags for handling, storage, and transport.
- ix. If outside contamination of a primary specimen container occurs, that container is placed within a second leak proof container, appropriately labeled, for handling and storage.
- x. Bloodborne pathogens kits are located on top of first aid kits and are to be used in emergency situations by the caregiver. Once the seal is broken on the kit and any portion has been used it is not to be reused. Pathogen kits shall be ordered and replaced promptly. Biohazard bags are identified by stickers and located in the first aid area. Contaminated supplies are to be disposed at once.

e. Personal Protective Equipment

- i. When the possibility of occupational exposure is present, PPE is to be provided at no cost to the workers such as gloves, gowns, etc. PPE shall be used unless workers temporarily declined to use under rare circumstances. PPE shall be repaired and replaced as needed to maintain its effectiveness. All PPE shall be of the proper size and readily accessible.
- ii. Our workers adhere to the following practices when using their personal protective equipment:
 1. Any garments penetrated by blood or other infectious materials are removed immediately.
 2. All potentially contaminated personal protective equipment is removed prior to leaving a work area.
 3. Gloves are worn whenever workers anticipate hand contact with potentially infectious materials or when handling or touching contaminated items or surfaces.
 4. Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an "exposure barrier".
 5. Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
 6. Any PPE exposed to bloodborne pathogens shall be disposed of properly.
 7. PPE shall be used unless workers temporarily declined to use PPE under rare circumstances.

8. PPE should be cleaned, laundered & properly disposed of if contaminated.
9. The Company will repair and replace PPE as needed to maintain its effectiveness.

f. Housekeeping

- i. Our staff employs the following practices:
 1. All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious materials.
 2. Protective coverings (such as plastic trash bags or wrap, aluminum foil or absorbent paper) are removed and replaced.
 3. All trash containers, pails, bins, and other receptacles intended for use routinely are inspected, cleaned, and decontaminated as soon as possible if visibly contaminated.
 4. Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.).
 5. Regulated waste must be discarded in proper containers, closed, and disposed of in accordance with applicable federal and state regulations. Regulated waste includes:
 - a. Liquid or semi-liquid blood or other potentially infectious material (OPIM)
 - b. Contaminated items that would release blood or OPIM in a liquid or semi-liquid state if compressed
 - c. Items that are caked with dried blood or OPIM and are capable of releasing these materials during handling
 - d. Contaminated sharps
 - e. Pathological and microbiological wastes containing blood or OPIM

g. Post-Exposure and Follow Up

- i. If there is an incident where exposure to bloodborne pathogens occurred, we immediately focus our efforts on investigating the circumstances surrounding the exposure incident and making sure that our workers receive medical consultation and immediate treatment. The Company Safety Manager/Supervisor investigates every reported exposure incident and a written summary of the incident, and its causes is prepared, and corrective actions are taken to avoid similar incidents in the future. We provide an exposed worker with the following confidential information:
 1. Documentation regarding the routes of exposure and circumstances under which the exposure incident occurred.
 2. Identification of the source individual (unless not feasible or prohibited by law).
- ii. Once these procedures have been completed, an appointment is arranged for the exposed worker with a qualified healthcare professional to discuss the worker's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.
- iii. We will forward the following information to the Health Care Professional:
 1. Description of the incident
 2. Other pertinent information
- iv. After the consultation, the health care professional provides our facility with a written opinion evaluating the exposed worker's situation. We, in turn, furnish a copy of this opinion to the exposed worker. The written opinion will contain only the following information:
 1. Whether Hepatitis B Vaccination is indicated for the worker.
 2. Whether the worker has received the Hepatitis B Vaccination.
 3. Confirmation that the worker has been informed of the results of the evaluation.
 4. Confirmation that the worker has been told about

any medical conditions resulting from the exposure incident which require further evaluation or treatment.

5. All other findings or diagnoses will remain confidential and will not be included in the written report.

v. Accurate medical records for each worker with occupational exposure must be maintained for at least the duration of employment plus 30 years and shall include at least the following:

1. Worker's name, Social Security number and worker identification number
2. Worker's Hepatitis B vaccination status, including vaccination dates
3. All results from examinations, medical testing, and follow-up procedures, including all health care professional's written opinions
4. Information provided to the health care professional
5. Any Hepatitis B Vaccine Declinations

vi. Training records shall be maintained for 3 years from the date on which the training occurred and shall include at least the following:

1. Outline of training program contents
2. Name of person conducting the training
3. Names and job titles of all persons attending the training
4. Date of training

i. Information provided to our workers includes:

1. The Biohazards Standard itself
2. The epidemiology and symptoms of bloodborne diseases
3. The modes of transmission of bloodborne pathogens
4. Our facility's Exposure Control Procedure (and where workers can obtain a copy)
5. Appropriate methods for recognizing tasks and other activities that may involve exposure
6. A review of the use and limitations of methods that will prevent or reduce exposure
7. Selection and use of personal protective equipment
8. Visual warnings of biohazards within our facility including labels, signs, and "color-coded" containers
9. Information on the Hepatitis B Vaccine
10. Actions to take and persons to contact in an emergency involving potentially infectious material
11. The procedure to follow if an exposure incident occurs, including incident reporting
12. Information on the post-exposure evaluation and follow-up, including medical consultation

b. Training

i. The Company shall ensure that all workers with occupational exposure participate in a training program in accordance with local jurisdiction. Training is conducted for all workers with occupational exposure before initial assignment and within 1 year of previous training. Training shall include:

1. What bloodborne pathogens are; how to protect themselves from exposure
2. Methods of warnings (signs, labels, etc.)
3. The requirements of bloodborne pathogens
4. The Hepatitis B vaccine and vaccine series will be made available to all workers who have an occupational exposure. It must be made available within 10 working days of the initial assignment if there is an occupational exposure. If workers decline the vaccination, they must sign a statement of declination. (See attachment 1)
5. The Hepatitis B vaccine shall be made available to all workers that have occupational exposure at no cost to the worker(s)

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Cadmium Awareness	Revision Date:
		Section:

1) PURPOSE

- a. While EARNEST CONTRACTING, hereafter referred to as "The Company", does not expect any exposure to Cadmium, if the job or project is determined to contain or potentially expose our workers, we will work with the client to first determine if the hazard can be engineered out or if we will need to establish a protocol using this policy to safely perform the work. The equipment and processes that typically contain Cadmium will be identified by the work permit and or job hazard analysis systems. Procedures for elimination or minimization of exposure will be the first line of defense. Special precautions will be exercised when maintenance of ventilation systems and changing of filters is performed.

2) APPEARANCE

- a. Cadmium metal-soft, blue-white, malleable, lustrous metal or grayish white powder. Some cadmium compounds may also appear as a brown, yellow, or red powdery substance. Cadmium can cause local skin or eye irritation. Cadmium can affect your health if you inhale or swallow it. Cadmium that may be immediately dangerous to life or health occurs in jobs where workers handle large quantities of cadmium dust or fumes; heat cadmium-containing compounds or cadmium-coated surfaces; weld with cadmium solders or cut cadmium-containing materials such as bolts.
- b. The program will be evaluated and updated as needed or an annual basis.

3) EXPOSURE LIMIT

- a. TWA PEL 8-Hour (time weighted average, permissible exposure limit) is Five (5) micrograms of cadmium per cubic meter of air 5 ug/m (3), time weighted average for an 8- hour workday. If the PEL is exceeded, a cadmium exposure policy will be implemented.

4) TRAINING

- a. Only trained and qualified workers may operate or maintain welding, cutting or brazing equipment. Welders/Cutters who may be exposed or have the potential to be exposed will be trained per this policy and will possess the appropriate certifications for their work scope.
- b. Any craft or trade required to perform any of the functions covered by this policy will be required to complete training per The Company training policy including:
 - i. *A test or other method to determine competency.*
 - ii. *Training initial to assignment and at least annually thereafter.*
 - iii. *All training records shall be documented and kept on file for at least one year or for the duration of the covered employee's employment.*
- c. Documentation will include outline or class name, the names and employee numbers of the employees who participated in the training, names, and signatures of those who trained the class and a class date.

5) MEDICAL SURVEILLANCE / WRITTEN EXPOSURE PLAN

- a. While the company should not expose employees to, at or above the action level, if those levels are reached, then a written exposure plan including annual reviews and updates will be required. The Company shall provide an initial (preplacement) examination to all workers covered by the medical surveillance program. The examination shall be provided to those workers within 30 days after initial assignment to a job with exposure to cadmium. Should workers become exposed to, at or above action levels related to work exposures and cadmium, then workers will receive a medical evaluation, which will include tests to determine exposure and a medical history.

This is provided at no cost to the employee. As with all medical records, these are kept strictly confidential. The worker or representative is entitled to see the records of measurements of the exposure. The worker can also request that medical records for exposure be furnished to the worker's personal physician or designated representative. The written program will be provided for examination and copying upon request of affected workers and their representatives.

6) RESPIRATORY PROTECTION PROGRAM

- a. If respiratory protection is required, see the company's Respiratory Protection Program for complete guidelines to respiratory protection.

7) EMERGENCY PROCEDURES

- a. First Aid for eye exposure – direct contact may cause redness or pain. Wash eyes immediately with large amounts of water and seek medical attention immediately.
- b. First Aid for skin exposure – direct contact may result in irritation. Remove contaminated clothing and shoes immediately. Wash affected area with soap or mild detergent and large amounts of water. Seek medical attention immediately.
- c. Ingestion may result in vomiting, abdominal pain, nausea, diarrhea, headache, and sore throat. Treatment for symptoms must be administered by medical personnel. Seek medical attention immediately.
- d. Inhalation – if large amounts of cadmium are inhaled, the exposed worker must be moved to fresh air at once. Seek medical attention immediately.
- e. Personal Protective Equipment (PPE) – you may be required to wear impermeable clothing, gloves, splash-proof or dust resistant goggles, face shield or other appropriate PPE to prevent skin contact with cadmium.
- f. Rescue – move affected worker from the hazardous exposure. If the exposed worker has been overcome, attempt rescue only if properly trained and after notifying at least one other worker and put into effect established emergency procedures.
- g. Respirators – you may be required to wear a respirator for work related to this type of exposure or for emergency response. Only use respirators approved by local or federal regulations. Cadmium does not have a detectable odor except at levels well above the PEL. If you can smell cadmium while wearing a respirator, proceed immediately to fresh air.



1) PURPOSE AND SCOPE

- a. Compressed and liquefied gases are routinely used in various construction and industrial work sites. This Gas Cylinder Safety Guideline applies to all EARNEST CONTRACTING, hereafter referred to as "The Company", workers who use or otherwise handle compressed or liquefied gases or systems. It is the intent of this guideline to provide information on the safe usage of compressed and liquefied gases at work locations and afford worker protection from potential health and physical hazards associated with gas and cylinder usage. The Company promotes the safe use of gases by offering training and information on the proper storage, handling, usage and disposal of gases and gas cylinders.

2) PROCEDURES

a. Storage of Compressed and Liquefied Gas

- i. Proper storage is critical for the safe usage of compressed and liquefied gases. Cylinder storage areas should be prominently posted with hazard information regarding the gases stored. The National Fire Protection Agency (NFPA) 704 diamond with a cylinder indicated in the "specific hazard" (white) section of the diamond and the corresponding flammability, health and reactivity hazard sections also marked is an accepted method of signage. Other storage requirements are outlined below.

b. Storage Requirements

- i. All gas cylinders:
 1. Shall not be stored in exits or egress routes.
 2. Shall be stored within a well-ventilated area.
 3. Shall not be stored in damp areas, near salt or corrosive chemicals, fumes, heat or where exposed to the weather.
 4. Shall be secured with a chain or appropriate belt above the midpoint, but below the shoulder. Laboratory cylinders less than 18" tall may be secured by approved stands or wall brackets.
 5. Shall be capped when not in use or attached to a system (if the cylinder will accept a cap).
 6. Shall be kept at least 20 ft. away from all flammables, combustible, or incompatible substances.
 7. Storage areas that have a noncombustible wall at least 5 ft. in height and with a fire resistance rating of at least 30 minutes may be used to segregate gases of different hazard classes in close proximity to each other.
 8. Shall be stored so that cylinders are used in the order in which they are received.
 9. Shall be stored so that gases with the same hazard class are stored in the same area. Inert gases are compatible with all other gases and may be stored together.
 10. Shall not be stored longer than one year without use.
 11. Shall be stored so that full cylinders remain separate from empty cylinders.

c. Compressed and Liquefied Gas Handling

- i. The Company workers must be trained on the proper use, handling, and storage of compressed gas cylinders. The following requirements shall apply to the handling of gas cylinders:
 1. Compressed gases shall be handled only by properly trained workers. Training must include the contents of this guideline as well as any specific information relevant to the gas being used and emergency information outlined in The Company health and safety plan (HASp), available at the construction site office.
 2. Safety shoes are required when moving cylinders.

3. Cylinders should not be dragged or physically carried. Transport cylinders with a hand truck designed for the transport of cylinders. Cylinder caps shall be secured during transport. Cylinders must be transported in a vertical secured position using a cylinder basket or cart and must not be rolled. Regulators should be removed, and cylinders capped before movement. Cylinders should not be dropped or permitted to strike violently, and protective caps are not used to lift cylinders
4. Prevent damage to cylinders. Locate cylinders where they will be protected from physical damage by striking or falling objects, corrosion, or damage from public tampering.
5. No person other than the gas supplier shall attempt to mix gases in a cylinder.
6. Cylinders shall not be subjected to artificially create low temperatures without approval from the supplier.
7. Containers shall not be used for any other purpose than holding the contents as received.
8. Damaged or leaking cylinders must be reported to the project manager or local safety office immediately for proper disposal.
9. Cylinders shall not be picked up by the cap.
10. Ropes, chains, and slings shall not be used to suspend cylinders, unless cylinder was designed for such.
11. Magnets shall not be used for lifting cylinders
12. Where appropriate lifting attachments have not been provided on the cylinder/container, suitable cradles, or platforms to hold the containers shall be used for lifting.
13. The user shall not paint cylinders.
14. Leaking, defective, fire burned, and corroded containers shall not be shipped without the approval of the supplier.
15. Visual and other inspections shall be conducted to determine that compressed gas cylinders are in a safe condition.

d. Compressed and Liquefied Gas Use

- i. The following are general requirements and “good practices” guidelines to follow when using gas cylinders and compressed gases:
 1. Cylinders must be equipped with the correct regulators. Regulators and cylinder valves should be inspected for grease, oil, dirt, and solvents.
 2. Ensure that regulator pressure control valve is relieved (i.e., closed) before attaching to tanks.
 3. Close valves on gas cylinders when a system is not in use.
 4. Remove all pressure from regulators not currently used (by opening equipment valves downstream **after** the regulators are closed).
 5. Shut-off valves must not be installed between pressure relief devices and the equipment they are to protect.
 6. Use pressure relief valves in downstream lines to prevent high pressure buildup if a regulator valve does not seat properly, and a tank valve is left on.
 7. Relief valves should be vented to prevent potential buildup of explosive or toxic gases.
 8. Never allow flames or concentrated heat sources to come in contact with a gas cylinder.
 9. Never allow a gas cylinder to become part of an electrical circuit.
 10. Never partially open a tank valve to remove dust or debris from the cylinder inlet.
 11. Never use cylinder gas as compressed air.
 12. Pressurize regulators slowly and ensure that valve outlets and regulators are pointed away from all workers when cylinder valves are opened.
 13. Cylinders which require a wrench to open the main valve shall have the wrench left in place on the cylinder valve while it is open. Use adequately sized wrenches (12” long) to minimize ergonomic stress

when turning tight tank valves. Never apply excessive force when trying to open valves. Cylinders with "stuck" valves should be returned to suppliers to have valves returned to suppliers to have valves repaired.

14. Do not attempt to open a corroded valve; it may be impossible to reseal.
 15. Valves should only be opened to the point where gas can flow into the system at the necessary pressure. This will allow for quicker shutoff in the event of a failure or emergency.
 16. Use a cylinder cap hook to loosen tight cylinder caps. Never apply excessive force or pry off caps. Return to supplier to remove "stuck" caps.
 17. Keep piping, regulators, and other apparatus gas tight to prevent gas leakage.
 18. Confirm gas tightness by using compatible leak test solutions (e.g., soap and water) or leak test instruments.
 19. Release pressure from systems before connections are tightened or loosened and before any repairs
 20. Do **not** use Teflon tape on CGA fittings (straight thread) where the seal is made by metal-to-metal contact. Use of Teflon tape causes the threads to spread and weaken, increasing the likelihood of leaks.
 21. Never use adapters or exchange fittings between tanks and regulators.
 22. Fluorescent light can be used to check for grease or oil in regulators and valves.
- ii. Labeling - The following labeling requirements shall apply to all gas cylinders:
1. Know the contents of each cylinder you are using.
 2. Use only the vendor label for positive identification of contents of the cylinder. Be aware that color coding may be inconsistent from vendor to vendor.
 3. Mixed gases shall be clearly labeled with the contents of the cylinder.
 4. Empty cylinders shall be labeled with the word empty or the abbreviation MT.
 5. Preferred labeling includes the identity of the material, statement of hazard and the associated signal word. For example, the preferred label for nitrogen would be:
 6. Nitrogen CAUTION: HIGH PRESSURE GAS CAN CAUSE RAPID SUFFOCATION
 7. Excellent sources of information for the warning and hazard information that should be contained on cylinders are the Air Products, Matheson, and other gas company catalogs, the CGA Pamphlet C-7: "Precautionary Labeling and Marking of Compressed Gas Cylinders," as well as the manufacturer or distributor of the gas.
- iii. Manifolds, Valves and Regulators - The following information applies to the use of manifolds, valves and/or regulators:
1. Where compressed gas containers are connected to a manifold, the manifold, and its related equipment, such as regulators, shall be of proper design for the product(s) they are to contain at the appropriate temperatures, pressures, and flows.
 2. Use only approved valves, regulators, manifolds, piping, and other associated equipment in any system that requires compressed gas. Care must be taken to ensure that pressure gauges on regulators are correct for the pressure of the gas cylinder used. With the exception of lecture bottles, threads, configurations, and valve outlets are different for each class of gases to prevent mixing of incompatible gases.
 3. CGA Pamphlet V-1: Standard for Compressed Gas Cylinder Valves, lists the appropriate valve for each gas. Manufacturers and distributors should also be able to identify the valves and associated equipment required for each gas.
 4. Lecture bottles use universal threads and valves, some of which are interchangeable. Label all associated equipment with the gas name to prevent unintentional mixing of incompatible materials.
 5. Valves and regulators should undergo periodic maintenance and repair. A visual inspection should be performed before each usage to detect any damage, cracks, corrosion, or other defects. Long term

maintenance or replacement periods vary with the types of gases used, the length of use, and conditions of usage. Consult the cylinder, regulator or gas supplier for recommended valve and regulator maintenance schedules.

6. Valves and regulator maintenance histories should be known before usage. Valves that pass visual inspection are still subject to failure, therefore it is critical that toxic or poisonous gases are used in ventilated enclosures and have local exhaust ventilation in place for downstream pressure relief valves, etc.
7. Valves and regulators should only be repaired by qualified individuals. Valve and regulator manufacturers, gas supply companies, or valve and regulator specialty shops should be consulted for any repair needs.

e. Gases with Specific Hazard Classes

- i. The following information regarding specific classes of gases is offered as additional guidance to be used in conjunction with the general usage requirements.
- ii. **Corrosive Gases** - The following information is provided for corrosive gases. Examples include chlorine, hydrogen chloride, fluorine, hydrogen fluoride, hydrogen sulfide, carbon monoxide and carbon dioxide.
 1. Metals become brittle when used in corrosive gas service, check equipment and lines frequently for leaks.
 2. A diaphragm gauge should be used with corrosive gases that would destroy a steel or bronze gauge. Check with gas supplier for recommended equipment.
 3. Remove regulators after use and flush with dry air or nitrogen.

f. Cryogenic Liquids and Gases

- i. Cryogenic liquids and their boil-off vapors rapidly freeze human tissue and cause embrittlement of many common materials which may crack or fracture under stress.
- ii. All cryogenic liquids produce large volumes of gas when they vaporize (at ratios of 600:1 to 1440:1, gas: liquid) and may create oxygen-deficient conditions. Examples of common cryogenic liquids include liquid oxygen, hydrogen, helium, and liquid neon. The following information applies to the use and handling of cryogenics:
 1. Use appropriate personal protective equipment (PPE) including insulated gloves and eye protection (goggles and a face shield) during any transfer of cryogenic liquid.
 2. In the event of skin contact with a cryogenic liquid, do not rub skin, place the affected part of the body in a warm water bath (not to exceed 40°C [105°F]).
 3. Use only equipment, valves and containers designed for the intended product and service pressure and temperature.
 4. Inspect containers for loss of insulating vacuum. If the outside jacket on a container is cold or has frost spots, some vacuum has been lost. Empty the contents into another cryogenic container and remove the damaged unit from service. Repairs should be made by the manufacturer or an authorized company.
 5. Transfer operations involving open cryogenic containers must be conducted slowly to minimize boiling and splashing of the cryogenic fluid.
 6. Ice or other foreign matter should not be allowed to accumulate beneath the vaporizer or the tank. Excessive ice buildup could result in the discharge of excessively cold gas or structural damage to the cryogenic container or surroundings.
 7. All cryogenic systems including piping must be equipped with pressure relief devices to prevent excessive pressure buildup. Pressure reliefs must be directed to a safe location. Do not tamper with pressure relief valves or the settings for the valves.
 8. Hot air, steam or hot water should be used to thaw frozen equipment. DO NOT USE water to thaw liquid helium.

g. Flammable Gases

- i. The following information applies to the use and handling of flammable gases. Some common examples of flammable gases include acetylene, hydrogen, methane, propane, and iso-butane.
1. Flammable gases, except for protected fuel gases, shall not be used near ignition sources. Ignition sources include open flames and sparks, sources of heat, oxidizing agents and ungrounded or non-intrinsically safe electrical or electronic equipment.
 2. Portable fire extinguishers shall be available for fire emergencies. The fire extinguisher must be compatible with the apparatus and the materials in use.
 3. Flames shall not be used for detecting leaks. A compatible leak detection solution shall be used for leak detection.
 4. Spark proof tools shall be used when working with or on a flammable compressed gas cylinder or system.
 5. Access doors to areas which use or store flammable gases shall be posted "No Open Flames."
 6. Manifold systems shall be designed and constructed by competent personnel who are thoroughly familiar with the requirements for piping of flammable gases. Manifolds should comply with the standards of a recognized safety authority such as Underwriters Laboratories, Inc. Federal, state, local or insurance company specifications must be identified before starting design and construction. Consultation with the gas supplier before installation of manifolds is recommended.

h. Fuel, High Pressure and Oxidizing Gases

- i. The following information applies to the use and handling of fuel, high pressure, and oxidizing gases:
1. Fuel gases often use a combination of flammable and oxidizing gases. Use of fuel gases must comply with OSHA 29 CFR1910.253--Oxygen-Fuel Gas Welding and Cutting, 29 CFR1910.102--Acetylene and 29 CFR1910.103--Hydrogen. Additionally, adherence to the requirements of the Compressed Gas Association as defined in Pamphlet G-1: Acetylene, Pamphlet SB-8: Use of Oxy-fuel Gas Welding and Cutting Apparatus, and the requirements of the NFPA Standard 51: Standard for the Design and Installation of Oxygen-Fuel Gas Systems for Welding, Cutting and Allied Processes is required.
 2. High pressure gases can be rated up to 3000 pounds per square inch (psi). Typical uses include MIG welding gas mixtures, cryogenics, non-toxic gas distribution, medical gas distribution, and emergency oxygen services. In addition to any gas specific hazards, high pressure gases should carry the following hazard label: CAUTION: HIGH PRESSURE GAS
 3. Oxidizing gases are non-flammable gases (e.g., oxygen chlorine, fluorine, and nitrous oxide), but in the presence of an ignition source and fuel can support and vigorously accelerate combustion. Do not use oil in any apparatus where oxygen will be used. Gauges and regulators for oxygen shall bear the warning "OXYGEN - USE NO OIL."

i. Toxic and Highly Toxic Gases

- i. The following information applies to the use of toxic and highly toxic gases:
1. All gases with a NFPA Health Hazard rating of 3 or 4 must be stored and used in accordance with applicable regulations.
 2. Unless otherwise indicated, all gases must be stored in a continuously mechanically ventilated gas cabinet, fume hood or other enclosure.
 3. Small quantities (e.g., lecture cylinders) or dilute concentrations of these gases may be stored outside of a ventilated enclosure with the approval of site management and the safety officer.
 4. Audible alarms should be utilized in ventilated hoods that are dedicated to toxic gas usage or storage.
 5. Standard Operating Procedures (SOP's) for processes or procedures which use corrosive, toxic or highly toxic gases shall be developed that include emergency response actions. All affected The Company workers shall be trained on the contents of these procedures.

j. Gas Cylinder Disposal

- i. The following information applies to the disposal of compressed gas cylinders:
1. If possible, purchase compressed gas only from manufacturers that will agree to take back the empty cylinder.

2. A cylinder is considered empty when the container pressure is at atmospheric pressure.
3. Refillable cylinders should be returned to materials handling personnel or directly to the vendor.
4. If a refillable cylinder is encountered that does not have a manufacturer label, contact materials handling personnel to see if they can
 5. identify the manufacturer through stamp marks on the cylinder.
 6. Maintain manufacturer labels and label the cylinder with an "Empty" or "MT" tag.
 7. Materials handling personnel or the vendor should be contacted for disposal of partially full cylinders.
 8. Proper identification of the contents of all cylinders is required and is the responsibility of the cylinder owner.
 9. Disposal fees for unknown cylinders is the contractor's expense.

k. Handling Compressed Gas Cylinder Leaks and Emergencies

- i. **Preplanning:** Despite strict adherence to safety practices, accidents involving gases may occur at the work site. The amount of damage sustained by workers and property from these accidents will be directly related to the quality of the site's emergency plan and procedures. Users of compressed gas cylinders must be familiar with necessary safety precautions. SOPs for using compressed gases shall include a discussion of possible accident scenarios, appropriate worker responses and should take into account the following factors:
 1. The nature of the operation (e.g., equipment used and type of injury that might be inflicted corridor or storage area, on a table, in a hood or on the floor).
 2. The potential location of a release or spill (e.g., outdoors versus indoors, in a laboratory, corridor or storage area, on a table, in a hood or on the floor).
 3. The quantities of material that might be released and the type of containment (i.e., compressed gas tank size, manifold systems, etc.).
 4. The chemical and physical properties of the compressed gas (e.g., its physical state, vapor pressure and air or water reactivity).
 5. The hazardous properties of the compressed gas (e.g., its toxicity, corrosivity and flammability).
 6. The availability and locations of emergency supplies and equipment.
 7. A contingency plan which identifies building evacuation routes, emergency telephone numbers, chemical containment procedures, fire extinguisher usage, etc., should be posted at the worksite.
- ii. **Minor Leaks:** Occasionally a gas cylinder or one of its component parts may develop a leak. Most of these leaks occur at the top of the cylinder in areas such as the valve threads, pressure safety device, valve stem and valve outlet. The following information applies to the remediation of minor leaks:
 1. If possible, verify suspected leaks using a flammable gas detector or soapy water solution (a flame should not be used for detection). **If the leak cannot be stopped by tightening a valve gland or packing nut, emergency action procedures should be initiated, and site safety and management should be notified.**
 2. For flammable, inert, or oxidizing gases, move the cylinder to an isolated, well-ventilated area away from combustible materials. Post signs that describe the hazard.
 3. For corrosive and toxic gases, move the cylinder to an isolated, well-ventilated area and use suitable means to direct the gas into an appropriate chemical neutralizer. Post signs that describe the hazards.
 4. If it is necessary to move a leaking cylinder through populated portions of the building, place a plastic bag, rubber shroud or similar device over the top and tape it (duct tape preferred) to the cylinder to confine the leaking gas.
- iii. **Major Leaks:** In the event of a large gas release or if an accident takes place in which readily available protective PPE is inadequate to ensure worker safety, **activate the following Emergency Procedures:**
 1. **Immediately call 911** and report the incident.

2. Activate building and area fire alarms (or chemical safety alarms if applicable).
3. Evacuate the area, securing entrances, and providing assistance to others on the way out.
4. Provide emergency response officials with details of the problem upon their arrival.

iv. Accidents Involving Personnel Injury

1. For medical emergencies, call the site emergency response number or 911.
2. Assist workers involved and administer immediate first aid which may include:
3. Washing under a safety shower (in case of burning clothing or chemical exposures).
4. Removing contaminated clothing.
5. Irrigating the eyes at an eyewash.
6. Administering artificial respiration.
7. Notify workers in adjacent areas of any potential hazards (e.g., activate building or area alarms).
8. Move injured worker only if necessary, to prevent their exposure to further harm.

i. Fire and Fire-Related Emergencies

- i. **For all fires, immediately call the site emergency response number or 911**
- ii. Small, isolated fires within the laboratory may be extinguished using the appropriate portable fire extinguisher if workers are confident that they can safely extinguish the fire and have had appropriate training. Additional information on fire extinguisher use is contained in the site safety plan. For large or rapidly spreading fires, the following procedures should be followed:
 1. Call the site emergency response number or 911 to report the fire.
 2. Activate building and area alarms.
 3. Evacuate the building, shutting doors, and providing assistance to others on the way out.
 4. Provide fire or police officials with the details of the problem upon their arrival.

m. Training

- i. Only trained and qualified personnel shall be allowed to use compressed and liquefied gases. Training should include the associated hazards of the materials, necessary safety precautions, PPE, and emergency response procedures. Appropriate safety data sheets (SDS), associated information, or other gas supplier product information shall be made accessible to compressed gas users.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Confined Space Awareness	Revision Date:
		Section:

1) PURPOSE

- a. To set forth procedures for the safe entry to confined spaces. This program is intended for “Awareness Level” purposes. Systems shall be used to ensure the safety of workers who are required to enter confined spaces. Only those EARNEST CONTRACTING, hereafter referred to as “The Company”, workers who have received specifically required training and certification on confined space entry shall be allowed to enter and/or attend a confined space. This program will be reviewed annually and revised as necessary.
- b. *This policy covers minimum performance standards applicable to all The Company associates, workers, and locations. Local practices requiring more detailed or stringent rules, or local, state, or other federal requirements regarding this subject can and should be added as an addendum to this procedure as applicable.*

2) SCOPE

- a. Applies to all The Company work sites, i.e., The Company offices, client job sites, etc., involving confined space entry.

3) DEFINITIONS

- a. **Attendant** - an individual stationed outside permitted confined spaces that monitors the authorized entrants and who performs all attendants’ assigned duties.
- b. **Authorized Entrant** - an individual who is authorized to enter a confined space.
- c. **Blanking or blinding** - an absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.
- d. **Confined space** - a space that is large enough and so configured that an individual can enter and perform assigned work; has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and is not designed for continuous occupancy. A permit required confined space has one or more of the following characteristics:
 - i. *Contains or has the potential to contain a hazardous atmosphere*
 - ii. *Contains material that has the potential for engulfing an entrant*
 - iii. *Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section*
 - iv. *Contains any other recognized serious safety or health hazard*
- e. **Confined Space Permit** - a written or printed document that allows workers to enter a permitted confined space.
- f. **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.
- g. **Emergency**- any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permitted confined space that could endanger entrants.
- h. **Engulfment** - the surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

- i. **Entry**- the action by which a person passes through an opening into a permit-required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.
- j. **Entry supervisor** - the person responsible for determining if acceptable entry conditions are present at a permitted confined space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section. An entry supervisor may also be acting as an attendant.
- k. **Hazardous atmosphere** - an atmosphere that may expose persons to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness.
- l. **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 any fluid at a volume, pressure, or temperature capable of causing injury.
- m. **Permit-required confined space program** (permit space program) -the employer's overall program for controlling, and, where appropriate, for protecting workers from, permit space hazards and for regulating employee entry into permit spaces.
- n. **Permit system** - a written procedure for preparing and issuing permits for entry and for returning the permit space to service following termination of entry.
- o. **Prohibited condition**- any condition in a permit space that is not allowed by the permit during the period when entry is authorized.
- p. **Oxygen deficient atmosphere** - an atmosphere containing less than 19.5 percent oxygen by volume.
- q. **Oxygen enriched atmosphere**- an atmosphere containing more than 23.5 percent oxygen by volume.
- r. **Rescue service** -the personnel designated to rescue workers from permit spaces.
- s. **Retrieval system** - the equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.
- t. **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.

4) **PROCEDURES**

a. **General**

- i. Workers shall be informed of identified permit required confined spaces for the work site as they are identified.
- ii. Only authorized workers may be permitted to enter a permit required confined space.
- iii. Danger signs or other equivalent means shall be used to warn of existing confined spaces that are accessible by workers and others. The wording shall be "DANGER-PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER" or other equivalent language.
- iv. Required safety equipment shall be at the confined space work area, in working order, and instruments calibrated.

b. **Initial Evaluation of Confined Spaces**

- i. Confined spaces shall be considered as permit required confined spaces until a competent person conducts an initial evaluation of the work site to identify permit required confined spaces. Confined spaces shall be classified as follows:
 1. *Non-Hazardous*
 2. *Hazardous due to work task*

3. Hazardous due to internal condition

- ii. If the work site contains permit required confined spaces, danger signs stating "DANGER CONFINED SPACE ENTER BY PERMIT ONLY" or equivalent shall be posted to inform workers of the existence and location of the spaces. Bilingual signs shall be posted as necessary.

c. Reclassification or Canceling of Permit Required Spaces

- i. Permit required confined spaces shall be reclassified as non-permit spaces under the following circumstances:
 - 1. *The space has no actual or potential atmospheric hazards and if hazards within the space are eliminated without entry into the space*
 - 2. *If testing and inspection during entry demonstrates that the hazards within the space have been eliminated and remain eliminated*
 - 3. *If a hazard returns, workers shall evacuate the space and the space shall be reevaluated*
 - 4. *If new hazards are identified that are not part of the original permit, workers shall immediately evacuate the space and the confined space shall be re-evaluated*
 - 5. *Cancelled permits shall be kept on file for a period of at least 12 months and reviewed to determine problems encountered.*

d. Confined Space Entry Form

- i. The supervisor responsible shall ensure that a Confined Space Entry Form is completed prior to the entry of any permit required confined space. Completion of this form involves the following activities:
 - 1. *Assessing hazards*
 - 2. *Atmospheric testing*
 - 3. *Identification of qualified entrants*
 - 4. *Identification of attendant(s).*
 - 5. *Identification of entry supervisor*
 - 6. *Establishment of Rescue methods and Rescue Service*
 - 7. *De-energizing systems*
 - 8. *Cleaning of confined spaces*
 - 9. *Types of equipment required*
 - 10. *Hazards that may be generated through work activities*
 - 11. *Communication methods*
 - 12. *Entrants are qualified*
- ii. Confined Space Permits are valid for the work period or work shift and become void and shall be reissued when:
 - 1. *There is an unplanned interruption in the work process*
 - 2. *The surrounding conditions change that introduce a new hazard*
 - 3. *Workers leave the space to perform other work*
 - 4. *The workspace is left unattended*
 - 5. *The work period (normal time a worker or crew is scheduled to work during that day) ends*
 - 6. *When new crew assumes the work assignments of the existing work crew*
- iii. Permits are not void during any single work period when crew members are added to the existing crew or when crew members are replaced on a planned rotational basis and the provisions of the permit are met including training and instructions.
- iv. Permits become void when the scope of work exceeds the definition of work defined on the permit, and when work is required to be completed that is not covered by the permit.
- v. Confined Space Permits shall be posted at the confined space work area until the work is completed. At the conclusion of work, the permit shall be returned to the issuer (i.e., Entry Supervisor, client, etc.).
- vi. Completed confined space permits shall be kept for a minimum of 12 months and until a review of the confined space permit program is completed.

e. Atmospheric Testing

- i. Atmospheric conditions of a confined space shall be tested with calibrated equipment prior to entry of workers and as identified by the Initial Evaluation of Confined Spaces. Atmospheric testing shall be completed as indicated below and recorded on the Entry Permit:
 1. *Oxygen content shall be tested. The acceptable range is 19.5 to 23.5 percent.*
 2. *Test for combustible gas and vapors. Acceptable range is 0 to 10 percent of the Lower Flammable Limit (or Lower Explosive Limit). Record readings on the Entry Permit.*
 3. *Check for toxic gases and airborne combustibles (i.e., dusts) as identified by the initial determination of confined spaces.*
 4. *Entrants and/or attendants may request additional monitoring at any time.*
- ii. See testing equipment requirements under the Industrial Hygiene manual.

f. Pre-Entry (Occurring Prior to Entry)

- i. Only those workers receiving specifically required training and certification on confined space entry shall be allowed to enter and/or attend a confined space. This training shall be documented at orientation. Annual refresher training shall be conducted for all applicable The Company workers to include emergency rescue drills. Proficiency in assigned duties will be established after training.
- ii. Workers who enter confined space, Attendant(s), and Entry Supervisor shall receive the following minimum instructions concerning the confined space:

<ol style="list-style-type: none"> 1. <i>How to recognize symptoms of the specific potential hazards of confined space</i> 2. <i>The consequences of exposure to potential hazards</i> 3. <i>When to evacuate the confined space</i> 4. <i>Adhering to instruction of the Attendant</i> 	<ol style="list-style-type: none"> 5. <i>Evacuating when alarms sound</i> 6. <i>How communications will be maintained</i> 7. <i>What to do if an exposure occurs or there is a release of a substance</i> 8. <i>Shutting off tools during an emergency</i>
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- iii. Sources of energy or contaminants shall be controlled, such as:
 1. *Electrical energy*
 2. *Pressurized systems such as pipelines and vessels are isolated through double blocking, blinding, bleeding, and depressurization*
 3. *Extreme heat and extreme cold conditions*
- iv. Pre-entry atmospheric testing shall be completed.
- v. The method of ventilating the confined space shall be established.
- vi. The approved tools shall be identified and staged at or near the entry point of the confined space. Tools, electrical tools, and lighting systems shall be approved for use in confined spaces as identified by the Initial Evaluation of confined spaces.
- vii. Depending upon the Pre-Job Assessment (lighting and electrical equipment may be either low voltage (50V or less), or conventional 120V portable lamps and tools if powered by approved ground fault circuit interrupter devices and the work is not an electrically hazardous location. Pneumatic equipment may be used instead of electrical equipment.
- viii. Required rescue procedures and rescue equipment that shall be staged at the confined space
- ix. The safe methods to enter, exit, and escape for workers (including rescue workers during retrieval) working in a permit-required confined space shall be developed during the job planning phase, specified on, and included, as needed, on the entry permit.
- x. Workers have been issued the required personal protective equipment (PPE).

g. Ventilation of Confined Spaces

- i. Powered ventilation shall occur before entry into permit-required confined space and continue until after the workers have left the space. Layout of ventilation equipment will be made in such a manner that the air is being sent throughout the entire confined space. Forced air ventilation shall come from a clean source and may not increase hazards.
- ii. Air hoses with diffusers may not be used to provide forced ventilation.
- iii. Air sampling shall be conducted prior to worker entry to assure the safety of the space and periodic air sampling shall be continued thereafter in the space when forced ventilation is used.
- iv. Forced ventilation may be used to:
 - 1. *To remove contaminants created by work activities such as welding*
 - 2. *As a method of maintaining controlling the ambient temperature of a confined space when the rise in temperature is caused by atmospheric conditions.*
- v. Ventilation shall occur only by forcing air into a confined space. If it is necessary to exhaust hazardous gases, such as those produced when welding, the air being forced into the confined space shall be increased by at least the amount that is being exhausted out of the space.

h. Performance of Work

- i. The confined space attendant shall remain at the entry point of the confined space while workers are inside any permit required confined space.
- ii. The confined space attendant shall ensure that only authorized workers enter the confined space.
- iii. Confined space attendants shall not perform any other work activities except that they may also serve as the attending supervisor.
- iv. Confined space attendants shall only monitor a single confined space unless entry points to subsequent confined space(s) are immediately adjacent and are under the direct control of the attendant.
- v. If an emergency or other unplanned event takes place during work the Confined Space Work Permit is void.
- vi. The Attendant and Entry Supervisor have the authority to discontinue work activities at any time.
- vii. Compressed gas cylinders other than a self-contained breathing apparatus should not be taken into a confined space.
- viii. The hoses of gas cutting, and welding tools shall be inspected for leaks prior to taking them into any confined space.
- ix. Workers who enter confined spaces shall comply with the provisions of this standard and the confined space permit. This includes:

1. <i>Supervisors</i>	5. <i>Scaffold Builders</i>
2. <i>Inspectors</i>	6. <i>Engineers</i>
3. <i>Surveyors</i>	7. <i>Vendors</i>
4. <i>Observers</i>	8. <i>Contractors, subcontractors, and other workers</i>
- x. Sources of ignition (e.g., flame, arc, or spark) shall not be permitted in any confined space until tests have ensured that the percentage of combustible/flammable gas or vapor is not more than zero (0) % of the Lower Explosive Limit (LEL).

i. Emergencies

i. Emergency Notification

- 1. It is the responsibility of the Entry Supervisor and/or the Entry Attendant to immediately notify The Company's senior worker on the worksite of a potential emergency by radio or cell phone. The Company's senior worker will assess the situation and contact emergency response services if applicable.

2. Only those workers trained and certified in confined space entry procedures on the worksite may assist in emergency rescue operations.

j. Rescue / Retrieval System

- i. To facilitate emergency rescue, retrieval systems or methods shall be used whenever an authorized entrant enters a confined space, unless the retrieval equipment increases the overall risk of entry or would not contribute to the rescue of the entrant.
- ii. The entry supervisor, prior to the initial entry of workers into a confined space, will ensure:
 1. *Procedures for summoning emergency and rescue services are available*
 2. *and can respond in a timely manner during confined space entries.*
 3. *Rescue equipment and retrieval systems are functioning properly.*
 4. *First aid is provided by trained workers.*
 5. *Prevention of unauthorized workers from attempting a rescue in a confined space.*
 6. *Retrieval systems shall meet the following requirements to the greatest extent possible.*
 7. *Each authorized entrant shall use a full body harness with a retrieval lifeline attached at the center of the entrant's back near shoulder level, or above the entrant's head or safety coveralls with built-in harness, with a retrieval lifeline attached at the near shoulder level of the entrant's back, or above the entrant's head*
 8. *Wristlets may be used in lieu of the full body harness if the entry supervisor can demonstrate that the use of a full body harness is not feasible or creates a greater hazard and that the use of wristlets is the safest and most effective alternative*
 9. *The other end of the retrieval line shall be attached to a mechanical device or fixed point outside the confined space in such a manner that rescue can begin as soon as the rescuer becomes aware that rescue is necessary. A mechanical device shall be available to retrieve workers from vertical type confined spaces more than 5 feet deep*
 10. *The safety harness shall be of the type that permits easy rescue of workers from confined space during emergency conditions and may be either the harness type that suspends a worker in an upright position or the wrist type rescue harness. (A hoisting device or other effective means for lifting workers from confined spaces is preferred)*
 11. *Lifelines shall have a minimum breaking strength of 5,400 pounds*

k. Completion of Work

- i. When the work is completed in a confined space the following, as a minimum shall be completed:
 1. *Tools, equipment, and materials shall be removed*
 2. *The area surrounding the confined space shall be clean of materials, equipment, scraps, and debris*
 3. *The supervisor responsible for the confined space work shall inspect the work location to ensure cleanup of materials, tools, and other items is complete*
 4. *(Lockout) locks are removed only when work is completed*



1) PURPOSE & SCOPE

- a. EARNEST CONTRACTING, hereafter referred to as “The Company”, progressive discipline policy and procedures are designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable workers behavior and performance issues. It has been designed consistent with The Company’s organizational values, human resource (HR) best practices and employment laws.
- b. Outlined below are the steps of The Company’s progressive discipline policy and procedure. The Company reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling, training, the worker’s work record, and the impact the conduct and performance issues have on the organization.

2) PROCEDURES

a. *Step 1: Counseling and verbal warning*

- i. Step 1 creates an opportunity for the immediate supervisor to schedule a meeting with a worker to bring attention to the existing performance, conduct, or attendance issue. The supervisor should discuss with the worker the nature of the problem or the violation of company policies and procedures. The supervisor is expected to clearly describe expectations and steps the worker must take to improve performance or resolve the problem.
- ii. The supervisor will prepare written documentation of a Step 1 meeting. The worker will be asked to sign this document to demonstrate their understanding of the issues and the corrective action.

b. *Step 2: Written warning*

- i. Although The Company hopes that the worker will promptly correct any performance, conduct, or attendance issues that were identified in Step 1, The Company recognizes that this may not always occur. The Step 2 written warning involves more formal documentation of the performance, conduct, or attendance issues and consequences.
- ii. During Step 2, the immediate supervisor and manager or director will meet with the worker to review any additional incidents or information about the performance, conduct, or attendance issues as well as any prior relevant corrective action plans. Management will outline the consequences for the worker of their continued failure to meet performance or conduct expectations.

c. *Step 3: Suspension and final written warning*

- i. There may be performance, conduct, or safety incidents so problematic and harmful that the most effective action may be the temporary removal of the worker from the workplace. When immediate action is necessary to ensure the safety of the worker or others, the immediate supervisor may suspend the worker pending the results of an investigation.
- ii. Suspensions that are recommended as part of the normal progression of this progressive discipline policy and procedure are subject to approval from a next-level manager and HR.
- iii. Depending on the seriousness of the infraction, the worker may be suspended without pay in full-day increments consistent with federal, state, and local wage-and-hour employment laws. Nonexempt/hourly workers may not substitute or use an accrued paid vacation or sick day in lieu of the unpaid suspension. Due to Fair Labor Standards Act (FLSA) compliance issues, unpaid suspension of salaried/exempt workers is reserved for serious workplace safety or conduct issues. HR will provide guidance so that the discipline is administered without jeopardizing the FLSA exemption status.
- iv. Pay may be restored to the worker if an investigation of the incident or infraction absolves the worker.

d. Step 4: Recommendation for termination of employment

- i. The last and most serious step in the progressive discipline procedure is a recommendation to terminate employment. Generally, The Company will try to exercise the progressive nature of this policy by first providing warnings, a final written warning, or suspension from the workplace before proceeding to a recommendation to terminate employment. However, The Company reserves the right to combine and skip steps depending on the circumstances of each situation and the nature of the offense. Furthermore, workers may be terminated without prior notice or disciplinary action.
- ii. Management's recommendation to terminate employment must be approved by HR and the division director or designate. Final approval may be required from the CEO or designate.

e. Appeal Process

- i. Workers will have the opportunity to present information that may challenge information management has used to issue disciplinary action. The purpose of this process is to provide insight into extenuating circumstances that may have contributed to the worker's performance or conduct issues while allowing for an equitable solution.
- ii. If the worker does not present this information during any of the step meetings, they will have five business days after that meeting to present such information.

f. Performance and Conduct Issues Not Subject to Progressive Discipline

- i. Behavior that is illegal is not subject to progressive discipline, and such behavior may be reported to local law enforcement authorities.
- ii. Similarly, theft, substance abuse, intoxication, fighting, and other acts of violence at work are not subject to progressive discipline and may be grounds for immediate termination.

g. Documentation

- i. The worker will be provided copies of all progressive discipline documentation including all PIPs. The worker will be asked to sign copies of this documentation attesting to their receipt and understanding of the corrective action outlined in these documents.
- ii. Copies of these documents will be placed in the worker's official personnel file.

h. Important Note

- i. Nothing in this policy provides any contractual rights regarding worker discipline or counseling, nor should anything in this policy be read or construed as modifying or altering the employment relationship between The Company and its workers.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Drug & Alcohol Policy	Revision Date:
		Section:

1) POLICY

- a. Earnest Contracting, hereafter referred to as "The Company", is committed to maintaining a safe work environment for all workers and those in the public who may be affected, while ensuring that all workers are treated fairly and with respect. Everyone who works for and with The Company is expected to understand the risks of alcohol and drug use to workplace safety, and to be able to identify and respond to those risks in compliance with this policy. Workers are expected to comply directly with this policy and any supporting programs. Contractors who conduct work on behalf of The Company are expected to develop and enforce comparable policies and programs to manage alcohol and drug risks among their workers.

2) WORK RULES

- a. All workers will be informed regarding this policy at the time of employment. Additionally, it will be discussed periodically at "tailgate" safety meetings.
- b. A worker who has a substance problem is encouraged to seek immediate assistance. The Company Human Resources Department will provide the worker with the name and address of local agencies or facilities that are equipped to provide the rehabilitation assistance needed by the worker.
- c. The following actions are strictly prohibited:
- i. *While on company property or at a company worksite, to use, consume, possess, distribute, sell or transfer:*
 1. *Alcohol (unless contained in sealed (unopened) packaging, and secured in vehicle for transfer to home or official company-sanctioned event)*
 2. *Drugs other than those permitted by this policy as described below*
 3. *Drug paraphernalia*
 4. *From reporting to work or performing work while the worker's ability to safely perform their duties is adversely affected by use of drugs or alcohol.*
 - ii. *From refusing to:*
 1. *Comply with a request to confirm they are following this policy when a supervisor or manager has reasonable grounds to believe the worker may not be complying*
 2. *Comply with a request to submit to an alcohol or drug test*
 3. *When a supervisor or manager has reasonable grounds to believe the worker may not be following the policy and the worker cannot confirm compliance without a test*
 4. *Following an incident or near miss if a supervisor or manager present at the workplace has reasonable grounds to believe that the worker was involved in the incident or near miss and there is no objective evidence to believe that the use of alcohol or drugs did not contribute to the cause of the incident or near miss*
 5. *When applying for or transferring into a safety-sensitive position*
 6. *As periodically required by the Company throughout the time the worker is working in a safety-sensitive position*
 7. *When the worker has previously tested positive and is returning to work after an assessment by a substance abuse expert*
- d. This Work Rule permits the possession or use of prescription and non-prescription drugs under the following conditions:

- i. Any prescription drug in the worker's possession or used by the worker is prescribed to the worker, and
 - ii. The worker is using the prescription or non-prescription drug for its intended purpose and in the manner directed by the worker's physician or pharmacist or the manufacturer of the drug, and
 - iii. The use of the prescription or non-prescription drug does not adversely affect the worker's ability to safely perform his or her duties, and
 - iv. The worker has notified his or her supervisor or manager before starting work of any potentially unsafe side effects associated with the use of the prescription or non-prescription drug.
- e. No information collected about a worker under this policy will be disclosed to any person unless the worker has given consent or the supervisor or manager in possession of the information is legally required to disclose it.

f. Testing Procedures

i. Laboratory Testing

1. The Company will designate the laboratories to perform substance testing on blood or urine specimens in accordance with standards set forth by an established industry standard. The substances and detection levels covered by this testing program are set forth below. Workers may be asked by collection site personnel to indicate whether there is the potential that they will test positive for prescription or other substances. A consent form and information sheet will be provided. If the worker fails to provide an acceptable urine specimen the company may take the following steps:
 - a. *Extend the stay of the worker at the designated collection site, if feasible, until an acceptable specimen can be collected.*
 - b. *Reschedule the test due to unusual circumstances, (i.e., post-operative situations).*
 - c. *Discipline the worker, up to and including termination, on the first offense for failing to cooperate or refusing to provide an acceptable specimen*
2. All positive urine specimen test results for workers on active status will be confirmed by standard laboratory procedures. In case of testing by means other than urine (i.e., breath or other samples), reliable laboratory or instrument testing procedures will be followed.

ii. Testing Substances

1. As a minimum, the following substances and detection levels shall be tested for:
 - a. *Alcohol level equal to or in excess of 0.04 BAL.*
 - b. *Equal to or in excess of the urine concentrations set out in the below table:*
 - c. Concentrations at or in excess of the above levels shall be conclusive proof of unacceptable levels of unauthorized, prohibited, illegal or controlled substances.

Drugs or Classes of Drugs	Screening concentration equal to or in excess of ng/ml
Marijuana metabolites	50
Cocaine metabolites	300
Opiates	2000
6-Acetylmorphone	10
Phencyclidine	25
Amphetamines/Methamphetamines	1000
MDMA	500

g. Disciplinary Action for Policy Violation

i. Applicants

1. If the final result of a pre-employment drug screen is positive, the applicant will not be employed. No applicant can be reconsidered for employment sooner than six (6) months following the date of the positive drug screen.

ii. Workers

1. No drug test will be conducted without written consent. However, any worker who refuses to provide such written consent and fully cooperate with this policy will be subject to disciplinary action up to and including discharge from employment.
2. Under certain circumstances, disciplinary action may include a mandatory referral to and enrollment in an approved rehabilitation program at the worker's expense. This action may also require an indefinite suspension of regular employment.
3. A worker's job is not in jeopardy by reason of his voluntary admission to having a substance problem and request for help and referral to an approved rehabilitation program, provided that such request is made prior to, and well in advance of, any consideration of being tested under the provisions of this policy. Workers participating in this rehabilitation program will be subject to follow-up or "maintenance" testing.

iii. Contractors, Subcontractors, Vendors, Their Workers' Agents or Representatives

1. *No drug test will be conducted without written consent. However, anyone who refuses to provide such written consent and does not fully cooperate with this policy will be subject to disciplinary action up to and including removal from the job or job site, as may be appropriate. Preliminary findings of a policy violation may require that the individual involved be suspended from the job pending the results of the company investigation.*
2. *If the final result of a "reasonable cause" or "post-accident" drug screen is positive, the individual will be permanently barred from the job.*

iv. Client Requirements

1. In the event that a client has an Alcohol and Drug Testing Guideline that is more stringent than those outlined above, the client's guidelines will be followed for all work done with that client. Examples of more stringent guidelines include but are not limited to:
 - a. *A greater number of substances (panels) to be tested for.*
 - b. *A lower detection/cut off levels.*
 - c. *Specified number or percent of workers to be tested on the site.*
 - d. *DOT or similar mandated programs.*

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Emergency Action Plan	Revision Date:
		Section:

1) PURPOSE

- a. The purpose of an Emergency Action Plan is to protect workers from serious injury, property loss, or loss of life, in the event of an actual or potential emergency. An emergency may include, but not limited to, any of the following: fire, tornado, earthquake, bomb threat, hazardous chemical spill, or active shooter.

2) PROCEDURES

- a. Emergency preparedness and response planning is an important factor in ensuring worker safety, protecting the environment, public safety, and company assets. Therefore, operations do not require any worker to continue operating critical equipment during an emergency evacuation. Following an emergency evacuation, no worker is permitted to re-enter the building until authorized.
- b. A written copy of the Emergency Action Plan shall be kept in the workplace and available to workers for review.
- c. **Training**
 - i. The Safety Manager has overall responsibility of designating and training workers to assist in a safe and orderly evacuation as well as implementing this plan and updating as needed. Additionally, the Safety Manager will assist any worker who may need more information about the plan or an explanation of their duties under the plan. All workers shall be trained in the following areas:
 - 1. *The Alarm System*
 - 2. *Various types of emergency scenarios (Fire, Chemical Release, Severe Weather, Lightening, etc.)*
 - 3. *Preferred means of reporting fires and other emergencies*
 - 4. *Emergency escape procedures and route assignments*
 - 5. *Procedures to account for all workers after emergency evacuation has been completed*
 - 6. *Rescue and medical duties for those workers who perform them*
 - 7. *Designated Meeting Areas (Muster Areas)*
 - ii. Refresher training is required; (1) When the plan is developed or the worker is assigned initially to a job, (2) When the worker's responsibilities under the plan change, or (3) When the plan is changed.
- d. **Alerting Building Occupants**
 - i. In case of a fire, call the local Fire Department at 911. In addition, the smoke alarms will alert building occupants of the need for evacuation. Any pertinent fire or rescue information should be conveyed to the Fire Department.
 - ii. Workers discovering a fire, smoky condition or any other emergency shall activate the fire alarm system and make a verbal announcement immediately.
- e. **Evacuation Procedures**
 - i. When the fire alarm sounds or a verbal announcement is made, all workers should ensure that nearby workers are aware of the emergency, quickly shutdown operating equipment, close doors and exit the building.
 - ii. All workers should proceed to their Designated Muster Area via their primary or alternate exits and await further instructions from their Safety Monitor.
 - iii. REMEMBER R.A.C.E.
 - 1. **Rescue:** *When you discover a fire, rescue people in immediate danger if you can do so without*

endangering yourself.

2. **Alarm:** *Sound the alarm by pulling a fire box and call 911 from a safe distance.*
3. **Confine:** *Close all doors, windows, and other openings.*
4. **Evacuate:** *Evacuate the building.*

f. Designated Meeting Area

- i. When an alarm sounds or a verbal announcement is made, all occupants will proceed to the nearest exit and gather at the designated meeting area or "Muster Area" which is pictured on the facilities emergency evacuation maps throughout the facility. The "Muster Area" is designated to be the safe meeting point for all workers. Once the evacuation has been completed, the Safety Monitor shall conduct a head count. The "Receptionist" will have the responsibility of bringing the "Sign-In Roster" to the Muster Area to account for all workers and visitors after the evacuation.

g. Rescue & Medical Duties

- i. *Do not move injured workers.*
- ii. *Always keep injured workers lying down, covered, and warm.*
- iii. *Only trained workers will conduct rescue and medical duties.*

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Ergonomics Office	Revision Date:
		Section:

1) PURPOSE

- a. The purpose of this procedure is to prevent incidents in the office environment.

2) SCOPE

- a. This procedure applies to workers to prevent MSD (Muscular Skeletal Disorder)

3) PROCEDURES

a. Lifting

- i. Back injuries are often because of improper lifting. Follow the guidelines below for proper lifting:
 1. *Size up the load before you lift. Divide the load into smaller pieces if possible.*
 2. *Get help should the object be too heavy for you to lift.*
 3. *If you can, try to place heavy items on a surface that is waist high, so you do not have to bend down or lift to reach it.*
 4. *Use a hand truck if you have to move a heavy object. Push rather than pull.*
 5. *Stretch before lifting.*
 6. *Keep the load close to your body.*
 7. *Bend at the knees and hips to avoid pressure on the lower back. Keep the back straight.*
 8. *Lift with the muscles in your legs instead of your back.*
 9. *Do not twist when lifting.*

b. File Cabinets

- i. *Whenever possible, filing cabinets will be arranged side by side.*
- ii. *Upper drawers of file cabinets must not be overloaded.*
- iii. *Only one file cabinet drawer will be open at a time. Open file drawer must not be left unattended.*
- iv. *Close desk and file cabinet drawers when they are not in use.*
- v. *File cabinets and files will not be positioned so open drawers block passageways.*
- vi. *Two-drawer file cabinets must not be stacked unless they are designed to be stacked and fastened together.*
- vii. *File cabinets must not be stacked on top of tables or desks unless they are designed for such use. Even if they are attached to the wall, they may fall if the table is moved because of excessive unsupported weight.*
- viii. *Tall or large file cabinets, bookcases, and cabinets will be bolted to the wall or together, in libraries or file rooms.*

c. Overhead Items and Wall Hangings

- i. *A stepladder or step stool will be used to reach articles high above the floor (shoulder height).*
- ii. *Never stand on the top rung of a stepladder.*
- iii. *Swivel chairs, chairs, desktops, tables, or other makeshift devices will not be used to reach high places.*
- iv. *Pictures and wall hangings will be secured with the proper fasteners.*
- v. *Shelves will be secured with the proper fasteners and will not be overloaded.*
- vi. *Avoid storing heavy objects above shoulder level.*

d. Furniture

- i. Furniture will be kept in proper repair. Repair or replace furniture that has:
 1. *Sharp burrs*
 2. *Splintered edges*
 3. *Broken casters, legs*
 4. *Broken seat or seat back*
 5. *Any other deficiency*
- ii. When furniture replacement is necessary, safety will be considered (i.e., 5-caster vs. 4-caster chairs, ergonomic furniture, etc.)
- iii. Directions or instructions will be provided for adjusting chairs or other adjustable office furniture.
- iv. Bookcases must not be stacked on other furniture unless that furniture is designed to hold the weight.
- v. Where chair mats are used, they will not create a tripping hazard. Remove chair mats which are:
 1. *Warped*
 2. *Cracked*
 3. *Broken*
- vi. Desk chairs will be stable and level. Do not tilt the chair back to the point where any chair feet leave the floor.
- vii. Typewriter and computer stand will be only used for their intended purpose. Use caution when pulling out a spring-loaded keyboard platform.

e. Office Safety

- i. Remove staples with a staple puller and dispose of used staples properly.
- ii. Do not overload or force staplers, paper cutter or hole-punch.
- iii. Paper cutters will be left in a closed latch position when not in use. Where a paper cutter is equipped with a guard the guard will not be removed.
- iv. Use a moistener to seal envelopes to avoid mouth cuts and germs. Avoid paper cuts by picking up individual sheets at the corners. When turning pages or going through files use a moistener pad to avoid paper cuts.
- v. Keep razor-type cutters, such as box cutters and x-acto knives covered or shielded when not in use. Cut on a nonslip surface and away from you.
- vi. Avoid touching the heated parts of printers, fax or copy machines whenever:
 1. *Adding or changing paper and cartridges*
 2. *Removing paper jams*
- vii. Never stick a metal object such as a letter opener into a machine or try to make unauthorized repairs.
- viii. Do not allow paper or other materials to collect behind copiers or other machinery.
- ix. Candles, incense or other open flames are not allowed in the office environment, except using an open flame to keep food warm, when used by a caterer.
- x. Immediately clean up liquid spills that may cause a slip hazard.
- xi. Keep walkways free of snow or ice. Tell the building management of dangerous conditions because of snow or ice. At mobile construction field offices, arrangements will be made for snow removal and deicing.

f. Workstations

- i. When using a computer for long periods of time you will:
 1. *Take mini-breaks and look away from the screen periodically*
 2. *Stretch to reduce muscle tension*

3. *Use proper posture*
 4. *Arrange keyboard, mouse, monitor and chair for a comfortable position*
- ii. Recommended workstation setup:
1. *Monitor- the top of monitor will be at eye level and positioned to avoid glare*
 2. *Document holders will be at the same level as the monitor*
 3. *Forearms will be parallel to the floor and wrist straight. Use a wrist rest to help keep the wrist straight*
 4. *The backrest of the chair will support the lower back*
 5. *Mouse will be close to keyboard*
 6. *Hips and knees will be bent at 90°*
 7. *Feet will be flat on the floor or use footrest*
 8. *Arrange the telephone so it is within easy reach. It is suggested that a headset or speaker be used in place of cradling the receiver on your shoulder*

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Fall Protection	Revision Date:
		Section:

1. POLICY

- a. Work activities where workers may be subject to falls and/or falling objects shall be conducted safely with associated hazards eliminated and/or controlled pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as "The Company".
- b. *This policy covers minimum performance standards applicable to all The Company workers and locations. Local practices requiring more detailed or stringent rules, or local, state or other federal requirements regarding this subject can and should be added as an addendum to this procedure as applicable.*

2. PURPOSE

- a. To ensure that workers are protected from the hazards associated with falls and falling objects.

3. SCOPE

- a. Applies to all The Company's work sites, (i.e., The Company offices, client job sites, etc.), where field construction related activities involve exposure to heights greater than or equal to six (6) feet and/or falling objects exist. In general industry (e.g. offices, shops, warehouses, etc.) exposure to heights greater than or equal to four (4) feet shall be in place of all references to the construction six (6) foot reference.

4. DEFINITIONS

- a. **Anchorage** - a secure point of attachment for lifelines, lanyards, or deceleration devices that is capable of supporting 5,000 lbs. per worker or two times the intended impact load, whichever is greater, or for a positioning system, 3,000 lbs. without failure.
- b. **Approved** - authorized by the Branch Safety Officer, tested and certified by the manufacturer or any recognized national testing laboratory to possess the strength requirements.
- c. **Catenary Line** – see Horizontal Lifeline.
- d. **Competent Person** - an individual knowledgeable (through experience and/or training) of fall protection equipment, including the manufacturer's recommendations and instructions for the proper use, inspection, and maintenance; who is capable of identifying existing and potential fall hazards; who has the authority to take prompt corrective action to eliminate those hazards; and who is knowledgeable of the rules regarding the erection, use, inspection, and maintenance of fall protection equipment and systems.
- e. **Controlled Access Zone** - an area in which certain work may take place without the use of guardrail systems, personal fall arrest systems, or safety net systems and access to the zone is controlled.
- f. **Deceleration Device** - a device manufactured (fall) shock-absorbing device whereby the forces of the fall are rapidly reduced to meet acceptable levels.
- g. **Drop Line** - a vertical lifeline secured to an upper anchorage for the purpose of attaching a lanyard or device.
- h. **Worker** - every laborer regardless of title or contractual relationship.
- i. **Fall Arrest System** – personal use of multiple, approved safety equipment components such as body harnesses, shock absorbing lanyards, deceleration devices, droplines, horizontal and/or vertical lifelines and anchorages, interconnected and rigged to ones body as to arrest a free fall.
- j. **Fall Protection Work Plan** - a written planning document in which the employer identifies areas in the work area where a fall hazard of 6 feet or greater exists, whereby conventional Fall Restraint and Fall Arrest Systems cannot be used.
- k. **Fall Restraint System** - an approved device and any necessary components that function together to restrain an worker in such a manner as to prevent that worker from falling to a lower level.
- l. **Fall Distance** - the actual distance from the worker's work platform (area) to the level where a fall would stop (ground level or otherwise).

- m. **Full Body Harness** - a configuration of connection straps to distribute a fall arresting force over at least the thighs, shoulders and pelvis, with provisions for attaching a lanyard, lifeline, positioning rings, or deceleration devices.
- n. **Full Body Harness System** - a Class III full body harness and shock absorbing lanyard attached to an anchorage or attached to a horizontal or vertical lifeline which is properly secured to an anchorage point.
- o. **Hardware** snap hooks, D-rings, buckles, carabiniers, and adjusters used to attach the components of a fall protection system together.
- p. **Holes (floor, roof or walking surface)** any opening in the floor greater than two inches whereby falling objects or a worker fall equal to, or greater than six foot is possible.
- q. **Holes (wall)** – see **Wall Opening**.
- r. **Horizontal Lifeline** an approved rail, rope, or synthetic cable installed in a horizontal plane between two anchorages and used for attachment of a worker's lanyard or lifeline device while moving horizontally.
- s. **Lanyard** a flexible line of webbing, rope or cable (usually in two, four or six foot lengths) used to secure a harness to a lifeline or an anchorage point.
- t. **Leading Edge** the advancing edge of a floor or roof, where a fall of more than six foot is possible to the ground or to another level.
- u. **Lifeline (vertical or horizontal)** means an approved vertical line from a fixed overhead anchorage or horizontal line between two horizontal anchorages, independent of walking or working surfaces, to which a lanyard or device is secured.
- v. **Restraint Line** a line from a fixed anchorage or between two anchorages to which an worker is secured in such a way as to restrict the worker from reaching a point where falling to a lower level is possible.
- w. **Safety Line** – see **Lifeline**.
- x. **Shock Absorbing Lanyard** a flexible line of webbing or rope used to secure a harness to a lifeline or anchorage point that has an integral shock absorber of either a rip-stitch or retractable configuration.
- y. **Snaphook** – 'locking' hook at the end of a lanyard or restraining/positioning line that has a double-action locking mechanism intended to eliminate unintentional unhooking from the D-ring of a body harness. Non-locking snaphooks are prohibited.
- z. **Standard Guardrail** a toprail at 42 inches high (plus or minus three inches), a midrail installed midway the top edge of the guardrail system and the surface.
- aa. **Static Line** – see **Lifeline**.
- bb. **Toeboard** a barrier at the base of the guardrail system to prevent material and objects from falling off the surface. They are at least four (4) inches of nominal height with no less than one (1) inch clearance from the surface.
- cc. **Unprotected Sides and Edges** any side or edge (except at entrances to points of access) of a floor, roof, ramp, or runway where there is no wall or guardrail system.
- dd. **Walking/Working Surface** any area whose dimensions are 45 inches or greater in all directions through which workers pass or conduct work, and can include scaffolding and aerial lifts regardless of surface dimensions.
- ee. **Wall Opening** a gap in a wall where the outside bottom edge is 6 feet or more above lower levels, and the inside bottom edge (e.g. parapit wall) is less than 39 inches above the walking/working surface.
- ff. **Work Area** that portion of a walking/working surface where work activities are being performed.

5. **PROCEDURES**

a. **Training**

- i. Fall Protection training requirements shall include:
 1. New workers with work responsibilities requiring the use of fall protection will be oriented to The Company's Fall Protection Program.
 2. At new worksites, The Company offices, client job sites, etc., during the pre-job meeting to describe specific fall protection requirements of the job.
 3. Thereafter, every foreseeably exposed worker will be trained at least annually, and include the following:

- a. The nature of fall hazards in the typical work area
 - b. The correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems
 - c. The use and operation of conventional and non-conventional fall protection systems
 - d. The role of each worker in the safety monitoring system when such a system is in use
 - e. The limitations on the use of mechanical equipment during the performance of roof work on low-slope roofs
 - f. The correct procedures for equipment and materials handling and storage, and the erection of overhead protection
 - g. The correct fit, maintenance and use of personal fall arrest system components, as determined by the manufacturer(s)
 - h. Rescue procedures in the event an individual falls
4. Toolbox talks for related issues of this program shall be covered periodically.
 5. Retraining shall also occur whenever deficiencies in the training program are identified, standard requirements change or are modified or new fall protection systems are introduced.
 6. Any worker who has not received orientation or annual training (as previously outlined) shall not be allowed to work at heights.
 7. Training provided shall be documented and maintained in a training file. Training will include dates of training, instructor's name, worker signature, and course name.
- ii. **Conventional Fall Arrest and Fall Restraints Systems shall be used where the exposure to falls greater than 6 foot and from falling objects as is reasonably foreseen. The following systems shall be used:**
1. Guardrail System (fall restraint and potentially from falling objects)
 2. Toprails and midrails of guardrail systems constructed of wood shall be at least ¼ inch diameter or thickness to prevent cuts and lacerations.
 3. If wire rope is used for top rails, it shall be flagged at not more than 6 feet intervals with high-visibility material. Steel and plastic banding are prohibited for use as top rails or midrails.
 4. The top edge height of top rails, or (equivalent) guardrails shall be 42 inches, plus or minus 3 inches, above the walking/working level.
 5. When workers are using ladders in close proximity equivalent to the maximum use-length of the ladder, the top edge height of the top rail, or equivalent member, shall be increased an amount equal to the maximum use-length height of the ladder.
 6. Screens, midrails, mesh, intermediate vertical members, or equivalent intermediate structural members shall be installed between the top edge of the guardrail system and the walking/working surface when there are no walls or parapet walls at least 21 inches high. When midrails are used, they shall be installed at a height midway between the top edge of the guardrail system and the walking/working level. When screens and mesh are used, they shall extend from the top rail to the walking/working level. Intermediate members, such as balusters, when used between posts, will not be more than 19 inches apart.
 7. The guardrail system shall be capable of withstanding a force of at least 200 pounds of force applied within 2 inches of the top edge in any outward or downward direction. When the 200 pounds is applied in a downward direction, the top edge of the guardrail shall not deflect to a height less than 39 inches above the walking/working level.
 8. Midrails, screens, mesh, intermediate vertical members, solid panels, and equivalent structural members will be capable of withstanding a force of at least 150 pounds of force applied in any downward or outward direction at any point along the midrail or other member.
 9. Guardrail systems shall be free of sharp edges and burrs to protect against punctures or lacerations and to prevent clothing from snagging.
 10. The ends of top rails and midrails shall not overhang terminal posts, except where such an overhang does not constitute a projection hazard.

11. When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section shall be placed across the access opening between guardrail sections when hoisting operations are not taking place. At uncovered holes, guardrail systems shall be set up on unprotected sides or edges. When holes are used for the passage of materials, the hole shall have not more than two sides with removable guardrail sections. When the hole is not in use, it shall be covered or provided with guardrails along unprotected sides/edges.
12. If guardrail systems are used around uncovered holes that are used as access points (such as ladderways), gates shall be used or the guardrail shall be offset at a 45 degree angle to prevent accidental walking into the hole. Toeboards shall be used around the edges not used as the actual access point.
13. If guardrails are used at unprotected sides or edges of ramps and runways, they shall be erected on each unprotected side/edge.
14. When guardrail systems, in combination with netting, is used to prevent materials from falling from one level to another, openings shall be small enough to prevent passage of potential falling objects.

iii. Covers for Holes (fall restraint and from falling objects)

1. Covers (or a guardrail system with toe boards (Guardrail Systems within this section) shall be installed over holes equal to or greater than 2" in floors, roofs and walkways that are more than 6 feet above lower levels.
2. Hole covering material shall support at least two times the potential weight that will cross over it. If plywood is chosen as the cover material, it shall be of at least 3/4 inch in thickness.
3. Hole covers shall be secured in place in such a manner as to not easily be displaced. Examples of securing methods include, but are not limited to: nailing, attached cleats, wire, etc.
4. Such covers shall have the word 'HOLE' or 'COVER' predominately marked on the top surface. Where covers are too small for such marking, they shall be painted or significantly marked in the color orange.

iv. Restraining/Positioning System (fall restraint)

1. Only full body harness systems with positioning rings are to be used with any restraining/positioning system.
2. Restraint line (rope) length shall not exceed the distance to fall exposure, and shall be secured to an anchorage capable of supporting at least twice the potential impact load of an worker's fall or 3,000 pounds, whichever is greater.
3. Requirements for body harness systems, snaphooks, D-rings, and other connectors used with positioning device systems shall meet the same criteria as those for fall arrest systems.
4. No makeshift fall protection equipment may be used.

v. Body belts are prohibited.

b. Personal Fall Arrest System

i. Personal Fall Arrest Systems shall do all of the following:

1. Limit maximum arresting force on an worker to 1,800 pounds. Note: total body weight including tools cannot exceed 310 lbs. to stay under arresting force limit
2. Be rigged so that an worker can neither free fall more than 6 feet nor contact any lower level
3. Bring an worker to a complete stop and limit maximum deceleration distance an worker travels to 3.5 feet
4. Have sufficient strength to withstand 5000 lbs. (excluding horizontal lifelines which require a safety factor of at least two times the potential impact energy)
5. All components of the personal fall arrest system (lanyards, body harness and attached hardware, and shock-absorbing devices) shall meet the design specifications of local or federal regulations

ii. The following items/actions are prohibited for use with personal fall arrest systems:

1. body belts
2. non-locking snaphooks
3. lanyards without shock absorbers

4. tying back to the lanyard (once around another object) for a means of an anchorage point, unless the lanyard was designed for this purpose by the manufacturer, the object tied around can support the anticipated fall force and the object does not have sharp edges or burrs

c. Personal fall arrest systems shall be used in the following manner:

i. Pre-Use Inspection

1. All components shall be inspected prior to each use for wear damage, and other deterioration in accordance with manufacturer's requirements (see equipment inspection and maintenance procedures).

ii. General Proper Body Harness Fit Guidelines (two workers are usually required to completely fit each other)

1. The body harness type and size shall meet the physical needs of its user (male/female or small, medium, large, etc.).
2. Follow the manufacturer's guidelines on proper fit.
3. Shoulder, thigh, button and chest straps shall be fit snugly whereas it is slightly difficult to slide the hand underneath.
4. Loose straps ends shall be folded back under.
5. D-ring placement should be between the shoulder-blades.
6. Chest straps should be positioned across the mid-chest area.

iii. Sufficient Anchorage Points Used

1. Anchorages shall be used under the supervision of a competent person, as part of a complete personal fall arrest system that maintains a safety factor of at least two (i.e., capable of supporting at least twice the weight expected to be imposed upon it).
2. Anchorages used to attach personal fall arrest systems will be independent of any anchorage being used to support or suspend platforms and shall be capable of supporting at least 5,000 pounds of force per worker attached.
3. Anchorage points can include:
 - a. Lifelines (horizontal and vertical)
 - b. Designed anchorage points on aerial lifts
 - c. Eye-bolts listed for use by the manufacturer
 - d. Specially designed anchorage tools specifically designed to meet fall force requirements, including:
 - e. Wrap-around lanyards as approved by the manufacturer
 - f. I-beam clamps designed specifically as an anchorage point

iv. Prohibited anchorage points include, but are not limited to:

1. Standard guardrails and railing
2. Ladders/rungs
3. Scaffolding, unless approved by the manufacturer for/with anchorage points
4. Light fixtures, ductwork, conduit, pipe vents, wiring/duct/piping harnesses, other roof stacks, vents or fans
5. C-clamps
6. Piping (unless capable of meeting the criteria of an anchorage point)
7. To a lanyard (around a solid object), unless the lanyard and hardware is manufactured for that purpose

v. Lifeline/Lanyard Applications

1. Lanyards shall only be attached to anchorage points sufficient to meet the fall force requirements.
2. Shock-absorbing lanyards are required to limit the fall force to less than 1800 pounds.

- vi. **Self-retracting lanyards (retractables)** capable of withstanding the tensile load of 3,000 lbs. that limit the free fall distance to two (2) feet or less are always recommended and are required when the fall distance is less than nineteen and one-half (19.5) feet.
1. Lanyards that do not limit free fall distance to 2 feet or less, such as ripstitch lanyards and tearing/deforming lanyards will be capable of sustaining a minimum tensile load of 5,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
 2. Horizontal lifelines will be designed, installed, and used under the supervision of a Competent Person, as part of a complete personal fall arrest system. Lifelines shall be protected against being cut or abraded. Horizontal lifelines cannot exceed sixty feet in length.
 3. Vertical lifelines shall be used with leading edge work, shall reach the ground, and the method of anchorage attachment shall be of proper design (i.e. no knots).
- vii. **Where conventional fall restraint and fall arrest methods cannot be used (or used safely), the following non-conventional methods can be used:**
1. A written work plan shall be developed when a project or task possesses a fall exposure whereby these systems are used.
 2. A Competent Person will develop and implement a written Fall Protection Work Plan including each area of the work place where the workers are assigned and where fall hazards of 6 feet or more will exist. The Risk Assessment for this project/task should be reviewed for this document.
 3. The written Fall Protection Work Plan shall include:
 - a. Identification of fall hazards in the work area
 - b. Describe the non-conventional method (or in combination with conventional method) of fall protection to be provided
 - c. Describe the correct procedures for the assembly, maintenance, inspection, and disassembly of any fall protection system to be used
 - d. Describe the correct procedures for the handling, storage, and securing of tools and materials
 - e. Describe the method of providing overhead protection for workers who may be in or pass through the area below the work site
 - f. Describe the method for prompt, safe removal of injured workers
 - g. Describe the method for destruction of personal fall arrest system equipment subjected to the forces of any fall
 - h. Be available at all times on the jobs
- viii. **Controlled Access Zone System**
1. Controlled access zone systems shall be set up as follows:
 - a. Zone shall be established no closer than six (6) feet or further than twenty-five (25) feet from any leading edge
 - b. Control line shall extend parallel along the entire length of the unprotected or leading edge
 - c. Only trained workers are allowed in the Zone
 - d. The Zone shall have signage marking it as a 'Controlled Access Zone'
- ix. **Warning Line System (pitches of $\leq 4:12$ and flat surfaces only)**
1. Warning line systems consist of ropes, wires, or chains, and supporting stanchions and are set up as follows:
 - a. Flagged at not more than 6-foot intervals with high-visibility material
 - b. Rigged and supported so that the lowest point including sag is no less than 34 inches from the walking/working surface and its highest point is no more than 39 inches from the walking/working surface
 - c. Stanchions, after being rigged with warning lines, will be capable of resisting, without tipping over, a force of at least 16 pounds applied horizontally against the stanchion, 30 inches above the walking/working surface, perpendicular to the warning line and in the direction of the floor, roof, or platform edge
 - d. The rope, wire, or chain will have a minimum tensile strength of 500 pounds, and after being attached to the stanchions, shall support without breaking the load applied to the stanchions as prescribed above

- e. Line will be attached to each stanchion in such a way that pulling on one section of the line between stanchions will not result in slack being taken up in the adjacent section before the stanchion tips over
 - f. Warning lines will be erected around all sides of roof work areas. When mechanical equipment is being used, the warning line will be erected not less than 6 feet from the roof edge parallel to the direction of mechanical equipment operation, and not less than 10 feet from the roof edge perpendicular to the direction of mechanical equipment operation
2. When mechanical equipment is not being used, the warning line shall be erected not less than 6 feet from the roof edge.
 3. The warning line system shall be used in conjunction with one of the following:
 - a. safety monitoring system (most common); or
 - b. personal fall arrest system; or
 - c. safety net system; or
 - d. guardrails

x. Safety Monitoring System

1. A competent person will appoint the 'safety monitor' and will ensure that the safety monitor:
 - a. Is competent in the recognition of fall hazards
 - b. is capable of warning workers of fall hazard dangers and in detecting unsafe work practices
 - c. Is operating on the same walking/working surfaces of the workers and can see them
 - d. Is close enough to work operations to communicate orally with the workers and has no other duties but the monitoring function
 - e. Has the authority to stop work
2. Only workers engaged in roof/surface work and the safety monitor shall be allowed in an area where a worker is being protected by a safety monitoring system.

d. Specific Fall Hazard Procedures

i. Aerial Personnel Lifts

1. Workers using aerial personnel lifts (e.g. scissor lifts, genie lifts, cherry-pickers, boom-lifts, etc.) shall use a restraint/positioning system or personal fall arrest system, even though a guardrail system is in place.
2. Attachment points for these systems shall be capable of withstanding 5,000 pounds and shall be maintained in the floor of the lift or where designed by the manufacturer.
3. Rails of such lifts shall not to be used as attachment points unless designed for that purpose by the manufacturer.

ii. Excavations

1. Workers who work at the edge of an excavation 6 feet or more deep will be protected from falling into the excavation by guardrail systems or covers.
2. Where walk-ways are provided to permit workers to cross over excavations, guardrails are required on the walkway if the fall would be 6 feet or more to the lower level.

iii. Hoist Areas

1. Each worker in a hoist area will be protected from falling 6 feet or more by guardrail, restraint/positioning or personal fall arrest systems. If guardrail systems (or chain gate or guardrail), or portions thereof, must be removed to facilitate hoisting operations, as during the landing of materials, and a worker shall lean through the access opening or out over the edge of the access opening to receive or guide equipment and materials, that worker shall be protected by a personal fall arrest system.

iv. Falling Objects (additional protection from)

1. Except for scaffolding and aerial lifts, no materials or equipment shall be stored within 6 feet of working edges. When canopies are used as protection from falling objects, canopies shall be strong enough to prevent collapse and to prevent penetration by any objects that may fall onto them.
2. When toeboards are used as protection from falling objects, they shall be erected along the edges of the overhead walking or working surface for a distance sufficient to protect persons working below. Toeboards will

be capable of withstanding a force of at least 50 pounds of force applied in any downward or outward direction at any point along the toeboard. Toeboards will be a minimum of four (4) inches tall from their top edge to the level of the walking/working surface, have no more than one (1) inch clearance between its bottom and the surface.

v. Ladders

1. If work is performed outside the rails of a ladder equal to, or exceeding 6' ; or if three-point contact on the ladder cannot be maintained, a Personal Fall Arrest Systems shall be used if anchorage points are available.
2. If anchorage points are not available or other traditional fall control systems are not feasible, a non-conventional system can be used.

vi. Leading Edge Work

1. Workers near a leading edge 6 feet or more above lower levels shall be protected by guardrail, safety net, restraint/positioning, or personal fall arrest systems.

e. Roofs (work from or on)

i. Low-sloped (<4:12 pitch)

1. Workers engaged in roof activities on low-slope roofs with unprotected sides and edges 6 feet or more above lower levels will be protected from falling by guardrail systems, safety net systems, personal fall arrest systems or a combination of a warning line system and guard-rail system, warning line system and safety net system, warning line system and personal fall arrest system, or warning line system and safety monitoring system.

ii. Steep Roofs (>4:12 pitch)

1. Workers on a steep roof with unprotected sides and edges 6 feet or more above lower levels will be protected by either guardrail systems with toeboards, a safety net system, or a personal fall arrest systems.

iii. Wall Openings

1. Worker working on, at, above, or near wall openings (including those with chutes attached) shall be protected from falling by the use of either a guardrail system, a safety net system, or a personal fall arrest system.

f. Equipment Inspection and Maintenance Procedures

i. Inspection, Replacement and Destruction

1. All equipment hereafter noted shall be visually inspected before each use, replaced immediately if any of the defective conditions are found, tagged 'out of service' and sent back to the safety coordinator for destruction.

ii. Body Harness Inspection

1. Beginning at one end, holding the body side of the harness toward you, grasp one area of the harness with your hands six to eight inches apart. Bend the strap in an inverted "U". Follow this procedure the entire length of the belt or harness. Watch for frayed edges, broken fibers, pulled stitches, cuts, burn marks or chemical damage. Special attention should be given to the attachment of buckles and D-rings to strap webbing. Inspect for frayed or broken strands. Broken webbing strands generally appear as tufts on the webbing surface.
2. Rivets should be tight and unmovable with fingers. Body-side rivet base and outside rivet burr should be flat against the material. Bent rivets will fail under stress. Especially note condition of D-ring rivets and D-ring metal wear pads (if applicable). Discolored, pitted, or cracked rivets indicate chemical corrosion.
3. The tongue or billet of bolts receives heavy wear from repeated buckling and unbuckling. Inspect for loose, distorted, or broken grommets. Harnesses using punched holes without grommets should be checked for torn or elongated holes causing slippage of the tongue buckle.

iii. Hardware (Buckles, D-Rings, Snaps and Thimbles)

1. Buckle tongues should be free of distortion in shape and motion. They should overlap the buckle frame and move freely back and forth in their socket. Roller should turn freely on frame. Check for distortion or sharp edges.
2. Inspect the friction buckle for distortion. The outer bars and center bars must be straight. Pay special attention to corners and attachment points of the center bar.

3. Inspect the sliding bar buckle frame and sliding bar for cracks, distortion, or sharp edges. The sliding bar should move freely. Knurled edge will slip if worn smooth. Pay special attention to corners and ends of sliding bar.
4. Inspect the forged steel D-ring for cracks or other defects. Inspect the assembly of the D-ring to the body pad or D-saddle. If the D-ring can be moved vertically independent of the body pad or D-saddle, the harness should be replaced. Check D-Rings and D-Ring metal wear pad (if any) for distortion, cracks, breaks, and rough or sharp edges. The D-Ring bar should be at a 90 degree angle with the long axis of the belt and should pivot freely.
5. Inspect closely for hook and eye distortions, cracks, corrosion, or pitted surfaces. The keeper (latch) should seal into the nose without binding and should not be distorted or obstructed. The keeper spring should exert sufficient force to firmly close the keeper.
6. The thimble must be unmovable in the eyes of the splice, and the splice should have no loose or cut strands. The edges must be free of sharp edges, distortion, or cracks.

iv. Lanyard (shock-absorbing)

1. Begin at one end and work to the opposite end. Slowly rotate the lanyard so the entire circumference is checked. Factory spliced ends require particular attention.

v. Lanyard (Webbing) Retractable

1. Bend the webbing over a non-lacerating edge, observe each side of the webbed lanyard. This will reveal any cuts or breaks. Swelling, discoloration, cracks, and charring are obvious signs of chemical or heat damage. Closely observe for any breaks in the stitching.

vi. Rope

1. Rotation of the rope lanyard while inspecting from end to end will bring to light any fuzzy, worn, broken, or cut fibers. Areas weakened by extreme loads will appear as noticeable change in original diameter. The rope diameter should be uniform throughout, following a short break-in period. Strands should be separated and inspected since the rope may wear on the inside if grit or moisture becomes embedded.

vii. Storage/Cleaning

1. Storage areas shall be maintained as clean, dry and free of exposure to fumes or corrosive elements.
2. Cleaning methods established by the manufacturer shall be followed for all components. Generally, the following applies for body harnesses:
 - a. Wipe off surface dirt with a sponge dampened in plain water. Squeeze the sponge dry. Dip the sponge in a mild solution of water and commercial soap or detergent. Work up a thick lather with a vigorous back and forth motion
 - b. Wipe the belt dry with a clean cloth. Hang freely to dry but away from excessive heat and UV rays
 - c. Bolts and other equipment should dry thoroughly without close exposure to heat, steam, or long periods of sunlight
 - d. Mildly dirty cotton may be cleaned normally. For heavy dirt or grease, soak belts in a solution of one tablespoon of grease cutter to one gallon of water. DO NOT USE A STRONGER SOLUTION. After soaking, rinse again, then hang to dry
 - e. Fall protection, which is not in the original package, shall be stored in a clean, dry area protected from UV rays

viii. Post-Fall or Near-Miss Incidents

1. Fall incidents and near-misses shall be thoroughly investigated to determine root causes and facilitate corrective measures to prevent reoccurrences.
2. Workers involved in a fall equal to, or greater than 6' shall be required to receive an immediate medical evaluation.
3. All components of a personal fall arrest system involved in any fall with a fall distance of over six feet shall be immediately and completely replaced. Such equipment shall be tagged 'out of service' and sent back to the safety coordinator for destruction.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Fatigue Management	Revision Date:
		Section:

1) PURPOSE

- a. To ensure EARNEST CONTRACTING, hereafter referred to as "The Company", workers recognize the effect of fatigue as related to safely being able to perform work and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations.

2) SCOPE

- a. This program applies to all Company projects and operations.

3) POLICY

- a. The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:
 - i. Workers must be in a fit state to undertake work
 - ii. Workers must be fit to complete work
 - iii. Workers must take minimum periods of rest to safely perform their work
- b. These principles will be managed through:
 - i. The appropriate planning of work tasks, including driving, vehicle, and equipment maintenance, loading, and unloading and other job-related duties and processes
 - ii. Providing appropriate equipment to help reduce stress and fatigue
 - iii. Regular medical checkups and monitoring of health issues as required by legislation
 - iv. The provision of appropriate sleeping accommodation where required
 - v. Ongoing training and awareness of worker health and fatigue issues

4) RESPONSIBILITIES

- a. **Managers**
 - i. Management accepts responsibility for the implementation of this fatigue management policy.
- b. **Supervisors**
 - i. Responsible for the implementation and maintenance of this program for their site and ensuring all assets are made available for compliance with the program.
- c. **Workers**
 - i. Workers must present in a fit state free from alcohol and drugs.
 - ii. Workers must not chronically use over the counter or prescription drugs to increase mental alertness.
 - iii. Workers are prohibited from taking any substance known to increase fatigue in that worker, including fatigue that sets in after the effects of the drug wear off.
 - iv. Workers shall report tiredness/fatigue to supervision and supervisors shall take appropriate action to assist the worker.
 - v. Workers must report fatigue/tiredness and lack of mental acuity to supervision. Supervision must take appropriate actions to prevent loss.
 - vi. Workers need to be rested prior to starting work.
 - vii. Workers need to monitor their own performance and take regular periods of rest to avoid continuing work when tired.

5) PROCEDURES

a. Work Hour Limitations

- i. The Company has set the following work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and to increase mental fitness.
- ii. Breaks - Workers shall have necessary work breaks to avoid fatigue. These scheduled breaks will apply to both driving and on-site hours. The following shall be a minimum:
 1. 15 Minutes each 2.5 hours
 2. 30 Minutes after 5 Hours
 3. 30 Minutes after 10 Hours
- iii. No Workers shall work more than:
 1. 16 hours per day
 2. 24 Days Continuous
- iv. Unfamiliar or irregular work should be avoided.

b. Driving

- i. Property Carrying Drivers
 1. 30-Minute Driving Break - Drivers must take a 30-minute break when they have driven for a period of 8 cumulative hours without at least a 30-minute interruption.
 2. 11-Hour Driving Limit – Workers may drive a maximum of 11 hours after 10 consecutive hours off duty.
 3. 14-Hour Limit – Workers may not drive beyond the 14th consecutive hour after coming on duty, following 10 consecutive hours off duty. Off-duty time does not extend the 14-hour period.
- ii. Passenger Carrying Drivers
 1. 10-Hour Driving Limit - may drive a maximum of 10 hours after 8 consecutive hours off duty.
 2. 15-Hour Limit - may not drive after having been on duty for 15 hours, following 8 consecutive hours off duty. Off-duty time is not included in the 15-hour period.

c. Equipment and Evaluation

- i. The Company will provide equipment such as anti-fatigue mats for standing, lift assist devices for repetitive lifting and other ergonomic devices as deemed appropriate, chairs for workers to sit periodically and will provide periodic rest breaks for personnel.
- ii. The Company will also periodically analyze and evaluate work tasks to control fatigue.

d. Training

- i. The Company is committed to ensuring that all workers are competent to perform their tasks including:
 1. Fatigue management
 2. Health issues
- ii. The Company will provide initial and annual training on how to recognize fatigue, how to control fatigue through appropriate work and personal habits and reporting of fatigue to supervision.
- iii. A record of individual fatigue training and competency will be maintained.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Fire Protection Program	Revision Date:
		Section:

1) PURPOSE

- a. Fire Prevention/Protection Policy is intended to provide compliance with all related regulations and standard safe work practice. The purpose of the policy is to prevent fires and to provide guidelines for action if a fire does occur.
- b. Fire prevention program combines the following policies:
 - i. PPE Policy
 - ii. Electrical Safety Policy
 - iii. Emergency Action Plan
- c. These policies encompass methods used for incidence avoidance, incident response and specialized training required in the event of a fire.
- d. Issues addressed in the above policies include, but are not limited to:

i. Evacuation Procedure	vi. Emergency Life Support Training
ii. Extinguisher Training	vii. Respiratory Protective Devices Training (if applicable)
iii. Basic Process Safety Training (if applicable)	viii. Assured Grounding Programs
iv. Hot Work Safety Training (if applicable)	
v. Confined Space Entry Safety Training (if applicable)	

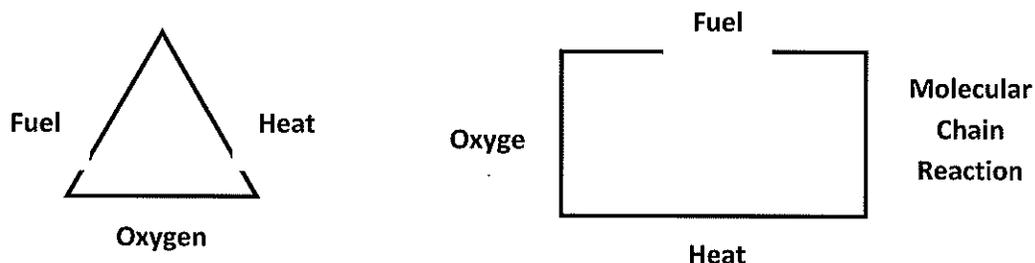
2) POLICY

- a. Workers shall be informed of the proper actions to take in the event of a fire. This includes, but is not limited to, notification and evacuation procedures. It is STRESSED that at no time does the task of fighting fire supersede an employee's primary duties of:
 - i. Ensuring their own personal safety and the safety of others.
 - ii. Reporting the incident to the proper authority and ensuring personnel accountability for yourself and all subordinates at the jobsite, in accordance with company and client policy.

3) PROCEDURES

- a. All workers are responsible for good housekeeping practices to enhance fire prevention methods. Supervisors will be held accountable for the housekeeping of their job sites.
- b. If applicable, welding machine mufflers will be equipped with an approved spark arresting muffler.
- c. Only approved containers will be used during fueling operations. These shall be of the self-closing type.
- d. Combustible and flammable liquids shall be handled and stored in approved containers, cabinets, and areas that are designed for fire prevention. All combustible and flammable materials will be handled and stored in compliance with applicable regulations and client requirements. The quantity of flammable/combustible material shall be kept to a minimum on the job site.
- e. Welding, cutting, and grinding sparks shall be contained.
- f. Hot work areas shall be kept wetted down, and a fire extinguisher and hose maintained on each jobsite.
- g. Oily rags shall be immediately disposed of in designated hazardous waste containers.

- h. No hot work is to be performed without a Hot Work Permit.
- i. All vehicle entry into process areas requires a permit or permission from the operator.
- j. Use bonding straps to discharge and prevent static charges during transfer of flammable liquids from one container to another.
- k. Report all spills or suspicious odors immediately.
- l. Fire extinguishers are to be kept in areas easily accessible to workers. Only approved fire extinguishers are to be used. They must have an inspection tag attached and be maintained in a fully charged, ready to operate state. Portable fire extinguishers are to be inspected monthly and annually with documentation supporting the inspection and maintenance schedule. Training is provided to all workers who use or may use fire extinguishers. Fire extinguisher training will include general principles of fire and extinguisher use and the hazards involved with incipient stage firefighting.
- m. **NEVER** put yourself or others at risk while attempting to extinguish an incipient fire.
- n. **DO NOT USE** any fire hoses larger than 1-3/4", unless fully trained as an industrial firefighter.
- o. **NEVER** attempt to extinguish a pressurized fuel fed fire.
- p. **DO NOT** direct a fire nozzle with a straight stream at any type of LPG fire. This action could extinguish the fire, producing an LPG vapor cloud capable of detonation.
- q. **DO NOT USE** fire monitors as the force can damage small equipment and certain high chrome alloy equipment cannot have water applied as cracking could occur.
- r. **DO NOT APPLY** water to any acid or caustic release as it can cause a violent reaction. Additionally, low concentration acids or caustics become extremely corrosive, causing an increasing leak condition.
- s. **In the Event of a Fire:**
 - i. Remain calm
 - ii. Only extinguish a fire when it is clearly within your abilities and the equipment available
 - iii. Know the location of the nearest alarm and how to activate the emergency system
 - iv. Know the evacuation routes and collection points
 - v. If the fire cannot be extinguished, leave the area immediately and report to your evacuation area
 - vi. Await further instructions from the Incident Commander, or designated responsible personnel
- t. **Basic Fire Science**
 - i. The combination of fuel, heat, oxygen equals the well-known fire triangle. To understand fire better, a fourth factor is added, a molecular chain reaction. This is due to the fact that fire results from a series of reactions in which complicated molecules "crack" into easily oxidized fragments. Disruption of this chain, along with the removal of fuel, heat or oxygen, is recognized as a method of fire extinguishment through the use of dry chemical extinguishers.



- i. **Heat Energy** - Can be produced by building up molecules (composition) or breaking apart (decomposition) by heat or a solution when materials are dissolved in a liquid, or by combustion.
- ii. **Heat Transfer** - A law of physics states that heat tends to flow up from a hot substance or place to a cold substance or place. This is through conduction (transfer of heat through a medium such as metals) or through convection (transfer of heat with a medium-usually circulatory).
- iii. **Fuels** - Those substances that will burn when heat is applied. The most common fuels are not pure elements such as carbon, but compounds and mixtures such as paper and wood.
- iv. **Oxygen** - Makes up a major portion of the oceans and earth's crust and one-fifth of our atmosphere. Atmospheric oxygen is the major source of oxygen that supports combustion. Oxygen itself does not burn, however, without it, combustion is impossible. Normal burning is the combination of fuels with oxygen under the influence of heat.
- v. **Combustion** - A rapid oxidation or chemical combination accompanied by heat.
- vi. **Oxidation** - The ability of materials to produce oxygen during a chemical reaction.
- vii. **Spontaneous Combustion** - When oxidation is allowed to occur, enough oxygen is available, heat is produced, molecules become more energetic and combine with oxygen at an increasing rate, temperatures rise, and visible heat (flames) are produced.

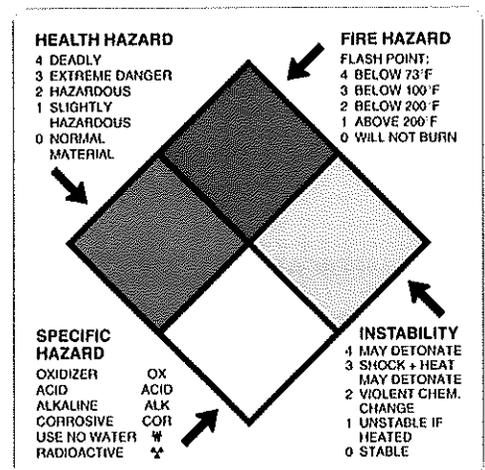
b. Classes of Fires

- i. Class A - Ordinary combustibles (wood/paper/textiles)
- ii. Class B - Flammable liquids (gasoline/oils/grease)
- iii. Class C - Live electric (wiring/generators/motors)
- iv. Class D - Combustible metals (finely divided form/chips, turnings)
- v. Class K - Kitchen (oils/grease)

c. Types of Fire Extinguishers

- i. **Water** - extinguisher for ordinary combustible fires
- ii. **Dry Chemical or CO2** - extinguisher for electrical equipment fires and for flammable liquid fires
- iii. **Multipurpose Dry Chemical** - extinguisher for ordinary combustible fires, liquid fires, and electrical equipment fires
- iv. **Foam** - extinguishing agent for hydrocarbon fires

NFPA Diamond:





1) PURPOSE

- a. EARNEST CONTRACTING, hereafter referred to as “The Company”, is committed to the safety and health of workers and to ensure prompt medical attention for injuries that occurs at work are managed appropriately.

2) SCOPE

- a. This program applies to all workers, visitors, and contractors under company responsibility.

3) RESPONSIBILITIES

a. Employer Responsibilities

- i. Ensure first aid kits remain fully stocked and any emergency response equipment is in good condition.

b. Worker Responsibilities

- i. Follow the first aid program.
- ii. If trained in first aid, render care as needed.

4) PROCEDURES

a. First Aid Kits

- i. The Company provides a First Aid Kit on the premises. It is there for worker’s use in the treatment of minor scratches, burns, headaches, nausea, etc. All workers shall know the location of the First Aid Kit and shall notify their supervisor if they need to use the First Aid Kit. If a worker has a work related injury or illnesses that requires professional medical assistance, they shall notify their supervisor as soon as possible.
- ii. The Safety Coordinator shall inspect First Aid Kits before the kits are sent out to each job and on a weekly basis to ensure each kit has the required amount of supplies.

5) MEDICAL TREATMENT

a. Non-Emergency Medical Treatment

- i. For non-emergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If a worker sustains an injury requiring treatment other than first aid, they shall:
 - 1. Inform their supervisor
 - 2. Provide details for the completion of the accident investigation report
 - 3. Workers shall use the nearest wash facility or eyewash station in the event a worker accidentally spills or splashes injurious chemicals or liquids on their clothing or body

b. Emergency Medical Treatment

- i. If a worker sustains a severe injury requiring emergency treatment:
 - 1. Injured workers should call for help and seek assistance from a co-worker or supervisor immediately.
 - 2. A trained first aid provider will render emergency first aid and request assistance for transportation to the local hospital emergency room or other resources as needed.
 - 3. Prior to the start of a job, The Company will ensure that arrangements are in place to transport injured workers from the jobsite to the nearest health care facility.

4. The phone number of the ambulance service is to be conspicuously posted and provided to all employees for response to an emergency condition.
5. If an ambulance is not available, The Company will ensure other transportation is available to accommodate the injured. This transportation will:
 - a. Be suitable, considering the distance to be travelled and the types of acute illnesses or injuries that may occur at the work site
 - b. Protect occupants from the weather
 - c. Have systems that allow the occupants to communicate with the health care facility to which the injured or ill worker is being taken
 - d. Be able to accommodate a stretcher and an accompanying person if required
6. Provide details for the completion of the accident investigation report.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Fitness for Duty	Revision Date:
		Section:

1) PURPOSE

a. Overview

- i. EARNEST CONTRACTING, hereafter referred to as “The Company”, is committed to providing a safe working environment and to protecting the health and safety of workers, staff, visitors, and The Company property.

b. DEFINITIONS

- i. **Fitness for Duty** - physical and mental health status that facilitates the performance of essential job duties in an effective manner and protects the health and safety of oneself, others and property.
- ii. **Medical certification** - a document from a medically appropriate, licensed provider attesting to a worker's fitness for duty following an extended medical absence. Allowable costs to obtain the certification are paid by Workers Compensation for work-related absences, and by the worker and the worker's health insurance for absences which are not work-related.
- iii. **Medical evaluation** - An examination performed by a designated health professional, including but not limited to a health history, physical and/or psychological examination and any medically indicated diagnostic studies. The cost is paid by the employer.
- iv. **Reliable report** - self-disclosure or third-party opinion about a worker's possible lack of fitness for duty which is assessed as reasonable by the manager/supervisor considering such factors as the relationship of the reporter to the worker, the seriousness of the worker's condition, the possible motivation of the reporter and how the reporter learned the information.
- v. **Working hours** - beginning with a worker's starting time and ending with the worker's quitting time as well as any time a worker is on call. All work activities are included whether they occur on or outside The Company properties.

2) RESPONSIBILITIES

a. Worker responsibilities

- i. Reporting to work, fit for duty.
- ii. Notifying the manager/supervisor when not fit for duty.
- iii. Notifying the manager/supervisor when observing a co-worker who may not be fit for duty (in cases where the possibly impaired individual is the worker's manager, the worker should make the notification to the next higher-level manager or the Director of Human Resources/Payroll).
- iv. Cooperating with a manager/supervisor's directive, and, or referral for a medical evaluation.

b. Manager/supervisor responsibilities

- i. Observing the attendance, performance, and behavior of workers they supervise.
- ii. Interviewing a worker who appears to the manager/supervisor, (or third-party report) unfit for duty and referring a worker for a medical evaluation when appropriate.
- iii. Recording the reasons/observations, that triggered a fitness for duty medical evaluation referral.
- iv. Utilizing this policy in a fair and consistent manner, respecting the worker's privacy, and the confidentiality of medical information.

3) PROCEDURES

- a. **Return to Work** (after an extended medical absence)

- i. Manager/supervisor receives medical certification from worker prior to their return to work, with suggested accommodations, if applicable.
 - ii. Manager/supervisor determines whether worker can perform essential functions of the job with or without accommodation, accepting suggested accommodations or developing alternative accommodations.
 - iii. Manager/supervisor provides accommodations if applicable per job description/scope and worker complies with medical direction provided by physician or healthcare professional.
- b. Triggering Event** occurs when a manager/supervisor observes or receives a reliable report of a worker's possible lack of fitness for duty. Observations may include, but are not limited to a worker's self-reports, manual dexterity, coordination, alertness, speech, vision acuity, concentration, response to criticism, interactions with co-workers and supervisors, suicidal or threatening statements, change in personal hygiene, presence of condition likely to lead to food borne disease transmission, memory and/or odor of alcohol or marijuana. Management actions include:
- i. Manager/supervisor interviews workers, when possible.
 - ii. Manager/supervisor assesses magnitude of safety risk and are encouraged to contact Human Resources/Payroll for assistance.
 - iii. No Risk: keep notes of events.
 - iv. Minor Risk: encourage workers to use Worker Assistance Program (see The Company policy) or seek medical treatment; document event.
 - v. Significant Risk: Contact local Police if appropriate, place worker on paid leave of absence (sick leave or paid administrative leave, depending on situation, arrange for worker's safe transportation home if situation warrants. Refer worker to Worker Assistance Program or for medical evaluation, implement discipline, if appropriate.
 - vi. Severe risk: Contact local Police, place worker on paid leave of absence, arrange for worker's safe transportation home, and implement appropriate discipline.
- c. Outcomes**
- i. Workers voluntarily seeking assistance for physical (including controlled substance, drug, and alcohol abuse/addictions), mental, and/or emotional problems before their work performance or attendance is adversely affected will not have their employment status jeopardized for seeking assistance.
 - ii. Workers cooperating in a medical evaluation and in compliance with recommendations for medical, psychological and/or chemical dependence treatment may be returned to the job provided appropriate discipline, if warranted, has taken place.
 - iii. Workers posing a severe risk may be subject to discipline up to and including termination of employment.

Worker Signature

Date

Worker Printed Name

Supervisor/Manager Signature

Date



1. Hand Tool Usage

- a. All tools, whether owned by EARNEST CONTRACTING or employee, must be maintained in a safe condition and inspected regularly. Replace defective tools and tag- out damaged equipment.
- b. Do not modify tools. Safety guards must NOT be removed, restrained, or bypassed.
- c. Use tools for designed purposes only. Get the right tool for the job.
- d. Do not remove guards and/or handles from grinders. Do not operate a grinder without proper training.
- e. Be sure power tools are turned off before connecting to an energy source. De-energize equipment before servicing or changing components.
- f. If there is any potential for fire or explosion, intrinsically safe tools must be used. Air operated tools should be chosen, and compressed gas is never used to operate these tools.
- g. With the exception of UL double-insulated tools, the frames of portable electric tools must be grounded, either through a 3-way plug or separate wire. Tools used in or near wet locations must be plugged into a ground-fault protection circuit.
- h. Never use one wrench as a cheater for a second wrench. Cheaters shall not be used.
- i. Never step or jump on wrenches when additional force is required. Get a larger tool.
- j. An air hose is not to be used to blow particles off clothing, hair or skin.
- k. Do not use tools not intended for prying as a pry bar.
- l. Do not throw tools.
- m. Guards or shields must be in place and operable at all times while tool is being operated.
- n. Electric power tool cords must be in good condition and should not be run through door openings or across driveways.
- o. Air hoses used for tools should be secured with devices to prevent accidental separation. Hoses under pressure will be secured at end connections to prevent separation or whipping.
- p. Do not operate power tools unless you are properly trained.
- q. Be aware of twisting/kick-out forces with certain tools. Maintain solid footing and remain alert.
- r. Employees will be issued and are required to wear any PPE that is considered necessary to protect them from the potential hazards of the tool or environment (i.e., falling, flying, abrasive, or splashing objects, or harmful dust, fumes, mists, vapors, or gases). Compliance is mandatory.
- s. Carry tools in appropriate pouches and/or sheaths.
- t. Use proper securing devices to hold material in place.
- u. Do not place sharp or pointed tools in pockets.
- v. Hold and carry tools by designated handles.
- w. De-energize all power tools when moving or repairing.
- x. Keep cutting tools sharp and lubricated.
- y. Do not wear loose jewelry or clothing around rotating equipment. Tie long hair back.
- z. During work operations, idle tools will be placed in secure spots where they do not become a tripping or falling hazard.
- aa. Tools will be secured in the rear of vehicle where they do not become a projectile during vehicle collisions.
- bb. Tools stored in the rear of vehicles must not obstruct the drivers' vision.
- cc. Report damaged (i.e., tools for appropriate repair. Do not use broken tools.
- dd. Handles will not be taped or painted.
- ee. Any tool which is not in compliance with any applicable requirement of this program is prohibited and must be identified as unsafe by tagging and/or locking the controls to render it inoperable. If this is not practical or feasible, the tool must be physically removed from its place of operation.



1) PURPOSE

- a. The purpose of this plan is to establish a program and procedures for the safe use of hazardous chemical substances pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as "The Company".
- b. The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200 (General Industry) and 29 CFR 1926.59 (Construction Industry) call for the development of a hazard communication program when workers may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency. In 2012, OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012. The written hazard communication program will include and address the following criteria to satisfy the minimum requirements of the OSHA HCS 2012:
 - i. List of all hazardous chemicals known to be present in the workplace or individual work area
 - ii. Methods used to ensure that all containers, including pipes and holding tanks, are labeled, tagged or marked properly
 - iii. Methods used to obtain and maintain safety data sheets (SDSs)
 - iv. Methods used to provide workers with information and training on hazardous chemicals in their work areas
 - v. Methods used to inform workers of the hazards of non-routine work practices
 - vi. Methods used to provide the workers of other employers (e.g., consultants, construction contractors and temporary workers) on-site access to SDSs for each hazardous chemical that the other employer's workers may be exposed to while working in the workplace
 - vii. Methods used to inform the workers of other employers of precautionary measures that need to be taken to protect themselves during the workplace's normal operating conditions and in foreseeable emergencies
 - viii. Methods used to inform the workers of other employers of the labeling system used in the workplace
- c. The hazard communication program will identify the following:
 - i. Key personnel responsible for the program
 - iii. Workplace labeling system
- ii. Location of chemical inventory list and SDSs
 - iv. Good work practices and procedures to minimize exposures
 - vi. Procedures to maintain the program and update the required information
 - v. How training will be performed
 - vii. How records will be maintained

2) RESPONSIBILITIES

- a. The Safety Coordinator, is responsible for administering the hazard communication program.
- b. This person is also responsible for:
 - i. Reviewing the potential hazards and safe use of chemicals
 - ii. Maintaining a list of all hazardous chemicals and a master file of SDSs
 - iii. Ensuring that all containers are labeled, tagged or marked properly
 - iv. Providing new-hire and annual training for workers
 - v. Maintaining training records
 - vi. Monitoring the air concentrations of hazardous chemicals in the work environment
 - vii. Properly selecting and caring for personal protective equipment

- viii. Directing the cleanup and disposal operations of the spill control team
 - ix. Identifying hazardous chemicals used in nonroutine tasks and assessing their risks
 - x. Informing outside contractors who are performing work on company property about potential hazards
 - xi. Reviewing the effectiveness of the hazard communication program and making sure that the program satisfies the requirements of all applicable federal, state or local hazard communication requirements
- c. The purchasing agent or delegate is responsible for:
- i. Contacting chemical manufacturers and/or distributors to obtain SDSs and secondary labels for hazardous chemicals used or stored in the workplace
- d. The receiving department is responsible for:
- i. Reviewing incoming hazardous chemicals to verify correct labeling
 - ii. Holding hazardous chemicals in the receiving area until receipt of the SDS for the product
- e. Workers are responsible for the following aspects of the hazard communication program:
- i. Identifying hazards before starting a job
 - ii. Reading container labels and SDSs
 - iii. Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers
 - iv. Using controls and/or personal protective equipment provided by the company to minimize exposure
 - v. Following company instructions and warnings pertaining to chemical handling and usage
 - vi. Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement
 - vii. Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals
 - viii. Participating in training

3) PROCEDURES

a. Chemical Inventory List

- i. Attached to this program is a list of hazardous chemicals used, produced and/or stored at The Company.
- ii. Copies of the chemical inventory list are available in the ENTER LOCATION HERE.
- iii. This list will contain the product identifier that is referenced on the appropriate SDS, the location or work area where the chemical is used, and the personal protective equipment and precautions for each chemical product. This list will be updated annually and whenever a new chemical is introduced to the workplace.

b. Labels and Other Forms of Warning

- i. Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:
 1. Product identifier
 2. Signal word
 3. Hazard statement(s)
 4. Pictogram(s)
 5. Precautionary statement(s)
 6. Name, address and telephone number of the chemical manufacturer, importer or other responsible party

- ii. The Company will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with a GHS label containing the following information:

1. Product Identifier	3. Hazard Statements	5. Precautionary Statements
2. Signal Word	4. Pictograms	
- iii. The Company workers will ensure labels are not defaced or removed on containers of hazardous chemicals. Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the worker who performs the transfer do not require a label. If the portable container will be used by more than one worker or used over the course of more than one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.
- iv. Signs, placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual, stationary process containers as long as the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.
- v. Where an area may have a hazardous chemical in the atmosphere (e.g., where extensive welding occurs), the entire area will be labeled with a warning placard.
- vi. Pipes that contain hazardous chemicals should be labeled in accordance with ANSI/ASME A13.1 and indicate the direction of flow. (Please note that this not a requirement of the OSHA HCS but a best practice or requirement of local jurisdiction.)
- vii. Workplace labels or other forms of warning will be legible, and prominently displayed on the container or readily available in the work area throughout each work shift. If workers speak languages other than English, the information in the other language(s) may be added to the material.
- viii. **Note:** After Dec. 1, 2015, distributors may not ship containers labeled by the chemical manufacturer or importer unless the label on the container meets GHS labeling requirements.

c. Safety Data Sheets

- i. A SDS will be obtained and maintained for each hazardous chemical in the workplace. SDSs for each hazardous chemical will be readily accessible during each work shift to workers when they are in their work areas.
- ii. SDSs will be obtained from the chemical manufacturer, importer or distributor. The name on the SDS will be the same as that listed on the chemical inventory list. SDSs for chemicals or process streams produced by the company will be developed and provided by the Safety Coordinator or delegate.
- iii. The Safety Coordinator or delegate will maintain the master file of all original SDSs. Hard copies of the master file will be in the ENTER LOCATION HERE.
- iv. SDSs for new products or updated SDSs for existing products will be obtained by the purchasing agent or delegate and forwarded to the safety coordinator. The Safety Coordinator or delegate will then update the master file with new and/or updated SDSs.
- v. If problems arise in obtaining an SDS from the chemical manufacturer, importer or distributor, a phone call will be made to request an SDS and to verify that the SDS has been sent. The phone call will be logged and a letter will be sent the same day. The company will maintain a written record of all efforts to obtain SDSs. If these efforts fail to produce an SDS, the local OSHA office will be contacted for assistance.

d. Worker Information and Training

- i. Workers included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work area:
 1. Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry)
 2. Operations in the work area where hazardous chemicals are present
 3. Location and availability of the hazard communication program, chemical inventory list and SDSs
 4. Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released

5. Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area
 6. Measures workers can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used
 7. Explanation of the labels received on shipped containers
 8. Explanation of the workplace labeling system
 9. Explanation of the SDS, including order of information and how workers can obtain and use the appropriate hazard information
- ii. *Note: To facilitate understanding of the new GHS system, the OSHA HCS requires that workers be trained regarding the new label elements and SDS format by Dec. 1, 2013. Employers are required to update the hazard communication program and to provide any additional training for newly identified physical or health hazards no later than June 1, 2016.*

e. Subcontractors

- i. Prior to beginning work, the Safety Coordinator or delegate will inform contractors with workers working on company property of any hazardous chemicals that the contractors' workers may be exposed to while performing their work. The Safety Coordinator delegate will also inform contractors of engineering or work practice control measures to be employed by the contractor, personal protective equipment to be worn by the contractors' workers, and any other precautionary measures that need to be taken to protect their workers during the workplace's normal operating conditions and in foreseeable emergencies.
- ii. Furthermore, the Safety Coordinator delegate will advise contractors that they must comply with all OSHA standards while working on company property. Appropriate controls will be established with the contractor to ensure that company workers are not exposed to safety and health hazards from work being performed by the contractor and that company operations do not expose contractors' workers to hazards.
- iii. The Safety Coordinator or delegate will inform contractors of the workplace labeling system and the availability and location of SDSs for any chemical to which contractors' workers may be exposed while performing their work.

f. Recordkeeping

- i. Records pertaining to the hazard communication program will be maintained by the Safety Coordinator or delegate. The Safety Coordinator or delegate will keep the following records:
 1. Chemical inventory list
 2. Hazardous material reviews
 3. Copies of phone call logs and letters requesting SDSs
 4. Worker training records
 5. Warnings issued to workers for not following the hazard communication program



1) PURPOSE

- a. The purpose of this program is Hazard Identification, Risk Assessment Control. The program should be used as a tool to help identify and evaluate both existing and potential hazards on worksites as well as methods to control and eliminate the hazards identified. EARNEST CONTRACTING shall hereafter be referred to as "The Company."

2) RESPONSIBILITIES

a. Supervisors

- i. The supervisor or competent person shall start the hazard identification process before the job begins by identifying hazards that are known to exist on site and documenting them. By identifying hazards early, the supervisor or competent person may be able to implement controls before any workers arrive on site. Hazards should be identified, classified, and ranked according to a risk matrix or scale.
- ii. To ensure the process is thorough, the supervisor or competent person should:
 1. Look at all aspects of the work
 2. Include non-routine activities such as maintenance, repair, or cleaning
 3. Look at accident/incident/near-miss records (including for workers who work "off-site" either at home, on other job sites, drivers, etc.)
 4. All affected workers be actively involved in the risk identification and assessment process. The program must state at minimum that hazards and risks are reviewed with all affected workers
 5. Look at the way the work is organized or "done" (include experience and age of people doing the work, systems being used, etc.)
 6. Look at foreseeable unusual conditions (for example: possible impact on hazard control procedures that may be unavailable in an emergency situation, power outage, etc.)
 7. Examine risks to visitors or the public
 8. Include an assessment of groups that may have a different level of risk such as young or inexperienced workers, etc.
 9. Look for continuous improvement process for lessons learned to be incorporated into hazard controls such as plan-do-check-act (PDCA) or other similar continuous improvement process

3) PROCEDURES

a. General

- i. 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. All workers shall be trained on workplace hazards and how to identify, report, and control them. The assessment process must be completed prior to the start of all jobs to identify existing or potential hazards to workers and eliminate or control these hazards using engineering or administrative controls, proper training, or the use of personal protective equipment (PPE). All company workers should be trained on hazard identification and risk assessment.
- ii. All workers are required to take a proactive approach to managing and reporting hazards. When they observe a hazard, they are required to take steps to correct that hazard directly (provided they are adequately knowledgeable/trained to safely do so) and eliminate the hazard or get assistance from appropriate workers to do so whenever reasonably possible. Where hazards cannot be eliminated immediately, workers should take necessary steps to warn others of the hazard. Always report hazardous or potentially hazardous conditions and acts to a supervisor or competent person.

b. Risk Assessment

- i. The Company has a formal process for identifying potential hazards. Processes are in place to identify potential hazards using Job Safety Analysis (JSA), Job Hazard Analysis (JHA) facility wide or area specific analysis/inspections. Information shall be collected, organized, and reviewed with workers to determine which workers may be exposed or potentially exposed. Risk assessments should be done at a minimum, prior to beginning work. A risk assessment must be conducted whenever changes occur to processes, equipment, weather, or facilities.
- ii. The Company program provides processes to ensure workers are actively involved in the hazard identification process and hazards are reviewed with all workers concerned.
- iii. Information available in the workplace may include, but not be limited to:
 1. Safety Data Sheets (SDS)
 2. Inspection reports
 3. Records of previous injuries and illnesses
 4. Machinery and Equipment operating manuals

c. Classification

- i. Hazards are classified and ranked based on severity. The program identifies that hazard are classified/prioritized and addressed based on the risk associated with the task. (See the risk analysis matrix outlining severity and probability). Ranking or prioritizing hazards is one way to help determine which hazard is the most serious and thus which hazard to control first.
- ii. Priority is usually established by considering the worker exposure and the potential for accident, injury, or illness. By assigning a priority to the hazards, you are creating a ranking or an action list. Hazards are to be mitigated through a prescribed hierarchy of controls. The hierarchy of controls includes elimination as the preferred control followed by substitution, engineering, administrative, and personal protective equipment (PPE).
- iii. All health hazards will be identified by conducting qualitative exposure assessments and reviewing worker medical records. Health hazards include:
 1. Chemical
 2. Physical
 3. Biological
 4. Ergonomic Risk Factors
- iv. The program requires a process for hazard identification such as process hazard analysis (PHA), JHA JSA, daily hazard assessments, pre-task plans, pre-job hazard assessments, or workplace hazard inspections.
- v. The following factors play an important role:
 1. Percentage of workforce exposed
 2. Frequency of exposure
 3. Degree of harm likely to result from the exposure

d. Probability of Occurrence

- i. There is no single, simple way to determine the level of risk. Ranking hazards requires the knowledge of the workplace activities, urgency of situations, and most importantly, objective judgment. One option is seen in the following examples:
 1. Risk Severity Index:
 - a. Level 1 Fatality OR Property Damage Exceeding \$50,000
 - b. Level 2 Employee admitted to hospital or permanently disabled OR property damage between \$10,000 and \$50,000

- c. Level 3 Employee not able to perform all their regular duties OR property damage between \$1,000 and \$10,000
 - d. Level 4 Employee able to perform all their regular duties OR property damage less than \$1,000
2. Probability Index of Occurrence Example:
- a. Likely to occur immediately could happen any day
 - b. Probable in time Likely to happen if conditions are repeated
 - c. Possible in time Under the right conditions, the incident might be repeated
 - d. Remotely possible Even under similar conditions, it is unlikely the incident will be repeated
- ii. For the activity being examined, determine the most likely reasonable level of severity (levels 1 through 4 in the above example). Then determine how likely (the probability) the injury would be (letters A-D). For example, being hit by a low-speed car is most often a level 2 injury but is barely possible for someone who works a kitchen job (level D). However, put that same worker wearing all black on a roadside at night replacing roadside light bulbs and the probability increases to level A and the severity to 1 (fatality reasonably likely).

e. Risk Definitions

- i. Risk is the chance or probability that a worker will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss.
 - 1. 4 - Low Activities in this category contain minimal risk and are unlikely to occur. Organizations can proceed with these activities as planned.
 - 2. 3 - Medium Activities in this category contain minor to serious risks that are remotely likely to likely to occur.
 - 3. Application of proactive risk management strategies to reduce the risk is advised. Organizations should consider ways to modify or eliminate unacceptable risks.
 - 4. 2 - High Activities in this category contain unacceptable levels of risk, including catastrophic and critical injuries that are highly likely to occur. Organizations should consider whether they should eliminate or modify activities that still have a "high" rating after applying all reasonable risk management strategies.
 - 5. 1 - Extreme Activities in this category should not be allowed to proceed without very careful planning. The Company needs to evaluate whether the activity is necessary in the first place.
- ii. Once the risk has been assessed, the appropriate controls shall be put into place. The following describes how identified hazards/risks are addressed and mitigated.

f. The main ways to control a hazard include:

- i. Elimination (including substitution): Remove the hazard from the workplace.
- ii. Engineering Controls: includes designs or modifications to plants, equipment, ventilation systems, and processes that reduce the source of exposure.
- iii. Administrative Controls: controls that alter the way the work is done, including timing of work, policies and other rules, and work practices such as standards and operating procedures (including training, housekeeping, and equipment maintenance, and personal hygiene practices).
- iv. PPE: equipment worn by individuals to reduce exposure such as contact with chemicals or exposure to noise.
- v. Develop Safe Practices/ Engineering Controls to Mitigate Risk.

g. These methods are also known as the "hierarchy of control" because they should be considered in the order presented (it is always best to try to eliminate the hazard first, etc.).

i. Controls are placed:

- 1. At the source (where the hazard "comes from")
- 2. Along the path (where the hazard "travels")

3. At the worker

- ii. Control at the source and control along the path are also known as engineering controls.
- iii. The Company shall make sure investigations go into all workplace incidents (such as injuries, illnesses, near misses, and stop work) to identify the root cause to prevent future occurrences.
- iv. Administrative controls limit workers' exposure by implementing other "rules," such as training, supervision, shorter shifts in high-risk areas, etc. These control measures have many limitations because the hazard itself is not actually removed or reduced. Administrative controls are not generally favored because they can be difficult to implement and maintain and are not a reliable way to reduce exposure.
- v. PPE includes items such as respirators; protective clothing such as gloves, face shields, eye protection; and footwear that serves to provide a barrier between the wearer and the chemical or material. It is the final item on the list for a very good reason.
- vi. PPE should never be the only method used to reduce exposure except under very specific circumstances because PPE may "fail" (stop protecting the worker) with little or no warning.
- vii. For example: "Breakthrough" can occur with gloves, clothing, and respirator cartridges.
- viii. Once it has been decided what the best and most practical control for a particular hazard is, this needs to be documented. The safe work procedure for the job needs to be written based on those risks and controls. Using the example from earlier with the car striking a worker, the kitchen work procedure for garbage removal should include something about having the dumpster near the back door to the kitchen and not across the parking lot.
- ix. It could also include instruction to the worker to ensure that they report any burnt-out exterior lights. Some may add requirements to put on a reflective vest when taking out the garbage at night. The groundskeeper changing light bulbs needs to have a safe work procedure that includes only working during the day in high visibility clothing and with proper traffic control barriers. Parking a service vehicle in the road ahead of the worker to act as a substantial physical barrier would further reduce the risk.

h. Communicate the Controls and Train the Workers

- i. All workers will be trained in the hazard identification process, including the use and care of proper PPE.
- ii. Once the control has been put into place, The Company shall train workers how to use it. This applies whether it is an engineering control such as a guard or interlock, an administrative control such as a safe work procedure for cold weather, or particular PPE when handling a chemical. Training records are required to show that the workers have been made aware of the hazards and the controls.

i. Simultaneous Operations (SIMOPS) (IF APPLICABLE)

- i. This procedure outlines the processes and general plan for conducting SIMOPS to provide for the safety of workers and protection of the environment and equipment. SIMOPS are situations in processes where two or more operations or activities occur at the same time and place. They may interfere or clash with each other and may involve risks that are not identified when each activity is considered by itself. Thus, they can increase the risks of the activities or create new risks.

j. Work Activities Covered by the SIMOPS Procedure

- i. Any works significant in nature such as large construction jobs, change-out of major rotating equipment, naked flame and hot works in restricted areas, blasting and painting works, radiography, entry into confined space, rigging and lifting works over live equipment or plant, etc. and which occur in the areas under commissioning control. Any works that pose a significant hazard such as working in areas where there is a risk of hydrogen sulfide gas (H₂S), activities where special chemicals are utilized, work in which multiple workers are involved. This work listed is not inclusive and other work activities may also be covered under the SIMOPS Procedure.
- ii. SIMOPS often involve work in the same area by companies or multi-disciplinary workers whose work may overlap and/or interact. SIMOPS shall be coordinated through joint planning efforts by the separate operations, such as development, construction, and operations managers/supervisors/engineers who plan and direct activities.

- iii. Prior to commencing SIMOPS, there will be a survey of the existing site. The site safety inspection form will contain the site name, signature of the person performing the inspection, and date of inspection. Specific operations must be reviewed on a case-by-case basis with a risk assessment. Activity or works in any given area, where joint activities may be ongoing simultaneously, shall be reviewed and analyzed for potential interference or limitation. The Company shall:
 - 1. Establish a mechanism for the review of proposed activities (meetings, toolbox talks, etc.) to identify department and subcontractor participation
 - 2. Establish a matrix of responsible workers who shall authorize such simultaneous activities
 - 3. Ensure simultaneous activities are controlled and performed in a safe manner by defining the responsibilities of all workers involved in the tasks
 - 4. Appointing a Simultaneous Operations Leader (SOL) to coordinate the activities between the different organizations
 - 5. Identifying any preventive safety measures, which shall be implemented prior to commencement of the simultaneous activities
 - 6. Limit the number of simultaneous activities in any given area
 - 7. Establishing communication channels
 - 8. Provide training of all workers involved in the tasks
- iv. The Company shall restrict workers access to areas where simultaneous activities may be taking place. The Company shall have specific instructions for securing operations and assembling workers in an emergency. All workers involved in the simultaneous tasks must be aware of the specifics of simultaneous operations and emergency procedures.

k. Communication

- i. Communication shall be established among all workers involved in SIMOPS. A communications system, such as intercom, or radios, shall be set up to facilitate communication. The supervisor or competent person shall communicate with responsible workers from the various operations to discuss the expected activities at the commencement of work, at the beginning of each shift, and at other times during the operation, as conditions require, and to resolve any conflicts due to SIMOPS. The supervisor or competent person shall inform all involved parties of any special problems that might be encountered and the appropriate actions to take if such problems should occur.

l. Review

- i. Repeat the Hazard Assessment process when site conditions change, when new tasks are added, or when new workers join the crew order to prevent the development of unsafe working condition.



Health and Safety Program Manual
Hazardous Waste Operations
HAZWOPER

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Section:

1) PURPOSE

- a. EARNEST CONTRACTING, hereafter referred to as "The Company", has developed and implemented this written safety and health program for workers involved in hazardous waste operations.
- b. This program is established for the purposes of evaluation, identification, and control of safety and health hazards to workers when confronted with hazardous wastes, and to established procedures for emergency response to hazardous waste situations and operations.
- c. The written safety and health program includes the organizational structure for response.
- d. The plan also establishes requirements for:
 - i. A site-specific comprehensive work plan
 - ii. Site-specific safety and health plan
 - iii. Confirmation that safety and health training program components are provided
 - iv. A medical surveillance program appropriate to work situations and potential exposures
 - v. The Company standard operating procedures for safety and health; and
 - vi. Associations and coordination procedures as required between The Company safety and health programs and site-specific work and/or site situations
- e. Safety requirements for Contractors and Subcontractors. When The Company uses a contractor or subcontractor(s) to perform work at a hazardous waste job site or to perform hazardous waste operations, such non-company personnel shall be told in advance of site emergency response procedures and any known hazards or potential hazards that could result in fire, explosion, health, safety, or other such exposures.
- f. The Company written safety and health program, and any site-specific programs, work plans or support information relating to the work, shall be made available to any such contractor or subcontractor. This information also shall be made available to workers or their designated representative(s), and to OSHA other government personnel with regulatory authority over the job site or work operations.

2) RESPONSIBILITIES

- a. This program shall be administered in accordance with the following specific chain of command, as well as the following designation of the program responsibilities to supervisors and workers.
 - i. The site superintendent has the responsibility and authority to direct all hazardous waste operations.
 - ii. The safety coordinator or designated site safety representative has the responsibility and authority to develop and implement the site safety and health plan and verify compliance.
 - iii. Other workers and non-company personnel shall be assigned specific responsibilities and tasks to be performed as part of hazardous waste site and emergency response operations.
- b. The site-specific organizational structure shall be reviewed and updated as required to ensure that waste site work and safety plans are kept current.
- c. This program's comprehensive work plan will explain tasks and objectives, as well as resources required to complete the project in accordance with the goals and objectives.
- d. The work plan will specifically list and explain planned clean-up activities and The Company standard operating procedures for performance of this kind of work. This includes defining specific tasks and objectives, and how these tasks and objectives will be accomplished.

- e. The work plan will explain workers needs as anticipated through project planning and establish procedures and processes for training as required performing tasks safely and in accordance with regulatory requirements. This includes providing information programs as required for the work.
- f. The work plan also shall establish and implement a medical surveillance program as required for the work being performed.

3) PROCEDURES

a. Site-specific safety and health plan

- i. The Company has developed and implemented a written safety and health program for workers involved in hazardous waste operations that shall be available for inspection by workers, their representatives and OSHA personnel.
- ii. The program is designed to identify, evaluate, and control safety and health hazards in their facilities for the purpose of worker protection, to provide for emergency response meeting The Company and regulatory requirements and to address as appropriate site analysis, engineering controls, maximum exposure limits, hazardous waste handling procedures and uses of new technologies.
- iii. The site safety and health plan shall be maintained on the job site. It shall identify and establish procedures for protecting workers from safety and health hazards identified at each phase of site operations.
- iv. The Company written Hazard Communication Program shall be used to meet the requirements of 29 CFR 1910.1200 as part of the Company's overall safety and health program implementation.
- v. The Company site-specific safety and health plan will include the following components, as well as others when required by the work:
 - 1. Hazard analysis for each site task and operation contained in the work plan.
 - 2. Worker training assignments in accordance with program and regulatory requirements.
 - 3. Designation of personal protective equipment required for use by workers based on job hazard analysis for specific tasks and operations.
 - 4. Requirements of the medical surveillance program.
 - 5. Information about frequency and types of air monitoring and personnel monitoring, as well as any environmental sampling techniques and instrumentation that will be utilized. This shall include methods of maintenance and protocols for the calibration of monitoring and sampling equipment.
 - 6. Site control measures as explained in the project's site control program.
 - 7. Requirements and procedures for decontamination.
 - 8. Emergency response plan and procedures, including specific personal protective equipment and other equipment anticipated to be needed for emergencies.
 - 9. Safety procedures for entering any confined spaces as authorized by the site superintendent. Any confined space entries shall be performed in accordance with The Company's Confined Space Entry Program.
 - 10. The site-specific plan and program components for spill containment at the job site.
 - 11. A pre-entry briefing shall be held prior to initiating any site activity, and at such other times as necessary to ensure that workers are kept informed about site safety and health plan components. This information shall be updated and communicated as needed to keep workers aware of current situations.
 - 12. Inspections shall be conducted by the safety coordinator or the designated site safety representative or site superintendent. The Company also may utilize qualified third parties to conduct these and/or confirmation inspections. Any hazards, unsafe situations or safety deficiencies discovered by inspection shall be reported to the site superintendent and corrected.

b. Training

- i. General site workers engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction

off the site, and a minimum of three days actual field experience under the direct supervision of a trained experienced supervisor.

c. First Responder Awareness Level

- i. First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:
 1. An understanding of what hazardous substances are, and the risks associated with them in an incident.
 2. An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
 3. The ability to recognize the presence of hazardous substances in an emergency.
 4. The ability to identify hazardous substances, if possible.
 5. An understanding of the role of the first responder awareness individual in The Company's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook.
 6. The ability to realize the need for additional resources, and to make appropriate notifications to the communication center.

d. First Responder Operations Level

- i. First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level and The Company shall so certify:
 1. Knowledge of the basic hazard and risk assessment techniques.
 2. Know how to select and use proper personal protective equipment provided to the first responder operational level.
 3. An understanding of basic hazardous materials terms.
 4. Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit.
 5. Know how to implement basic decontamination procedures.
 6. An understanding of the relevant standard operating procedures and termination procedures.

e. Hazardous Materials Technician

- i. Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition, have competency in the following areas and The Company shall so certify:
 1. Know how to implement The Company's emergency response plan.
 2. Know the classification, identification, and verification of known and unknown materials by using field survey instruments and equipment.
 3. Be able to function within an assigned role in the Incident Command System.

4. Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician.
5. Understand hazard and risk assessment techniques.
6. Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit.
7. Understand and implement decontamination procedures.
8. Understand termination procedures.
9. Understand basic chemical and toxicological terminology and behavior.

f. Hazardous Materials Specialist

- i. Hazardous materials specialists are individuals who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician; however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with federal, state, local and other government authorities regarding site activities. Hazardous materials specialists shall have received at least 24 hours of training equal to the technician level and in addition have competency in the following areas and The Company shall so certify:
 1. Know how to implement the local emergency response plan.
 2. Understand classification, identification, and verification of known and unknown materials by using advanced survey instruments and equipment.
 3. Know the state emergency response plan.
 4. Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist.
 5. Understand in-depth hazard and risk techniques.
 6. Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available.
 7. Be able to determine and implement decontamination procedures.
 8. Have the ability to develop a site safety and control plan.
 9. Understand chemical, radiological, and toxicological terminology and behavior.

g. On Scene Incident Commander

- i. Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and The Company shall so certify:
 1. Know and be able to implement The Company's incident command system.
 2. Know how to implement The Company's emergency response plan.
 3. Know and understand the hazards and risks associated with workers working in chemical protective clothing.
 4. Know how to implement the local emergency response plan.
 5. Know of the state emergency response plan and of the Federal Regional Response Team.
 6. Know and understand the importance of decontamination procedures.
- ii. Workers who are trained in accordance with the plan shall receive an annual refresher on or before the initial training date of expiration. A record of methods used must be kept.

h. Engineering Controls

- i. Engineering controls, work practices, personal protective equipment, or a combination of these shall be implemented as required to protect workers from exposure to hazardous substances and safety and health hazards.
- ii. Engineering controls and work practices shall be instituted to reduce and maintain worker exposure to or below the permissible exposure limits for substances regulated by 29 CFR Part 1910, to the extent required by Subpart Z, except to the extent that such controls and practices are not feasible.
- iii. Engineering controls which may be feasible include the use of pressurized cabs or control booths on equipment, and/or the use of remotely operated material handling equipment. Work practices which may be feasible are removing all non-essential workers from potential exposure during opening of drums, wetting down dusty operations and locating workers upwind of possible hazards.
- iv. Whenever engineering controls and work practices are not feasible, or not required, any reasonable combination of engineering controls, work practices and PPE shall be used to reduce and maintain to or below the permissible exposure limits or dose limits for substances regulated by 29 CFR Part 1910, Subpart Z.
- v. The Company shall not implement a schedule of worker rotation as a means of compliance with permissible exposure limits or dose limits except when there are no other feasible ways of complying with the airborne or dermal dose limits for ionizing radiation.

i. Monitoring Requirements and Procedures

- i. Monitoring shall be performed where there may be a question of worker exposure to hazardous concentrations of hazardous substances in order to assure proper selection of engineering controls, work practices and personal protective equipment so that workers are not exposed to levels which exceed permissible exposure limits, or published exposure levels if there are no permissible exposure limits, for hazardous substances.
- ii. Air monitoring shall be used to identify and quantify airborne levels of hazardous substances and safety and health hazards to determine the appropriate level of worker protection needed on site.
- iii. Upon initial entry, representative air monitoring shall be conducted to identify any IDLH condition, exposure over permissible exposure limits or published exposure levels, exposure over a radioactive material's dose limits or other dangerous condition such as the presence of flammable atmospheres, oxygen-deficient environments.
- iv. Periodic monitoring shall be conducted when the possibility of an IDLH condition or flammable atmosphere has developed or when there is indication that exposures may have risen over permissible exposure limits or published exposure levels since prior monitoring. Situations where it shall be considered whether the possibility that exposures have risen are as follows:
 1. When work begins on a different portion of the site.
 2. When contaminants other than those previously identified are being handled.
 3. When a different type of operation is initiated (e.g., drum opening as opposed to exploratory well drilling.)
 4. When workers are handling leaking drums or containers or working in areas with obvious liquid contamination (e.g., a spill or lagoon.)
 5. Following the start of the actual clean-up phase of any hazardous waste operation (for example, when soil, surface water or containers are moved or disturbed), the Company shall monitor workers who are likely to have the highest exposures to any hazardous substances and health hazards that may be present above permissible exposure limits, or published exposure levels.
 6. This monitoring shall be performed using personal sampling frequently enough to characterize worker exposures.
 7. The Company may utilize a representative sampling approach by documenting that the workers and chemicals chosen for monitoring are based on the criteria stated in Item v) immediately above. If the workers likely to have the highest exposure are over permissible exposure limits or published exposure limits, then monitoring shall continue to determine all workers likely to be above those limits. The Company may utilize a representative sampling approach by documenting that the workers and chemicals chosen for monitoring are based on the criteria stated above.

8. The Company shall develop and implement a program component to inform workers, contractors, and subcontractors (or their representative) engaged in hazardous waste operations of the nature, level, and degree of exposure likely as a result of participation in such hazardous waste operations.
9. Workers, contractors, and subcontractors working outside of the operations part of a site are not covered by this program.

j. Policies and Procedures for Decontamination

- i. Procedures for all phases of decontamination shall be developed and implemented by The Company for each hazardous waste work location.
- ii. Decontamination procedures for the job site shall be communicated to workers and implemented before personnel or equipment enters areas where there is a potential for exposure to hazardous substances.
- iii. Site-specific standard operating procedures shall be developed and utilized to minimize worker contact with hazardous substances, or with equipment that has contacted hazardous substances.
- iv. All workers and personnel leaving a contaminated area shall be decontaminated in accordance with The Company and regulatory safety and health requirements. All contaminated clothing and equipment leaving a contaminated area shall be appropriately disposed of or decontaminated.
- v. Decontamination procedures shall be monitored by the designated site safety representative and/or site superintendent, with ongoing review by the safety coordinator. This monitoring is intended to determine the effectiveness of decontamination procedures and practices. When such procedures or practices are found to be ineffective, appropriate steps shall be taken to correct any deficiencies.
- vi. Decontamination operations shall be performed in one or more areas that have been selected to minimize the exposure of uncontaminated workers or equipment to contaminated workers or equipment.
- vii. All equipment and solvents used for decontamination shall be decontaminated or disposed of properly.
- viii. Protective clothing and equipment shall be decontaminated, cleaned, laundered, maintained, or replaced as needed to maintain their effectiveness.
- ix. Workers whose non-impermeable clothing becomes wetted with hazardous substances shall immediately remove that clothing and proceed to shower. The clothing shall be disposed of or decontaminated before it is removed from the work zone.
- x. Unauthorized workers shall not remove protective clothing or equipment from change rooms.
- xi. Commercial laundries or cleaning establishments that decontaminate protective clothing or equipment shall be informed of the potentially harmful effects of exposure to hazardous substances.
- xii. Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, they shall be provided and meet the requirements of 29 CFR 1910.141. If temperature conditions prevent the effective use of water, then other effective means for cleansing shall be provided and used.

k. Sanitation at Temporary Workplace

- i. An adequate supply of potable water shall be provided on the site.
- ii. Portable containers used to dispense drinking water shall be capable of being tightly closed and equipped with a tap. Water shall not be dipped from containers.
- iii. Any container used to distribute drinking water shall be clearly marked as to the nature of its contents and not used for any other purpose.
- iv. Where single service cups (to be used but once) are supplied, both a sanitary container for the unused cups and a receptacle for disposing of the used cups shall be provided.
- v. Outlets for non-potable water, such as water for firefighting purposes shall be identified to indicate clearly that the water is unsafe and is not to be used for drinking, washing, or cooking purposes.
- vi. There shall be no cross-connection, open or potential, between a system furnishing potable water and a system furnishing non-potable water.

- vii. Toilets shall be provided for workers according to Table H-120.2 in 1910.120(n)(3).
- viii. Under temporary field conditions, provisions shall be made to ensure not less than one toilet facility is available.
- ix. Hazardous waste sites, not provided with a sanitary sewer, shall be provided with the following toilet facilities unless prohibited by local codes:
 - 1. Chemical toilets
 - 2. Recirculation toilets
 - 3. Combustion toilets
 - 4. Flush toilets
- x. These requirements for sanitation facilities shall not apply to mobile crews having transportation readily available to nearby toilet facilities.
- xi. Doors entering toilet facilities shall be provided with entrance locks controlled from inside the facility.
- xii. All food service facilities and operations for workers shall meet the applicable laws, ordinances, and regulations of the jurisdictions in which they are located.
- xiii. When temporary sleeping quarters are provided, they shall be heated, ventilated, and lighted.
- xiv. The Company shall provide adequate washing facilities for workers engaged in operations where hazardous substances may be harmful to workers. Such facilities shall be in near proximity to the worksite; in areas where exposures are below permissible exposure limits, and which are under the control of The Company; and shall be so equipped as to enable workers to remove hazardous substances from themselves.
- xv. When hazardous waste clean-up or removal operations commence on a site and the duration of the work will require six months or greater time to complete, The Company shall provide showers and change rooms for all workers exposed to hazardous substances and health hazards involved in hazardous waste clean-up or removal operations.
- xvi. Showers shall be provided and shall meet the requirements of 29 CFR 1910.141(d)(3).



1) PURPOSE

- a. EARNEST CONTRACTING, hereafter referred to as “The Company”, has established a Hearing Conservation Program to protect worker(s) from the hazards of noise on the job. The Company requires that each employer implement a hearing conservation program when workers are exposed to noise levels exceeding 85 dB. It is not hard to exceed this level of noise on many of the job’s sites. Typically, noise levels exceeding 85 dB are experienced when working with any type of pneumatic chipper or hammer, metal saw, grinders, and heavy machinery. See attachment I for list of some common noise levels.

2) SCOPE

- a. The OSHA Standard on Occupational Noise Exposure, 29 CFR 1910.95, established the permissible limit of noise as 85 dB(A) (decibels), expressed as an eight-hour (8-hours), time-weighted average, (TWA). This standard allows short-term unprotected noise exposure up to a maximum of 115dB (A), peak sound.
- b. The noise standard requires the identification by personnel monitoring of workers who may be exposed above the 85 dB (A), 8-hour, TWA. Hearing protection is also required for specific activities or using certain types of equipment.

3) RESPONSIBILITIES

- a. The Safety Coordinator or delegate is responsible for developing a written Hearing Conservation Procedure and overseeing the training of all workers in the company. The Safety Coordinator or delegate is responsible for the monitoring and administering this procedure.

4) PROCEDURES

- a. The Company has taken a conservative approach to noise hazards by establishing this program. The following elements establish the program:
 - i. An Audiometric Testing Program
 - ii. A Worker Education and Training Program
 - iii. Monitoring and Analysis of Workplace Noise Levels
 - iv. Providing Suitable Engineering Controls
 - v. Providing Hearing Protectors
 - vi. Maintain required Records

b. Audiometric Testing Program

- i. Each new worker whose work exposes them to “excess noise levels” will receive an audiometric test as part of a pre-screening physical examination or within 6 months of a workers first exposure at or above the 8-hour Time Weighted Average (TWA) to establish a baseline audiogram against which subsequent audiograms can be compared.
- ii. Annually, all workers who are exposed to noise levels exceeding the 85 dB standard will be given a follow-up audiometric examination to monitor for any significant changes in their hearing ability. Workers will be formally notified if there is any change in their hearing as the result of the testing. The Standard has defined this shift as a change in hearing threshold relative to the baseline audiogram of an average of 10 dB or more at 200, 3000 and 4000 hz in either ear. In determining whether a standard threshold shift has occurred, allowance may be made for the contribution of aging (presbycusis) to the change in hearing level by correcting the annual audiogram according to the procedure described in Appendix F: “Calculation and Application of Age Correction to Audiograms.” When audiometric testing is required, each affected worker must not be exposed to any workplace noise for at least 14 hours prior to their test. This requirement may be met by wearing hearing protectors which will reduce the worker’s exposure to a sound level of 80 dB (A) or below.

- iii. Audiometric tests shall be performed by a licensed or certified audiologist, otolaryngologist, or other physician, or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation, or who has satisfactorily demonstrated competence in administering audiometric examinations, obtaining valid audiograms, and properly using, maintaining, and checking calibration and proper functioning of the audiometers being used. A technician who operates microprocessor audiometer does not need to be certified. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist, or physician.
- iv. An audiologist, otolaryngologist or physician will review problem audiograms and shall determine whether there is a need for further evaluation. The company will provide to the person performing this evaluation the following information:
 - 1. A copy of the 29 CFR 1910.95 Hearing Conservation
 - 2. The baseline audiogram and most recent audiogram of the worker to be evaluated
 - 3. Measurement of background sound pressure in the audiometric test room as required in 29 CFR 1910.95 Appendix D
 - 4. Records of audiometric calibrations as required by 20 CFR 1910.95 Appendix
- v. If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift as defined by OSHA, the worker will be informed of this fact, in writing, by The Company within 21 days of determination.
- vi. Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, the company will ensure that the following steps are taken when a standard threshold shift occurs:
 - 1. A worker not using hearing protectors will be fitted with hearing protectors, trained in their use and care, and required to use them
 - 2. A worker already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary
 - 3. Refer the worker for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if the company suspects that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors
 - 4. Inform the worker of the need for an otological examination if a medical pathology of the ear which is unrelated to the use of hearing protector is suspected
- vii. If subsequent audiometric testing of a worker whose exposure to noise is less than an 8-hour TWA average of 90 decibels indicates that a standard threshold shift is not persistent The Company:
 - 1. Will inform the worker of the new audiometric interpretations
 - 2. May stop the required use of hearing protectors for that worker

c. Worker Education and Training

- i. The Company workers must be trained in the use of personal hearing protection equipment and have access to information and training materials. Each worker must know how to clean and maintain the hearing protection equipment. The training will cover the following:
 - 1. Training will be for all workers who are exposed to noise at or above the 8-hour TWA of 85 dB
 - 2. The training will be repeated annually for each worker included in the hearing conservation program
 - 3. The effects of noise on hearing
 - 4. The purpose of hearing protectors, the advantages, disadvantages, and the attenuation of various types and instruction on selection, fitting, use and care
 - 5. The purpose of audiometric testing, and an explanation of the test procedures
 - 6. Access to information and training materials

d. Monitoring and Analysis of Workplace Noise Levels

- i. The Company will periodically or as necessary, conduct noise level surveys of the workplace. The results of these surveys will be made available to workers.
- ii. Any job area or company location found to be in excess of the allowable designated noise levels that cannot be brought into compliance with the noise standard will be designated as an area where hearing protectors are to be worn. When signs are posted workers must wear hearing protection. The signs may read as follows:

**NOTICE
EAR PROTECTION
REQUIRED
IN THIS AREA**

- iii. REMEMBER: A client may determine if a unit or work area is classified as a high noise area. After the decision is made, company workers will be instructed to wear the appropriate hearing protection.

e. Provide Suitable Engineering Controls

- i. Where appropriate, The Company will provide engineering controls to reduce noise exposure. Due to the complexity of most job sites, it is difficult, if possible, to institute effective engineering controls for most noise exposures. Should this be the case, then workers will be required to wear suitable hearing protection.

f. Provide Hearing Protectors Where Required

- i. The Company will provide the required workers with hearing protectors if their 8-hour TWA is above the 85dB (A). The company will also make hearing protectors available to all workers exposed to a TWA above 85dB (A) at no cost to the worker. Any worker who may have a significant threshold shift of hearing level will be required to wear hearing protection if they are exposed to noise TWA of 85dB. The Company will ensure all Hearing protectors meet the requirements in CSA Standard Z94.2-02, Hearing Protection Devices – Performance, Selection, Care and Use. The Company will make a concerted effort to find the right protector for each worker, one that offers the right attenuation, is accepted in terms of comfort, and is used by the worker.

g. Responsibilities

i. THE CLIENT WILL:

1. Determine all sources of noise at or above 85dB
2. Determine if personnel have 8-hour TWA exposures at or above fifty percent (50%) of the OSHA allowable
3. Review noise exposures annually for all job classifications with TWA
4. Exposure at or above fifty percent (50%)
5. Ensure that audiograms are made annually for personnel whose TWA exposures are at or above fifty percent (50%) of the OSHA allowable

ii. JOB SITE SUPERVISION WILL:

1. Require hearing protection in all areas with noise levels at or above the 85dB(A) and for all task which generate such noise level (i.e., grinding, hammering). Ear plug shall be required in an area and/or on tasks with the sound levels exceeding 105dB
2. Alert workers to possible hazardous noise exposures, Signs shall be posted in work areas in which the sound levels may exceed 85dB. These signs will be posted by the client
3. Evaluate the need for engineering and/or administrative controls to reduce the noise levels below the 85 dB and, where feasible, develop a plan to reduce all personnel exposures to less than fifty- percent (50%) of the OSHA allowable
4. Make hearing protection available and enforce its use by all workers with TWA exposures at or above the fifty percent (50%) of the OSHA allowable and/or by those who must enter or work in areas where the noise level is 85dB or above
5. REMEMBER - The client determines if a unit or work area is classified as a high noise area. After the determination is made, the company's workers will be instructed to wear the appropriate hearing protection.

ATTACHMENT I

The following list represents some work activities and equipment which will require the use of hearing protection:

ACTIVITIES AND/OR EQUIPMENT TYPICALLY RESULTING IN HIGH NOISE LEVEL	ESTIMATED AVERAGE NOISE LEVEL dB(A)
1. Air Arc Gouging	115
2. Air compressor	95
3. Chain saw	107
4. Electric Disc Grinder	100
5. Forklift inside a trailer	98
6. Heavy equipment working	100
7. Impact tools	108
8. Pneumatic chipping hammer	110
9. Abrasive blasting	100
10. Welding machines	95



1) **PURPOSE**

- a. EARNEST CONTRACTING, hereafter referred to as “The Company”, has developed this policy to address the hazards associated with heat and cold-related illness.

2) **PROCEDURES**

a. **Preventing Heat-Related illnesses (heat stress)**

i. **Heat Stress**

- 1. Heat stress takes place when your body’s cooling system is overwhelmed. It can happen when heat combines with other factors such as:
 - i. hard physical work
 - ii. fatigue (not enough sleep)
 - iii. dehydration (loss of fluids)
 - iv. certain medical conditions
- 2. Heat stress can lead to illness or even death. The company has a duty to take every precaution reasonable in the circumstances to protect their workers.

ii. **Heat Stress Symptoms**

- 1. Heat rash: itchy red skin.
- 2. Heat cramps: painful muscle cramps.
- 3. Heat exhaustion: high body temperature; weakness or feeling faint; headache, confusion or irrational behavior; nausea or vomiting.
- 4. Heat stroke: no sweating (hot, dry skin), high body temperature, confusion, or convulsions. Get immediate medical help.

b. **Precautions When Working in Hot, Humid Conditions**

- i. Increase the frequency and length of rest breaks.
- ii. Provide **cool drinking water** near workers and remind them to drink often.
- iii. Caution workers about working in direct sunlight.
- iv. Train workers to recognize the signs and symptoms of heat stress. Start a “buddy system” because it’s unlikely people will notice their own symptoms.
- v. Tell workers to wear light summer clothing to allow air to move freely and sweat to evaporate. They should always wear shirts to protect themselves from direct sunlight.

c. **Preventing Cold-Related illnesses (cold stress)**

i. **Cold Stress**

- 1. When you’re cold, blood vessels in your skin, arms, and legs constrict, decreasing the blood flow to your extremities. This helps your critical organs stay warm, but your extremities are at risk for frostbite.
- 2. **Frostbite** means that your flesh freezes. Blood vessels are damaged, and the reduced blood flow can lead to gangrene.
- 3. The first sign of frostbite is skin that looks waxy and feels numb. Once tissues become hard, it’s a severe medical emergency.

- ii. **Wind chill** accelerates heat loss—sometimes to a dramatic extent. For example, when the air temperature is -30°C
 - 1. with no wind, there is little danger of skin freezing
 - 2. with 16 km/h wind (a flag will be fully extended), your skin can freeze in about a minute
 - 3. with 32 km/h wind (capable of blowing snow), your skin can freeze in 30 seconds
- iii. When your core temperature drops, you're at risk for hypothermia. Early signs of hypothermia are shivering, blue lips and fingers, and poor coordination. Breathing and heart rate will slow down, and you become disoriented and confused. Hypothermia requires medical help.

d. Precautions to Prevent Cold Stress

- i. Train workers to recognize the signs and symptoms of cold stress. Start a "buddy system" because it's unlikely people will notice their own symptoms.
- ii. Wear several layers of clothing rather than one thick layer.
- iii. Wear gloves if the temperature is below 16°C for sedentary work, below 4°C for light work, and below -7°C for moderate work.
- iv. Take warm, high-calorie drinks and food.
- v. If your clothing gets wet at 2°C or less, change into dry clothes immediately to prevent hypothermia.
- vi. If you feel hot, open your jacket but keep your hat and gloves on.
- vii. Give workers warm-up and rest breaks in a heated shelter. Ensure work is not conducted only within allowable exposure limits, as per provincial OHS Regulations.



Health and Safety Program Manual

Issue Date: 04/04/2023

Heavy Mobile Equipment

Revision Date:

Section:

1) PURPOSE

- a. The use of heavy equipment/mobile equipment is a common part of many jobs conducted by EARNEST CONTRACTING; hereafter referred to as "The Company." The Company recognizes the hazards associated with the operation of heavy equipment/mobile equipment, and has developed this policy to establish guidelines in an attempt to eliminate injuries or fatalities related to this type of equipment.
- b. The Company is dedicated to assuring that every job is conducted safely, and that operational expediency, including the use of short cuts, does not compromise the safety and well being of workers and the public.

2) RESPONSIBILITIES

- a. The following identifies some of the responsibilities for various parties affected by this policy.
- b. **Supervisors/Mangers/Leads**
 - i. Responsibilities include:
 1. Observing and evaluating the use of heavy equipment/mobile equipment by workers and correcting any unsafe conditions or practices and reporting or correcting any found.
 2. Remove from service, any heavy equipment/mobile equipment that is not safe.
 3. Promptly investigating all accidents and completing required reports.
 4. Encouraging workers to report all unsafe conditions and practices.
 5. Being familiar with and enforcing all safety procedures and practices applicable to work done by their workers.
- c. **Workers/Heavy Equipment/Mobile Equipment Operators**
 - i. Worker responsibilities include:
 1. Reading, understanding and following the procedures and practices outlined in this policy.
 2. Report any inspection deficiencies with equipment to their immediate supervisor for maintenance or further action prior to operation of the equipment.
 3. Using all appropriate safety equipment and devices
 4. Immediately reporting all work related accidents, fuel spills, fires, and injuries to their supervisors.
 5. Obey traffic signs and signals and audible or visual warning devices.
 6. Immediately reporting all unsafe conditions and practices to their supervisors and/or Department Head and/or Company Administrator.
 7. Attending appropriate training as recommended by their supervisors.
- d. **Fuel Truck Driver**
 - i. Fuel truck driver responsibilities include:
 1. Replenishing all fuel, oil, grease to assure they are ready to be used
 2. Logging fuel levels, hours used, mileage
 3. Perform a daily equipment walkaround inspection
 4. Document all potential problems in the equipment log software



1) PURPOSE

- a. The purpose of Earnest Contracting’s, hereafter referred to as “The Company”, policy is to establish cutting and welding safety procedures and to ensure that all cutting, and welding operations are performed in the safest manner possible, and in compliance with applicable regulations.

2) POLICY

- a. All cutting and welding operations shall be performed in compliance with OSHA standards and all other applicable state, local and client regulations, policies, procedures, and standard safe work practices. Welding is restricted to areas or situations where adequate fire prevention, welder protection and passerby protection can be assured.

3) PROCEDURES

- a. This safety standard is intended as a guide to safe practices in welding, burning, brazing and related operations. The precautions and protective measures outlined are recommended minimum requirements. Welders should exercise judgment in applying these precautionary measures in such matters as length of work periods, poor ventilation, unusual work locations, and specialized operations. Additional protective measures may be required in certain instances.

- i. Only trained and qualified workers may operate or maintain welding, cutting or brazing equipment. Welders/Cutters will be trained per this policy and will possess the appropriate certifications for their work scope.
- ii. Craft who perform any of the functions covered by this policy will be required to complete training including:
 - 1. A test or other method to determine competency
 - 2. All training records shall be documented and kept on file with Human Resources

b. General Rules

- i. **Initial Assessment – Fire is a primary focus and the assessment for fire protection guide should be used:**
- ii. Inspections and certification records will be kept for recordkeeping.

If	And	Then
The object to be welded, cut, or heated can be moved	A fire-resistant, safe workspace is available	Welding, cutting, or heating shall be done in that space.
The object to be welded, cut, or heated cannot be moved	All fire hazards can be moved to a safe distance	Welding, cutting, or heating can be done once fire hazards are taken to a safe place.
The object to be welded, cut, or heated cannot be moved	All the fire hazards cannot be removed	Guards shall be used to confine the heat, sparks, and slag, and to protect the immovable fire hazards.

- iii. Before doing any welding or burning, outside of an area approved for routine hot work, be certain the necessary Hot Work Permit has been issued. All hot work will be approved by the client and the site supervisor. The crew responsible for the equipment will ensure all is suitable and in good working order. All equipment is inspected prior to beginning work and all crew members using the equipment will be familiar with “American Welding Society Standard A6-1-1966”. Any equipment that is not ready for service or needs repair shall be red-tagged and repaired by qualified personnel.

- iv. Whenever it is necessary for hoses, lines or cords to cross walkways or work areas, they must be strung overhead or protected by planks laid on both sides of the hose. All hoses, cord and leads and other welding equipment must be maintained in a safe and serviceable condition, with no fraying or exposed copper permitted. They should be deployed in a manner that does not create tripping hazards.
- v. Before each use, hose must be inspected for leaks, burns, worn places, loose connections, or other defects which may render the hose unfit for service. Hose burned by a flash back must be discarded.
- vi. Temporary power lines to portable arc welding machines should be carried overhead whenever practical or laid on the floor or ground suitably protected so that they cannot be damaged or interfere with safe passage.
- vii. Necessary precautions must be taken to protect against electrical shocks when working in wet or damp places.
- viii. In electric welding, all parts of the body should be covered to prevent skin burns from ultra-violet rays or molten metal. The feet and ankles are particularly vulnerable to burns, and care should be taken to see that they are properly protected.
- ix. Do not use ear cotton when welding. Sparks or slag may ignite the cotton.
- x. Welding rod shall not be stored in its original container once the container has been opened. When an original container is opened, the rod shall be immediately transferred to either a rod oven or an approved container, such as the plastic "rod guard" container. The original container shall then be crushed and properly disposed of.
- xi. Two sets of Flash Back arrestors must be installed on oxyacetylene system; one set installed at regulators and one set at torch handle (unless torch is equipped with arrestors).
- xii. Welders must wear Z-87 Safety Glasses with side shields under their welder's hoods.
- xiii. Grinders are required to have OSHA approved guards in place at all times. Exceptions must be approved by the Safety Department.
- xiv. All welding rigs must be in safe operating condition and be properly identified.
- xv. The work area must be kept clean and materials including used weld rod removed when job is complete.
- xvi. All welding rigs shall have a fire extinguisher.
- xvii. Approved spark arrestors are required on all welding machines.
- xviii. Always inspect grinders before each use. Grinders must have ground fault circuit interrupters (GFCI's)
- xix. Welding hoods must be equipped with the proper shaded lens for protection against radiant energy. (According to chart)

c. Filter Lens Shade Numbers for Protection against Radiant Energy

Shade Number	Welding Operation
10	Shielded metal arc welding 1/16, 3/32, 1/8, 5/32-in. diameter electrodes
11	Gas-shielded arc welding (nonferrous) 1/16, 3/32, 1/8, 5/32-in. diameter electrodes
12	Gas-shielded arc welding (ferrous) 1/16, 3/32, 1/8, 5/32-in. diameter electrodes
12	Shielded metal-arc welding 3/16, 7/32, 1/4-in. diameter electrodes
14	Shielded metal-arc welding 5/16, 3/8-in. diameter electrodes.
10 to 14	Atomic hydrogen welding
14	Carbon arc Welding
2	Soldering
3 or 4	Torch Brazing
3 or 4	Light cutting, up to 1 in.
4 or 5	Medium cutting, 1 in. to 6 in.
5 or 6	Heavy cutting, over 6 in.
4 or 5	Gas welding (light), up to 1/8-in.
5 or 6	Gas welding (medium), 1/8-in. to 1/2-in.
6 or 8	Gas welding (heavy), over 1/2-in.

d. Gas Cylinders

- i. Compressed gas cylinders are to be shut-off at the bottle when not in use or unattended for short periods of time. At the end of the shift the bottles are to be shut off and gauges and hoses detached, and properly stored and protective caps installed.
- ii. Compressed gas cylinders shall have gauges removed and be capped prior to transportation.
- iii. Use approved storage racks or dollies to store compressed gas cylinders. Chain or #9 wire may also be used. Never use rope for this purpose.

e. Welding and Burning Safe Practices

- i. The following information is the recommended minimum precautionary measure to be followed in performing the types of hot work listed in Table 13-1. If, in the opinion of the supervisor, additional protection is required for a particular welding or burning job, such added protective measures should be used.
- ii. Open Area includes most outside work, the mechanical shop (except vessels or partitioned areas inside the building) and well-ventilated large rooms, buildings, or tanks. Confined Spaces include work areas such as inside small tanks, drums, towers, or other vessels, whether indoors or out, as well as small rooms, deep excavations, and manholes.

Table 13-1 - Welding and Burning Stick Electrode Welding			
Electrode	Basic Elements	Byproducts	Precautions
AWS E-6010	Iron		A
AWS E-6011	Iron		A
AWS E-6012	Iron		A
AWS E-6013	Iron		A
AWS E-6020	Iron		A
E-316 Stainless 18-12	Chromium, Nickel, Iron	Chromium, Nickel	B
E-310 Stainless 25-20	Chromium, Nickel, Iron	Chromium, Nickel	B
E-308 Stainless 18-8	Chromium, Nickel, Iron	Chromium, Nickel	B
E-610 12% Cr	Chromium, Iron	Chromium	B
E-502 5% Cr	Chromium, Iron		A
E-605 9% Cr	Chromium, Iron	Chromium	B
E-7018 Low Hydrogen	Iron	Fluorides	C
E-8018 B-2 (1-1/4% Cr)	Chromium, Iron		A
E-9018 B-3 (2-1/4% Cr)	Chromium, Iron		A
E-8108 C-2 (3-1/2% Ni)	Nickel, Iron		
Stoody 6	65% Cobalt, 45% Tungsten, 28% Chromium Cobalt	Chromium	B
Eutectic 680	High Chromium, Nickel	Chromium, Nickel	B
Inco-A	68% Nickel	Nickel	B
Inconel 182	65% Nickel	Nickel	B
Monel 190	60% Nickel, 23% Copper	Nickel, Copper	B
Ni-Rod 55	60% Nickel	Nickel	B
Carpenter 20	36% Nickel, 20% Chromium		B

Precautions:

- A. No special precautions are needed in open or well-ventilated areas. Work in poorly ventilated areas will require respiratory protection. Work in confined spaces may require fume filter-type respirators or supplied air. Adhere to or upgrade permit requirements. Consult the Welding Supervisor.
- B. Moderate amounts of fumes generated:
 - 1. Use exhaust blowers or air siphons to remove fumes from breathing zone in open areas.
 - 2. Work in confined spaces will require high efficiency particulate respirators.
- C. Fumes and gases generated:
 - 1. Use exhaust blowers or air siphons to remove gases and fumes from breathing zone in open areas.
 - 2. Work in confined spaces will require air-supplied respirator.
- D. Intense arc. Large amounts of metal fumes and gases generated:
 - 1. Provide adequate ventilation of work. Use fume exhausters to remove fumes and gases from breathing zone in open areas. Do not direct exhaust air toward other workers. Use fume filter-type respirators in open areas.
 - 2. In confined areas, adequate ventilation must be provided, and air-supplied respirator must be worn.
- E. Use only in metalizing hood. If necessary to metalize in other locations, use air-supplied respirator and protect other workers in the vicinity. Do not use any lead alloys in open shop area.

Table 13-1 Tungsten Arc Welding, Gas Shielded (Heliarc)* (TIG)

Rod	Basic Elements	Harmful Byproducts	Precautions
Evedur 1010	05.6% Copper Silicon	Copper, Ozone	C
Oxweld 372 Copper	98% Copper	Copper, Ozone	C
AWS ER 4043	Aluminum, Silicon	Ozone	C
AWS ER 5356	Magnesium, Aluminum	Ozone	C
Oxweld 28	18% Chromium, 8% Nickel, Iron		C
Steel	Steel	Ozone	C
1-1/4% Chromium	Chromium, Iron	Ozone	C
2-1/4% Chromium	Chromium, Iron	Ozone	C

*High levels of ultraviolet light produced. Avoid eye flash with side shield goggles. Avoid skin burns with proper clothing.

C. Fumes and gases generated:

- 1) Use exhaust blowers or air siphons to remove gases and fumes from breathing zone in open areas.
- 2) Work in poorly ventilated areas will require respiratory protection.
- 3) Work in confined spaces will require air-supplied respirator.

Short Arc Consumable Electrode Gas Shield* (MIG)

Wire	Basic Elements	Harmful Byproducts	Precautions*
18-8 Stainless	18% Chromium, 8 % Nickel, Steel	Chromium, Nickel, Ozone	B
25-20 Stainless	25% Chromium, 20% Nickel, Steel	Chromium, Nickel, Ozone	B
Oxweld 63	98% Copper	Copper, Ozone	B
Airco 110	98% Copper	Copper, Ozone	B
Oxweld 62	91.5% Copper, Aluminum	Copper, Ozone	B
Type 316 Stainless	18% Chromium, 13% Nickel, Steel	Copper, Nickel, Ozone	B
Aluminum	Aluminum	Ozone	B
Hastelloy B	Nickel, Molybdenum	Nickel, Ozone	B
Inconel 62	Chromium, Nickel	Nickel, Ozone	B
Oxweld 65	Iron		B

*High levels of ultraviolet light produced. Avoid eye flash with side shield goggles. Avoid skin burns with proper clothing.

B. Moderate amounts of fumes generated:

1. Use exhaust blowers or air siphons to remove fumes from breathing zone in open areas.
2. Work in confined spaces or poorly ventilated areas will require high efficiency particulate respirators.

Acetylene Welding and Brazing

Wire	Basic Elements	Harmful Byproducts	Precautions
Hastelloy D	Silicon, 90% Nickel	Nickel	A
Oxweld 5M	Copper, Zinc, Tin	Copper, Zinc	B
1 Oxweld	Steel		A
Aluminum	Aluminum		A
Everdur 1010	Copper, Silicon	Copper	A
Arcosil J	56% Silver, 22% Copper, 17% Zinc, 5% Tin	Copper, Zinc	B
Oxweld 28	18% Chromium, 8% Nickel, Steel	Chromium, Nickel	B
18-8 Stainless	18% Chromium, 8% Nickel, Steel	Chromium, Nickel	B
Easy-Flo	45% Silver, 15% Copper, 25% Cadmium, 16% Zinc	Copper, Cadmium, Zinc	B
Sil-Fos	15% Silver, 80% Copper, 5% Phosphorus	Copper	B
Oxweld 372	98% Copper	Copper	B
Colmonoy 6	65% Cobalt, 28% Chromium	Cobalt, Chromium	B
Chromium	Tungsten		
Stoodite	Iron, 30% Chromium	Chromium	B
Borod	Tungsten Carbide, Iron		

- A. No special precautions are needed in open or well-ventilated areas. Work in confined spaces or poorly ventilated areas may require fume filter-type respirators. Consult the mechanical welding and metals supervisor.
- B. Moderate amounts of fumes generated:
- 1) Use exhaust blowers or air siphons to remove fumes from breathing zone in open areas.
 - 2) Work in confined spaces will require high efficiency particulate respirators.

Short Arc Consumable Electrode Gas Shield* (MIG)

Wire	Basic Elements	Harmful Byproducts	Precautions*
18-8 Stainless	18% Chromium, 8 % Nickel, Steel	Chromium, Nickel, Ozone	B
25-20 Stainless	25% Chromium, 20% Nickel, Steel	Chromium, Nickel, Ozone	B
Oxweld 63	98% Copper	Copper, Ozone	B
Airco 110	98% Copper	Copper, Ozone	B
Oxweld 62	91.5% Copper, Aluminum	Copper, Ozone	B
Type 316 Stainless	18% Chromium, 13% Nickel, Steel	Copper, Nickel, Ozone	B
Aluminum	Aluminum	Ozone	B
Hastelloy B	Nickel, Molybdenum	Nickel, Ozone	B
Inconel 62	Chromium, Nickel	Nickel, Ozone	B
Oxweld 65	Iron		B

*High levels of ultraviolet light produced. Avoid eye flash with side shield goggles. Avoid skin burns with proper clothing.

B. Moderate amounts of fumes generated:

1. Use exhaust blowers or air siphons to remove fumes from breathing zone in open areas.
2. Work in confined spaces or poorly ventilated areas will require high efficiency particulate respirators.

Acetylene Welding and Brazing

Wire	Basic Elements	Harmful Byproducts	Precautions
Hastelloy D	Silicon, 90% Nickel	Nickel	A
Oxweld 5M	Copper, Zinc, Tin	Copper, Zinc	B
1 Oxweld	Steel		A
Aluminum	Aluminum		A
Everdur 1010	Copper, Silicon	Copper	A
Arcosil J	56% Silver, 22% Copper, 17% Zinc, 5% Tin	Copper, Zinc	B
Oxweld 28	18% Chromium, 8% Nickel, Steel	Chromium, Nickel	B
18-8 Stainless	18% Chromium, 8% Nickel, Steel	Chromium, Nickel	B
Easy-Flo	45% Silver, 15% Copper, 25% Cadmium, 16% Zinc	Copper, Cadmium, Zinc	B
Sil-Fos	15% Silver, 80% Copper, 5% Phosphorus	Copper	B
Oxweld 372	98% Copper	Copper	B
Colmonoy 6	65% Cobalt, 28% Chromium	Cobalt, Chromium	B
Chromium	Tungsten		
Stoodite	Iron, 30% Chromium	Chromium	B
Borod	Tungsten Carbide, Iron		

A. No special precautions are needed in open or well-ventilated areas. Work in confined spaces or poorly ventilated areas may require fume filter-type respirators. Consult the mechanical welding and metals supervisor.

B. Moderate amounts of fumes generated:

- 3) Use exhaust blowers or air siphons to remove fumes from breathing zone in open areas.
- 4) Work in confined spaces will require high efficiency particulate respirators.

Acetylene Welding and Brazing

Wire	Basic Elements	Harmful Byproducts	Precautions
Hastelloy D	Silicon, 90% Nickel	Nickel	A
Oxweld 5M	Copper, Zinc, Tin	Copper, Zinc	B
1 Oxweld	Steel		A
Aluminum	Aluminum		A
Everdur 1010	Copper, Silicon	Copper	A
Arcosil J	56% Silver, 22% Copper, 17% Zinc, 5% Tin	Copper, Zinc	B
Oxweld 28	18% Chromium, 8% Nickel, Steel	Chromium, Nickel	B
18-8 Stainless	18% Chromium, 8% Nickel, Steel	Chromium, Nickel	B
Easy-Flo	45% Silver, 15% Copper, 25% Cadmium, 16% Zinc	Copper, Cadmium, Zinc	B
Sil-Fos	15% Silver, 80% Copper, 5% Phosphorus	Copper	B
Oxweld 372	98% Copper	Copper	B
Colmonoy 6	65% Cobalt, 28% Chromium	Cobalt, Chromium	B
Chromium	Tungsten		
Stoodite	Iron, 30% Chromium	Chromium	B
Borod	Tungsten Carbide, Iron		

A. No special precautions are needed in open or well-ventilated areas. Work in confined spaces or poorly ventilated areas may require fume filter-type respirators. Consult the mechanical welding and metals supervisor.

B. Moderate amounts of fumes generated:

- 5) Use exhaust blowers or air siphons to remove fumes from breathing zone in open areas.
- 6) Work in confined spaces will require high efficiency particulate respirators.

Silver Soldering and Soldering

Rod, Wire	Basic Elements	Harmful Byproducts	Precautions*
1801 Super	Silver, Copper, Cadmium, Zinc	Copper, Cadmium, Zinc	B
1602	Silver, Copper, Tin	Copper	B
18 FC	Copper, Tin Zinc	Copper, Zinc	B
16 FC	Silver Copper, Nickel	Copper, Nickel	B
15 Phoson	Silver Copper Phosphorous	Copper	B
11 Allstate	Copper, Zinc, Nickel	Copper, Zinc, Nickel	B

B. Moderate amounts of fumes generated:

- 1) Use exhaust blowers or air siphons to remove fumes from breathing zone in open areas.
- 2) Work in confined spaces will require high efficiency particulate respirators.

Air Arc Cutting and Gouging (Carbon Rod) *

Material Worker	Basic Elements	Harmful Byproducts	Precautions*
Steel	Iron	Iron Oxides	D
Cast Iron	Iron	Iron Oxides	D
Monel	Copper, Nickel	Copper, Nickel	D
Stainless Steels	Chromium, Nickel, Iron	Chromium, Nickel	D
Chrome Steels	Chromium, Iron	Chromium	D
Brass	Copper, Zinc	Copper, Zinc	D
Copper	Copper	Copper	D
Aluminum	Aluminum	Nickel Oxides	D
High Nickel	Nickel	Nickel Oxides	D

CADMIUM AWARENESS

While The Company does not expect any exposure to cadmium, if the job or project that we are working is determined to contain or potentially expose our workers, then we will work with the client to first determine if the hazard can be engineered out or if we will need to establish a protocol using this policy to safely perform the work. The equipment and processes that typically contain cadmium will be identified by the work permit and or job hazard analysis systems. Procedures for elimination or minimization of exposure will be the 1st line of defense. Special precautions will be exercised when maintenance of ventilation systems and changing of filters is performed.

Appearance

Cadmium metal-soft, blue-white, malleable, lustrous metal or grayish white powder. Some cadmium compounds may also appear as a brown, yellow, or red powdery substance. Cadmium can cause local skin or eye irritation. Cadmium can affect your health if you inhale or if you swallow it. Cadmium that may be immediately dangerous to life or health occur in jobs where workers handle large quantities of cadmium dust or fume; heat cadmium-containing compounds or cadmium-coated surfaces; weld with cadmium solders or cut cadmium-containing materials such as bolts.

The program will be evaluated and updated as needed on an annual basis.

Exposure Limit

TWA PEL 8-Hour (time weighted average, permissible exposure limit) is Five (5) micrograms of cadmium per cubic meter of air 5 ug/m (3), time weighted average for an 8- hour workday. If the PEL is exceeded, this policy will be implemented.

Training

Only trained and qualified workers may operate or maintain welding, cutting or brazing equipment. Welders/Cutters who may be exposed or have the potential to be exposed will be trained per this policy and will possess the appropriate certifications for their work scope.

Any Craft or Trade required to perform any of the functions covered by this policy will be required to complete training per The Company's Training policy including:

- A test or other method to determine competency.
- Training initial to assignment and at least annually thereafter.
- All training records shall be documented and kept on file with Human Resources for at least one year or for the duration of the covered worker's employment.

Documentation will include outline or class name, the names and worker numbers of the workers who participated in the training, names, and signatures of those who trained the class and a class date.

Medical Surveillance/Written Exposure Plan

While the company should not expose workers to, at or above the action level, if those levels are reached, then a written exposure plan including annual reviews and updates will be required. Should worker(s) become exposed to, at or above action levels related to work exposures and cadmium, then workers will receive a medical evaluation, which will include tests to determine exposure and a medical history. This is provided at no cost to the worker. As with all medical records, these are kept strictly confidential. The worker or representative is entitled to see the records of measurements of the exposure. The worker can also request that medical records for exposure be furnished to the worker's personal physician or designated representative. The written program will be provided for examination and copying upon request of affected workers and their representatives.

Respiratory Protection Program

If respiratory protection is required, see the company's Respiratory Protection Program for complete guidelines to respiratory protection.

Emergency Procedures

First Aid for Eye Exposure

Direct contact may cause redness or pain. Wash eyes immediately with large amounts of water and seek medical attention immediately.

First Aid for Skin Exposure

Direct contact may result in irritation. Remove contaminated clothing and shoes immediately. Wash affected area with soap or mild detergent and large amounts of water. Get medical attention immediately.

Ingestion

May result in vomiting, abdominal pain, nausea, diarrhea, headache, and sore throat. Treatment for symptoms must be administered by medical personnel. Get medical attention immediately.

Inhalation

If large amounts of cadmium are inhaled, the exposed person must be moved to fresh air at once. Get medical attention immediately.

Rescue

Move affected person from the hazardous exposure. If the exposed person has been overcome, attempt rescue only after notifying at least one other person and put into effect established emergency procedures.

Respirators

You may be required to wear a respirator for work related to this type of exposure or for emergency response. Only use respirators approved by MSHA and NIOSH. Cadmium does not have a detectable odor except at levels well above the PEL. If you can smell cadmium while wearing a respirator, proceed immediately to fresh air.

PPE

You may be required to wear impermeable clothing, gloves, splash-proof or dust resistant goggles, face shield or other appropriate PPE to prevent skin contact with cadmium.

HEXAVALENT CHROMIUM AWARENESS

While The Company does not expect any exposure to Hexavalent Chromium, if the job or project that we are working is determined to contain or potentially expose our workers, then we will work with the client to first determine if the hazard can be engineered out or if we will need to establish a protocol using this policy to safely perform the work. The equipment and processes that typically contain hexavalent chromium will be identified by the work permit and or job hazard analysis systems. Procedures for elimination or minimization of exposure will be the 1st line of defense. Special precautions will be exercised when maintenance of ventilation systems and changing of filters is performed.

DEFINITIONS

Action Level = a concentration of airborne chromium (VI) of 2.5 micrograms per cubic meter of air ($2.5 \mu\text{g}/\text{m}^3$) calculated as an 8-hour time-weighted average (TWA)

Chromium (VI) [hexavalent chromium or Cr (VI)] means chromium with a valence of positive six, in any form and in any compound

Emergency means any occurrence that results, or is likely to result, in an uncontrolled release of chromium (VI). If an incidental release of chromium (VI) can be controlled at the time of release by workers in the immediate release area, or by maintenance personnel, it is not an emergency

Worker Exposure means the exposure to airborne chromium (VI) that would occur if the worker were not using a respirator

Regulated Area means an area, demarcated by the employer, where a worker's exposure to airborne concentrations of chromium (VI) exceeds, or can reasonably be expected to exceed the PEL. Access to Regulated Area shall be limited to:

- Persons authorized by the employer
- Persons with required work duties in the regulated area
- Workers are not permitted to eat, drink, smoke, chew tobacco or gum, or apply cosmetics in the regulated area where skin and eye contact with Chromium VI may occur

Permissible Exposure Limit (PEL). The Company shall ensure that no worker is exposed to an airborne concentration of chromium (VI) in excess of 5 micrograms per cubic meter of air ($5 \mu\text{g}/\text{m}^3$), calculated as an 8-hour time-weighted average (TWA)

- Below $0.5 \mu\text{g}/\text{m}^3$ under any condition – Exempt
- Between 0.51 and $2.5 \mu\text{g}/\text{m}^3$
 - Housekeeping – no dust
 - Clean eating and drinking areas
- Above action level $2.5 \mu\text{g}/\text{m}^3$ for more than 30 days per year
 - All of the above
 - Install engineering controls
 - Personal respiratory protection
 - Monitoring every 6 months
 - Medical Surveillance, at least annually
 - Recordkeeping, Hazard Communication Training
- Above the PEL $5.0 \mu\text{g}/\text{m}^3$
 - All of the above
 - Establish regulated areas – roped off, limited access, Personal Protective Equipment (PPE), washing facilities
 - Monitoring every 3 months

Respiratory Protection

Fresh air will be the only method currently that will prevent airborne exposure and eye exposure when being exposed to the PEL.

Skin Protection

If exposure or likely exposure is there, then appropriate skin protection such as Tyvek and gloves (i.e., disposable type PPE).

No PPE that is contaminated shall be removed from the job site, except by those workers whose job it is to launder, clean, maintain, or dispose of such clothing and equipment (all clothing/equipment being removed for laundering, cleaning, maintenance, or disposal shall be transported in sealed, impermeable bags or other closed, impermeable containers).

Removal of chromium (VI) from protective clothing and equipment by way of blowing, shaking, or any other means that disperses chromium (VI) into the air or onto a worker's body is prohibited.

Access to regulated areas will be limited to those workers with the authority to be there. Regulated areas will be marked as such.

A medical surveillance program including notifications and medical follow-ups will be required for any worker who is exposed at no cost to the worker (medical examination to include: medical work history, with emphasis on: past, present, and anticipated future exposure to chromium (VI); any history of respiratory system dysfunction; any history of asthma, dermatitis, skin ulceration, or nasal septum perforation; and smoking status and history; physical examination of the skin and respiratory tract; and any additional tests deemed appropriate by the examining physician).

If any worker exposure exceeds the PEL, The Company will notify the worker within 15 days in writing of the exposure.

When protective clothing is required, a change room facility must be provided, and the room will include separate areas for protective clothing and street clothes to prevent cross-contamination.

Where skin contact with chromium (VI) occurs, washing facilities must be provided and workers must wash their hands and faces at the end of the shift and prior to eating, drinking, smoking, chewing tobacco or gum, applying cosmetics, or using the toilet (none of these activities can be done in the regulated area).

Housekeeping

All areas contaminated with chromium (VI) will be cleaned by HEPA-filter vacuuming or other methods that minimize the likelihood of exposure. All surfaces must be kept as free as practical of Chromium VI. Waste, scrap, debris, and other materials with Chromium VI must be placed in impermeable bags and labeled according to the Hazard Communication Standard prior to disposal.

Training

- Only trained and qualified workers may operate or maintain welding, cutting or brazing equipment. Welders/Cutters who may be exposed or have the potential to be exposed will be trained per this policy and will possess the appropriate certifications for their work scope.
- Craft who perform any of the functions covered by this policy will be required to complete training per The Company's Training policy including:
 - A test or other method to determine competency
 - Training initial to assignment and at least annually thereafter
 - All training records shall be documented and kept on file for the duration of the covered worker's employment.
- Documentation will include an outline or class name, the names and worker numbers of the workers who participated in the training, names, and signatures of those who trained the class and a class date.

Medical Surveillance/Written Exposure Plan

While The Company's work should not expose workers to work at or above the action level, if those levels are reached, then a written exposure plan including annual reviews and updates will be required. Should worker(s) become exposed to at, or above action levels related to work exposures and Hexavalent Chromium VI, then workers will receive a medical evaluation, which will include tests to determine exposure and a medical history. This is provided at no cost to the worker. As with all medical records, these are kept strictly confidential. The worker or representative is entitled to see the records of measurements of the exposure. The worker can also request that medical records for exposure be furnished to the worker's personal physician or designated representative.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Housekeeping	Revision Date:
		Section:

1) PURPOSE

- a. The purpose of this document is to provide definitions and procedures that should be used by all facilities in defining and managing housekeeping and walking-working surfaces within EARNEST CONTRACTING, hereafter referred to as “The Company”, sites. Where local regulations are more stringent than this requirement, those regulations supersede this requirement.

2) SCOPE

- a. This requirement applies to all The Company facilities.

3) DEFINITIONS

- a. **Standard railing** – A vertical barrier erected along exposed edges of a floor opening, wall opening, ramp, platform, or runway to prevent falls of workers.
- b. **Stairs, stairway** – A series of steps leading from one level or floor to another, or leading to platforms, pits, boiler rooms, crossovers, or around machinery, tanks, and other equipment that are used continuously or routinely by workers, or only occasionally by specific workers.
- c. **Platform** – A working space for persons, elevated above the surrounding floor or ground, such as a balcony or platform for the operation of machinery and equipment.

4) REQUIREMENTS

- a. The workplace must be kept in a suitable clean and tidy state.
- b. Aisle-ways must be kept free of hoses, cords, stored materials, and other trip hazards.
- c. Floors must be even and free of holes or other trip hazards.
- d. Elevated surfaces (platforms, mezzanines) must be provided with guard rails (standard railing).
- e. Staircases must be safe.
- f. Ladders and other equipment should be secured and not left leaning.
- g. Housekeeping inspections should be conducted at each location at least monthly and documented.
- h. Health and safety inspections should be conducted at each work site at least monthly.
- i. Training must be provided to all workers at all work sites to maintain orderliness and housekeeping.



1) PURPOSE

- a. The purpose of the Incident Investigation Policy is to make certain that incidents are investigated according to the injury, or injury potential of an event, in accordance with EARNEST CONTRACTING, hereafter referred to as “The Company”. This will help to control further losses of human and material resources by identifying and correcting unsafe acts and conditions that lead to an incident. This policy applies to any and all work-related incidents and near misses that affect company employees and others who are performing work for the company.

2) POLICY

- a. All safety incidents, including work-related injuries, accidents, near misses, and property damage will be reported and investigated to determine root causes, and recommendations will be developed, communicated, and implemented to prevent recurrence of the incident. This policy applies to all workers, contractors, and associates on The Company locations. All entities working with The Company are required to report all incident types to management, supervisors, and/or safety representatives. If the incident requires medical attention, it should be reported as soon as the medical situation has been brought under control.

3) RESPONSIBILITIES

a. Management

- i. Management will participate in the investigation of all incidents to the appropriate level with regards to incident severity.
- ii. Management will review all accidents/injuries of subordinates and implement corrective action and safety modification and/or employee training as recommended by the incident investigation.
- iii. Will ensure proper case management, accident/incident processes, investigation methods, and reporting are carried out according to company guidelines.

b. Supervisor / Workers

- i. The supervisor shall conduct the investigation of the incident in a manner that is timely and appropriate to the circumstances and severity of the incident.
- ii. The supervisor must immediately report accidents and near misses to management and perform an initial investigation, and timely submit an Incident Report within 24 hours of the incident.
- iii. The supervisor must advise new and returning workers of the requirement to report all incidents including near misses. An annual reminder to all employees to report incidents is recommended
- iv. Workers are responsible for immediately informing supervisors of accidents, near miss events, unsafe conditions, unsafe equipment, and known unsafe practices.
- v. Workers are responsible for reporting any incident or near miss immediately.
- vi. Workers shall participate in the incident investigation unless they are unable to do so as a result of injury.
- vii. Workers may choose to report a near miss using the company’s form Incident Near Miss Reporting, or verbally to their supervisor, who will be responsible for completing the document

c. Safety Representative

- i. Responsible for assisting in the investigation of an incident and ensuring the case is managed appropriately working with supervisors and other responsible managers.
- ii. Utilizing information collected during investigation of incidents and near misses to help improve and maintain safety overall.
- iii. Monitor corrective actions as appropriate to remedy an unsafe working condition, facility, equipment, location, or practice.



4) PROCEDURES

a. Training

- i. All personnel will be trained in their roles and responsibilities for incident response, reporting, and investigating techniques before performing any work. It is the responsibility of the supervisor to ensure all affected workers are properly trained in accident/incident investigation processes and company reporting criteria.

b. Incident Investigating Procedures

- i. All safety incidents are to be investigated in a timely manner (no more than 24 hours) to determine the root cause(s) and contributing factors involved. The extent of the investigation depends on a number of factors including the severity or potential severity of the incidents. All evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.
- ii. Respond to the Incident Scene Immediately: If the incident results in an employee injury or illness, make sure that the affected employee receives immediate medical attention. Take actions necessary to prevent or minimize the risk of additional injury or illness in the area.
- iii. Secure the Incident Scene: The scene of the event should be left intact to the greatest extent possible, with nothing moved or disturbed until the investigation is complete. Use barricades, signs, or other means to isolate the site, warn of hazards, and otherwise restrict access.
- iv. Preserve Evidence: Before and during the investigation, make a prompt and careful effort to preserve the evidence that is necessary to answer the key questions about the incident (who, where, what, when how and why). Observe and record perishable or environmental evidence (such as instrument readings, control panel settings, and weather conditions). Use photographs, sketches, and diagrams to record evidence or conditions. Make detailed notes about any photographs, sketches, or diagrams made.
- v. Identify Witnesses: When arriving at the scene, identify the individuals who were either involved in the event or saw it happen. Ask them to identify others who were also in the area and make a list of these names. Separate witnesses. Have each complete a witness statement and sign.
- vi. Interview Witnesses: Interview witnesses individually and as soon as possible after the event. Interview the people directly involved first (if Possible), then eyewitnesses and observers.

c. Complete Investigation Report to include:

- i. Activity in progress at the time of the event
- ii. Sequence of events leading to the event
- iii. Emergency response to the event
- iv. Medical treatment provided by first responders to the injured/ill employee
- v. Direct contributing factors
- vi. Corrective actions taken or planned (including estimated completion dates)
- vii. Name(s) of individual(s) responsible for corrective actions

d. Corrective Actions

- i. Management's initial findings and any immediate corrective actions must be documented and sent to The Company's representative or designee within 24 hours of notifications of the incident. Near miss reports are sent to The Company's representative or designee within 48 hours. The Company's representative or designee will review each incident to ensure the investigation was thorough and all immediate corrective actions are completed, and longer-term follow-up actions are clearly defined with adequate schedule and resources for completion.

e. Reporting Requirements

- i. Time elements of when incident should be reported

1. The Company will verbally report fatality and catastrophic incidents to OSHA within 8 hours of discovery. For any in-patient hospitalization, amputation, or eye loss The Company must report the incident within 24 hours of discovery to OSHA. OSHA requires reporting of work-related incidents resulting in death of an employee or the hospitalization of one or more workers within 8 hours.

f. Involving the Environment

- i. If an environmental incident occurs that must be reported to local, state, and/or federal agencies, the following persons should be notified: Joey Earnest, Justin Earnest, and the Yard Manager.

Investigation Checklist and Plan

Potential Witnesses (list on separate sheet):

- Workers involved in the incident
- Workers close to the incident
- Workers involved with events prior to the incident
- Workers involved with events after the incident
- Workers of other contractors
- Client Workers

Identified

Interviewed

Documents:

- Job Hazard Analysis
- Tailgate/Toolbox Talks
- Other Safety Meetings
- Audits
- Inspections
- Work Order/Job Order
- Permit
- Time Sheets

Relevant

Obtained

- Personnel File
- Safety Log
- Contract(s)
- Medical Reports
- Doctor's First Report
- Training Records
- Other

Relevant

Obtained

Other Evidence:

- Tools
- Equipment
- PPE/Clothing

- Photographs
- Drawings
- Blueprints

Incident Report

This form contains information relating to worker health and must be used in a manner that protects the confidentiality of workers to the extent possible while the information is being used for occupational safety and health purposes.

Worker	Male / Female
Phone #	Date hired
Street Address	Date of incident
City	Time of incident
State / Zip	Time worker began work
Date of birth	Supervisor

Site/Location (facility name) and Unit or Project:

Name of physician or other health care professional:

If treatment was given away from the worksite, where was it given?

Was emp. treated in an emergency room?	Yes or No	Was emp. hospitalized overnight as an in-patient?	Yes or No
First Aid	<input type="checkbox"/>	Medical Non-Disabling	<input type="checkbox"/>
Near Miss	<input type="checkbox"/>	Restricted Work Case	<input type="checkbox"/>
Motor Vehicle Accident	<input type="checkbox"/>	Lost Time Case	<input type="checkbox"/>
		Equipment Damage	<input type="checkbox"/>
		Fire or Release	<input type="checkbox"/>
		Non-Occupational	<input type="checkbox"/>

LOSS - apparent nature and extent of injury, damage or potential loss?

INCIDENT - description of the incident (who, what, how, when, why and what was the worker doing just before the incident occurred)?

PREVENTION

Immediate action and future action to prevent recurrence?

Prepared By:	Title:	Date:
Report Routed To?		

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Job Competency	Revision Date:
		Section:

1) PURPOSE

- a. The purpose of this policy is to establish general job competency requirements for all EARNEST CONTRACTING, hereafter referred to as "The Company", workers.

2) RESPONSIBILITIES

- a. Designated Safety Representative will be responsible for:
 - i. Identifying, updating, and monitoring minimum qualification requirements, job titles and training documentation.
 - ii. Supplying training reports.
 - iii. Company Management will be responsible for:
 1. Ensuring all workers assigned to their project meet job competency requirements and complete training identified in the training matrix prior to being assigned to the task.
 2. Ensuring that any work that may endanger a worker must be completed by a worker who is competent to do the work.
 3. Ensuring all workers have sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.
 - iv. All workers will be responsible for:
 1. Attending and following requirements of safety and health management training.

3) PROCEDURES

a. Competence

- i. Competence is a combination of knowledge, skills, and abilities to sufficiently perform the task. Knowledge, skills and abilities are acquired by training and experience.
- ii. The following components are to be considered for each worksite's delivery team for competency assurance:
 1. Experience
 2. Level of Knowledge
 3. Capability to Perform
- iii. The Company's view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities, and critical activities. This process enables the continuous improvement loop that feeds back into training and development activities that ensure competency assurance is an ongoing career cycle process.
 1. **Job Description Identified** → Candidate Selection and Hiring Process (Reference and Background Check, Drug Screen, Physical Assessment) → Person Assessed and Hired for Open Position
 2. **Experience, Qualifications Assessed for Initial Training** ↔ Initial Induction Training Completion
 3. **Further Training Required?** If no → Ready for Work → On the Job Training → Competency Continually Assessed
 4. **Performance Appraisal** → Ready to Promote? → Worker Promoted → Further Training Required?
- iv. Competency is verified before workers are permitted to perform tasks independently. A competent person (supervisor, lead hand, instructor, etc.) must verify that a worker is competent to perform their roles and responsibilities before being allowed to work independently. If there is Short Service Worker (SSE) program

established the new or transferred worker will fall under the SSE requirements until they are determined to be competent and removed from the SSE program.

b. Identification of Documentation

- i. Documentation is obtained from workers to demonstrate they meet the qualifications of their job. Based on the job description requirements documentation may include educational, certifications, licenses, prior acceptable training course completion, etc. Documentation is reviewed and confirmed during the worker hiring process.

c. Identification of Positions

- i. An organizational chart and list of job titles has been established by The Company. Based on the positions and their exposure to risk their required training is entered into each worksite's training matrix. Job descriptions are prepared for each job title.

d. Identification of Qualifications

- i. Minimum qualification requirements for each job title have been established by The Company Management. Qualifications may include a combination of education, certifications, and work experience. Safety training completion for the indicated job title is required before full qualifications are met to allow a worker to begin work.

e. Identification of Training and Competency Needs

- i. Workers (new or transferred) are provided job specific training related to their roles and responsibilities and trained on the tasks they perform on a regular basis. Training is identified in our training matrix which specifies safety and health training needs by job title.

f. Training Records

- i. All training records are maintained by The Company's Safety Coordinator or HR Manager or their designee.

g. Delivery of Induction, Transfer and Refresher Training

- i. Workers receive initial induction training. No work by any worker is allowed to begin until the orientation is completed. Training requirements are tracked by The Company Safety Coordinator and formal training sessions are conducted by the Safety Coordinator or competent/qualified instructor for the required subject matter. Applicable training will be completed annually or according to certification requirements.

h. Supervisor Safety Management Training

- i. Supervisors and managers receive annual, documented safety management system training.



1) PURPOSE

- a. The Ladder Safety Policy is intended to provide workers with safe guidelines for the use of portable ladders, while complying with applicable regulatory compliance standards.

2) POLICY

- a. Under no circumstances are portable ladders to be used unless conditions are considered safe, secure and in compliance with EARNEST CONTRACTING procedures and safe work practices.

3) PROCEDURES

- a. The use of ladders with broken or missing rungs or steps, broken or split side rails, or other faulty or defective construction is prohibited. All rungs, cleats, and steps will be parallel, level and uniformly spaced when the ladder is being used. All ladders will be inspected prior to use by a competent person. When ladders with such defects are discovered, they must be immediately removed from service and tagged as such.
- b. Employees will face the ladder and will not carry material or tools in their hands while ascending or descending.
- c. Ladders will not be loaded beyond the maximum intended load for which they were built or beyond the manufacturer's rated capacity.
- d. All ladders shall be placed on secure footing, and the area around the top and bottom will be kept clear of work materials, tools, and debris.
- e. Planks will not be used on the top step of stepladders.
- f. Portable ladders will be placed and used at a pitch that places the horizontal distance, from the top support to the foot of the ladder, at about one-quarter of the working length of the ladder. Ladders will not be used in a horizontal position as a platform, runway, or scaffold.
- g. Ladders shall not be placed in front of doors, unless the door is blocked open, and/or a barricade or guard is provided.
- h. Ladders shall not be placed on scaffold, boxes, boards, barrels, or other unstable bases.
- i. Ladders shall not be spliced together.
- j. Employees will not stand on the top cap or the step below the top cap of a stepladder.
- k. Any ladder splashed with caustic or acid shall not be used until thoroughly cleaned and inspected for possible corrosive damage.
- l. There shall be ample clearance and clear access at the top and bottom of portable ladders.
- m. Portable rung ladders shall only be used with metal supports on the underside.
- n. No ladder shall be used to gain access to a roof unless it extends at least 3 feet above the point of highest support with the building. Side rails must extend not less than 36" above any landing. When this is not practical, grab rails will be provided to facilitate employee movement to and from the point of access.
- o. Portable metal ladders will not be used for electrical work or where they may contact electrical conductors.
- p. All ladders shall be equipped with non-slip bases when a hazard of slipping exists.

- q. All ladders will be tied off on top, blocked or otherwise secured to prevent movement before work is performed on them.
- r. All ladders must have a minimum width of 12 inches. All ladders must have a distance of 12" between rungs.
- s. Stepladders shall not exceed 20 feet in length.
- t. Extension ladders shall be equipped with positive stops.
- u. Ladders shall be maintained in good condition.
- v. Only one employee is to work on or climb a ladder at the same time.
- w. All work done from a ladder shall be within an individual's normal reach and with no overextending allowed.



1) PURPOSE

- a. This safety guideline is intended to provide suitable information to all workers regarding the potential effects of lead and where lead may be found so that adequate measures can be taken to limit exposure through controls in the workplace.

b. GENERAL

- i. The objective of this guideline is to prevent absorption of harmful quantities of lead pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as "The Company". The guideline is intended to protect The Company workers from the immediate toxic effects of lead and from the serious toxic effects that may not become apparent until years of exposure have passed.

ii. Characteristics & Where It Can Be Found

1. To understand why lead is so hazardous, it is important to know what it is, the hazardous effects on people, and which materials do or may contain lead. Once this is understood, workers will gain respect for the safety guidelines set forth in this policy.

iii. What Is It?

1. Pure lead (Pb) is a heavy metal and is a basic chemical element. It can combine with various other substances to form numerous lead compounds.

iv. Lead can be found in:

- | | |
|--|--|
| 1. Old glossy paints used on walls and pipe. | 3. Report to The Company Project Manager anytime you suspect lead-containing materials that may not have been disclosed: |
| 2. Building and roof metal support frames. | 4. Cracked or peeling paint, |
| | 5. Visible paint dust, grindings, or shavings. |

c. Health Effects

i. Ways in which lead enters your body:

1. Lead can be absorbed into your body by inhalation (breathing) and ingestion (eating). When lead is scattered in the air it can be inhaled and absorbed through your lungs and upper respiratory tract. Inhalation of airborne lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed.
2. Hazards encountered with lead occur when:
3. Inhaling lead as a dust, fume, or mist.
4. Ingesting lead through food, cigarettes, and chewing tobacco when handled with contaminated hands.
5. Lead (except for certain organic lead compounds not covered by the standard, such as tetraethyl lead) is not absorbed through your skin. When lead is scattered in the air as a dust, fume or mist it can be inhaled and absorbed through your lungs and upper respiratory tract. Inhalation of airborne lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed. If you handle food, cigarettes, chewing tobacco, or make-up, which have lead on them or handle them with hands contaminated with lead, this will contribute to ingestion.
6. A significant portion of the lead that you inhale or ingest gets into your blood stream. Once in your blood system, lead is circulated throughout your body and stored in various organs and body tissues. Some of this lead is quickly filtered out of your body and excreted, but some remains in the blood and other tissues. As exposure to lead continues, the amount stored in your body will increase if you are absorbing more lead than your body is excreting. Even though you may not be aware of any immediate symptoms of disease, this lead stored in your tissues can be slowly causing irreversible damage, first to individual cells, then to your organs and whole-body systems.

d. **Effects of overexposure to lead:**

i. **Short-term (acute) overexposure**

1. Lead is a potent, systemic poison that serves no known useful function once absorbed by your body. Taken in large enough doses, lead can kill you in a matter of days. A condition affecting the brain called acute encephalopathy may arise which develops quickly to seizures, coma, and death from cardiorespiratory arrest. A short-term dose of lead can lead to acute encephalopathy. Short-term occupational exposures of this magnitude are highly unusual, but not impossible. Similar forms of encephalopathy may, however, arise from extended, chronic exposure to lower doses of lead. There is no sharp dividing line between rapidly developing acute effects of lead and chronic effects, which take longer to acquire. Lead adversely affects numerous body systems and causes forms of health impairment and disease which arise after periods of exposure as short as days or as long as several years.

ii. **Long-term (chronic) overexposure**

1. Chronic overexposure to lead may result in severe damage to your blood-forming, nervous, urinary, and reproductive systems. Some common symptoms of chronic overexposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, pallor, excessive tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain or soreness, fine tremors, numbness, dizziness, hyperactivity, and colic. In lead colic there may be severe abdominal pain.
2. Damage to the central nervous system in general and the brain (encephalopathy) is one of the most severe forms of lead poisoning. The most severe, often fatal, form of encephalopathy may be preceded by vomiting, a feeling of dullness progressing to drowsiness and stupor, poor memory, restlessness, irritability, tremor, and convulsions. It may arise suddenly with the onset of seizures, followed by coma, and death. There is a tendency for muscular weakness to develop at the same time. This weakness may progress to paralysis often observed as a characteristic "wrist drop" or "foot drop" and is a manifestation of a disease to the nervous system called peripheral neuropathy.
3. Chronic overexposure to lead also results in kidney disease with few, if any, symptoms appearing until extensive and most likely permanent kidney damage has occurred. Routine laboratory tests reveal the presence of this kidney disease only after about two-thirds of kidney function is lost. When overt symptoms of urinary dysfunction arise, it is often too late to correct or prevent worsening conditions, and progression to kidney dialysis or death is possible.
4. Chronic overexposure to lead impairs the reproductive systems of both men and women. Overexposure to lead may result in decreased sex drive, impotence, and sterility in men. Lead can alter the structure of sperm cells raising the risk of birth defects. There is evidence of miscarriage and stillbirth in women whose husbands were exposed to lead or who were exposed to lead themselves. Lead exposure also may result in decreased fertility and abnormal menstrual cycles in women. The course of pregnancy may be adversely affected by exposure to lead since lead crosses the placental barrier and poses risks to developing fetuses. Children born of parents either one of whom were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood.
5. Overexposure to lead also disrupts the blood-forming system resulting in decreased hemoglobin (the substance in the blood that carries oxygen to the cells) and ultimately anemia. Anemia is characterized by weakness, pallor, and fatigue because of decreased oxygen-carrying capacity in the blood.

2) PROCEDURES

a. **Permissible Exposure Limits (PEL)**

- i. The current OSHA lead standard is 50 µg/m³ as an 8-hour Time Weighted Average (TWA). The standard as it applies to construction is unique in that it groups tasks *presumed* to create worker exposures above the PEL of 50 µg/m³ as an 8-hour TWA, as follows:

ii. **LEAD-RELATED CONSTRUCTION TASKS AND THEIR 8-HOUR TWA EXPOSURE LEVELS**

3) > 50 to 500 µg/m ³	4) > 500 µg/m ³ to 2,500 µg/m ³	5) > 2,500 µg/m ³
6) Manual demolition	7) Using lead-containing mortar	8) Abrasive blasting
9) Dry manual scraping	10) Lead burning	11) Welding

12) Dry manual sanding	13) Rivet busting	14) Torch cutting
15) Heat gun use	16) Power tool cleaning without dust detection systems	17) Torch burning
18) Power tool cleaning with dust collection systems	19) Cleanup of dry expendable abrasive blasting jobs	20)
21) Spray painting with lead paint	22) Abrasive blasting enclosure movement and removal	23)

d. Action Level

- i. The standard also establishes an action level of 30 micrograms per cubic meter of air (30 µg/m³), time-weighted average, based on an 8-hour workday. The action level initiates several requirements of the standard, such as exposure monitoring, medical surveillance, and training and education.

e. Evaluation Process

- i. The Contracting Company's Project Manager will provide workers with results of any evaluation processes and a listing of lead containing material. The Contracting Company will provide all precautions and render the area safe for workers before work begins.

f. Safety Measures

- i. Workers are not permitted to work in areas where there may be a potential for Lead exposure. If it is necessary to perform any work where the exposure to Lead is about the acceptable limits, then must implement a comprehensive mandated safety policy and procedure that includes special elements of exposure monitoring, formal medical program, special personal protective equipment, and much more.
- ii. Below are listed possible work controls and practices:
 1. WELDING, BURNING, AND TORCH CUTTING.
 2. Welding and cutting activities that potentially involve exposure to lead can occur as part of a number of construction projects such as highway/railroad bridge rehabilitation (including elevated mass-transit lines), demolition, and indoor and outdoor industrial facility maintenance and renovation. Lead exposures are generated when a piece of lead-based painted steel is heated to its melting point either by an oxyacetylene torch or an arc welder. In this situation, lead becomes airborne as a volatilized component of the coating.
 3. The amount of time a worker may spend welding or cutting can vary from only a few minutes up to a full shift. In addition, the coating being worked on may consist of several layers of lead-based paint, each of which could contain as much as 50% lead. Taken together, these factors suggest that a worker's exposure to airborne lead during welding or cutting activities can vary widely and may be exceedingly high. Lead burning, a process by which virgin or alloyed lead is melted with a torch or otherwise fused to another lead object, is typically performed in maintenance operations on electrostatic precipitators or during the installation of lead shot, bricks, or sheets in the walls or floors of health-care x-ray units or industrial sites. Lead health hazards in this operation, as in welding and torch cutting, are from lead that is superheated and released into the worker's breathing zone in the form of a fume.

g. Engineering Controls.

- i. The engineering controls that can be used, depending on feasibility, are:
 1. Local exhaust ventilation (LEV) that has a flanged hood and is equipped with HEPA filtration may be appropriate where the use of LEV does not create safety hazards. Use of a flexible duct system requires that the welder be instructed to keep the duct close to the emission source and to ensure the duct is not twisted or bent
 2. A fume-extractor gun that removes fumes from the point of generation is an alternative to an exhaust hood for gas-shielded arc-welding processes. Such extraction systems can reduce breathing zone concentrations by 70% or more. These systems require that the gun and shielding gas flow rates be carefully balanced to maintain weld quality and still provide good exhaust flow

3. A longer cutting torch can be used in some situations to increase the distance from the lead source to the worker's breathing zone
4. Hydraulic shears can sometimes be used to mechanically cut steel that is coated with lead-based paint. The use of this method is limited by the ability of the shears to reach the cutting area
5. Whenever possible, pneumatic air tools should be used to remove rivets in lieu of burning and torch cutting

h. Work Practice Controls.

- i. The following work practice controls will help to reduce worker exposures to lead during welding, burning, and torch cutting:
 1. Strip back all lead-based paint for a distance of at least 4 inches in all directions from the area of heat application. Chemical stripping, vacuum-shrouded hand tools, vacuum blasting, or other suitable method may be used. However, in enclosed spaces, strip back or protect the workers with air-line respirators
 2. Ensure that workers avoid the smoke plume by standing to the side or upwind of the cutting torch whenever the configuration of the job permit
 3. Prohibit burning to remove lead-based paint. Paint should be removed using other methods, such as chemical stripping, power tools (e.g., needle guns) with vacuum attachments, etc.

i. Manual Scraping and Sanding of Lead-based Paints

- i. Hand scraping of lead-based paints involves the use of a hand-held scraping tool to remove paint from coated surfaces. The health hazards in this activity are caused by the lead dust and paint chips produced in the scraping process. Hand sanding can also produce excessive dust. These activities are typically performed during residential and commercial/institutional lead abatement projects.

j. Engineering and Work Practice Controls

- i. Controls which employers can implement to protect workers performing scraping and sanding of lead-based paints are:
 1. Use of wet-sanding and wet-scraping methods in conjunction with HEPA vacuuming or HEPA mechanical ventilation. Wet methods include misting of peeling paint with water before scraping, and sanding and misting of debris prior to sweeping or vacuuming
 2. Use of shrouded power tools with HEPA vacuum attachments. The shroud must be kept flush with the surface
 3. Use of techniques with known low exposure potential, such as encapsulation and removal or replacement instead of hand scraping and hand sanding

ii. Regulated Areas

- | | |
|---|---|
| <ol style="list-style-type: none"> 1. The Company will ensure a work plan is designed and implemented that will: 2. Eliminate lead dust or fumes from exposing both work personnel and building occupants | <ol style="list-style-type: none"> 3. Ensure that unauthorized persons cannot access the area 4. Use of signage - warning signs shall be provided and displayed at each regulated area and is posted at all approaches to regulated areas |
|---|---|

k. Training

- i. All The Company workers will be provided awareness training in this program to be familiar with the potential hazards and proper safe work procedures to follow if exposed to this health hazard. Training and information will be provided for all workers exposed to lead at or above the action level, or who may suffer skin or eye irritation from lead. The training will inform exposed workers of:
 - ii. Specific hazards associated with their work environment
 - iii. Protective measures which can be taken
 - iv. Danger of lead to their bodies (including their reproductive systems)
 - v. Their rights under the standard



1) PURPOSE

- a. The purpose of the Personal Protective Equipment (PPE) Program is to develop and implement the procedures for the identification, use, care, and maintenance of PPE required to be used by workers for the prevention of illness and injury.
- b. All workers are required to follow the minimum procedures outlined in this program. Any deviations from this program must be immediately brought to the attention of the Program Administrator.

2) SCOPE

- a. This policy applies to the use of PPE pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as "The Company", and related facilities and operations. This program is integrated into our organization's written safety and health program and is a collaborative effort that includes all workers. The Program Administrator is responsible for the program's implementation, management, training, and recordkeeping requirements.

3) RESPONSIBILITIES

a. Management

- i. The management of The Company is committed to the safety and health of its workers. Management supports the efforts of the PPE Program Administrator by pledging financial and leadership support for the identification of hazards and implementation of appropriate PPE for those hazards. Management will regularly communicate with workers about this program.

b. Program Administrator

- i. The Program Administrator reports directly to upper management and is responsible for the hazard assessments, implementation, training, and administration of the PPE program. The Program Administrator will monitor the results of the program to determine additional areas of focus as needed. The Program Administrator will also:
 - ii. Conduct workplace hazard assessments to determine the presence of hazards that require the use of PPE (*Appendix A*)
 - iii. Select and purchase PPE
 - iv. Review, update, and conduct PPE hazard assessments whenever:
 - 1. A job or process changes
 - 2. New equipment is used or added
 - 3. There has been an accident
 - 4. A supervisor or worker requests it
 - v. Maintain records on hazard assessments
 - vi. Maintain records on PPE assignments and training
 - vii. Provide training, guidance, and assistance to supervisors and workers on the proper use, care, and cleaning of approved PPE
 - viii. Periodically re-evaluate the suitability of previously selected PPE
 - ix. Review, update, and evaluate the overall effectiveness of PPE use, training, policies, and program

c. Supervisors

- i. Supervisors have the primary responsibility for implementing and enforcing PPE use in their work area, including, but not limited to:
 - 1. Providing appropriate PPE and making it available to workers
 - 2. Ensuring that workers are trained on the proper use, care, storage, and cleaning of PPE

3. Ensuring that PPE training certification and evaluation forms follow company recordkeeping and documentation policy
4. Ensuring that PPE is properly inspected, used, and maintained in a sanitary and reliable condition.
5. Notifying the Program Administrator when new hazards are introduced or when processes are added or changed
6. Ensuring that defective or damaged PPE is immediately disposed of and replaced

d. Workers

- i. The PPE user is responsible for following the requirements of the PPE program, including, but not limited to:
 1. Properly wearing PPE as required
 2. Attending required training sessions
 3. Properly caring for, cleaning, storing, maintaining, and inspecting PPE as required
 4. Following program policies and rules
 5. Informing the supervisor of the need to repair or replace PPE
 6. *Workers who repeatedly disregard and do not follow PPE procedures and rules will face disciplinary action up to and including termination.*

4) PROCEDURES

a. General Requirements

- i. **Appropriate PPE is required to be worn at all times when workers are exposed to hazards that cannot be eliminated through the use of preferred elimination, substitution, engineering, or administrative controls.**
- ii. The workplace will be evaluated per company schedule and all previously unidentified hazards will be addressed based on changes to the workforce and workplace operations. Assessments will include, but are not limited to, the following items:

<ol style="list-style-type: none"> 1. Torso and abdominal protection 2. Eye and face protection 3. Head protection 4. Foot protection 5. Leg protection 	<ol style="list-style-type: none"> 6. Hand protection 7. Hearing protection (Separate written program) 8. Respiratory protection (Separate written program) 9. Fall protection (Separate written program)
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*NOTE: PPE hazard assessment instructions are located in **Appendix A**. Hazard assessment forms are included in **Appendix B**.*

- iii. PPE appropriate for the identified hazards will be purchased and provided to all workers exposed to those hazards. All PPE will be properly fit to each worker before relying on it as a protective measure.
- iv. Workers will be trained on the types of PPE necessary for the workplace hazards and its limitations. Training will also include the proper way to wear, use and maintain the PPE.
- v. Worker-owned equipment is not allowed.

b. PPE Program Implementation

- i. The following implementation steps will be used for this program:
 1. Conduct and document PPE assessment for each work task, assignment, or location (see form in **Appendix B**)
 2. Select appropriate PPE based on hazard assessment
 3. Communicate PPE selection decisions to workers
 4. Provide PPE free of charge to all affected workers
 5. Train each affected worker

6. Verify workers understanding of PPE training
7. Document training and worker testing results
8. Retrain as necessary
9. Enforce PPE requirements

c. Training

i. General Training

1. Before any worker is allowed to perform work in areas requiring PPE, they must first receive training in the proper use and care of the PPE they will be using. Retraining will be offered to PPE users as identified by the lack of knowledge or the improper use of PPE, after changes in work tasks or at the supervisor's request, or per regulatory requirements. The training will include, at a minimum, the following subjects:
 - a. Requirement that PPE be worn at all times during identified tasks or in areas requiring PPE
 - b. When it is necessary to wear PPE
 - c. What PPE is necessary
 - d. How to properly put on, take off, adjust, and wear PPE
 - e. The limitations of the PPE
 - f. The proper care, maintenance, useful life, and disposal of the PPE
 - g. Eye and Face Protection
2. Each affected worker will:
 - a. Use appropriate eye and face protection equipment when exposed to hazards from flying objects or particles, molten metal, fumes, chemical liquids, gases, vapors, dusts, acids, caustics, and other potentially injurious chemical or physical hazards.
 - b. Use appropriate eye protection equipment with filter lenses that have a shade number appropriate for the work being performed when exposed to an eye hazard from potentially injurious light radiation.
 - c. When wearing prescription lenses while engaged in operations that involve eye hazards, wear eye protection that incorporates the prescription in its design, or wear eye protection that can be worn over the prescription lenses without disturbing the prescription lenses or the protective lenses.
3. Foot Protection
 - a. Each affected worker will wear protective footwear when working in areas where there is danger of objects falling on or rolling across the foot, piercing the sole, and where the feet are exposed to electrical or chemical hazards. Foot protection will comply with appropriate ANSI standards.
4. Hand and Body Protection
 - a. The Program Administrator will select and require workers to use appropriate hand protection when workers' hands are exposed to hazards from cuts, abrasions, punctures, chemical or thermal burns, harmful temperature extremes, vibration, and skin absorption of harmful substances.
5. Head Protection
 - a. Each affected worker will wear appropriate protective head gear (hard hats, bump caps, etc.) when working in areas where there is a potential for injury to the head from falling objects, impact hazards, extreme temperatures, or high UV levels.
6. Hearing Protection
 - a. The Program Administrator will select and require workers to wear appropriate hearing protection in environments where noise levels equal or exceed the OSHA Occupational Noise Exposure Standard (OSHA 29 CFR 1910.95) 8-hour time weighted average (TWA) of 85 dBA. See Hearing Protection Program for details.
7. Respiratory Protection

- a. Each affected worker will wear respiratory protective equipment (respirators) when working in areas where respiratory hazards exist. All respirators will be in compliance with the OSHA 29 CFR 1910.134. See Respiratory Protection Program for details.
 - 8. After training, workers will demonstrate that they understand how to use PPE properly. If they cannot demonstrate a sufficient understanding, they will be retrained. Training of each worker will be documented using the Worker Training Record (**Appendix D**) and kept on file. The PPE Training Quiz (**Appendix E**) will be used to evaluate workers' understanding and will be kept in the worker training records. The record documents that the worker has received and understands the required training on the specific PPE they will be using.
- ii. **Retraining**
 - 1. The need for retraining will be indicated when:
 - a. A worker's habits, or knowledge indicate a lack of necessary understanding, motivation or skills required to properly use the PPE
 - b. New equipment is installed that requires new or different PPE
 - c. Changes in the workplace make previous training obsolete
 - d. Changes in the types of PPE to be used make previous training obsolete
 - e. Upon supervisor requests
- d. **Periodic Program Review**
 - i. At least annually, the Program Administrator will conduct a program review to assess the progress and success of the program. The review will consider the following:
 - 1. Evaluation of all training programs and records
 - 2. The need for retraining of managers, supervisors, and workers
 - 3. The jobs, processes or areas that have produced a high incidence rate of injuries or illnesses
 - 4. The Program's success will be determined and reported to senior management based upon comparison to previous years, using the following criteria:
 - a. Cost and frequency of workers' compensation cases
 - b. Worker and supervisor feedback through direct interviews and questionnaires
 - c. Annual reviews will be documented with the form shown in **Appendix C**.
- e. **Outside Contractors**
 - i. Whenever outside personnel are contracted to work on-site, the Program Administrator or location management will communicate all necessary PPE safety requirements to the contractor before any work commences.
- f. **Record Retention**
 - i. Written records will be kept which include trainee names, the type of training provided and the dates when training occurred. The Program Administrator will maintain the written hazard assessment and worker training for the duration of employment for all affected workers exposed to the identified hazards. Program Administrator will also retain worker PPE training records for the duration of employment.
 - ii. The Program Administrator will maintain the Hazard Assessment Form for each work site.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Road Transportation	Revision Date:
		Section:

1) PURPOSE

- a. EARNEST CONTRACTING; hereafter referred to as "The Company" has created this policy to ensure all responsibilities are defined and The Company's commitment to the safe operation of transportation vehicles. This written Motor Vehicle Safety Program establishes guidelines to ensure that we hire capable drivers, only allow eligible drivers to drive a "covered motor vehicle," train and supervise drivers, and maintain vehicles properly. A "covered motor vehicle" is a motor vehicle that is owned, leased, or rented by The Company or is a driver-owned vehicle operated during work time. A driver may be assigned to use a company vehicle to visit clients, make deliveries, attend meetings, pick up supplies, or to do a variety of other tasks. When driving is part of the job, like every other task, it must be done safely adherence to this written program can improve traffic safety performance, minimize the risk of motor vehicle incidents, and help to keep our drivers safe and our costs as low as possible. Management leads, supports, and enforces this program; but driver input is essential for its success. The Company will comply with all Federal and State agency requirements.

2) PROCEDURES

- a. The Company Safety Manager or delegate is our Motor Vehicle Safety Program Administrator. The Program Administrator is responsible for ensuring all jurisdictional regulatory compliance requirements are met. The Program Administrator coordinates the Motor Vehicle Operation Program elements for our company. This Program Manager is responsible for setting up and managing the program so that managers, supervisors, and drivers know what our company expects. The Safety Manager will examine our existing policies and practices to ensure that they encourage and do not discourage reporting and participation in our program. In this way, early reporting of motor vehicle incidents and hazards and meaningful driver participation in the program are more likely to occur. For this program to be administratively effective, good judgment and correct choices must be made by the person in charge of their section or group of drivers and vehicles. Prior to the assignment of any vehicle to any driver or prior to allowing a driver to drive their own vehicle on company business or the continuation of driving any vehicle, The Company or driver owned vehicle, the following will be reviewed:
 - i. A current valid state driver's license with no "Status Actions"; must be at least 21 years of age to drive a CMV or 18 years of age or older to drive a Fleet Vehicle. A current medical card is required, and a copy must be provided for recordkeeping in the driver qualification files. Drivers who hold a CDL or commercial learner's permit (CLP) must provide each new certificate to their state licensing agency and carry a copy for at least 15 days after issuance, until their state driving record is updated. The Company must also have a copy of the certificate in the file for up to 15 days. By the end of those 15 days, a new Motor Vehicle Report (MVR) must be placed in the employee's file as proof of medical certification. The medical certificate must be updated by an approved medical examiner at least once every 24 months, unless more frequently due to underlying conditions. The driver must carry the medical certificate or a copy of it on their person. Another copy must be provided to The Company to be retained in the driver's qualification file.
 - ii. A review of the driver's background and MVR (MVR 3 years back initially, then annual thereafter) will be done. The Company requires a preceding 3-year, state issued, driving record (MVR), for each driver-applicant operating a vehicle which is company owned, rented, or leased as well as any personal vehicle used on Company business. If the driver has an out-of-state license, they will be required to submit their MVR from that state for our review. The MVR will be reviewed by a responsible management official for determination of qualification of each driver. If the MVR indicates no violations, or the following minor violations, the driver may be considered for qualification by The Company management. They are:
 - 1. conviction of one or more minor moving violations, as long as no more than 6 points have been assessed
 - 2. minor accident (no injuries) Note: If the driver/driver can remove the citation by going to traffic school, The Company will take this action into consideration for final qualification of the driver.
 - iii. If the driver's MVR indicates the following major violations, then the driver is NOT qualified to drive for The Company:
 - 1. Operating a vehicle under the influence of a drug or alcohol
 - 2. Implied Consent Refusal (refusal to take blood alcohol test and or urine analysis)
 - 3. Committing homicide, manslaughter, or aggravated assault with a vehicle

4. Failing to stop if you are involved in a traffic accident
 5. Reckless driving
 6. Felony speeding
 7. License Suspension or Revocation
- iv. Notification by The Company insurance carrier that the driver is ineligible for auto insurance coverage will cause the driver to be ineligible to drive. The above listed violations should not be considered all inclusive, and these are not the only major violations that would disqualify the driver as a driver. Management reserves the right to make the final decision as to whether the driver will be qualified to drive.

b. Fleet Vehicle

- i. Any motor vehicle a company owns or leases that is used in the normal operations of a company. Vehicles which are used in the operation of a company but are owned by company drivers are not fleet vehicles. Fleet vehicles include gasoline/diesel powered vehicles and alternative-fuel vehicles. Commercial driver's license (CDL) A license issued to an individual by a State or other jurisdiction of domicile, in accordance with the standards contained in this part, which authorizes the individual to operate a class of a commercial motor vehicle. All motor vehicles will be placed on a preventive maintenance and inspection program maintained per the manufacture's specifications. All maintenance reports will be retained for the duration of when the vehicle is in use. A pre and post trip inspection will be performed and documented by each driver. The driver will provide the documentation to the maintenance department as part of the recordkeeping requirements. During the pre and post trip inspections if any defects are identified the driver will alert their supervisor or maintenance department before the motor vehicle is placed back in service.

c. Commercial motor vehicle (CMV)

- i. A motor vehicle or combination of motor vehicles used in commerce to transport passengers or property if the motor vehicle:
- ii. Has a gross combination weight rating or gross combination weight of 11,794 kilograms or more (26,001 pounds or more), whichever is greater (including) towed unit(s) with a gross vehicle weight rating or gross vehicle weight of more than 4,536 kilograms (10,001 pounds), whichever is greater
- iii. Has a gross vehicle rating, gross combination weight rating, gross vehicle weight or gross combination weight of 4,536 kg (10,001 lbs.) or more
- iv. Is designed or used to transport more than 8 passengers for compensation or more than 15 passengers without compensation
- v. Is of any size and is used in the transportation of hazardous materials

d. Gross Combination Weight Rating (GCWR)

- i. The value specified by the manufacturer as the loaded weight of a combination (articulated) vehicle. In the absence of a value specified by the manufacturer, GCWR will be determined by adding the GVWR of the power unit and the total weight of the towed unit and any load thereon.

e. Gross Vehicle Weight Rating (GVWR)

- i. The value specified by the manufacturer as the loaded weight of a single vehicle. Out-of-service order (OOS) A declaration by an authorized enforcement officer of a Federal, State, Canadian, Mexican, or local jurisdiction that a driver, a commercial motor vehicle, or a motor carrier operation, is out-of-service pursuant to FMCSR 386.72, 392.5, 395.13, 396.9, or compatible laws, or the North American Uniform Out-of-Service Criteria.

f. Motor Vehicle

- i. A vehicle, machine, tractor, trailer, or semitrailer propelled or drawn by mechanical power that is used on highways.

g. Commercial Driver Qualifications (CMV and CDL)

- i. A person shall not drive a commercial motor vehicle unless he/she is qualified to drive a commercial motor vehicle. The Company shall not require or permit a person to drive a commercial motor vehicle unless that person is qualified to drive a commercial motor vehicle.

- ii. A person is qualified to drive a CMV:
 - 1. If at least 21 years old
 - 2. Can read and speak the English language sufficiently to converse with the public, to understand highway traffic signs and signals in the English language, to respond to official inquiries, and to make entries on reports and records
 - 3. Can, by reason of experience, training, or both, safely operate the type of commercial motor vehicle they drive
 - 4. Is physically qualified to drive a commercial motor vehicle in accordance with FMCSR's Physical Qualifications and Examinations
 - 5. Has a currently valid commercial motor vehicle driver's license issued only by one State or jurisdiction (for GVWs or GCVWs of 26,001+ lbs.)
 - 6. Has prepared and furnished The Company with the list of violations or the Certificate of Violations
 - 7. Is not disqualified to drive a commercial motor vehicle under FMCSR §391.15
 - 8. Has successfully completed a driver's road test and has been issued a certificate of driver's road test or has presented a driver's license or a certificate of road test which we may accept as equivalent to a road test under FMCSR §391.33
- iii. Final determination will be the responsibility of The Company Management with the advice of the Safety Manager.
- iv. All commercial drivers must always be prepared for their driving of a The Company CMV. There are many items, mainly documentation and proofs. CMV/CDL drivers will need:
 - 1. Certificate of Registration
 - 2. Hours of service records (logbook)
 - 3. Registration papers (cab cards, permits, etc.)
 - 4. Proof of insurance
 - 5. Driver's license documents and any related certificates or endorsements, if applicable
 - 6. Special permits for oversize and overweight loads, if required
 - 7. Hazardous materials shipping papers and placards, if required
 - 8. Fuel tax permits (IFTA)
 - 9. Bills/Invoices, etc. showing content and origin of agricultural products, if required
 - 10. Evidence of financial responsibility
- v. Only pre-qualified and authorized drivers may operate company owned, rented, leased or their personal vehicle, used for company business.

h. Mobile Phone Use and Texting

- i. There shall be no mobile phone usage by any CMV/CDL drivers while operating a company vehicle unless that vehicle or the driver's phone is equipped with a "hands-free" operating system. The commercial driver should pull over at a safe location and then return the phone call if necessary. There shall be NO TEXTING while driving a vehicle (Fleet or CMV); the driver shall read or create texts only when stopped and parked in a safe location for them and the vehicle.
- ii. Two-way radios are not restricted by the DOT banning of mobile phones, push to talk communications allow for a safer communication.

i. Driving Safety

- i. While it's important to understand The Company vehicle safety program, as a driver, you must put safe driving techniques into practice each time you get behind the wheel. The following safe driving strategies are under the driver's control:

- 1. Make sure the vehicle is safe to operate

2. Bring supplies you may need in case of an emergency
3. Wear your seat belt
4. Drive defensively, not aggressively
5. Pay attention to your driving and avoid distractions
6. Only drive when you're alert and fully awake
7. Never drive under the influence of alcohol, medications, or illegal drugs

Note: Seat belts are the single most effective means of reducing deaths and serious injuries in traffic crashes.

j. Vehicle Inspections

- i. Safe driving starts before you turn the ignition key. Always inspect the vehicle before and after your trip. Make sure:
 1. The vehicle does not have any visible damage that affects its safe operation
 2. The tires are properly inflated (use the vehicle manufacturer's recommendations that are typically noted on a sticker inside the door, glove box, or trunk - the pressures stamped on the tire are not specific to the vehicle). Check the pressure when the tires are cold
 3. Tires have sufficient tread depth (tread depth should be at least 1/16 inch)
 4. The vehicle's fluid levels are correct (oil, brake, transmission, battery, and wiper fluids)
 5. Belts and hoses are free of blisters, cracks, and cuts
 6. The vehicle has plenty of fuel
 7. The windshield wipers are in good condition and are functional
 8. You are familiar with the location and operation of all the vehicle's controls; and the seat, steering wheel, and mirrors are properly adjusted
 9. Headlights, brake lights, turn signals, emergency flashers, and interior lights are working
 10. The seat belt is properly adjusted, and it's in good condition
 11. The vehicle is equipped with an emergency kit
 12. Loose objects are secured so they won't shift during a sudden stop or turn

k. Plan for Emergencies

- i. In case of a breakdown or accident, your first actions should be to move the vehicle to a safe area, remain in the vehicle (if there is no risk of fire or other danger), and call for help. Some basic provisions to include in an emergency supply kit can include:
 1. A phone and a list of emergency phone numbers
 2. First aid supplies
 3. Roadside warning triangles or flares (follow instructions for their safe use)
 4. A fire extinguisher
 5. Water and food
 6. Clothing (raincoat; warm clothing, hat, mittens/gloves; comfortable boots/shoes).
 7. Basic car maintenance tools (a flashlight with fresh batteries; battery jumper cables; a jack, lug nut wrench, and spare tire; water for the radiator; oil; windshield wiper fluid; rags; gloves; etc.)

l. Be Defensive

- i. It's best to always practice defensive driving techniques. Continually check your mirrors, leave enough following distance, and keep a cushion of space around the vehicle in case you need to quickly change lanes or go onto the shoulder. Aggressive driving acts include:

- ii. Speeding.
- iii. Tailgating.
- iv. Failing to signal lane changes.
- v. Running red lights or stop signs.
- vi. Passing on the right.
- vii. Aside from being aggressive, taking these actions can result in getting a ticket. The best advice is to share the road - allow other drivers to merge as needed. Safely move out of an aggressive driver's way; don't become part of a conflict.

m. Stay Focused and Alert

- i. Driving is no time to multi-task. Stay focused on the road. Drivers can be distracted by a variety of things:
 - 1. Conversations with passengers.
 - 2. Eating, drinking, or grooming.
 - 3. Tuning the radio or selecting a CD to play.
 - 4. Reading maps or directions.
 - 5. Using electronic navigation systems.
 - 6. Using a mobile phone.
 - 7. Get a full night of rest before driving.
 - 8. Stop and get out of the car to stretch and walk about every two hours.
 - 9. Set a realistic goal of how many miles you can safely drive each day.
 - 10. Avoid taking medications that cause drowsiness.

n. Hours of Service

- i. The hours of service (HOS) rule refers to the maximum amount of time drivers are permitted to be on duty including driving time, and specifies number and length of rest periods, to help ensure that drivers stay awake and alert. The Company will comply with HOS regulations found in 49 CFR 395.

o. Hazardous Materials Shipping

- i. All drivers transporting hazardous will have been properly trained. Drivers are responsible for ensuring that the applicable markings/placards that are required are placed on the CMV based on jurisdictional requirements. Drivers will ensure that the proper shipping papers or manifests are properly prepared, stored and retained for the required times based on jurisdictional and company requirements.

p. What to do in Case of an Accident

- i. **Stop at once!** Check for personal injuries and send for an ambulance, if needed. Do not leave the scene but ask for the assistance of bystanders.
 - 1. If fire or smoke is present evacuate vehicle occupants to a safe location. If stalled on a railroad track, evacuate occupants to a safe location away and at a right angle from the tracks.
 - 2. If fire, smoke, or spilled fuel is present send for the fire department. Do not leave the scene; ask a bystander to call the fire department. If possible, use a spill kit to absorb the spill.
- ii. **Protect the scene.** Set emergency warning devices to prevent further injury or damage. Secure your vehicle and its contents from theft, if possible.
- iii. **Secure assistance** of the police whenever possible. Record names and badge numbers. Do not leave without law enforcement presence on scene.
- iv. **Record names, addresses, and phone numbers** of all witnesses injured and driver(s) and their passengers, record vehicle license numbers. Take complete pictures with mobile phone or camera.
- v. **Do not argue!** Make no statement except to the proper authorities and to Management. Sign only official police reports. Do not make statements regarding the operating condition of your vehicle and do not admit fault.
- vi. **Report the incident to your supervisor/safety manager IMMEDIATELY** after first aid has been given, authorities have been notified, the scene has been protected and you are able to do so.

- vii. **Complete the incident report** at the scene (or with your Supervisor ASAP) and as thoroughly as possible. Make sure the Safety Manager gets copies of all incident paperwork and related information within 24 hours.
 - viii. **If you strike an unattended vehicle** and cannot locate the owner, leave a note with your name and The Company's address and phone number, get the vehicle description, VIN number and license plate number. If possible, take a picture with your mobile phone or camera of the damage.
 - ix. A motor vehicle incident is a negative occurrence that involves a "covered" motor vehicle and that caused or could have caused injury, illness, or property damage.
 - x. All motor vehicle incidents will be investigated to determine their causes and whether the incidents were preventable. Understanding the root causes of incidents and why they are happening, regardless of fault, forms the basis for eliminating them in the future.
 - xi. If any of the following traffic violations occur, whether in the driver's personal vehicle (on or off company business) or while operating an owned, rented, or leased vehicle, suspension of driving or operating any vehicle will be immediate:
 - 1. Operating a vehicle under the influence of a drug or alcohol
 - 2. Implied Consent Refusal (refusal to take blood alcohol test and or urine analysis)
 - 3. Committing homicide, manslaughter, or aggravated assault with a vehicle
 - 4. Failing to stop if you are involved in a traffic accident
 - 5. Reckless driving
 - 6. Felony speeding
 - 7. License Suspension or Revocation
 - 8. Cancellation of the driver's auto insurance by the driver's insurance carrier.
 - xii. The above listed violations should not be considered all inclusive, and these are not the only major violations that would suspend the driver as a driver. Management reserves the right to make the final decision. The Company follows 49 CFR Subpart C 383.33 for CMV drivers. If the driver is found to not have reported to The Company any traffic violation, suspension, or revocation of their license, by reviewing their MVR on an annual basis or as often as deemed necessary, the driver will be subjected to disciplinary action up to and including termination. It is the overall responsibility of all drivers to maintain proper and acceptable driving records and all licenses required for their position.
- q. Drugs and Alcohol**
- i. In accordance with our Drugs and Alcohol Policy driving a company owned, rented, leased or personal vehicle on company business, while under the influence of drugs or alcohol shall result in immediate termination.
- r. Training**
- i. Under no circumstances may a driver operate a covered motor vehicle until they have successfully completed this company's initial training on motor vehicle safety. Training can include reading material, watching a presentation, and driving with a supervisor as a ride-a-long. The supervisor of that individual is responsible for conducting training if they assign a driver to driving duties.
 - ii. The Company training program includes the topics of driving that the driver will have to deal with. Through training we ensure that motor vehicle drivers are knowledgeable in practices such as impaired, fatigued, aggressive, distracted, and defensive driving; seat belt use; vehicle inspection; security and motor vehicle incident procedures; cargo securement; handling hazardous materials and spills; and safety features and emergency equipment.
- s. Driver training must include the following:**
- i. Pre-trip safety inspection
 - ii. Use of vehicle controls and equipment, including operation of emergency equipment

- iii. Operation of vehicle, including turning, backing, braking, parking, handling, and vehicle characteristics including those that affect vehicle stability, such as effects of braking and curves, effects of speed on vehicle control, dangers associated with maneuvering through curves, dangers associated with weather or road conditions that a driver may experience (e.g., blizzards, mountainous terrain, high winds), and high center of gravity
- iv. Procedures for maneuvering tunnels, bridges, and railroad crossings
- v. Requirements pertaining to attendance of vehicles, parking, smoking, routing, and incident reporting
- vi. Loading and unloading of materials, including:
 - 1. Compatibility and segregation of cargo in a mixed load
 - 2. Package handling methods
 - 3. Load securement
- vii. Defensive driving including:
 - 1. proper attitude
 - 2. visual habits
 - 3. proper decision making
 - 4. road rage
 - 5. distracted driving
- viii. Fatigue management
- ix. Hazardous Materials in compliance with jurisdictional requirements
- x. After a driver has completed the training program, management will determine whether the driver can safely operate a motor vehicle. If the driver passes, management places a training record in the driver's personnel file or driver qualification file.

t. Evaluation

- i. The Safety Manager evaluates each trained driver to verify that the driver has retained and uses the knowledge and skills needed to operate safely. If the evaluation shows that the driver is lacking the appropriate skills and knowledge, the driver is retrained.
- ii. The Safety Manager also reviews motor vehicle records periodically to ensure that drivers maintain a good driving record. The results of each check are made known to the appropriate departments.
- iii. A driver may lose their privilege to operate a company vehicle for work or operate a company-owned-leased-rented vehicle for personal use, if after an incident(s), accident(s), or after a violation(s) it was discovered to be the driver's fault and preventable; the Safety Manager may recommend the driver receive additional training if warranted.
- iv. In addition to the safety issues surrounding the driving of a commercial motor vehicle, there are other safety issues that can affect a driver. Examples of these are back strain and lifting concerns; slip- trip-falls; and personal safety in parking lots and other places.
- v. Training and policy documents have been developed to address some of these driver safety topics. It is inherent that problems may occasionally arise. By having our program thoroughly evaluated, periodically and as necessary, and promptly taking action to correct any deficiencies in our program, we can eliminate problems effectively. Note: The occurrence of a motor vehicle incident does not in itself mean that the program is ineffective.

u. Disciplinary Actions

- i. The Company's progressive driver discipline policy and procedures are designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable driver behavior and performance issues.
- ii. Outlined below are the potential steps of our progressive discipline policy and procedures. The Company reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offense. Some of the factors that will be considered are whether the offense is repeated despite coaching,

counseling, or training; the drivers work record; and the impact the conduct and performance issues have on the company, driver, or public.

- iii. Drivers who receive three unsafe driving-related complaints may be subject to mandatory training and/or disciplinary action up to and including a recommendation for termination.
 - 1. First validated complaint—Supervisor will discuss complaint with driver and give a verbal warning. Driver may be required to complete a mandatory driver training provided by Risk Management Services or his or her assigned department.
 - 2. Second validated complaint—Supervisor will discuss complaint with driver and provide driver with a written warning (summary of conference). Driver will need to complete mandatory driver training provided by their supervisor.
 - 3. Third validated complaint—Driver will need to complete mandatory driver training provided by their supervisor. Driver may receive additional disciplinary action up to and including a recommendation for termination.
- iv. At no time will aggressive driving be tolerated by any driver who is driving a company vehicle. If it is determined that a driver is exhibiting unsafe driving behavior that includes, but is not limited to, rude gestures, verbal insults, deliberately driving in an unsafe or threatening manner, or making threats, they will be removed from driving status and may receive additional disciplinary action up to and including a recommendation for termination.
- v. Drivers are subject to disciplinary actions for being involved in three preventable vehicle accidents within a five-year period. (After five years, one accident will be removed.)
- vi. Disciplinary actions are as follows:
 - 1. First incident—Driver will receive a written warning from their supervisor, must attend defensive driving class and any retraining course required by their supervisor, and may receive additional disciplinary action up to and including a recommendation for termination.
 - 2. Second incident—Driver will be placed on an intervention plan, must attend defensive driving class and any retraining course required by their supervisor, and may receive additional disciplinary action up to and including a recommendation for termination.
 - 3. Third incident—Driver will be removed from driving status and may receive additional disciplinary action up to and including a recommendation for termination.
- vii. All drivers have a general obligation to work and drive safely.



1) PURPOSE

a. The purpose of this document is to create awareness to limit silica exposure for EARNEST CONTRACTING, hereafter referred to as "The Company", workers. Occupational silica exposure may be preventable through worker training, use of a silica substitute, use of engineering controls, improved work practices, and lastly, use of personal protective equipment.

b. Silica Awareness

- i. You may not have realized it, but silica is everywhere. In fact, it's present in about 95% of rocks, clays, sands, and soils! Hazardous exposure in the workplace can occur when crystalline silica found in sand, quartz, and granite becomes airborne as dust from activities such as:
- ii. Demolition of brick, concrete, or masonry. Chipping, hammering, grinding, sawing, and drilling in concrete, brick, or rock. Abrasive blasting using sand or from the material being blasted such as concrete. Crushing loading, hauling, and dumping of concrete or rock. Dry sweeping concrete, sand, or rock dust. Trenching and excavating.
- iii. Once crystalline silica dust is inhaled it can potentially result in silicosis. Silicosis is a debilitating respiratory illness which may take years of silica exposure to develop. It can go undetected for years and only a complete work history, chest X-ray, and a lung-function test will determine whether a worker has the disease. Symptoms include shortness of breath, severe cough, fatigue, loss of appetite, chest pains, and fever. Silicosis can also make a worker susceptible to emphysema and tuberculosis.

c. Training

- i. Training is required prior to using silica-containing materials or working in an environment known to contain airborne concentrations of Silica. Training will include information about adverse health effects of silica, safe work practices, chemical hazards and use and care of personal protective equipment. Periodic refresher training is also required to ensure that personnel retain knowledge of the dangers of Silica and how to protect themselves from such dangers.

d. Engineering Controls

- i. Engineering controls are interventions that can be used to eliminate or more safely work around hazards. The Company will use engineering controls by removing or minimizing hazardous conditions such as respirable dust. To control silica exposures, there are wet methods that use water sprays to control dust and dry methods such as ventilation controls that use vacuums and high efficiency particulate air (HEPA) filters. For blasting operations, The Company will use an alternate blasting media if possible. Other types of engineering controls will include containment methods such as blast cleaning machines & cabinets, blasting rooms, or portable equipment.

e. Personal Protective Equipment

- i. Personal protective equipment such as gloves, coveralls and eye protection should be used to control silica exposures. Where respiratory protection is required, The Company will provide each employee an appropriate respirator that complies with the requirements of the company's Respiratory Protection Program. (Respirators must be selected based upon measured exposure levels and the assigned protection factor of respirators.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Spill Prevention and Response	Revision Date: Section:

1) GENERAL

- a. EARNEST CONTRACTING employees work around various chemicals while performing their job. A product release or spill is always feasible, so attention to safety and prevention is critical.
- b. These spills pose physical hazards (combustible liquid and/or gases), and health hazards (carcinogens, corrosives). Some spills require professionally trained responders (i.e., Hazwoper), so be certain to reference the appropriate SDS whenever there is a release of product.
- c. **Training**
 - i. EARNEST CONTRACTING employees must be instructed on the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal, and communication procedures.

2) PROCEDURES

- a. While working with or around any chemical, an employee must know what engineering controls, and safe work practices have been implemented for his/her safety, and what personal protective equipment is required while performing the job.
- b. Chemical substances should be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals should be kept in closed containers and stored so they are not exposed to storm water. Areas where chemicals may be used or stored must be maintained using good housekeeping practices. This includes cleaning and good organization, labeling of containers, and a secondary containment where necessary.
- c. Safety Data Sheets will serve as the primary source of information regarding handling, spill, contact, and clean-up procedures.
- d. Response to spills and releases should adhere to the following procedures (each situation will dictate different responses based on spill types/amounts, and these are general procedures):
 - Report all spills to clients and EARNEST CONTRACTING immediately (degree of spill amount, reporting and related hazards are left up to the decision of client and management).
 - A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials.
 - Summon emergency services per client and management directives.
 - Do not enter the contaminated area without respiratory and skin contact protection. Enter only if you have the appropriate training.
 - Do not try to rescue the person by holding your breath and entering the contaminated area.
 - Even with proper respiratory protection, do not enter a contaminated area without standby help.
 - If necessary, evacuation should be upwind and crosswind
 - As soon as the victim is in a safe area, personnel should conduct an assessment to determine if the victim is breathing and perform cardiopulmonary resuscitation (CPR) if needed.
 - Any employee who experiences a significant exposure to any hazardous substance, either liquid or vapor, must report the incident to the supervisor immediately. The supervisor ensures that the safety department has been contacted, and Safety will initiate the applicable protocol for testing and medical response.
 - If toxic materials contact the skin or clothing, remove the contaminated clothing, and refer to SDS for first aid procedures. Launder these clothes separately.
 - Clean up of spilled material is based on Safety Data Sheets and those persons conducting clean-up will be trained and equipped to do so.
 - Personnel should avoid ditches, bell holes, ravines, and other low-lying areas where vapors, fumes, or mists may collect.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Stop Work Authority	Revision Date:
		Section:

1) PURPOSE

- a. The purpose of this policy is to ensure that all workers are given the responsibility and authority to Stop Work when they believe that a situation exists that place them, coworker(s), contractors, or the public at risk or in danger pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as "The Company". A worker's responsibility and authority to Stop Work also includes situations, that if allowed to continue, could adversely affect the safe operation, or cause serious damage to a facility or equipment, or adversely affect the environment.

2) SCOPE

- a. This policy applies to all The Company locations, work sites, and areas. It is applicable to all The Company workers working at these locations.

3) RESPONSIBILITIES

- a. All workers have the right and obligation to stop any job or task when there are questions or concerns regarding the control of hazards or unsafe acts.
- b. Management establishes a culture that promotes SWA and supports use of SWA without potential for retribution, supervisors, and managers honor SWA requests and resolve before resuming operations, HSE provides training, support, documentation, and monitors compliance of SWA program, workers and contractors initiate stop work and support stop work initiated by others.

4) PROCEDURES

- a. A Stop Work intervention should be initiated for conditions or behaviors that could reasonably be expected to pose a risk or danger to worker(s), safe operation of a facility, serious damage to equipment or adversely affect the environment. Situations that warrant a Stop Work intervention may include, but are not limited to the following:
 - i. Unsafe conditions
 - ii. Change in conditions
 - iii. Changes to scope of work or work plan
 - iv. Equipment used improperly
 - v. Lack of knowledge, understanding or information
 - vi. Clarify work instructions
 - vii. Propose additional controls
- b. Any Stop Work issue(s) requiring corrective action(s) to resolve the issue(s), shall be documented on a Stop Work Authority Form (Attachment A)
- c. **Steps of Stop Work Authority**
 - i. Stop - When a worker(s) perceives conditions or behaviors that pose imminent danger, they must immediately initiate a stop work intervention.
 1. Workers are protected from retribution or reprimand for exercising SWA. Any form of retribution or reprimand will not be tolerated against workers who exercise SWA.
 - ii. Notify - Notify affected workers and supervision of the stop work action.
 - iii. Investigate - Affected workers will discuss the situation and come to an agreement on the stop work action.

1. No work can resume once SWA is exercised until all issues and concerns have been addressed.
- iv. Correct – Take immediate or as soon as possible actions to rectify the known unsafe act or condition
- v. Corrective actions - Will be made according to the corrections agreed upon in the investigation to prevent a recurrence of the unsafe act or condition.
- vi. Resume - All affected workers will be notified of what corrective actions were implemented and work will resume only when it is safe to do so.

d. Documentation

- i. All SWA when exercised must be documented for lessons learned and corrective actions.
- ii. All SWA occurrences shall be documented to evaluate effectiveness of the program and identify areas for improvement.
- iii. Management must review SWA reports to measure participation, establish the quality of SWA interventions, and corrective actions, establish trends, discover opportunities for improvement, and establish lessons learned.
- iv. The Company places a high importance of follow-up after a Stop Work Intervention has been initiated and closed. It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved workers prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify, address and correct root causes.

ACCIDENT REPORT

DAY _____ DATE _____ TIME OF ACCIDENT _____

CONTRACTOR _____ JOB NAME _____ JOB NO. _____

NAME OF INJURED _____ AGE _____ SEX _____

ADDRESS _____ OCCUPATION _____

TYPE OF INJURY _____

HOW AND WHERE IT HAPPENED _____

WHAT WAS THE INJURED PERSON DOING WHEN ACCIDENT OCCURED?

WHO ADMINISTERED FIRST AID? _____

DESCRIBE FIRST AID TREATMENT _____

TIME AMBULANCE ARRIVED _____ NAME OF AMBULANCE SERV. _____

NAME OF HOSPITAL _____ NAME OF DOCTOR _____

WILL THIS BE A LOSS TIME ACCIDENT? _____ HOW LONG? _____

WAS THE STATEMENT TAKEN FROM INJURED? _____ FROM WITNESS? _____

DESCRIBE ACCIDENT SCENE IN DETAIL _____

WAS ACTION TAKEN TO PREVENT RECURRENCE? _____

WITNESSES _____

ATTACH COPIES OF ANY PHOTOGRAPHS OF ACCIDENT SCENE TO THIS SHEET

FEDERAL & STATE REPORTS FILED YES NO NIA

SUPERVISOR'S SIGNATURE _____

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Sustainable Business and Ethics	Revision Date:
		Section:

1) PURPOSE

- a. To provide guidance to management and workers in promoting sustainability, human rights, and business ethics, among other topics as appropriate pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as “The Company”. To promote local community development activities that address corporate conduct including a commitment to act professionally, fairly and with integrity and conduct all business in an honest and ethical manner.

2) SCOPE

- a. To provide awareness and training as appropriate as well as an avenue for feedback from all workers whenever they feel they have encountered persons or pressure to act in a manner inconsistent with this document.

3) RESPONSIBILITIES

- a. Management is responsible for:
 - b. Setting a high standard of conduct for all workers to follow, promote sustainability where and to the degree appropriate to their position and authority, and respect diversity and basic human rights.
 - c. The proper implementation of this plan.
 - d. Providing appropriate training, including documentation.
 - e. Evaluating regulatory or other changes to the subject of this plan and updating this plan as needed to meet or exceed those changes as appropriate.
- f. Workers are responsible for:
 - i. Attend appropriate training and applying that training on the job.
 - ii. Notifying management of changes to requirements as noted through education, training, or exposure to best practices or improvements to the plan suggested by contact with clients.
 - iii. Notifying management of any attempt:
 1. Bribery,
 2. Dishonest business practices,
 3. Coercion,
 4. Or any other attempt to lower the high business ethics standards set forth by The Company

4) PROCEDURES

- a. **General management practices**

- i. Management will provide and through observation of their own actions set high business standards for The Company and its workers.
- ii. Promote fairness in sourcing, contracting, and dealing with companies and individuals and conduct business operations in an honest and ethical manner.
- iii. Identify stakeholders and develop an open communications channel to monitor the effectiveness of engagement activities
- iv. Support local community and service development activities in the markets serviced by The Company
- v. Management will evaluate companies and their sustainability claims.
- vi. Support sustainability through the assessment of sustainable products with our suppliers. Challenge them to show proof of sustainability claims with respect to products and services as well as memberships in sustainability programs and their associated claims (e.g., offset programs that might over-sell, or carbon capture programs that might release the CO2 back into the environment for a net negative effect).
- vii. Workers should assist management by bringing forth observations in support or to refute claims.
- viii. Management will promote dialogue with vendors and contractors and to that degree possible promote the inclusion of all vendors in bids and contracts regardless of their social status.
- ix. Management will abide to that degree possible by business related principles of the United Nations: The Universal Declaration of Human Rights (UDHR). It is anticipated that The Company will have little if any challenges close to those types of activities for which this document was initially created (slavery, human trafficking, genocide) but nevertheless will passively assess the performance of vendors and contractors (and others) for violations of the UDHR.
- x. Management will continue to support policies and procedures for the promotion of workers within the company and provide for related career management and training.
- xi. Management will provide a method for anonymous claims to reach the executive level (or as may be delegated) without interference or requirement for the claimant to self-identify or be identified by any method, active or passive.
- xii. Management and workers will uphold the following Code of Conduct:
- xiii. To conduct business on behalf of The Company in a manner consistent with basic human rights, and promote sustainability, economic and environmental responsibility, and commit to act professionally, fairly and with integrity and conduct all business in an honest and ethical manner.
- xiv. To report to management attempts at bribery, coercion, deceptive or dishonest business practices that one may encounter and to not participate in activities or continue business practices with related persons or business enterprises until or unless there is a fair assessment that clears those persons or business enterprises from wrongdoing.
- xv. To forward claims from subordinates without judgment to superiors for their assessment and evaluation.

- xvi. To promote an open-door policy between management and workers for the discussion of this Code of Conduct.

5) Training

- i. Management will provide sufficient guidance and training to workers as appropriate to implement the statements made in this document.
- ii. Training shall include general instruction on this document consistent with their position and potential for exposure to adverse activities and provide guidance related to those activities.
- iii. Workers should contact their supervisor or Human Resources if they identify additional topics or have any concerns regarding this document.



1) PURPOSE

- a. The purpose of this document is to outline safety policy and procedures surrounding the use of Hand and Power Tools for EARNEST CONTRACTING; hereafter referred to as "The Company." This program covers hand, electrical, pneumatic, powder driven, and hydraulic tool safety.

2) RESPONSIBILITIES

a. Management

- i. Provide correct tools for assigned tasks
- ii. Ensure tools are maintained and stored safely
- iii. Provide worker training
- iv. Provide for equipment repair

b. Workers

- i. Follow proper tool safety guidelines
- ii. Report tool deficiencies and malfunctions
- iii. Properly store tools when work is completed

c. Administrative

- i. Tool sharpening program
- ii. Use of PPE
- iii. Control of tool issue
- iv. Worker Training
- v. Controlled access to equipment and tool areas

3) POLICY

- a. Workers who use hand and power tools and who are exposed to the hazards of falling, flying, abrasive and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases must be provided with the personal equipment necessary to protect them from the hazard. All hazards involved in the use of tools can be prevented by following five basic safety rules:
 - i. Keep all tools in good condition with regular maintenance.
 - ii. Use the right tool for the job.
 - iii. Examine each tool for damage before use.
 - iv. Operate according to the manufacturer's instructions.
 - v. Provide and use the proper protective equipment.
- b. Whether furnished by the employer or the worker, tools shall be maintained in safe condition. Any tool which is not in compliance shall be identified as unsafe by tagging and or locking the controls to render the piece of equipment inoperable or the tool shall be physically removed from its place of operation.
- c. **Ergonomic Guidelines**
 - i. Applying these guidelines in tool design can help maximize human performance on the job by making the job easier for the worker, improving safety, and decreasing injuries. Take-Away Tips for Tool Selection:

1. Use the right tool for the job, and the right tool for the user.
2. "Bend" the tool, not the wrist.
3. Avoid high contact forces and static loading.
4. Reduce excessive gripping force or pressure.
5. Avoid extreme and awkward joint positions.
6. Avoid twisting hand and wrist motion by using power tools rather than hand tools.
7. Avoid repetitive finger movements, or at least reduce their number.
8. Minimize the amount of force needed to activate trigger devices on power tools.
9. Avoid thumb triggers.
10. Use two- or three-finger triggers for power tools; use four-finger triggers only when the tool is balanced.

d. Hand Tools

- i. Hand tools are non-powered. They include anything from axes to wrenches. The greatest hazards posed by hand tools result from misuse and improper maintenance. Some examples:
 - ii. Using a screwdriver as a chisel may cause the tip of the screwdriver to break and fly, hitting the user or other workers.
 - iii. If a wooden handle on a tool such as a hammer or an axe is loose, splintered, or cracked, the head of the tool may fly off and strike the user or another worker.
 - iv. A wrench must not be used if its jaws are sprung, because it might slip.
 - v. Impact tools such as chisels, wedges, or drift pins are unsafe if they have mushroomed heads. The heads might shatter on impact, sending sharp fragments flying.
 - vi. Workers using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases shall be provided with PPE necessary to protect them from the hazard.
 - vii. Appropriate personal protective equipment, e.g., safety goggles, gloves, etc., should be worn due to hazards that may be encountered while using portable power tools and hand tools.
 - viii. Floors shall be kept as clean and dry as possible to prevent accidental slips with or around dangerous hand tools.
 - ix. Around flammable substances, sparks produced by iron and steel hand tools can be a dangerous ignition source. Where this hazard exists, spark-resistant tools made from brass, plastic, aluminum, or wood will provide for safety.

e. Power Tool Precautions

- i. Power tools can be hazardous when improperly used. There are several types of power tools, based on the power source they use: electric, pneumatic, liquid fuel, hydraulic, and powder actuated. The following general precautions should be observed by power tool users:
 1. Never carry a tool by the cord or hose.
 2. Never yank the cord or the hose to disconnect it from the receptacle.
 3. Keep cords and hoses away from heat, oil, and sharp edges.
 4. Disconnect tools when not in use, before servicing, and when changing accessories such as blades, bits, and cutters.
 5. All observers should be kept at a safe distance away from the work area.
 6. Secure work with clamps or a vise, freeing both hands to operate the tool.
 7. Avoid accidental starting. The worker should not hold a finger on the switch button while carrying a plugged-in tool.

8. Tools should be maintained with care. They should be kept sharp and clean for the best performance. Follow instructions in the user's manual for lubricating and changing accessories.
9. Be sure to keep good footing and maintain good balance.
10. The proper apparel should be worn. Loose clothing, ties, or jewelry can become caught in moving parts.
11. All portable electric tools that are damaged shall be removed from use and tagged "Do Not Use."

f. Guards

- i. Hazardous moving parts of a power tool need to be safeguarded. For example, belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment must be guarded.
- ii. Guards, as necessary, should be provided to protect the operator and others from the following:
- iii. Point of operation
- iv. In-running nip points
- v. Rotating parts
- vi. Flying chips and sparks
- vii. Guards shall be always in place and operable while the tool is in use. The guard may not be manipulated in such way that will compromise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in ANSI B15.1.
- viii. Safety guards must never be removed when a tool is being used. For example, portable circular saws must be equipped with guards. An upper guard must cover the entire blade of the saw. A retractable lower guard must cover the teeth of the saw, except when it contacts the work material. The lower guard must automatically return to the covering position when the tool is withdrawn from the work.

g. Safety Switches

- i. The following hand-held powered tools are to be equipped with a momentary contact "on-off" control switch: drills, tappers, fastener drivers, horizontal, vertical and angle grinders with wheels larger than two inches in diameter, disc, and belt sanders, reciprocating saws, saber saws, and other similar tools. These tools also may be equipped with a lock-on control if turnoff can be accomplished by a single motion of the same finger or fingers that turn it on.
- ii. The following hand-held powered tools may be equipped with only a positive "on-off" control switch: platen sanders, disc sanders with discs two inches or less in diameter; grinders with wheels two inches or less in diameter; routers, planers, laminate trimmers, nibblers, shears, scroll saws and jigsaws with blade shanks 1/4-inch wide or less.
- iii. Other hand-held powered tools such as circular saws having a blade diameter greater than two inches, chain saws, and percussion tools without positive accessory holding means must be equipped with a constant pressure switch that will shut off the power when the pressure is released.

h. Electrical Safety

- i. Among the chief hazards of electric-powered tools are burns and slight shocks which can lead to injuries or even heart failure. Under certain conditions, even a small amount of current can result in severe injury and eventual death. A shock also can cause the user to fall off a ladder or other elevated work surface.
- ii. To protect the user from shock, tools must either have a three-wire cord with ground or be grounded, be double insulated, or be powered by a low-voltage isolation transformer. Three-wire cords contain two current-carrying conductors and a grounding conductor. One end of the grounding conductor connects to the tool's metal housing. The other end is grounded through a prong on the plug. Anytime an adapter is used to accommodate a two-hole receptacle, the adapter wire must be attached to a known ground. The third prong should never be removed from the plug.
- iii. Double insulation is more convenient. The user and the tools are protected in two ways: by normal insulation on the wires inside, and by a housing that cannot conduct electricity to the operator in the event of a malfunction.

i. Electric Power Tool General Safety Practices

- i. Electric tools should be operated within their design limitations.
- ii. Gloves and safety footwear are recommended during use of electric tools.
- iii. When not in use, tools should be stored in a dry place.
- iv. Electric tools should not be used in damp or wet locations.
- v. Work areas should be well lighted.

j. Ground Fault Protection

- i. The Company shall use either ground fault circuit interrupters or an assured equipment grounding conductor to protect workers on construction sites. These requirements are in addition to any other requirements for equipment grounding conductors.

k. Ground-Fault Circuit Interrupters (GFCI)

- i. All 120-volt, single-phase 15- and 20-ampere receptacle outlets on construction sites, which are not a part of the permanent wiring of the building or structure, and which are in use by workers, shall have approved ground-fault circuit interrupters for personnel protection. Receptacles on a two-wire, single-phase portable or vehicle-mounted generator rated not more than 5kW, where the circuit conductors of the generator are insulated from the generator frame and all other grounded surfaces, need not be protected with ground-fault circuit interrupters. 1926.404(b)(1)(ii)

l. Powered Abrasive Wheel Tools

- i. Powered abrasive grinding, cutting, polishing, and wire buffing wheels create special safety problems because they may throw off flying fragments.
- ii. Before an abrasive wheel is mounted, it should be inspected closely and sound- or ring-tested to be sure that it is free from cracks or defects. To test, wheels should be tapped gently with a light non-metallic instrument. If they sound cracked or dead, they could fly apart in operation and so must not be used. A sound and undamaged wheel will give a clear metallic tone or "ring." To prevent the wheel from cracking, the user should be sure it fits freely on the spindle. The spindle nut must be tightened enough to hold the wheel in place, without distorting the flange. Follow the manufacturer's recommendations. Care must be taken to assure that the spindle wheel will not exceed the abrasive wheel specifications.
- iii. Due to the possibility of a wheel disintegrating (exploding) during start-up, the worker should never stand directly in front of the wheel as it accelerates to full operating speed.
- iv. Portable grinding tools need to be equipped with safety guards to protect workers not only from the moving wheel surface, but also from flying fragments in case of breakage.

m. Powered Grinder Safety Precautions

- i. Always use eye protection.
- ii. Turn off the power when not in use.
- iii. Never clamp a hand-held grinder in a vise.

n. Pneumatic Tools

- i. Pneumatic tools are powered by compressed air and include chippers, drills, hammers, and sanders. There are several dangers encountered in the use of pneumatic tools. The main one is the danger of getting hit by one of the tool's attachments or by fastener the worker is using with the tool. Eye protection is required, and face protection is recommended for workers working with pneumatic tools. Working with noisy tools such as jackhammers requires proper, effective use of hearing protection.
- ii. When using pneumatic tools, workers are to check to see that they are fastened securely to the hose to prevent them from becoming disconnected. A short wire or positive locking device attaching the air hose to the tool will serve as an added safeguard.

- iii. A safety clip or retainer must be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel.
- iv. Screens must be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers, or air drills.
- v. Compressed air guns should never be pointed toward anyone. Users should never "dead-end" it against themselves or anyone else.

o. Powder-Actuated Tools

- i. Powder-actuated tools operate like a loaded gun and should be treated with the same respect and precautions. In fact, they are so dangerous that they must be operated only by specially trained workers.

p. Powder-Actuated Tool Safety

- i. These tools should not be used in an explosive or flammable atmosphere.
- ii. Before using the tool, the worker should inspect it to determine that it is clean, that all moving parts operate freely, and that the barrel is free from obstructions.
- iii. The tool should never be pointed at anybody.
- iv. The tool should not be loaded unless it is to be used immediately. A loaded tool should not be left unattended, especially where it would be available to unauthorized persons.
- v. Hands should be kept clear of the barrel end. To prevent the tool from firing accidentally, two separate motions are required for firing: one to bring the tool into position, and another to pull the trigger. The tools must not be able to operate until they are pressed against the work surface with a force of at least five pounds greater than the total weight of the tool.
- vi. If a powder-actuated tool misfires, the worker should wait at least 30 seconds, then try firing it again. If it still will not fire, the user should wait another 30 seconds so that the faulty cartridge is less likely to explode, then carefully remove the load. The bad cartridge should be put in water.
- vii. Suitable eye and face protection are essential when using a powder-actuated tool.
- viii. The muzzle end of the tool must have a protective shield or guard centered perpendicularly on the barrel to confine any flying fragments or particles that might otherwise create a hazard when the tool is fired. The tool must be designed so that it will not fire unless it has this kind of safety device.
- ix. All powder-actuated tools must be designed for varying powder charges so that the user can select a powder level necessary to do the work without excessive force.
- x. If the tool develops a defect during use it should be tagged and taken out of service immediately until it is properly repaired.

q. Powder-Actuated Tool Fasteners

- i. When using powder-actuated tools to apply fasteners, there are some precautions to consider. Fasteners must not be fired into material that would let them pass through to the other side. The fastener must not be driven into materials like brick or concrete any closer than three inches to an edge or corner.
- ii. In steel, the fastener must not come any closer than one-half inch from a corner or edge. Fasteners must not be driven into very hard or brittle materials which might chip or splatter or make the fastener ricochet.
- iii. An alignment guide must be used when shooting a fastener into an existing hole. A fastener must not be driven into a spalled area caused by an unsatisfactory fastening.

r. Hydraulic Power Tools

- i. The fluid used in hydraulic power tools must be an approved fire-resistant fluid and must retain its operating characteristics at the most extreme temperatures to which it will be exposed. The manufacturer's recommended safe operating pressure for hoses, valves, pipes, filters, and other fittings must not be exceeded.

s. Jacks

- i. All jacks - lever and ratchet jacks, screw jacks, and hydraulic jacks - must have a device that stops them from jacking up too high. Also, the manufacturer's load limit must be permanently marked in a prominent place on the jack and should not be exceeded.
- ii. A jack should never be used to support a lifted load. Once the load has been lifted, it must immediately be blocked up. Use wooden blocking under the base, if necessary, to make the jack level and secure. If the lift surface is metal, place a 1-inch-thick hardwood block or equivalent between it and the metal jack head to reduce the danger of slippage.
- iii. To set up a jack, make certain of the following:
- iv. The base rests on a firm level surface
- v. The jack is correctly centered
- vi. The jack head bears against a level surface
- vii. The lift force is applied evenly
- viii. Proper maintenance of jacks is essential for safety. All jacks must be inspected before each use and lubricated regularly. If a jack is subjected to an abnormal load or shock, it should be thoroughly examined to make sure it has not been damaged. Hydraulic jacks exposed to freezing temperatures must be filled with an adequate antifreeze liquid.

t. Inspection

- i. Workers shall make sure to inspecting tools before using them to determine that it is clean, that all moving parts operate freely, and that the barrel is free from obstructions and has the proper shield, guard, and attachments recommended by the manufacturer. Tools should be inspected before and after usage by your workers for signs of defects or misuse.

	Health and Safety Program Manual	Issue Date: 04/04/2023
	Trenching and Excavation	Revision Date: Section:

1) SCOPE

- a. This policy sets forth the official practices required for trenching and excavations pertaining to the service provided by EARNEST CONTRACTING; hereafter referred to as "The Company".

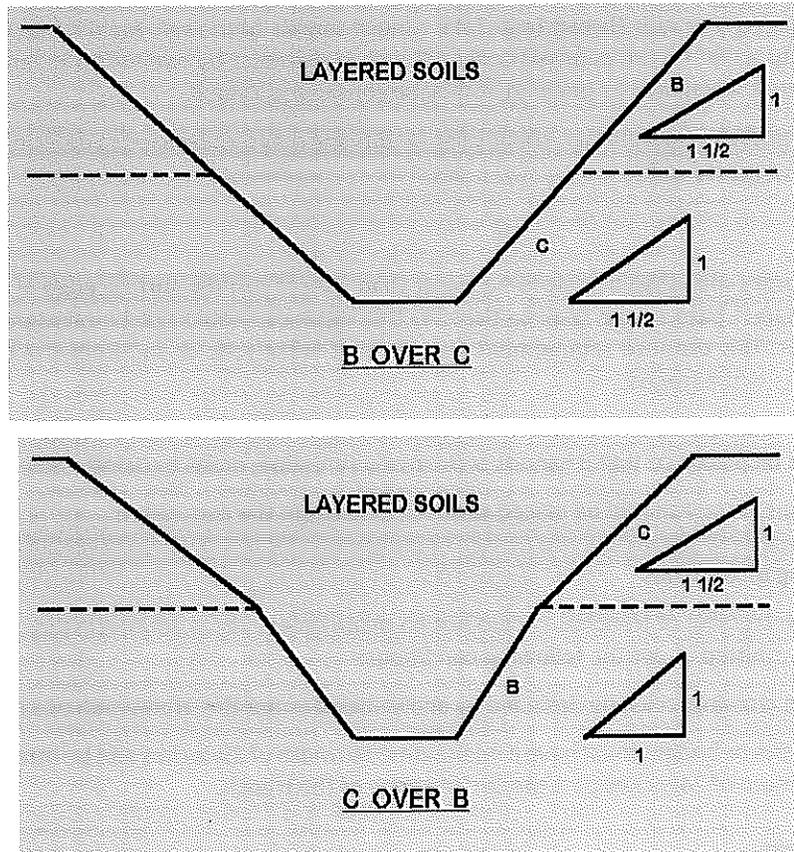
2) DEFINITIONS

- a. **Aluminum hydraulic shoring**- an engineered shoring system comprised of aluminum hydraulic cylinders (cross braces), used in conjunction with vertical rails (uprights) or horizontal rails (walers). Such a system is designed specifically to support the sidewalls of an excavation and prevent cave-ins.
- b. **Benching** - a method of protecting workers from cave-ins by excavating the sides of an excavation to form one or a series of horizontal levels or steps, usually with vertical or near-vertical surfaces between levels.
- c. **Cave-in** - the separation of a mass of soil or rock material from the side of an excavation, or the loss of soil from under a trench shield or support system, and its sudden movement into the excavation, either by falling or sliding, in sufficient quantity so that it could entrap, bury, or otherwise injure and immobilize a person.
- d. **Competent person** -one who is capable of identifying existing and predictable hazards in the surroundings, or working conditions that are unsanitary, hazardous, or dangerous to workers, and who has authorization to take prompt corrective measures to eliminate them. All competent persons must complete the 4-hour Physical Plant trenching and shoring class, successfully pass the exam, and be certified for successful completion of the class. A competent person should have and be able to demonstrate the following:
 - i. Training, experience, and knowledge of:
 1. soil analysis
 2. use of protective systems
 3. requirements of 29 CFR 1926 Subpart P
 - ii. Ability to detect:
 1. conditions that could result in cave-ins
 2. failures in protective systems
 3. hazardous atmospheres
 4. other hazards including those associated with confined spaces
 - iii. Authority to take prompt corrective measures to eliminate existing and predictable hazards and to stop work when required.
- e. **Excavation** -any man-made cut, cavity, trench, or depression in an earth surface, formed by earth removal.
- f. **Registered professional engineer**- a person who is registered as a professional engineer.
- g. **Shield (shield system)** -a structure that can withstand the forces imposed on it by a cave-in and thereby protect workers with the structure. Shields can be permanent structure or can be designed to be portable and moved along as work progresses. Also known as trench box or trench shield.
- h. **Shoring (shoring system)** -a structure such as a metal hydraulic, mechanical, or timber shoring system that supports the sides of an excavation and which is designed to prevent cave-ins.
- i. **Sloping (sloping system)** - a method of protecting workers from cave-ins by excavating to form sides of an excavation that are inclined away from the excavation to prevent cave-ins. The angle of incline varies with differences in such factors as the soil type, environmental conditions of exposure, and application of surcharge loads.

- j. **Trench (trench excavation)** -a narrow excavation (in relation to its length) made below the surface of the ground. In general, the depth is greater than the width, but the width of a trench is not greater than 15 feet. If forms or other structures are installed or constructed in an excavation to reduce the dimension measured from the forms or structure to the side of the excavation to 15 feet or less, the excavation is also considered to be a trench.

3) **PROCEDURES**

- a. All excavations shall be made in accordance with the rules, regulations, requirements, and guidelines set forth in 29 CFR 1926.650, .651, and .652; the Occupational Safety and Health Administration's standard on excavations, except where otherwise noted below.
- b. **Training**
 - i. The Company will ensure all workers and associates are trained in trenching and excavation safety and specific work-related practices. The Company requires all subcontractors whose work does not include trenching/excavations, but are in close proximity, to provide a basic awareness program that addresses all job scope activities. The awareness program shall include information regarding safe access and egress and protective measures associated with trenching.
 - ii. A competent person shall be placed in charge of all excavations. Underground utilities must be located and marked before excavation begins. Before digging, driving equipment into the ground, or engaging in earth moving activities are conducted, the appropriate one-call center will be contacted. Workers are not allowed in the excavation while heavy equipment is digging.
- c. **Inspections**
 - i. The competent person shall conduct inspections:
 - ii. Daily and before the start of each shift by using the DAILY EXCAVATION CHECKLIST found at the end of this chapter
 - iii. As dictated by the work being done in the trench.
 - iv. After every rainstorm.
 - v. After other events that could increase hazards, such as snowstorm, windstorm, earthquake, dramatic change in weather, etc.
 - vi. When fissures, tension cracks, sloughing, undercutting, water seepage, bulging at the bottom, or other similar conditions occur.
 - vii. When there is a change in the size, location, or placement of the spoil pile.
 - viii. When there is any indication of change or movement in adjacent structures.
 - ix. (For excavations 4 feet or greater in depth, a trench inspection form shall be filled out for each inspection.) If problems are found, provisions should be made for immediate personnel removal.
- d. **Soil Types:**
 - i. **Type A** - Most stable: clay, silty clay, and hardpan (resists penetration). No soil is Type A if it is fissured, is subject to vibration of any type, has previously been disturbed, or has seeping water.
 - ii. **Type B** - Medium stability: silt, sandy loam, medium clay, and unstable dry rock; previously disturbed soils unless otherwise classified as Type C; soils that meet the requirements of Type A soil but are fissured or subject to vibration.
 - iii. **Type C** - Least stable: gravel, loamy sand, soft clay, submerged soil or dense, heavy unstable rock, and soil from which water is freely seeping.
 - iv. **Layered geological strata** (where soils are configured in layers) - The soil must be classified based on the soil classification of the weakest soil layer. Each layer may be classified individually if a more stable layer lies below a less stable layer, i.e., where a Type C soil rests on top of stable rock.



e. Testing Methods

- i. The competent person in charge of the excavation shall be responsible for determining whether the soil is Type B or C. The competent person shall use a visual test coupled with one or more manual tests.
- ii. **Visual test**
 1. In addition to checking the items on the trench inspection form, the competent person should perform a visual test to evaluate the conditions around the site. In a visual test, the entire excavation site is observed, including the soil adjacent to the site and the soil being excavated. The competent person also checks for any signs of vibration.
 2. During the visual test, the competent person should check for crack-line openings along the failure zone that would indicate tension cracks, look for existing utilities that indicate that the soil has been previously disturbed, and observe the open side of the excavation for indications of layered geologic structuring.
 3. The competent person should also look for signs of bulging, boiling, or sloughing, as well as for signs of surface water seeping from the sides of the excavation or from the water table.
 4. In addition, the area adjacent to the excavation should be checked for signs of foundations or other intrusions into the failure zone, and the evaluator should check for surcharging and the spoil distance from the edge of the excavation.
- iii. **Manual tests**
 1. Thumb penetration test- Attempt to press the thumb firmly into the soil in question. If the thumb penetrates no further than the length of the nail, it is probably Type B soil. If the thumb penetrates the full length of the thumb, it is Type C. It should be noted that the thumb penetration test is the least accurate testing method.
 2. Dry strength test- Take a sample of dry soil. If it crumbles freely, or with moderate pressure into individual grains, it is considered granular (Type C). Dry soil that falls into clumps that subsequently break into smaller clumps (and the smaller clumps can only be broken with difficulty) it is probably clay in combination with gravel, sand, or silt (Type B).

3. Plasticity or Wet Thread Test- Take a moist sample of the soil. Mold it into a ball and then attempt to roll it into a thin thread approximately 1/8 inch in diameter by two inches in length. If the soil sample does not break when held by one end, it may be considered Type B.
4. A pocket penetrometer, shear vane, or torvane may also be used to determine the unconfined compression strength of soils.

f. Spoil

- i. Temporary spoil shall be placed no closer than 2 feet from the surface edge of the excavation, measured from the nearest base of the spoil to the cut. This distance should not be measured from the crown of the spoil deposit. This distance requirement ensures that loose rock or soil from the temporary spoil will not fall on workers in the trench.
- ii. Spoil should be placed so that it channels rainwater and other run-off water away from the excavation. Spoil should be placed so that it cannot accidentally run, slide, or fall back into the excavation.
- iii. Permanent spoil should be placed some distance from the excavation.

g. Surface Crossing of Trenches

- i. Surface crossing of trenches should not be made unless absolutely necessary. However, if necessary, they are only permitted under the following conditions:
- ii. Vehicle crossings must be designed by and installed under the supervision of a registered professional engineer.
- iii. Walkways or bridges must have a minimum clear width of 20-inches and be fitted with standard rails and extend a minimum of 24 inches past the surface edge of the trench.

h. Access and Egress

- i. Trenches 4 feet or more in depth shall be provided with a fixed means of egress.
- ii. Spacing between ladders or other means of egress must be such that a worker will not have to travel more than 25 feet laterally to the nearest means of egress.
- iii. Ladders must be secured and extend a minimum of 36 inches above the landing.
- iv. Metal ladders should be used with caution, particularly when electric utilities are present.
- v. Any structural ramps used solely for worker access or egress must be designed by a competent person.

i. Exposure to Vehicles

- i. Workers exposed to vehicular traffic shall be provided with and required to wear reflective vests or other suitable garments marked with or made of reflectorized or high-visibility materials.
- ii. Trained flag persons, signs, signals, and barricades shall be used when necessary.

j. Exposure to Falling Loads

- i. All workers on an excavation site must wear hard hats.
- ii. Workers are not allowed to work under raised loads.
- iii. Workers are not allowed to work under loads being lifted or moved by heavy equipment used for digging or lifting.
- iv. Workers are required to stand away from equipment that is being loaded or unloaded to avoid being struck by falling materials or spillage.
- v. Equipment operators or truck drivers may remain in their equipment during loading and unloading if the equipment is properly equipped with a cab shield or adequate canopy.

k. Warning Systems for Mobile Equipment

- i. The following steps should be taken to prevent vehicles from accidentally falling into the trench:
- ii. Barricades must be installed where necessary when:

1. Hand or mechanical signals must be used as required
2. Stop logs must be installed if there is danger of vehicles falling into the trench
3. Soil should be graded away from the excavation; this will assist in vehicle control and channeling of run-off water
4. Trenches left open overnight shall be fenced and barricaded

i. Hazardous Atmospheres and Confined Spaces

- i. Workers shall not be permitted to work in hazardous and/or toxic atmospheres. Such atmospheres include those with:
 - ii. less than 19.5% oxygen
 - iii. a combustible gas concentration greater than 20% of the lower flammable limit
 - iv. concentrations of hazardous substance that exceed those specified in the Threshold Limit Values for airborne contaminants established by the ACGIH
- v. All operations involving such atmospheres must be conducted in accordance with OSHA requirements for occupational health and environmental controls for personal protective equipment and for lifesaving equipment. Engineering controls (such as ventilation) and respiratory equipment may be required.

m. Testing for Atmospheric Contaminants

- i. If there is any possibility that the trench or excavation could contain a hazardous atmosphere, atmospheric testing must be conducted prior to entry. Conditions that might warrant atmospheric testing would be if the excavation was made in a landfill area or if the excavation was crossed by, was adjacent to, or contained pipelines containing a hazardous material (for example, natural gas lines).
- ii. Testing should be conducted before workers enter the trench and should be done regularly to ensure that the trench remains safe. The frequency of testing should be increased if equipment is operating in the trench.
- iii. Testing frequency should also be increased if welding, cutting, or burning is done in the trench.
- iv. Workers required to wear respiratory protection must be trained, fit-tested, and enrolled in a respiratory protection program.
- v. Some trenches qualify as confined spaces. When this occurs, compliance with The Company's Confined Space Program is also required.

n. Standing Water and Water Accumulation

- i. Methods for controlling standing water and water accumulation must be provided and should consist of the following if workers must work in the excavation:
 1. Use of special support or shield systems approved by a registered professional engineer
 2. Water removal equipment, such as well pointing, used, and monitored by a competent person
 3. Safety harnesses and lifelines used in conformance with 29 CFR 1926.104
 4. Workers removed from the trench during rainstorms
 5. Trenches carefully inspected by a competent person after each rain and before workers are permitted to re-enter the trench

o. Benching, Sloping, Shoring, and Shielding Requirements

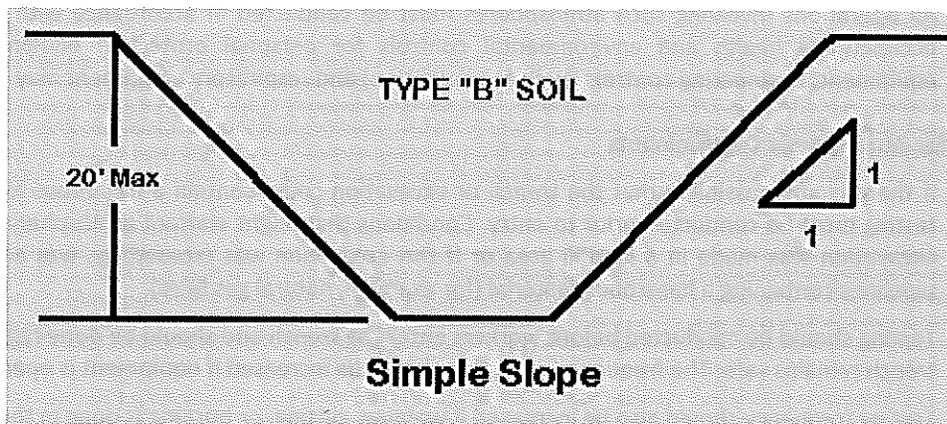
- i. All excavations or trenches 4 feet or greater in depth shall be appropriately benched, shored, or sloped according to the procedures and requirements set forth in OSHA's Excavation standard, 29 CFR 1926.650, .651, and .652.
- ii. Excavations or trenches 20 feet deep or greater must have a protective system designed by a registered professional engineer.

- iii. Excavations under the base of footing of a foundation or wall require a support system designed by a registered professional engineer.
- iv. Sidewalks and pavement shall not be undermined unless a support system or another method of protection is provided to protect workers from their possible collapse.

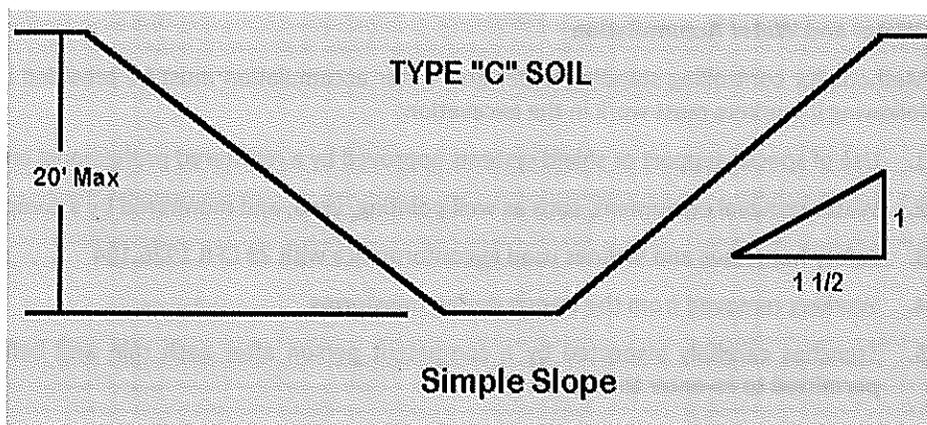
p. Sloping

- i. Maximum allowable slopes for excavations less than 20' based on soil type and angle to the horizontal are as follows:

4) Soil Type	5) Height/depth ratio	6) Slope angle
7) Type B	8) 1:1	9) 45 degrees
10) Type C	11) 1 1/2:1	12) 34 degrees



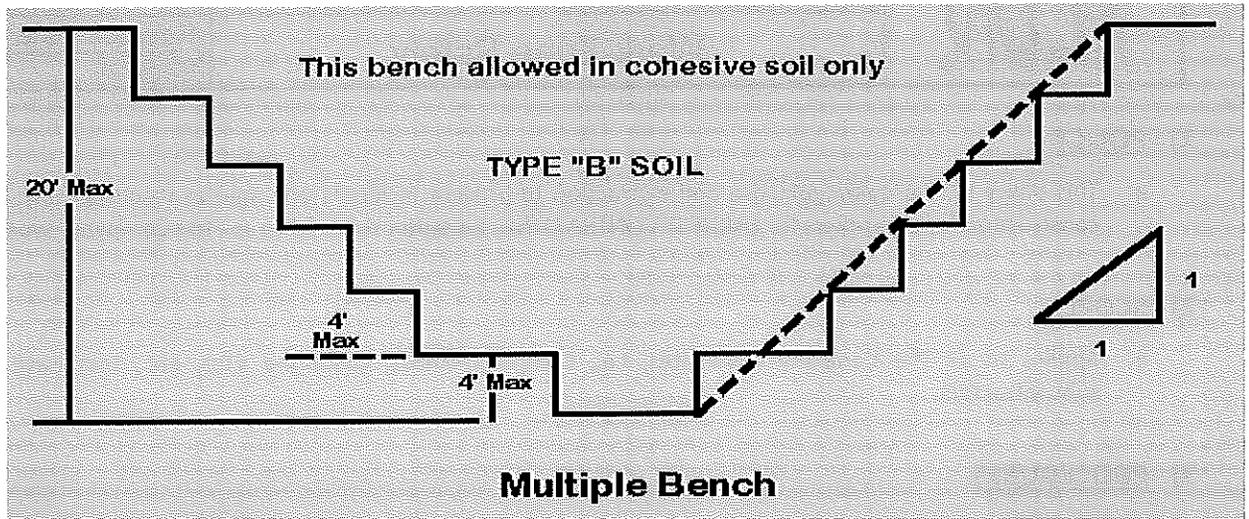
- ii. A 10-foot-deep trench in Type B soil would have to be sloped to a 45-degree angle or sloped 10 feet back in both directions. Total distance across a 10-foot-deep trench would be 20 feet, plus the width of the bottom of the trench itself. In Type C soil, the trench would be sloped at a 34-degree angle, or 15 feet back in both directions for at least 30 feet across, plus the width of the bottom of the trench itself. All simple slope excavations 20 feet or less in depth shall have a maximum allowable slope of 1 1/2:1.



q. Benching

- i. There are two basic types of benching, single and multiple, which can be used in conjunction with sloping.
- ii. All benched excavations 20 feet or less in depth shall have a maximum allowable slope of 1:1.
- iii. In Type B soil, the vertical height of the benches must not exceed 4 feet. Benches must be below the maximum allowable slope for that soil type. In other words, a 10-foot-deep trench in Type B soil must be benched back 10 feet in each direction, with a maximum of a 45-degree angle.

iv. Benching is not allowed in Type C soil.



	Health and Safety Program Manual	Issue Date: 04/04/2023
	Work Zone Safety	Revision Date:
		Section:

1) POLICY

- a. This policy is to provide guidance and instruction to prevent incidents and injuries resulting from highway/roadway construction for all workers for EARNEST CONTRACTING; hereafter referred to as "The Company" work sites.

2) SCOPE

- a. Applies to all The Company work sites, i.e., Company offices, client job sites, etc., that have occasion to use subcontractors.

3) PROCEDURES

a. Overview

- i. The number of persons killed in the United States in motor vehicle crashes in work zones continue to rise. There are now more than 1,000 deaths annually. In addition, more than 40,000 people are injured each year because of vehicle crashes in a work zone. It is for this reason that we have established this Traffic Control and Work Zone Safety Program. At times the nature of our operations does not require freeway lane closures, we often find that unloading material, installing conduit in excavation, overhead lighting installation and other work activities cause workers to be adjacent to or in actual vehicular traffic. Further, our work may also expose pedestrians or bicycle traffic to hazard, and this program will address that issue as well. Obviously, we are concerned that our materials, tools, equipment, etc. could cause damage to vehicles or cause injury to the public when our work encroaches into accessible areas. But we are most concerned about the health and safety of our workers who may work in these hazardous conditions.

b. Program Objectives

- i. Our first and most important objective is to ensure a high level of safety for our workers, other workers, and the public.
- ii. Our second objective is to minimize adverse traffic impacts associated with construction in terms of delays and congestion, noise, and other environmental impacts, to ensure a high level of satisfaction by our ultimate customer – the public.
- iii. Our third objective is the identification of specific risk factors associated with individual projects that present traffic hazard conditions and the development of countermeasures to mitigate those hazards to minimize the risk.

c. Program Goals

- i. No workers or others will be seriously injured because of traffic accidents in our work zones, regardless of the cause of the accident.
- ii. No members of the public traveling through our work sites will be injured because of traffic accidents caused by or made more serious by our work or traffic control operations.
- iii. Traffic delays and congestion associated with our work activities will be held to the minimum level that can be achieved, consistent with the traffic volumes through the project, the characteristics of the roadway where the work occurs, and the nature of the work operations that must be completed.
- iv. Interference with businesses and other activities adjacent to the project will be held to a minimum, consistent with traffic volumes, roadway characteristics and work operations.
- v. Traffic controls will be carried out in a manner that ensures that emergency services in and through the project can be delivered in a timely manner, and transit operations will not be disrupted.

- vi. Traffic controls will be conducted in a manner that provides us with adequate access to the work area to complete the planned work on schedule, in compliance with quality requirements of the contract. Efficient delivery of materials and equipment to work sites will be available.
- vii. All traffic control operations will be in full compliance with the terms and requirements of the construction contract and/or in keeping with current States and Federal traffic control standards. Full understanding of the Manual on Uniform Traffic Control Devices (MUTCD) may be necessary to fulfill these requirements. Temporary Traffic Control Part 6 refers to the traffic control procedures and methods to be followed, and additional state addendums may apply.
- viii. All traffic control devices, safety features, and work zone operations shall be always maintained in good condition, with full documentation of all work zones operations recorded according to the requirements of this Work Zone Program.

d. Regulatory and Contractual Requirements

- i. Each project will have a particular traffic control demands and needs. The Company will determine potential hazards related to work in and around the traffic control zone prior to the start of work. Delivery of materials in public roadway locations or adjacent to roadway locations or adjacent to roadways will be determined and scheduling and planning will be accomplished to minimize hazard.
- ii. Any foreman, supervisor or delegate with direct work zone responsibilities will have access to the Federal MUTCD and appropriate State supplementary requirements before the start of the project.
- iii. Typically, the General Contractor (GC) is responsible for traffic control on the construction site and coordination with the temporary traffic control plan of the GC is necessary. Additional traffic control planning may be required as determined by the scope of work.
- iv. OSHA regulations indicate that signs, barricades, and flagger signaling activities comply with the MUTCD regulations. Violations of the MUTCD requirements in these areas could be fully citable by OSHA.
- v. Vehicle and traffic laws of the particular state and municipality must be followed, and permits may be required for lane or sidewalk restriction or closures. All such issues should be addressed in pre-planning meetings and in conjunction with the GC.
- vi. Department of Transportation regulations in each State may require additional measures taken and this must be coordinated at time of job start up.

e. Worker Visibility

- i. A critical element of work zone safety is high visibility of workers when adjacent to traffic.
- ii. All workers must wear high visibility apparel when in or adjacent to traffic. Class 1, 2 or 3 garments will be used based upon specific exposure needs.
- iii. Working during dawn or dusk conditions will require use of fluorescent colored high visibility apparel (class 2 or 3 based upon exposure).
- iv. Yellow green apparel should be considered when a significant number of orange-colored signs, drums or vehicles are in the work zone.
- v. Workers will be issued appropriate high visibility vests based upon exposure. This clothing must be kept in good condition and laundered periodically to assure adequate visibility. Clothing/vests should be replaced as needed to assure color discrimination by motorist.

f. Worker Traffic Zone Training

- i. All workers exposed to traffic will be trained in how to work safely near traffic.
- ii. Any temporary traffic control measures implemented will only be complete by workers who have been fully trained and are cognizant of MUTCD requirements.
- iii. Any specific work procedures will be established by the Supervisor, General Foreman, or delegate when work activities present traffic hazards.
- iv. Traffic control plans will be clearly communicated to all affected personnel.

- v. When personnel are responsible for traffic control device maintenance, those workers will be fully trained.

g. Area Planning

- i. Routes for work activity and traffic must be clearly established and marked properly. A control plan will be established to assure all parties are aware of encroachment and closures.
- ii. Safe access and egress of workers and vehicles will be determined.
- iii. Backing of vehicles should involve back up alarms and spotters whenever pedestrians or workers may be present.
- iv. Overhead and underground utilities should be located and marked to prevent contact by equipment and workers.

h. Traffic Speed Control

- i. Compliance with posted speed limits is vital to protect workers and the traveling public. Reduction of initial posted speed limits may be required based upon job demands and work tasks.
- ii. Appropriate speed limits should be established and application for reductions should be coordinated with the GC or whoever is responsible for the traffic control plan.
- iii. Assure that the determined regulatory speed is properly and clearly posted immediately preceding the work zone.
- iv. Flaggers may be needed to monitor and slow traffic as necessary.
- v. Local law enforcement may be needed to enforce speed limits. Coordinate with the GC to determine if law enforcement presence will be needed at the site.

i. Separation of Traffic and Work Activities

- i. Effective separation of traffic from work activity is one of the most critical aspects of work zone safety.
- ii. Use of temporary traffic barriers, shadow vehicles or other devices must be determined and implemented according to traffic control plan.
- iii. Factors to consider when determining what separation is needed are as follows:
 - 1. Traffic speed
 - 2. Traffic volume
 - 3. Distance between workers and vehicles
 - 4. Duration of work
 - 5. Type of work operations
 - 6. Physical hazards within the work zone
 - 7. Alignment of traffic lanes through the work zone
- iv. Coordination with GC is critical to determine work areas that require separation. Other contractors work activity may come into play when determining the work zone.
- v. Adequate lateral buffer space should be provided to the greatest extent possible by shifting traffic slightly away from work operation as much as available space permits.
- vi. Where workers must work very close to traffic, a trained flagger or spotter should be used to protect workers from oncoming traffic.
- vii. For short duration work activity like pothole patching, taking measurements, marking, etc. the operation should be planned using a flagger or at least a spotter to make sure workers are not exposed to traffic in open lanes without protection.
- viii. Workers must not cross high speed travel lanes on foot unless the foreman, supervisor or delegate analyzes the situation and develops procedures to accommodate movement safely.
- ix. Warning sign should be posted at locations where work vehicles regularly enter and exit traffic.

j. Technical Requirements for Work Zone Temporary Traffic Control

- i. Basic requirements are detailed in the MUTCD. This manual should be consulted when setting up a control plan.
- ii. Flagging requirements, if applicable, mandate worker training and this should be established upon job start up.
- iii. All manuals of traffic control will be retained on the job for ongoing review.
- iv. Copies of any established traffic control plans will be maintained and reviewed with effected workers.
- v. Required signs will be determined and an adequate supply ordered to come onto the job site in advance of traffic control needs. Reasonable damage should be considered, and additional quantities should be available.
- vi. All necessary sign supports will be ordered in quantity to allow for damage and vandalism.
- vii. Channelizing devices (cones, drums, and barricades) must be ordered as required. Specification of 28" and 36" cones should be established to make certain that required cones are used based upon speed requirements. Type III barricades when required should be in adequate quantity to assure safe and complete closures. Channelizing devices must meet MUTCD and OSHA requirements
- viii. Warning lights and batteries will be maintained on site when night closure or overnight securing is needed.
- ix. Portable concrete barrier will be used when required by GC or long-term protection of workers in the work zone is needed. Appropriate warning and signage will be required.
- x. All barriers must be in good condition to present displacement when impacted.
- xi. Vehicles will be installed with warning beacons, flashers and markings as required in accordance with MUTC requirements.
- xii. Reflective markings and beacons must be kept in good condition and cleaned often to assure maximum visibility.

k. Work Zone Layout

- i. Many situations follow "typical" MUTCD requirements and details should be followed specifically. The type of Temporary Traffic Control Guide layout should be clearly identified in the traffic control plan and appropriate page, or diagram reference should be made to MUTCD.
- ii. Contract specifications or permit documents will typically include drawings or diagrams showing setups to be used for lane closures, flagger stations, shoulder closures and other typical set ups. This specification must be followed and referenced in foreman daily logs.
- iii. Significant deviations from contract or permit layouts should be reviewed with GC and signed off before implementation.
- iv. Almost all layouts will require some minor modifications based upon actual site conditions. The foreman, supervisor or delegate in charge will make the minor adjustments required, but it is expected that changes err on the side of additional warnings and be in the best judgment of the foreman, supervisor, or delegate. Any changes should be documented on the daily log. These adjustments would include:
 1. Minor shifts in sign location (10 percent or less) to avoid driveways, intersections, other devices and to improve visibility.
 2. Minor shifts in start point and length of tapers (10 percent on length, 100 ft on start point to avoid intersections and other conflicts and to improve sight distance.
 3. Add supplemental signs on the left side of the road to improve visibility.
 4. Reduce spacing of channelizing devices at potential problem areas
 5. Other minor changes to address obvious concerns.
- v. Any non-typical situation should be reviewed with a traffic control qualified person or engineer, and the layout document should be reviewed with a traffic control qualified person or engineer, and the layout document should be fully documented. Written plan should be maintained on the site for ongoing crew review for adherence to requirements.
- vi. Additional conditions may require further devices, including "pavement ends" or "bump" signs. These should be provided and documented in the plan.

I. Installing and Removing Traffic Control Set Ups

- i.** Periods during placement and removal of traffic control devices often present the highest risk of accident for workers and public because devices are not completely in place and workers and equipment are most exposed to traffic.
- ii.** Proper planning and careful execution of set ups and removals is needed, adhering to established procedures for protection of workers.
- iii.** Common sense and use of spotter or other means of identifying potential hazards are needed at all times when placement and removal.
- iv.** The following steps are required when setup/removal operations:
 - 1.** All fixed signs must be placed first, with covers attached so signs can be covered and uncovered quickly at the appropriate time. Covers will be placed at the end of the operation.
 - 2.** Portable signs will be deployed in the necessary location along the route.
 - 3.** Channelizing devices will be set into place in the proper pattern. Note the number of cones and angles of tapers and follow plan.
 - 4.** If setting devices on foot, make certain that a shadow vehicle is in place or worker carefully observes oncoming traffic.
 - 5.** Workers must not cross open lanes of high-speed traffic to place devices.
 - 6.** Arrow boards will be placed in the proper sequence as cones are placed. Normally, these are towed into place and should be activated when other devices are set.
 - 7.** Set up operations normally should start at the approach end and proceed downstream in the direction of traffic flow unless conditions determined by the foreman, supervisor or delegate dictate other measures and safer.
 - 8.** Removal will normally proceed in the opposite direction of set up.
 - 9.** The foreman, supervisor or delegate will be responsible for driving through all set ups after completion to make sure it meets all requirements.
 - 10.** The foreman, supervisor or delegate is also responsible for driving through removal to assure all equipment has been removed or properly secured.
- m.** Worker safety is paramount during set up and removal operations. The following safety rules will be followed:
 - i.** Workers are not allowed to place cones or other devices from the bed of moving pickup trucks.
 - ii.** Workers must not ride in the bed of a pickup truck during set up or any other time.
 - iii.** Workers must not place cones or other devices or otherwise work behind a backing work vehicle.
 - iv.** If a work vehicle needs to be backing, all workers must be in front of the vehicle and in sight of the driver.
 - v.** Violations of these rules will be grounds for disciplinary action, including suspension without pay.
- n. Lighting**
 - i.** Temporary lighting should be used in night work zones or when work is at dawn or dusk.
 - ii.** Lighting should allow motorists/pedestrians to clearly see work area and potential hazard so they can safely travel through the work area. But make certain that lighting does not "blind" motorists traveling in proximity to the work area.
 - iii.** Illumination should allow workers to see their work activity more clearly.
 - iv.** Lighting should be directed so motorists can clearly identify locations of workers in the work zone.
 - v.** Overnight procedures to secure work area and protect hazards must be developed and may require auxiliary flashers or lighting that must be activated upon departing the work area.

o. Overnight Procedures

- i. Work locations may require multiple days of activity and may necessitate the securing of the site overnight. The foreman, supervisor or delegate will be responsible for making sure that an adequate overnight plan has been established.
- ii. GC will be consulted if overnight procedures require special equipment, closures, or other contractor involvement.
- iii. The foreman, supervisor or delegate must determine the proper number of signs and channelizing devices that are needed to alert drivers and pedestrians of the hazards and any changes in the roadway or walkway.
- iv. All such devices should be reflectorized to ensure good visibility at night. Lighting may be required based upon the hazard and risk.
- v. All equipment and supplies should be parked and stored in a safe location where they are not accessible to vehicles or pedestrians.
- vi. Equipment, vehicles, and materials should be secured to prevent theft and vandalism.
- vii. Adequate pathways must be established as needed to allow passage to retail or commercial establishments as needed. Hazards should be delineated with cones, barricades, caution tape, snow fence, etc.
- viii. The foreman, supervisor or delegate is required to conduct a job check to verify that hazards and exposures have been minimized.
- ix. All caution tape, delineators, cones, barricades, and signs should be checked immediately prior to closing down the job for the day and inspection noted in the daily log by the foreman, supervisor, or delegate. Corrective action should be completed before departing the job.

p. Flagger Usage and Training

- i. Flaggers are in place to protect themselves, the crew, motorists, and pedestrians traveling through the work zone, and equipment. This is a critical job and one that must be taken seriously.
- ii. Flaggers must be mentally alert, in good physical condition, be courteous but authoritative.
- iii. All workers who flag must receive adequate training. Each State has different requirements. Most require some type of training, and many require actual certification. It is the policy that no matter what the State requirements, all workers will be properly trained before flagging.
- iv. Training and instructions will cover at a minimum the following:
 1. Flagger equipment that must be used
 2. Layout of the work zone and flagging station
 3. Methods to signal traffic to stop, proceed or slow down
 4. Methods of one-way control
 5. Actual demonstration of proper flagging methodology and operations
 6. Emergency vehicles traveling through the work zone
 7. Handling emergency situations
 8. Methods of dealing with hostile drivers
 9. Flagging procedures when a single flagger is used
- v. Written documentation of flagger training will be maintained with other safety training records.
- vi. Flaggers are to be used at locations on a construction site where barricades and warning signs cannot control the moving traffic.
- vii. Flaggers must wear proper orange, strong yellow-green or yellow warning garments, Class 2 for daytime and Class 3 for nighttime flagging, although the regulations only require Class 2 for nighttime.
- viii. Proper STOP/SLOW paddles will be used following MUTCD requirements, including reflectorized material when used at night. 18" paddles are the minimum size allowed. 24" paddles should be used for speeds of 45 mph or

greater. A flag may be used in emergencies but must be good grade red material at least 24" square and secured to a staff approximately 36" long.

- ix. Extension staff may be used for paddles for extended periods of flagging. Long staff should be 66" long and accommodate insertion of the 12" staff paddle.
- x. Proper and consistent hand and paddle/flag signals must be used as specified in the MUTCD. Flaggers will be tested on appropriate signals and foremen will monitor to assure proper signals are given. Failure to provide proper signals is given. Failure to provide proper signals could expose additional liability in the event of an accident.
- xi. Flagger stations or positions must be located so that approaching road users have sufficient distance to react and stop at an intended stopping point. Refer to the Stopping Distance Table in the MUTCD.
- xii. Flagger stations must be illuminated if used at night or reduced light conditions.
- xiii. Advance warning signs, including "flagger" warning signs must be properly positioned for worker safety.
- xiv. Flaggers should stand either in the shoulder adjacent to the road being controlled or in a closed lane prior to stopping road users. The flagger should only stand or move into the lane being used by moving traffic after the traffic has stopped.
- xv. The flagger should stay in line of sight of first road user to assure visibility.
- xvi. For operations requiring more than one flagger, portable radios will be used unless flaggers are close enough to permit voice or hand signals. Hand signals will be verified and agreed at time of initial operation.
- xvii. Flaggers should maintain a steady flow of traffic as much as possible and minimize unnecessary stops. Work vehicles should be held until a safe gap is available whenever possible.
- xviii. Flaggers will be relieved at least every 2 hours for a 15-minute break to assure they remain alert. No worker will be allowed to flag in excess of 10 hours in any day.
- xix. Drinking water and restroom facilities will be available for flaggers.

q. Additional Safety Measures

- i. Safe access points will be located so workers can get into workspaces without excessive exposure to traffic.
- ii. If safe parking areas are not available, workers will park at a central location and use work vehicles to reach the work site.
- iii. Restroom facilities break areas and other facilities will be located to minimize worker exposure to traffic.
- iv. Entry and exit points for work vehicles and haul trucks will be planned in advance to reduce traffic conflicts and enhance worker safety.
- v. Vehicles and equipment with restricted visibility to the rear may not back up in any location where workers or pedestrians are in the area unless using a spotter.
- vi. Blind backing (no spotter) will be done only when the driver has determined that the area is free of workers or other vehicles/equipment by physically exiting the vehicle and checking to the rear.
- vii. Drivers, when departing their vehicles, must be properly attired, including hard hat and appropriate visibility clothing (safety vest).
- viii. In cold weather, foreman, supervisor, or delegate will assure adequate larger sized vests are available for fit over bulky outer clothing.
- ix. Workers and foremen, supervisor or delegate should never become involved in any altercation with drivers. Simply record the plate number and description of the vehicle and driver so local law enforcement can be notified.
- x. Any worker who witnesses a work zone accident must report it immediately to their foreman, supervisor, or delegate. This would include incidents involving vehicles, bicyclists, pedestrians, etc.