

# Safety Procedures Manual

Desco Coatings, Inc. Desco Systems, LLC. Desco Systems of Arkansas, Inc.

SEPTEMBER 2018

## **Desco** SAFETY PROCEDURES MANUAL TABLE OF CONTENTS

SUBJECT	PAGES
SAFETY PROCEDURES	3
CORPORATE SAFETY POLICY	-
<sup>33</sup> EQUAL EMPLOYMENT OPPORTUNITY POLICY	
SAFETY & HEALTH PROGRAM ADMINISTRATION	
JOBSITE SAFETY RULES	
NOISE & HEARING CONSERVATION POLICY	
FIRE PREVENTION PROGRAM	
ELECTRICAL SAFET	
VAPOR-FUME LEVEL DETERMINATION (TLV/TWA)	
COMPULSORY RESPIRATOR PROGRAM	
SCRAP WASTE MATERIAL DISPOSAL GUIDELINES	
CONFINED SPACE ENTRY PROCEDURES	
HAZARD COMMUNICATIONS	20
CODE OF SAFE PRACTICES FOR ASSEMBLING & DISMANTLING STEEL	
SCAFFOLDS AND LADDERS	
SURFACE PREPARATION	
FALL PROTECTION	
DRUG AND ALCOHOL-FREE WORKPLACE POLICY	
EMERGENCY ACTION PLAN	
BACK INJURY PREVENTION	
AERIAL & SCISSOR LIFTS	-
OSHA INSPECTION GUIDELINES	
COMPANY VEHICLE POLICY	
SILICA AWARENESS	44
BLOODBORNE PATHOGENS HAZARDOUS EXPOSURE	
HAZARDOUS WASTE/EMERGENCY OPERATIONS	
FIT FOR DUTY	74
APPENDIX INDEX	

## DESCO

The following rules are implemented for the protection of our employees. It is not intended that any project's safety procedures be confined to the following requirements. These rules are usually general, and should be used in conjunction with more specific federal, state and local regulations. Whenever the two conflict, the more stringent regulations shall apply.

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

## **Desco Safety Guidelines**

This safety manual has been prepared to promote safety at the jobsite. It addresses typical work functions of Desco. Each chapter outlines the requirements of an individual aspect of the Safety Program. Each Section is implemented as a separate "building block" of the total Safety Program to form a positive approach to jobsite safety.

If these rules in any way conflict with any state, local or federal statute or regulation, said statute shall supersede these rules and it shall be the responsibility of each employee to comply therewith.

It is the intent of Desco to send back with every subcontract we sign with a general contractor, Safety Data Sheets. These Safety Data Sheets are being sent to the general contractor so that they might group them in a catalog of other OSHA approved method to supply on the jobsite. This will make them available to either be presented or shown to any individual or company working or that has access to these areas in which we will be storing or applying our products.

If we are not working through a General Contractor, Desco will have on hand at each jobsite, Safety Data Sheets for the perusal of any individual who has access to areas in which we are storing or applying our products.

## CORPORATE SAFETY POLICY

## **SECTION 2**

## DESCO

It is the policy of Desco to provide a safe and healthful work environment for our employees and contract associates.

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

Our safety program has been developed to assure compliance with Federal, State and Local regulations with particular emphasis on the Occupational Safety and Health Act of 1970 (OSHA), and all OSHA requirements that apply to our construction operations. It is the obligation of all employees to be knowledgeable of the standards established by these agencies and to implement the rules and regulations contained therein on projects under their direction.

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

## Matt Huggins, President

Desco Systems, LLC

## EQUAL EMPLOYMENT OPPORTUNITY POLICY

**SECTION 3** 

## DESCO

It is the employment policy and practice of Desco to recruit and hire employees without discrimination because of race, color, religion, national origin, sex, age, physical, or mental handicap, disabled veteran or Vietnam Era Veteran. Our policy is to treat all employees equally with respect to compensation and opportunities for advancement.

In furtherance of these policies and practices, this company has assigned and agreed to implement an Affirmative Action Program in accordance with the Equal Opportunity Clause 41-CFR 60.

Desco has agreed to assert leadership within the community and to put forth the maximum effort to achieve full employment plus the utilization and development of the capabilities and productivity of all our citizens.

Desco recognizes that the effective application of a policy of merit employment involves more than just a policy statement, and will implement this Affirmative Action Program in a positive and aggressive manner, and will make known our commitment to this effort and that equal opportunities are available within our company on the basis of individual merit.

## Matt Huggins, President

Desco Systems, LLC

## PROJECT SAFETY POLICY PROGRAM ADMINISTRATION SECTION 4

1. **DESCO'S SAFETY REPRESENTATIVE** (hereafter referred to as Safety Representative)

A. A qualified Safety Representative shall be appointed to coordinate and implement the jobsite Safety Regulations and Program.

B. Safety Representative will hold scheduled meetings to instruct all personnel on safety practices and jobsite conditions. Meeting notes and attendees will be recorded.

C. Safety Representative shall be responsible for furnishing and maintaining safety equipment and enforcing the use of such equipment by all personnel.

- D. Safety Representative shall maintain accurate injury reports.
- E. Safety Representative shall see that "lunch box" safety meetings are distributed weekly.
- F. Compliance with the above will be the responsibility of the Safety Representative.

## 2. DISCIPLINARY PROCEDURES

A. The Company's President and/or Vice-President are responsible for enforcement of Desco's Disciplinary Program.

B. Not following verbal or written safety procedures, guidelines, rules, horse play, failure to wear selected PPE, abuse of selected PPE, etc. are considered safety violations.

C. Upon issuance of a safety violation, Upper Management will hold a meeting with employee(s) to discuss the infraction & inform individual(s) of the rule or procedure that was violated and the corrective action to be taken.

D. Company officials will conduct periodic inspections of work areas to ensure compliance with safety rules and policies.

## 3. INCIDENT INVESTIGATION AND REPORTING

A. Required incidents must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the owner client as soon as possible, or in a timely manner (within 24 hours of incident). Reporting is required in the event of a fatality, or if three or more personnel are hospitalized.

B. Personnel will be trained in their roles and responsibilities for incident response and incident investigation techniques.

C. Proper equipment, including some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rules, cameras, small tools, audio recorder, PPE, marking devices such as flags, equipment manuals, will be made available to assist in conducting an investigation.

D. Initial identification of evidence is to be made immediately following an incident and might include listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions.

E. 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.

F. Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed.

G. Incident investigations should result in corrective actions.

H. Written incident reports should be prepared and include an incident report form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, investigation board member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included.

I. Lessons learned will be reviewed and communicated. Changes to processes will be placed into effect to prevent reoccurrence or similar events.

## JOBSITE SAFETY RULES

#### SECTION 5

## Jobsite safety shall include the following, as required:

- A. Observance of all Jobsite Safety Rules by all personnel at all times
- B. Fire Prevention Program
- C. Assured Equipment Grounding Program
- D. Respirator Program
- E. Scrap Waste Material Disposal Guidelines
- F. Scaffold Safety
- G. Mix Area Safety
- H. Compliance to Hazard Communication Standard
- I. Surface Preparation
- J. Confined Space Entry
- K. Lockout Procedures

- L. Personal Protective Equipment
- M. Housekeeping Practices
- N. Hot Work Permits

O. Noise Exposure

P. Clean up and Disposal

## I. MANAGEMENT RESPONSIBILITY

A. Management shall be responsible for promoting and maintaining safe environmental conditions on

- all projects.
- B. The superintendent, foreman or other person in charge shall instruct all workers with regard
- to performing their duties in as safe a manner as possible and the hazards involved.

C. The superintendent or foreman shall be informed of the condition of the jobsite before work is begun.

No worker shall be permitted to work in or enter a place where it is known that a dangerous condition exists, except to remove the danger, and then only under direct supervision, utilizing appropriate precautionary measures.

D. Workers must receive safety training and demonstrate the capability to perform the duties required before being permitted to lead work.

E. All workers shall use the necessary safety devices for the work involved. All tools and the work area shall be kept in a safe condition.

F. Adequate sanitation, washing facilities and drinking water shall be provided.

G. It shall be the responsibility of the President to investigate any recordable accident or illness and access probable cause.

H. A complete report of all accidents and illnesses inclusive of all OSHA logs required will be maintained at Company headquarters and made available to all during normal working hours.

## II. TOOLS/EQUIPMENT/MACHINERY

A. Only authorized persons shall be allowed to operate equipment and machinery and ride in company vehicles.

B. Machinery guards shall be kept in place at all times, except while being repaired. Unless necessary, machinery shall not be repaired while in motion, such as timing adjustments and calibration. Lockout procedures must be followed.

C. Hammer struck or other striking tools with chipped edges, mushroomed heads, broken or split handles shall not be used.

D. Riding material hoist platforms is prohibited unless hoist is equipped with approved safety devices.

Riding crane hooks, "headache balls" or crane loads is prohibited.

E. Power tools shall be used only by delegated persons. Safe operating instructions issued by the equipment manufacturer shall be complied with.

F. Unsafe, improperly functioning or broken equipment will be removed from service and tagged accordingly, until repair or replacement is made.

## III. PERSONAL PROTECTIVE EQUIPMENT

A. All employees will be properly trained as to when personal protective equipment (PPE) is necessary, what PPE is necessary, how to properly don, doff, adjust and wear PPE, the limitations of PPE, and the proper care, maintenance, useful life and disposal of PPE.

B. Retraining of employee(s) will be conducted when the workplace changes, making the earlier training obsolete, the type of PPE changes or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding.

C. PPE training is to be documented and must include the employee name, the dates of training, and the certification subject.

D. Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used and maintained in a sanitary and reliable condition whenever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

E. If employee-owned equipment is permitted, Desco must be responsible for the assurances of its adequacy, maintenance and sanitation.

F. A written and signed hazard assessment is to be performed determining if hazards are present or are likely to be present, which necessitate the use of PPE. The certification is to include the name of certifier, signature, date and identification of assessment documents.

G. The selected PPE must be fitted to each affected employee, including proper donning, doffing, cleaning, and maintenance.

H. Defective or damaged PPE shall not be used.

I. Personal protective equipment shall be used by all employees when required by these rules or when so instructed by the supervisor.

J. Hard hats shall be worn as required while on the job.

K. Safety glasses or goggles shall be worn by all employees when exposed to flying particles, dust

or liquids. Employees generating particles, dust or liquids shall wear goggles.

L. Clothing appropriate to the duties performed shall be worn by all workers. Large pockets, loose flowing neckties, finger rings, exposed watch and key chains, cuffed trousers, and loose or torn clothing are dangerous and should not be worn near machinery, when climbing ladders or working on structures.

M. Proper safety equipment will be worn in the mixing area including dust masks, respirators and safety glasses or goggles, as applicable.

N. The Respirator Maintenance, Fitting and Use Program must be followed as applicable.

## IV. FIRE SAFETY

A. Fuel cans or combustible material shall not be left near open flames, sparks or areas where welding and cutting are performed, and all containers shall be labeled with the contents.

B. Firefighting equipment is to be used for that purpose only. Hose boxes and extinguishers shall not be obstructed.

C. Non-smoking areas will be posted to insure a minimum clearance from surface where material

is being applied, mixing areas and material storage areas.

D. No burning, welding or cutting will occur within 100 feet from surface where material is being applied, mixing areas or material storage areas.

E. Charged fire extinguishers will be placed in all areas where material is being applied, mixed and stored. Units must be inspected prior to placement, and deemed ready for use.

F. Fire alarm and evacuation procedures will be reviewed per job.

G. Flammables will be stored in approved, designated and safety containers, and labeled, inventories will be maintained in secured and placarded locations.

## V. WASTE DISPOSAL

- A. All "waste" material will be disposed of properly.
- B. Work areas are to be kept as clean as possible. All trash is to be removed daily.

## VI. FIRST AID

A. Report all accidents to proper person immediately, whether or not an injury or property loss has occurred. A supervisor's accident investigation report must be filed.

B. First aid must be obtained immediately after an injury is sustained; employee shall report to a doctor when instructed to do so following an injury.

1. In the absence of an infirmary, clinic, hospital, or physician that is reasonably accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first-aid shall be available at the worksite to render first aid.

- 2. The valid certificate in first-aid training must be obtained from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that is verified by documentary evidence.
- C. Each jobsite shall have an approved first-aid kit; expended items shall be replaced as required.
  - 1. First-aid kits shall consist of appropriate items which will be adequate for the environment in which they are used. For construction operations, items shall be stored in a weather proof container with individual sealed packages of each type of item.
  - 2. Kits will contain adequate first-aid supplies and will be periodically reassessed and their inventories readjusted according to demand. For construction operations, first aid kits shall be checked before being sent out to each job and a least weekly.
  - 3. Where the eyes or body of any person maybe be exposed to injurious corrosive materials, suitable facilities shall be provided within the work area for drenching or flushing of eyes or body.

## VII. PROCESS SAFETY MANAGEMENT

A. Each employee must be trained in the work practices necessary to perform his/her job.

B. Each employee must be instructed in the known potential fire, explosion or toxic release hazards related to his/her job and the process and the applicable provisions of the emergency action plan.

C. Records which contain the identity of the employee, the date of training and the means used to verify that the employee understood the training must be maintained.

D. The purpose of Process Safety Management is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries, etc.

E. Desco employees shall abide by Owner/Contractors safe work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.

F. Desco shall advise the Owner/Contractor of any unique hazards presented by Desco's work, or of any hazards found by Desco's work.

G. All employers/employees must respect the confidentiality of trade secret information when the process safety information is release to them.

## VIII. MISCELLANEOUS

A. Horseplay, scuffling and practical jokes are forbidden on the job.

B. Compressed air shall not be used to blow dirt from clothing, played with, or blown at another person.

C. Free use of both hands is required for climbing ladders. If materials or tools have to be handled, use of a proper construction equipment belt and/or adequate lanyard to lift or lower them. Always face the ladder when climbing or descending.

D. Operating instructions issued by the individual manufacturer shall be complied with.

E. In confined areas, or as required by the manufacturer, owner or governmental agency, material vapor levels will be monitored periodically. No work shall occur in these areas if the threshold limits are exceeded, unless proper safety equipment and/or corrective procedures are implemented.

F. The use, possession, distribution and sale, and presence in the body of illegal drugs or alcohol during

working hours or while on company business is forbidden. Violators will be escorted from the jobsite and employment terminated. Prescribed drugs that impair body movement and/or mental faculties are not permitted.

G. Willful violation of these or other safety rules is cause for dismissal. All project safety rules will be followed.

H. Firearms and explosives are prohibited in employees' vehicles and on persons while at the jobsite or on company business; unauthorized possession of such will result in employment termination.

## IX. NOISE AND HEARING CONSERVATION

## POLICY Scope and Applicability

This procedure applies to facilities and field operations where personnel may encounter noise exposures that may exceed 85 dBA. The purpose of this procedure is to protect employees from hazardous noise exposures and to prevent hearing loss. Hearing protectors are provided to employees exposed to an 8-hour time-weighted average of 85 dBA.

## Implementation

Implementation of this program is the responsibility of the Safety and Health Manager.

## Procedure

## 1.0 Requirements

- A. General
  - 1. Require the use of hearing protectors in any location where powered or motorized equipment or any other noise source could reasonably be expected to exceed 85 dBA.
  - 2. Use of hearing protectors may only be discontinued when noise levels are verified to be less that 85 dBA through a properly conducted noise survey.
- B. Hearing protectors
  - 1. Require that at least three (3) types of hearing protectors are available to employees, preferably a plug and muff type.
  - 2. Minimum Noise Reduction Ratings (NRR)

a) Hearing protectors issued to or used by personnel must have the following minimum NRR:

- Ear plugs: 29dB
- I Muffs: 27dB
- 3. Require that hearing protectors are used properly and thus effectively protect hearing.
- 4. Hearing protection attenuation will be calculated using the OSHA Hearing Conversation procedure:
  - a) Actual NRR = [Rated NRR 7 dBA : 2] = dBA
- C. Noise surveys

1. Noise surveys must be conducted in a manner that reasonably reflects the exposure of the affected employees. Surveys must be conducted under supervision of the Safety and Health Manager.

2. Sound level meters and audio dosimeters used to determine employee exposure to noise sources must be type II (accurate to within +/- 2dB), operated in "slow" response, on the "A" scale, and be calibrated to factory guidelines (including periodic factory re-calibration).

 Samples must be taken with adequate duration to be representative of employees' exposures. Monitoring is to be done whenever new equipment or processes are introduced to the work area. 4. Employees are notified in writing of a standard threshold shift within 21 days of determination.

- 5. Hearing protection is re-evaluated in the event of a standard threshold shift.
- D. Engineering and administrative controls

1. Eliminate noise sources to the extent possible through engineering or administrative

- controls. Examples of controls that must be considered include:
  - a) Rotation of people to lower exposed positions.
  - b) Addition or replacement of mufflers on motorized equipment.
  - c) Addition of replacement of mufflers to air exhausts on pneumatic equipment.
  - d) Following equipment maintenance procedures to lubricate dry bearings.

e) Isolation of loud equipment such as machinery, compressors, and generators from employee work areas.

f) Replacement of older noisy equipment with newer and quieter models.

E. Audiometric exams – Employees are tested every 12 months. At least 14 hours (or more) without exposure to workplace noise is required prior to establishing a baseline audiogram.

1. Verify that permanent employees have an audiometric baseline test within 180 days of being assigned to a high noise area. At least 14 hours (or more) without exposure to workplace noise is required prior to establishing a baseline audiogram.

2. Verify that permanent employees and project employees who are required to wear hearing protection for at least six months have had audio metric tests (annually).

F. Training – Employees are provided annual training on the Hearing Conservation Program.

1. Verify that each employee who must work in a noisy environment is current on the required Hearing Conservation training.

- 2. Training must include the following topics:
  - a) The effects of noise on hearing.
  - b) The purpose of hearing protectors.
  - c) The advantages and disadvantages of various types of hearing protectors.
  - d) The attenuation of various types of hearing protection.
  - e) The selection, fitting, care, and use of hearing protectors.
  - f) The purpose of audiometric testing.
  - g) An explanation of the audiometric testing procedure.
- G. Audit

1. Annually, a program audit is to be performed for each site/project to assure all of the above procedures are in place and effectively managed.

2. Reports are to be in writing and documented along with corrective actions.

## 2.0 Documentation Summary

- A. File the following record in the Safety Filing System as a permanent record:
  - 1. Types of hearing protectors and associated NRRs.
  - 2. Noise surveys, when applicable.
  - 3. Hearing Conservation Program Medical Clearances.
  - 4. Training records.
  - 5. Audit reports and corrective action completion.

## FIRE PREVENTION PROGRAM

## **SECTION 6**

All work areas are to be cleaned daily or more often to insure removal of trash and accumulated residue and
observed for any hazardous conditions or hazardous work performance. Access shall be maintained at all times to
all firefighting equipment.

• All firefighting equipment shall be conspicuously located.

• All firefighting equipment shall be periodically inspected and maintained in proper operating condition. All defective equipment shall be immediately replaced.

• Should a fire start that is not extinguished immediately, all persons shall be evacuated from the area and the Fire Department shall be notified.

• Burning, welding and/or cutting operations shall not be done within a 100 ft. area adjacent to or above work or material storage areas. Where required, a burning, welding and/or cutting permit system will be established to enforce this requirement to provide control over unauthorized open flames and welding operations during material application.

• A burning, welding and/or cutting permit describing the work area will be obtained from the Safety Representative when required. Precautions to prevent the dropping of residue and hot slag from such operations will be taken prior to the start of the work.

- A smoking area outside the work area will be designated by the Safety Representative.
- The scrap waste material disposal guidelines (Section 10) will be followed as part of the fire prevention program.
- Proper ventilation will be employed for confined areas to prevent flammable fume buildup.

## I. GENERAL REQUIREMENTS:

A. A fire extinguisher, rated not less than 2A, shall be provided for each 3,000 square feet of the projected building area and near all flammable storage areas. Travel distance shall not exceed 100 feet any point of this projected area.

- 1. Where portable fire extinguishers are provided, training will be provided to familiarize the employees with the general principles of fire extinguisher use and the hazards involved in incipient stage firefighting.
- 2. Training will be provided prior to initial assignment and a least annually thereafter.
- 3. Portable fire extinguishers are subject to monthly visual inspections and annual maintenance check.

B. In multi-story buildings, at least one extinguisher shall be located adjacent to the stairway or elevator, and one or more fire extinguishers shall be provided on each floor.

C. Smoking shall be prohibited at or in the vicinity of operations which have a fire hazard, and shall be posted "No Smoking or Open Flame!"

D. Approved safety cans or Approved DOT Containers shall be used for handling and storage of flammable liquids of 5 gallons or less. For quantities of 1 gallon or less, the original container may be used for storage, use and handling.

E. No more than 25 gallons of flammable or combustible liquids in excess of 25 gallons shall be stored inside a building outside an approved storage cabinet. Quantities of more than 25 gallons shall be stored in an acceptable or approved cabinet.

F. In every inside storage room, there shall be maintained one clear isle at least 3 feet wide. Containers with 30 gallon or more capacities shall not be stacked atop one another.

## ELECTRICAL SAFETY

## SECTION 7

## <u>SCOPE</u>

This program defines minimum requirements to assure the installation and maintenance of equipment grounding conductors in accordance with the applicable requirements of Sections 210-7(c), 250-45, 250-59 and 305-2(d) of the 1975 National Electric Code and OSHA Regulation 1925.400.

An assured grounding conductor program must be implemented on sites 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 employees.

## <u>PURPOSE</u>

The purpose of this program is to ensure the proper installation, maintenance, inspection and testing of equipment grounding conductors in order to minimize injuries due to electrical ground faults.

## **APPLICATION**

One or more competent person(s) must be designated (as defined in 1926.32(f) to implement this program.

## **INSTALLATION**

Equipment grounding conductors shall be installed as follows:

A. All 120-volt, single phase, 15 and 20 ampere receptacles shall be of a grounding type. Grounding contacts shall be grounded by connection to the equipment-grounding conductor of the circuit supplying the receptacles in accordance with applicable requirements of Section 210-7(c) and 305-

2(d) of the National Electric Code.

B. All 120-volt flexible cord sets (extension cords) shall have an equipment-grounding conductor, which shall be connected to the grounding contact of the connector(s) on each of the cords.

C. The exposed non-current carrying metal parts of 120-volt cord, plug- connected tools and equipment That are employed in such a manner that it is deemed likely to become energized shall be grounded in accordance with the applicable requirements of Sections 250-4 and 250-59 of the National Electric Code.

## VISUAL INSPECTION

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

## HOW AND WHEN TESTS ARE TO BE PERFORMED AND RECORDS TO BE MAINTAINED

1. All equipment grounding conductors shall be tested for continuity & shall be electrically continuous.

2. Each receptacle & attachment cap or plug shall be tested for correct attachment of the equipment grounding conductors. The equipment grounding conductor shall be connected to its proper terminal.

- 3. Tests are to be performed before each use.
- 4. Tests are to be performed before equipment is returned to service following any repairs.
- 5. Tests are to be performed before equipment is used such as when a cord has been run over.

6. Tests are to be performed at intervals not to exceed 3 months, except that cord sets & receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months.

7. Tests performed as required by this program shall be recorded as to the identity of each receptacle, cord set and cord and plug connected equipment that passed the test and shall include the last date tested or interval for which it was tested. This record shall be kept by means of logs, color coding, or other effective means and shall be maintained until replaced by a more current record. These records shall be available at the job site for inspection by the Assistant Secretary and any affected employee.

## **RESTRICTIONS FOR EQUIPMENT THAT DOES NOT MEET REQUIREMENTS OR IS DEFFECTIVE**

Any equipment which has not met the requirements of this program shall not be available or permitted to be used. Damaged items shall not be used until repaired.

## VAPOR FUME LEVEL DETERMINATION

SECTION 8

## <u>SCOPE</u>

This section concerns sampling in confined spaces. Vapor-fume level concentrations monitoring is stated in the Threshold Limit Value of Airborne Contaminants of the American Conference of Governmental Industrial Hygienists as adopted by OSHA Sec. 1926.55 - Gases, Vapors, Fumes, Dusts, and Mists, which requires compliance to the TLV limits as stated. Generally, the Threshold Limit Value (TLV) refers to other airborne

concentrations of substances and represents conditions under which it is believed that nearly all workers may be repeatedly exposed day after day without adverse effect. TLV is referenced to TWA (Time Weighted Average), which determines the average exposure to a substance during the workday. Together, the TLV/TWA are used to compile the average concentration for a normal 8-hour workday and a 40-hour workweek. The values determined by OSHA, WHIMIS in Canada, and ACGIH have been determined on this basis and represent the suggested values of vapor fume levels in the work area on a consecutive day basis.

The TLV/TWA shall be used as guides in the control of health hazards and should not be used as fine lines between safe and dangerous concentrations.

Because vapor and fume levels associated with construction materials will vary both upward and downward each day during the work period, the possibility of higher short term (15 min.) exposure levels exists. Whenever the TLV/TWA is exceeded, immediate corrective steps shall be taken. These include, but are not limited to: improved ventilation; removal of the fumes or vapor by venting; use of additional safety equipment such as cartridge (organic vapor filter) respirators; fresh air masks or dust masks. The Respirator Program is an integral part of this testing function.

The following gives examples of commonly used monomers' TLV/TWA levels and the required type of respirators at those action levels.

## RESPIRATORY PROTECTION CONDITIONS MINIMUM RESPIRATORY PROTECTION VAPOR CONCENTRATIONS

<u>Styrene</u>	<u>Xylene</u>	
Above 50 PPM	Above 100 PPM	Mandatory use of chemical cartridge respirator with organic vapor cartridges.
Above 400 PPM	Above 400 PPM	Supplied-air respirator with full face piece, helmet or hood, or Self-contained breathing apparatus with full-face piece.

## COMPULSORY RESPIRATOR PROGRAM

#### **SECTION 9**

A. The Safety Representative, also designated as the Respiratory Program Administrator, will be contacted before any changes in respirator types or models are used.

B. The proper type respirator for the specific hazard will be selected in accordance with the American National Standard for Respirator Protection Z88.2-1969 and be included in NIOSH Approved List of Equipment.

C. The company will provide each employee the proper type of respirator to protect the worker from hazardous conditions in the work environment at no cost to the employee. This shall be done in accordance with the respirator selection and issuance procedures, and proper training for the employee which will include the following:

- 1. Employee shall be trained in the respiratory hazards to which there are potentially exposed.
- 2. Employee will also be trained in the proper use, limitations of use, storage, and maintenance.
- 3. The respiratory protection training will be completed by employee before he is initially required to use the respirator and annually thereafter.
- D. All employees required to wear this protection will complete a medical evaluation, which will be reviewed by company approved Doctor. This questionnaire is attached to the Appendix Section. (5-

A)

E. All respirators shall be checked by fit test for each individual to assure that the seal of the face mask is proper and secure. If difficulty is encountered in obtaining an effective seal, a different size mask or model respirator shall be obtained.

F. Multiple use respirators shall be assigned to an individual for his/her individual use only and shall be properly maintained.

## II. RESPIRATOR MAINTENANCE

## A. Inspection:

3.

- 1. All respirators shall be inspected routinely before and after each use.
- 2. Respirator inspection shall include:
  - a. Tightness of connections and the condition of face piece
  - b. Headbands
  - c. Valves
  - d. Connections tube and canisters.
  - e. Rubber and/or elastomer parts shall be checked for pliability and deterioration.
  - Respirators kept for emergency use must be inspected after each use.

B. Cleaning and Disinfections: Respirators shall be cleaned after each use, as follows and is the responsibility of the user:

- 1. Remove filters, cartridges and headbands, and disassemble the major parts.
- 2. Wash all respirator parts (except cartridges and elastic headbands) in a

cleaner/disinfectant solution. Use a hand brush to remove dirt.

- 3. Rinse completely in clean, warm water.
- 4. Air-dry in clean area.
- 5. Inspect all parts; replace if defective.
- 6. Reassemble respirator and insert new filters or cartridges. Make sure the seal is tight.
- 7. Disinfect all facial contact areas with an approved type disinfectant.
- 8. Seal the respirator in a new plastic bag for storage.
- C. Repair:

1. Repair or replacement shall be done only by experienced persons with parts designed for the respirators.

2. No attempt shall be made to replace components or to make adjustments or repairs beyond the manufacturer's recommendation.

3. Reducing valves or admission valves and regulators shall be returned to the manufacturer or to a trained technician for adjustment or repairs, as necessary.

D. Storage:

1. Respirators must be stored properly when not being used. The user will be responsible for the proper storage and cleaning of the respirator after each use. This shall be done on a daily basis or after each individual use in accordance with the company maintenance program for respirators. Respirators shall be packed or stored so that the face piece and exhalation valve rest in a near normal position.

2. After inspection, cleaning and necessary repairs, respirators shall be stored to protect against dust, sunlight, heat, extreme cold, excessive moisture and damaging chemicals.

3. Routinely used respirators, such as organic vapor canister respirators, may be placed in plastic bags.

## III. TRAINING

A. Some manufacturing or processing plants may require specific respirators to be worn. The variety of respirators in use at each plant location will be displayed and explained:

- 1. Reusable cartridge respirators
- 2. Supplied air respirators
- 3. Self-contained breathing apparatus
- 4. Disposable respirators

B. The maintenance program shall be reviewed in depth with each employee. C. The use of respirators as an interim method shall be explained.

D. Methods of determining a tight respirator seal will be demonstrated:

1. Positive pressure test: Close off exhalation valve with palm of hand and exhale air into the mask. If mask/face fit is satisfactory, some pressure can be built up without air leaking out between mask and face.

2. Negative pressure test: Inlet opening shall be closed off with palm of hand (some masks will require that the filter holder be removed to seal off the intake valve.) Inhale gently so that a vacuum occurs within the face piece. Then, hold breath for 10 seconds. If the vacuum remains and no inward leakage is detected, the respirator is properly fit.

3. Irritant smoke test.

## IV. SAFE OPERATING PROCEDURES

A. All damaged or worn parts should be repaired or replaced immediately.

B. Respirators are only effective when a good seal can be obtained. Facial hair, sideburns, eyeglasses, dentures, etc., are conditions that may prevent a good seal and, therefore, prevent an individual from performing a task requiring the use of a respirator.

C. Employees must leave the work area to wash, change cartridges, or if they detect breakthrough or resistance.

## V. EMERGENCY US

# Working in IDLH (immediate danger to life or health) atmospheres is not allowed for Desco employees.

A. In the event an emergency situation warrants entry into an area in which the wearer of respiratory equipment could be overcome by a toxic or oxygen deficient atmosphere, the following steps shall be adhered to strictly:

1. Before the dangerous atmosphere is entered, the air shall be properly monitored; the nature of the hazard and the proper equipment to deal with the hazard shall be determined and worn by the individual entering the area.

2. Dangerous atmosphere shall not be entered unless at least one additional person is present outside of the hazardous atmosphere, and a competent person has tested the area for approved oxygen levels.

3. A system of communications shall be maintained between the individual entering the atmosphere and those outside in the safe atmosphere.

4. The person or persons in the safe atmosphere must have the proper equipment for any rescue attempt that may be necessary. The proper manpower must be available for such rescue measures.

B. If the entry into the potentially hazardous atmosphere is being planned in advance, authorization from the management is required before entry. Type of respirator, tests of the atmosphere, and possible elimination of hazardous atmosphere by engineering, administrative, or protective equipment procedures, should all be thoroughly established prior to entry.

## <u>SCOPE</u>

Prior to performing work on a project, the amount of waste to be generated will be estimated so that the need for containers and waste removal, if necessary, can be determined.

Waste materials will be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.

Waste materials are to be properly segregated to ensure opportunities for reuse or recycling.

At the completion of installation, scrap material and/or leftover materials shall be disposed of according to the following guidelines:

- I. Scrap Material All empty material containers may be disposed of with the local trash pickup (refer to definition CFR section 261.7, Note A).
- II. Opened drums or cans of unused material may be disposed of by one of the following means:
  - A. All opened cans will be resealed, labeled and returned to the corporate office.

B. Resins, solvent free and scrap-free of paper, wood, or other combustible materials, may be catalyzed By adding the correct amount of hardener, thoroughly mixing the solution and following the instructions below:

1. Resin materials and hardeners should be placed in a five-gallon pail in proper proportion to insure low temperature curing. Large volumes of resin and hardener mixture should be mixed for proper disposal per the manufacturer's recommendations.

2. The material will be observed continuously for the first 15 minutes, and then rechecked at intervals of 15 minutes until reaction has been completed.

C. Solvents and their containers must be handled per EPA regulations when disposed of or recycled.

The following recommendations apply:

1. Solvents should be returned to the warehouse using the same labeling and warnings under which the materials were shipped to the work site. It is important not to mix the various solvents to facilitate their reuse or recycling.

2. Empty drums or other containers must be drained. These containers, free of unreacted resin and hardener and/or solvents, may then be disposed of with miscellaneous construction waste.

D. Rags, scaffolding boards and miscellaneous contaminated construction paraphernalia can be disposed of with local trash pick-up when these items do not exhibit any of the following hazardous waste characteristics: they do not significantly increase the possibility of fire hazard and/or are not contaminated with corrosive, reactive or toxic chemicals.

The following recommendations apply:

1. Scaffolding boards and miscellaneous contaminated construction paraphernalia, if contaminated with spilled, unreacted products, should be wiped clean and allowed to dry, and re-inspected before use.

2. Rags contaminated with product residues can be rinsed with water and allowed to dry. Rags used with solvents should be air dried, so as not to be ignitable (flashpoint below 140°F). At the end of each workday, qualified personnel shall visually inspect all scrap material buckets for compliance with this section and arrange for proper handling, disposal and/or storage of the buckets. Verification of the completed reaction shall be accomplished at this time daily.

III. Residues of Hazardous Waste in Empty Containers - Section 261.7.

Containers, which held linings, flooring or coating chemical products, are considered empty (non-

hazardous) and can be removed with local trash pickup when the following conditions are met:

A. All materials have been removed using the practices commonly employed to remove product from that type of container: pouring, pumping, and aspirating.

## CONFINED SPACE ENTRY PROCEDURES

SECTION 11

## I. CONFINED SPACES

No Desco employee shall enter any confined space without the specific written knowledge of the Safety Representative. A Confined Space Checklist – Appendix D is located in the appendix of this program to assist the safety representative with all aspects of these spaces. A Permit Required Confined Space shall have a **posted permit** at the entry point, and is also attached.

These forms must be completed before work begins in the space. Confined space is defined as any enclosed space which:

- A. Is large enough and so configured that an employee can bodily enter and perform assigned work;
- B. Has limited or restricted means for entry or exit (other than standard doors);
- C. Is not designed for continuous employee occupation; and
- D. Has one or more of the following characteristics:
  - 1. Contains or has a known potential to contain a hazardous atmosphere;
  - 2. Contains a material with the potential for engulfment of the entrant;

3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls, or a floor which slopes downward and tapers to a smaller cross section; or

4. Contains any other recognized serious safety or health hazard.

## II. PRINCIPAL HAZARDS

Explosion, Asphyxiation, Fire

## III. EXPLOSION HAZARDS

A. Flammable gases are explosive when mixed with air in certain proportions. Employees must always be on guard against the hazards of such mixtures. The information on explosive mixtures and the associated range of proportions through which they are possible is not generally understood. It is very important that employees have a fairly accurate idea of the limits within which explosive mixtures may occur.

B. Conditions may exist involving natural gas, sewer gas, propane or other flammable gases. These gases may occur in varying percentages so that the band of limits of flammability may fall within the theoretical band for any of the above-mentioned gases.

C. In referring to the explosiveness or flammability of a gas, the lower limit (LEL) is defined as the minimum percentage of gas in air, which will support combustion, while the higher limit (UEL) is defined as the maximum percentage of gas in air, which will support combustion.

## IV. IGNITION SOURCES

The following ignition sources shall never be exposed to a gas-air atmosphere:

## A. Flames

1. Open flames, lanterns, torches, etc.

- 2. Matches and cigarette lighters
- 3. Burning materials (including cigarettes)
- 4. Internal combustion engines
- B. Sparks and Arcs
  - 1. Static electricity
  - 2. Electrical shorts
  - 3. Lighting
  - 4. Switches
  - 5. Welding
  - 6. Electrically operated tools
  - 7. Portable radios
  - 8. Walkie-talkies
  - 9. Batteries
  - 10. Non explosive-proof electrical circuits
- C. Heated Materials
  - 1. Glowing metals, cinders and filaments
  - 2. Radiant or forced air heat

Gas or vapor from a flammable liquid expands and moves with the wind, and it may be ignited if any ignition source is in its path. Keep ignition sources at a safe distance.

## V. ASPHYXIATION

A. Asphyxiation must be kept in mind as a potential danger. Asphyxiation may be caused by any atmosphere, which is deficient in oxygen. In the case of gases, carbon monoxide is the agent most likely to cause asphyxiation, rather than deficiency of oxygen.

B. Carbon monoxide is a by-product of incomplete combustion. It may be found where there is a deficiency of oxygen. Adequate ventilation must be provided where any fuel is burned

C. While carbon monoxide is colorless, tasteless and odorless, it usually occurs in combination with aldehydes, which do have odors. Therefore, any odor should be regarded with suspicion.

D. Natural gas and propane, although not poisonous, should be considered hazardous when there are concentrated atmospheric mixtures, since they cause the air to be deficient in oxygen. Oxygen deficiency, which is an unsafe physical condition, will cause dizziness. Prolonged oxygen deficiency due to high concentration of these types of gases can cause unconsciousness and, ultimately, asphyxiation/death.

## VI. GENERAL SAFETY

A. Employees shall not enter confined spaces until they have made sure these areas are free from dangerous gases as indicated by approved testing devices, and only after the oxygen content has been found to be at least 19.5% by volume.

B. Non-sparking tools or lights may be required in confined areas.

C. The removal of access covers shall be carried out only with the use of a proper hook in good condition so there is no danger of the cover slipping or falling. After removal, the access cover shall be stored safely and out of the work area.

D. Whenever there is a worker in a confined space, another employee shall be stationed at the entrance.E. No more employees shall be permitted in a confined space at the same time than are absolutely necessary to perform work.

F. An approved barrier guard shall be erected around vaults, manholes, or other openings immediately after the cover has been removed. In the daytime, or when adequate light is available, standard- warning signs shall be displayed.

G. Confined spaces shall be kept free from scrap and rubbish at all times, as well as being cleaned out

at the conclusion of each work day.

H. The use of internal combustion equipment or powered tools in confined spaces is prohibited, unless previous approvals are obtained.

## VII. SPECIFIC REQUIREMENTS

A. There shall be only one person on the job site who has been given total responsibility to see that all work performed complies with the confined space entry procedures.

B. The responsible person must obtain the following materials prior to going to the jobsite:

- 1. Copies of the **Confined Space Entry Procedure** to be posted at the entrance of the confined area.
- 2. Copies of the **Confined Space Entry Checklist** and **Entry Permit** (See Appendix) to evaluate the hazards of entering a space, which may be

## considered "confined" or "permit required."

3. Verification of each entrant's completed training for Confined Space Entry.

- 4. Copies of the Confined Space Entry Log Sheets; one to be filled out for each manhole, pit, tank or vault entered.
- 5. Atmospheric testing devices.
- 6. First aid kit.
- 7. One fire extinguisher (ABC type) per 50 linear feet of confined space area.

8. One safety harness with 120 feet of 3/4" rope (min.) per worker.

9. One self-contained breathing apparatus or air-supplied respirator for each space area, plus necessary safety backup.

- 10. Blower equipment.
- 11. Proper tools.
- 12.. One wooden ladder per entrance.

13. If a fixed or portable telephone is not immediately available at the jobsite, a portable radio or walkie-talkie must be available with required contacts established.

C. Upon arrival at the jobsite and as the equipment is being unloaded; the responsible person shall start to fill out the Confined Space Entry Log Sheet.

D. If work site is subject to traffic conditions, all guards, traffic signs, lights, etc., shall be posted prior

- to start-up of preparation, placement or cleanup.
- E. Entry procedures must be posted.

F. All valves and switches to the confined area must be secured prior to entry.

G. If at all possible, atmospheric testing must be done with the manhole, tank or pit access cover in place. If this cannot be accomplished, the cover shall be removed only slightly to allow the test tube or hose in. Measurements should be made at different levels within the confined area.

## NOTE: Personnel shall not enter the confined space to make these tests.

H. No employee is to enter a confined space until the oxygen and contaminate concentrations have been measured and proper maintained.

I. The oxygen content must be at least 19.5% by volume, and the threshold limit values and short-term limit values attached to this procedure shall be used in determining the levels of contaminate which are considered safe. All sampling results must be recorded on the log sheet. If levels are found to be high, the confined area must be flushed with uncontaminated air from an outside source to assure adequate dilution of contaminates to safe levels.

J. Oxygen and contaminate concentrations shall be measured during occupancy, and fresh, uncontaminated air continuously supplied.

K. Before entry of the confined space, the previous contents must be determined and, if possible, residual materials neutralized or flushed out before entry. If flammable or combustible, all ignition sources shall be secured.

L. Standby personnel certified in First Aid are required at all times. The standby worker(s) should be in communication with the worker(s) inside the confined space. There must be an alarm system available for the standby worker(s) to summon help. Approved respiratory protective equipment, safety harness and first aid equipment must be readily available to the standby worker(s).

M. If the air sampling has shown inadequate oxygen content and/or high level of contaminants, the worker(s) entering the confined space must be equipped with a safety harness and rope attachment, as well as a self-contained breathing apparatus or air-supplied respirator of an approved type.

## NOTE: Prior to entry of this confined space, all precautions should be taken to increase the oxygen content and decrease high levels of contaminants.

N. No hot work and/or spark producing tools will be allowed in a confined space having a combustible or flammable atmosphere. If a blower is to be used to remove combustible or flammable concentrations, it must be an explosive-proof type.

O. Any employee who feels that these safety procedures are not being complied with may refuse to enter confined spaces and is to report these unsafe work conditions to the Site Superintendent.

## VIII. RESCUE PLAN ESSENTIALS

A. Rescue should be made from the outside, if possible. All entrants must review an emergency rescue plan before entry is permitted within the space.

B. When working alone, enter the confined space to rescue only after help has arrived.

C. The atmosphere inside the confined space should always be assumed to be life threatening. D. Use only self-contained breathing apparatus.

E. Do not use the same air source as the victims; it could be contaminated. F. Have all necessary equipment at the confined space site ready for use.

G. Telephone numbers of local emergency medical service groups shall be posted, and the location of the nearest phone known by all entrants.

## HAZARD COMMUNICATION

## SECTION 12

This section outlines an introductory level hazard communication "Right to Know" program, which is based on the Federal OSHA Standards. State laws on Hazard Communication may be effective if content differs from the federal regulations. In Canada, refer to WHIMIS regulations.

## I. SCOPE

## A. CONTAINER LABELING

1. The Job Foreman or Supervisor will verify that all containers received for use will:

- a. Be clearly labeled as to the contents
- b. Note the appropriate hazard warning
- c. List the name and address of the manufacturer
- d. Correct storage precautions

2. The Job Foreman or Supervisor in each section will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with generic labels that have a block for identity and blocks for the hazard warning. For help with labeling, please see our Safety Representative.

SPECIFIC HAZARD	HELATH
4 = SEVERE 3 = SERIOUS	FLAMMABILITY
2 = MODERATE 1 = SLIGHT	REACTIVITY
0 = MINIMAL	PROTECTION

## SUMMARY OF HMIS RATINGS HEALTH HAZARD RATING:

SUMMARY OF HMIS RATINGS HEALTH	
0 Minimal Hazard	No significant risk to health.
1 Slight Hazard	Irritation or minor reversible injury possible.
2 Moderate Hazard	Temporary or minor injury may occur.
Serious Hazard	Major injury likely unless prompt action is taken and medical
1 Course librard	treatment is given.
4 Severe Hazard	Life-threatening, major or permanent damage may result from single or repeated exposures.
	single of repeated exposures.
FLAMMABILITY HAZARD RATING:	
0 Minimal Hazard	Materials that are normally stable and will not burn unless heated.
1 Slight Hazard	Materials that must be preheated before ignition will occur.
Flammable	liquids in this category will have flash points (the lowest temperature
at	which ignition will occur) at or above 220°F (NFPA Class IIIB).
2 Moderate Hazard	Material that must be moderately heated before ignition will
occur,	including flammable liquids with flash points at or above 100°F and
	below 200⁰F (NFPA Class II & Class IIIA).
3 Serious Hazard	Materials capable of ignition under almost all normal
temperature	conditions. Including flammable liquids with flash points below
73°F	and boiling points above 100°F as well as liquids with flash
	points between 73°F and 100°F (NFPA Class 1B and 1C).
4 Severe Hazard	Very flammable gases or very volatile flammable liquids with
flash	points below 73°F and boiling points below 100°F (NFPA Class 1A).
	,
REACTIVITY HAZARD RATING:	
0 Minimal Hazard	Materials that are normally stable, even under fire conditions, and
	will not react with water.
1 Slight Hazard	Materials that are normally stable but can become unstable at
	high temperatures and pressures. These materials may react with
	water but they will not release energy violently.
2 Moderate Hazard	Materials that in themselves are normally unstable and will
	readily undergo violent chemical change but will not detonate.
	These materials may also react violently with water.
3 Serious Hazard	Materials that are capable of detonation or explosive reaction
	but require a strong initiating source or must be heated under
	confinement before initiation; or materials that react explosively with
	water.
4 Severe Hazard	Materials that are readily capable of detonation or explosive
	decomposition at normal temperatures and pressures.

- A. Safety Glasses
- B. Safety Glasses and Gloves
- C. Safety Glasses, Gloves and Apron
- D. Face Shield, Gloves and Apron
- E. Safety Glasses, Gloves and Dust Mask
- F. Safety Glasses, Gloves, Apron and Dust Mask
- G. Safety Glasses, Gloves and Organic Respirator (Cartridge)
- H. Safety Goggles, Gloves, Apron and Organic Respirator (Cartridge)
- I. Safety Glasses, Gloves and Fresh Air/Full Face Respirator
- J. Safety Goggles, Gloves, Apron and Fresh Air/Full Face Respirator
- K. Air Supply Face Shield, Gloves, Pressurized Suit and Boots
- L. Ask your supervisor for specialized handling directions.

## B. SAFETY DATA SHEETS

1. The Safety Representative will be responsible for obtaining and maintaining the data sheet system for the company, assuring this information can be accessed by all employees upon request.

2. The Safety Representative will review incoming data sheets for new and significantly health/safety information. He/she will see that any new information is passed on to the affected employees.

3. Copies of SDS's for all hazardous chemicals to which employees of this company may be exposed will be kept by the Job Foreman on site and at the company offices of Desco, and available upon request to all employees.

4. SDS's will be available to all employees in their work area for review during each work shift. If SDS's are not available or new chemicals in use do not have SDS's, immediately contact your Job Foreman or Safety Representative.

## C. EMPLOYEE TRAINING AND INFORMATION

1. The General Superintendent is responsible for the employee-training program. He will ensure that all elements specified below are carried out.

2. Prior to starting work, each new employee of Desco will attend a health and safety orientation and will receive information and training pertinent to his or her task.

- a. An overview of the requirements contained in the Hazard Communication Standards
- b. Chemicals present in their workplace operations
- c. Location and availability of our written hazard program.
- d. Physical and health effects of the hazardous chemical as stated on SDS

e. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.

f. How to lessen or prevent exposure to these hazardous chemicals through usage of control/work practices and personal protective equipment.

3. After attending the training session, each employee will sign a form to verify that they attended the training, received written materials, and understood Desco's policies on Hazard Communication. (This is an optional item, which WISHA recommends for the employer to use to track the employee training.) Prior to a new chemical hazard being introduced into any section of this company, each employee of that section will be given information as outlined above. The Job Foreman or Supervisor is responsible for ensuring the SDS on the new chemical(s) are available.

## II. HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, each affected employee will be given information by their Supervisor about hazardous chemicals to which they may be exposed during such activity. This information will include principal hazards, explosion, ignition sources, asphyxiation, general safety, specific requirements and rescue plan essentials (See Section 11: Confined Space Entry Procedures – and all appropriate policies in "Desco Safety Procedure Manual".)

## III. INFORMING CONTRACTORS

- A. It is the responsibility of Desco's Receptionist to provide general contractors the following information:
  - 1. An inventory list of all Hazardous chemicals to which others may be exposed while on the jobsite.

2. Precautions the employees may take to lessen the possibility of exposure by usage of appropriate protective measures or a copy of the SDS upon request.

B. The Receptionist will be responsible for sending each contractor, before the work is started on the site, any information concerning chemical hazards that the contractor is bringing to the workplace and tell the General Contractor it is their responsibility to forward these documents to their job superintendent where he shall keep them available on site to all employees of the General Contractor and his subcontractors, manufacturers, etc.

## IV. IMPLEMENTATION

A. The designated Safety Representative is required to obtain all the latest SDS of the product used in the construction project and to update the Safety Manual for the employees' information.

B. The Safety Representative shall initiate scheduled safety meetings, reviews and explanations of the Product Labels and SDS. This training is to be documented by a Safety Report covering the subjects and including signatures of attending construction workers.

## V. TRAINING AIDS

A. Attached is an outline of a Safety Data Sheet, with detailed explanations of sections and designations.

B. Employees on site shall be instructed about materials by using Product Labels and Material Safety Data Sheets as aids.

## SAFETY DATA SHEET VERSION 1 DATE: MAY 8, 2015

## PERMACOLOR QUARTZ AGGREGATES

## SECTION 1 PRODUCT AND COMPANY IDENTIFICATION

**PRODUCT BRAND NAME**: PERMA COLOR QUARTZ AGGREGATES

**PRODUCT IDENTIFICATION** : SAND COATED VARIOUS COLORS

CHEMICAL NAME: SILICON DIOXIDE (SIO2)

COMPANY IDENTIFICATION:

CLIFFORD W. ESTES CO., INC 182 FAIRFIELD RD

#### SECTION 2 HAZARDS IDENTIFICATION

#### GHS HAZARD CLASSIFICATION: NOT CLASSIFIED

# GHS LABEL ELEMENTS:SIGNAL WORD:NO SIGNAL WORDLABEL CODES/PICTOGRAMS:NO PICTOGRAMSHAZARD STATEMENTS:NONE UNDER GHS CLASSIFICATION

#### **PRECAUTIONARY STATEMENTS:** NONE ASSIGNED UNDER GHS

#### Special Statement regarding Hazardous ingredients:

Although these products are composed primarily of Silica Sand (SIO2), and such sand is potentially a source of respirable dust, the sand particles are thoroughly encapsulated in a coating which captures all dust and should, under normal circumstances, prevent any normal release of silica dust to the workplace. See section 7 for handling information.

#### SECTION 3 COMPOSITION

CHEMICAL NAME	% WT	CAS#	OSHA (PEL)	ACGIH (TLV)
SILICA SAND	94	14808-60-7		.1MG/M3
RESIN	4.95	NON-HAZARDOUS	N/A	N/A
TIO2	0.99	13463-67-7		
INORGANIC	0.06	NON-HAZARDOUS		
COLARANTS				

#### SECTION 4 FIRST AID MEASURES

Eye Contact: Remove in same manner as one would remove any foreign particle. Get medical attention if irritation develops.

Skin Contact: Wash with soap and water. Get medical attention if irritation develops. Ingestion: Swallowing this product is not recommended but should not cause harm.

Inhalation: Move from dusty area to fresh air and get medical attention for any breathing difficulty.

SECTION 5 FIRE FIGHTING MEASURES

FLASH POINT: NON-FLAMMABLE

FLAMMABLE LIMITS: LEL- N/A, UEL - N/A

UNUSUAL FIRE AND EXPLOSION HAZARDS: Products of combustion may include irritating gases.

EXTINGUISHING MEDIA: This product is not combustible or flammable. Use extinguishing agents that are suitable to the surrounding fire; water spray, dry chemical, foam or CO2.

#### SECTION 6 ACCIDENTAL RELEASE MEASURES

SMALL SPILL: If dust is generated, use appropriate respiratory protection. Vacuum or scoop material into an appropriately marked container for re-use or disposal. Avoid excessive generation of dust.

LARGE SPILL: Use recommended protective clothing and respiratory protection. Use shovel to reclaim material. Vacuum or scoop material into an appropriately marked container for re-use or disposal. Avoid excessive generation of dust. It is more effective to clean this product while dry by vacuuming or sweeping. However, spill area can be washed with water. Collect wash water for approved disposal. Prevent runoff from entering storm sewers and ditches whick lead to natural waterways.

#### SECTION 7 HANDLING AND STORAGE

STORAGE:Store dry at ambient temperature away from food and beverages, excessive heat or flame sources.HANDLING:Avoid breathing dust. Avoid getting in eyes or on skin. Wash hands thoroughly after handling. Avoid contact with moisture.

#### SECTION 8 EXPOSURE CONTROLS/PERSONAL PROTECTION

ENGINEERING CONTROLS: Maintain air levels below the recommended exposure limit using process enclosure and exhaust ventilation if necessary. Supply sufficient replacement air to make up for air removed by exhaust systems. If engineering controls and work practices are not effective in controlling exposures, appropriate personal protective equipment including a NIOSH/OSHA approved respirator should be worn/

EYES: Wear safety glasses with side shields or goggles. Eyewash stations should be available in the workplace.

SKIN: Wear rubber, PVC or leather gloves to facilitate personal hygiene.

RESPIRATORY PROTECTION: Workplace ambient dust concentrations should be monitored and if the recommended exposure limit is exceeded, a NIOSH/MSHA approved respirator with dust prefilter should be worn.

OTHER: Educate and train employees in the safe use and handling of hazardous chemicals. WORK/HYGIENE PRACTICES: Employees should wash their hands and face before eating, drinking, or using tobacco products.

#### SECTION 9 PHYSICAL AND CHEMICAL PROPERTIES

BOILING POINT: NONE VAPOR PRESSURE: NONE VAPOR DENSITY: NONE % VOLATILES :<1% APPEARANCE: SAND OR AGGREGATE, TYPICAL COLORS SPECIFIC GRAVITY: 2.65 PH: INERT EVAPORATION RATE: N/A SOLUBILITY IN WATER: INSOLUBLE

Use of this product under normal and recommended conditions and specifications will pose no known hazards. However, if surfaces using this product are subjected to sanding or grinding as might occur for maintenance purposes, and such treatment produces respirable dust, then proper ventilation and breathing apparatus should be used. Under such conditions, NIOSH-BOM approved respirators should be worn.

GLOVES: Optional

EYE PROTECTION: Full eye zone goggles should be worn.

#### SECTION 10 STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable. Keep away from flames and excessive heat as this could cause the bag to ignite.

INCOMPATIBILITY: Dissolves in hydroflouric acid.

#### SECTION 11 TOXICOLOGICAL INFORMATION

EYES: Non irritating SKIN: Non irritating INGESTION: Non irritating INHALATION: Non irritating

#### SECTION 12 ECOLOGICAL INFORMATION

NO APPRECIABLE BIOCONCENTRATION IS EXPECTED IN THE ENVIRONMENT.

TOXICITY: SAFE FOR AQUATIC LIFE

#### SECTION 13 DISPOSAL CONSIDERATIONS

Material which cannot be reused should be disposed of in accordance with federal, state and local environmental control regulations at an authorized site by an approved contractor. Product and packaging can be disposed of or recycled as non-hazardous waste. Not a RCRA hazardous waste. However, under RCRA, it is the responsibility of the product user to determine at the time of disposal, whether a material containing the product or derived from the product should be classified as a hazardous waste. (40CFR 261.20-24)

#### SECTION 14 TRANSPORTATION INFORMATION

DOT SHIPPING NAME:	None
TECHNICAL SHIPPING NAME:	Sand or aggregate
DOT HAZARD CLASSIFICATION:	None
DOT HAZARD CLASS:	None
DOT IDENTIFICATION NUMBER:	None
DOT LABELS REQUIRED:	None
DOT PLACARDS REQUIRED:	None
UN CLASS:	None
UN/NA NUMBER:	None
FREIGHT CLASS:	Sand 50

#### SECTION 15 REGULATORY INFORMATION

OSHA: Silica sand is considered hazardous by definition of Hazard Communication Standard (29 CFR 1910.1200)

CERCLA/SUPERFUND: Not reportable. (40 CFR 117.302) However, we recommend you contact local authorities to verify requirements for your site.

TSCA: Components of this product are listed on the TSCA Inventory

CANADIAN WHMIS: Not restricted/non-hazardous.

CEPA: EINECS: Components of this product are on the Domestic Substances List (DSL)

Components of this product are on the European Inventory of Existing Commercial Chemical Susbstances

#### HMIS RATINGS

\*REFER TO SPECIAL STATEMENT IN SECTION 2.

HEALTH: 0\* FLAMMABILITY: 0 REACTIVITY: 0

SECTION 16 OTHER INFORMATION

No R-phrases

## **CODE OF SAFE PRACTICES FOR ASSEMBLING & DISMANTLING STEEL**

## SCAFFOLDS & LADDERS

## **SECTION 13**

## I. GENERAL RULES

A. Survey the Jobsite for: hazards such as untapped earth fills, ditches, debris, high tension wires, unguarded openings, overhead power lines, hazardous conditions created by other trades;

B. Equipment, which has any obvious defect, shall not be used. Defective equipment should be immediately tagged and repaired or removed from the jobsite.C. Scaffolds shall not be assembled or dismantled when other crafts are working directly above or below the area where scaffold assembly or dismantling work is to be performed. Other craft employees shall not be allowed to access the area at any time during this process.

D. Equipment shall be used only for purposes or in ways for which it was intended by the manufacturer's recommendations.

E. Report any unsafe condition. Do not work on scaffolds if your own physical condition is such that you feel dizzy or unsteady in any way

F. Proper fall protection must be utilized by all company employees when exposed to a fall of 10 feet to a lower level.

G. All employees using scaffolds are to be instructed in the proper construction, use, placement and care of scaffolds. A competent person knowledgeable concerning scaffolding shall inspect and immediately correct any unsafe condition before work begins. This inspection shall occur before each work shift.

## II. ASSEMBLING SCAFFOLDS

A. Provide adequate sills for scaffold posts and always use base plates.

B. Use adjusting screws legs or other approved method, rather than blocking, to adjust to uneven grade condition.

C. Plumb, level and tie all scaffolds as assembly proceeds. Do not force braces to fit. Freestanding scaffold towers must be restrained from tipping by guying or other means.

D. Bracing: Each frame or panel shall be braced by horizontal bracing, cross bracing, or any combination thereof for securing vertical members together laterally. All brace connections shall be made secure, in accordance with manufacturer's recommendations. Do not climb cross braces.

E. Planked or staged areas should be provided with proper railings consisting of a top and mid rail. Toe boards shall be used when applicable.

F. When assembling scaffolds near any electrical power line, precautions shall be taken.

G. Do not use ladders or makeshift devices on top of scaffolds to increase the height.

## III. PLANKING:

A. Use only "scaffold" grade plank.

B. Visually inspect planks prior to use to be sure they are not warped, damaged or otherwise unsafe Those found defective shall be tagged out of service or removed from the project immediately.

C. Planking shall have at least 12" overlap and extend 6" beyond center of support, or be cleated at both ends to prevent sliding off supports. All planking will have no gaps between them larger than 1 inch.
 D. Fabricated scaffold planks and platforms (unless cleated or restrained by hooks) shall extend over their end supports not less than 6" or more than 12".

E. All scaffolding accessories shall be used and installed in accordance with the manufacturers recommended procedure.

## IV. FOR ROLLING SCAFFOLDS, THE FOLLOWING ADDITIONAL RULES APPLY:

A. Joints shall be provided with lock pins, bolts, or equivalent fastening, including caster joints.

B. Wheels or casters shall be provided with a locking device and kept locked during assembly and dismantling, or occupied by an employee.

C. Do not extend adjusting screws on rolling scaffolds more than 12".

D. Do not use brackets or other platform extensions without consideration of overturning effect.

E. The working platform height of a rolling scaffold must not exceed four times the smallest base dimension unless guyed or otherwise stabilized (some government agencies call for a stricter ratio of 3 to 1).

F. Cleat or secure all planks. All work levels will be fully planked and guardrails installed on all sides where necessary, for proper fall protection.

G. Employees are not permitted on scaffolding while it is being relocated/rolled to another position.

H. Areas below scaffolding must be barricaded off when the possibility of worker traffic exists. Entry and Exit doors must be blocked in near these high traffic areas.

## V. DISMANTLING SCAFFOLDS

A. If scaffolding has been structurally altered in any way, which would make it unsafe, reconstruct where necessary before beginning dismantling procedures.

B. Visually inspect planks prior to dismantling to be sure they are safe to work on.

C. Components should be lowered in a safe manner as soon as dismantled to protect personnel below.

D. Do not accumulate excess components or equipment on the level being dismantled. Walk paths will be maintained in safe conditions during this process.

E. Dismantled equipment should be stockpiled in an orderly manner and secured if needed to prevent displacement.

## VI. LADDERS

## General

## Requirements:

A .Ladders shall be used to give safe access to all elevations in the absence of stairways, ramps or runways.

B. Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position.

C. Portable and fixed ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective

components, shall either be immediately marked in a manner that readily identifies then as defective, or be tagged with "Do Not Use" or similar language, and shall be withdrawn from

service until repaired.

D. Ladders shall not be loaded beyond the maximum intended load for which they were built, nor beyond the manufacturer's rated capacity.

E. Wooden ladders shall be placed on substantial base and the area around the top and bottom shall be clear.

F. Portable ladders shall be placed at such a pitch that the base is equal to approximately 1/4 the length of the ladder to vertical (4 to 1 rule: e.g., 20 foot length, 5 foot base).

G. Ladders shall not be placed in any location where they may be displaced by other work activities unless protected by barricades or guards.

H. The side rails shall extend a minimum of 36 inches above the landing.

I. Portable ladders in use shall be tied, blocked or otherwise secured to prevent displacement.

J. Metal ladders shall not be used near electrical work.

K. Ladders shall not be used in a horizontal position as platforms, runways or scaffolds and should not be placed on top of boxes, barrels, crates, etc.

L. Job made ladders shall be constructed and used per the provisions of OSHA 1926.450(b) to 12.

1

M. Follow safe ladder practices; i.e., do not stand on the top two rungs of a step ladder, face the ladder when ascending or descending, and do not carry objects that could cause injury in the event of a fall.

N. Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.

## SURFACE PREPERATION

SECTION 14

## I. GENERAL RULES

## A. Power Tools

1. Before operating any power tool, employees are to read the operation manual or ask for instructions from the supervisor with regard to power requirements, safety features and proper function.

- 2. Safety functions shall be operational and all guards in place before any power tool is used.
- 3. Proper eye, face, respiratory and hearing protection shall be worn.

## B. Chemical Cleaning/Etching

1. Employees shallread SDS and label warnings before handing any chemical solutions.

2. Proper protective clothing, including eye and face protection, protective gloves and footwear shall be worn.

- 3. Proper respiratory protection shall be utilized when vapors are present.
- 4. No chemicals in any form shall be allowed in customer's drain system without prior approval.

5. Residual cleaning/etching solutions shall be disposed of in an approved manner.

## C. Blast Cleaning Machine

- 1. Before operating and/or servicing the machine, personnel must be thoroughly familiar by training or experience, with the characteristics of the machine.
- 2. All guards shall be maintained in place.
- 3. All operators must wear eyeglasses and hearing protection.

## D. Abrasive Blasting

1. Whenever hazardous substances such as dust, fumes, mists vapors, or gases exist or are produced in the course of construction work, their concentrations shall not exceed the limits specified in the "Threshold Limit Values of Airborne Contaminants – 1970" of the American Conference of Governmental Industrial Hygienists.

2. Abrasives and surface coatings on the materials blasted are shattered and pulverized during blasting operations and the dust formed will contain particles of respirable size. The composition and toxicity of the dust from these sources shall be considered in making an evaluation of the potential health hazards.

3. The blast nozzle shall be bonded and grounded to prevent the buildup of static charges.

4. A respiratory protection program shall be established wherever it is necessary to use respiratory protective equipment including worksite-specific procedures and elements for required respirator use. Abrasive blasting respirators shall be worn by all abrasive blasting operators under certain conditions.

5. Equipment for protection of the eyes and face shall be supplied to the operator when the respirator design does not provide such protection.

6. Equipment for protection of the eyes and face shall be supplied to any other personnel working in the vicinity of abrasive blasting operations.

7. Air for abrasive-blasting respirators must be free of harmful quantities of dusts, mists or noxious gases.

8. The blast cleaning nozzles shall be equipped with an operating valve which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.

9. Compressed air shall not be used for cleaning purposes except where the pressure is reduced to less than 30 psi.

## FALL PROTECTION

## SECTION 15

## STATEMENT OF POLICY

It is the policy of Desco to provide fall protection for employees exposed to falls of 6 feet or greater. It is important that every employee recognizes his or her responsibilities as it relates to fall protection and follows the rules and guidelines set forth in this program.

## UNPROTECTED SIDES AND EDGES

Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge that is 6 feet or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

## LEADING EDGES

Each employee who is constructing a leading edge 6 feet or more above lower levels shall be protected from falling by guardrail systems, safety net systems, or personal fall arrest systems. (Contact upper management if conventional fall protection measures are not applicable.)

## HOIST AREAS

Each employee in a hoist area shall be protected from falling 6 feet or more to lower levels by guardrail systems or personal fall arrest systems.

## <u>HOLES</u>

Each employee on walking/working surfaces shall be protected from falling through holes (including skylights) more than 6 feet above lower levels, by personal fall arrest systems, covers, or guardrail systems erected around such holes. Hole means a gap or void 2 inches or more in its least dimension in a floor, roof or other walking/working surface.

## WALL OPENINGS

Each employee working on, at, above, or near wall openings (including those with chutes attached) where the outside bottom edge of the wall opening is 6 feet or more above lower levels and the inside bottom edge of the wall opening is less than 39 inches above the walking/working surface, shall be protected from falling by the use of a guardrail system, safety net system, or personal fall arrest system.

## **GUARDRAIL SYSTEMS**

A. Guardrails shall be 42 inches in height (plus or minus 3 inches). Note: When employees are using stilts, guardrail height should be increased an amount equal to the stilt height.

B. Midrails shall be installed at a height midway between the top edge of the guardrail system and the walking/working level. A parapet wall must be at least 21 inches high to serve as a midrail.

C. Guardrails shall withstand a 200-pound load applied in any direction. Midrails should withstand a 150 pound load applied in any direction.

- D. If necessary, erect toe boards or screens to prevent exposure to falling objects
- E. If wire rope is used for toprails, it shall be flagged at 6-foot intervals with high-visibility material.
- F. Guardrails should be surfaced so as to prevent injury from punctures or lacerations and snagging of clothing.
- G. Scaffolding shall have guardrails when the working level of the system reaches 10 feet.

## PERSONAL FALL ARREST SYSTEM

Body Belts: Should never be used for fall protection, body belts can only be used for positioning.

Full Body Harness: Shall be used as part of a personal fall arrest system. Employees will be provided a body harness when necessary and he or she will be trained in its usage.

Lanyards and Vertical Lifelines: Shall be provided as needed to the employee(s) and will have a minimum breaking strength of 5,000 pounds.

Double Locking Snaphooks: Only locking snaphooks shall be used as part of a personal fall arrest system. Anchorages: An anchorage point, which supports personnel, must be independent of anchorage being used to support or suspend platforms. Anchorage must be able to support 5,000 pounds per employee; or designed, installed, and used under the supervision of a qualified person as part of a complete personal fall arrest system that maintains a safety factor of at least two.

## **STOPPING A FALL**

A. 6-foot rule must be followed. An employee shall not free fall more than 6 feet, or contact any lower level. Personal fall arrest system must: Limit maximum arresting force on a worker to 1800 pounds when used with a body harness.

B. A body harness and a lanyard should limit the fall arrest to 1800 pounds. However, if the employee and tool weight exceeds 310 pounds a body harness with a shock-absorbing lanyard or equivalent must be used.

C. An attachment point (D-Ring) should be located in the center of the wearer's back. The attachment point of a body harness should be located in the center of the wearer's back near shoulder level, or above the wearer's head.
 D. Personal fall arrest systems should be inspected prior to each use for wear, damage and other deterioration, and defective components should be removed from service.

## **POSITIONING DEVICE SYSTEMS**

Positioning devices should be rigged so a worker cannot free fall more than 2 feet. Positioning devices should be secured to an anchorage point capable of supporting at least twice the potential impact load of a worker's fall or 3,000 pounds, whichever is greater.

## WARNING LINE SYSTEMS

Warning lines shall be used while performing work on roofs to warn workers that they are approaching an unprotected roof side or edge.

## SAFETY MONITORING SYSTEMS

Safety monitoring system means a safety system in which a competent person is responsible for recognizing and warning workers of fall hazards.

## **COVERS**

Covers for holes in floors, roofs, and other walking/working surfaces shall meet the following requirements:

A. Covers located in road ways and vehicular aisles shall be capable of supporting, without failure, at least twice the maximum axle load of the largest vehicle expected to cross over the cover.

B. All other covers shall be capable of supporting, without failure, at least twice the weight of workers, equipment, and materials that may be imposed

C. All covers shall be secured when installed so as to prevent accidental displacement by the wind, equipment, or employees.

D. All covers shall be color-coded or they shall be marked with the word "HOLE" or "COVER" to provide warning of the hazard.

E. All holes 2 inches and larger shall covered at all times. When removing a cover for specific work, the affected area will be properly barricaded to prevent employee entry and the proper fall protection will be utilized if necessary.

## PROTECTION FROM FALLING OBJECTS

Falling object protection shall comply with the following provisions:

A. Hard hats shall be worn if working under an overhead hazard.

B. Toeboards shall be installed along the edge of walking/working surface if there are people near work area below.

C. Toeboards shall be at least 3 1/2 inches in height.

D. Toeboards shall be capable of withstanding 50 pounds of force applied in any direction.

E. Where tools, equipment, or materials are piled higher than the top edge of a toeboard paneling or screening should be erected to the top of a guardrail system's toprail or midrail, for a distance sufficient to protect people below.

## TRAINING PROGRAM

Every employee with potential exposure to fall hazards must receive adequate fall protection training. The training shall include the following topics:

A. Recognition of fall hazards.

B. Procedures to follow to minimize the fall

hazards.

C. Nature of the fall hazards in the work area.

D. Correct procedures for erecting, maintaining, disassembling, and inspecting fall protection.E. Use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used.

F. Role of each worker in a safety monitoring system.

G. Limitations on use of mechanical equipment during the performance of roofing work on low-sloped roofs.

H. Correct procedures for handling and storage of equipment and materials and erection of overhead protection.

- I. Role of workers in fall protection plans.
- J. OSHA Regulations (29 CFR 1926, Subpart M)

## DRUG AND ALCOHOL-FREE WORK PLACE POLICY

#### SECTION 16

In 1988, Congress passed the "Drug-Free Workplace Act." Effective March 1989, this Act addresses any drug abuse in the workplaces of federal contractors and grant recipients.

If response to the new federal requirements for drug-free workplaces, and in keeping with Desco's concern for the health and safety of its workforce, Desco is instituting the following Drug and Alcohol-Free Workplace Policy.

This policy certified this company's intent to maintain a drug-free workplace. The first section of this policy (Section A) prohibits the manufacture, distribution, sale, possession or use of a controlled substance or alcoholic

beverage in the workplace.

In addition, this policy creates a Drug Awareness Program (Section B) that will provide information to all employees on the dangers of workplace drug use, and on available private and community treatment facilities. The next section of this policy (Section C) lists the sanctions that employees will face for violations of Desco's Drug and Alcohol-Free Workplace Policy. Finally, this policy contains an employee acknowledgement (Section D) that must be signed and dated by each employee who receives a copy of this policy.

The Drug and Alcohol-Free Workplace Act specifically requires Desco to notify each employee that, as a condition of employment, each employee must:

a.) Comply with the company's Drug and Alcohol-Free Workplace Policy; and

b.) notify Desco of any conviction for a drug related offense committed in the workplace, within five (5) days of the conviction.

Any employee who violates this company policy will be subject to disciplinary action, up to and including termination of employment.

THE TAKING OF BLOOD, URINE, OR SALIVA SAMPLES FOR TESTING MAY ALSO BE REQUIRED FROM ANY PERSON ON COMPANY PREMISES, JOB SITES OR WORKPLACE WHO IS SUSPECTED OF BEING UNDER THE INFLUENCE OF DRUGS OR ALCOHOL, WHO IS INVOLVED IN A VEHICLE ACCIDENT, OR WHO IS INJURED IN THE COURSE OF EMPLOYMENT.

## **SECTION A PROHIBITIONS**

Desco's Drug and Alcohol-Free Workplace Policy prohibits employees from engaging in any of the following activities:

1. Use, possession, manufacture, distribution, dispensation or sale of illegal drugs on company premises or company business, in company supplied vehicles, or during working hours;

2. Unauthorized use of possession, or any manufacture, distribution, dispensation or sale of a controlled substance on company premises or while on company business or while in company supplied vehicles;

3. Storing in a locker, desk, automobile or other repository on company premises any controlled substance or alcoholic beverage whose use is unauthorized;

4. Being under the influence of a controlled substance on company premises or while on company business, or while in company supplied vehicles;

5. Any possession, use, manufacture, distribution, dispensation or sale of illegal drugs off company premises that adversely affects the individual's work performance, his own or others' safety at work, or the company's regard or reputation in the community;

6. Company employees must not report for duty under the influence of any drug, alcoholic beverage, intoxicant or narcotic or other substance, which will in any way, adversely affect their working ability, alertness, coordination, response, or adversely affect the safety of others on the job;

7. Failure to adhere to the requirements of any drug treatment or counseling program in which the employee is enrolled;

8. Failure to notify the company of any conviction under criminal drug statutes for a workplace offense within five days of the conviction; and

9. Refusal to sign a statement to abide by the company's Drug and Alcohol-Free Workplace Policy.

## AUTHORIZED USE OF PRESCRIBED MEDICINE

An employee undergoing prescribed medical treatment with any drug that may alter his or her physical or mental ability must report this treatment to his supervisor. The supervisor will determine whether a temporary change in

the employee's job assignment during the period of treatment is warranted.

## SECTION B

## DRUG AWARENESS PROGRAM

To assist employees and their families to understand and to avoid the perils of drug abuse, Desco has developed a comprehensive Drug Awareness Program. The company will use this program in an educational effort to prevent and eliminate drug abuse that may affect the workplace. The Drug Awareness Program will inform employees about: 1) the dangers of drug abuse in the workplace; (2) our company's Drug and Alcohol-Free Workplace Policy; (3) the availability of treatment and counseling for employees who voluntarily seek such assistance; and (4) sanctions for violations of Desco's Drug and Alcohol-Free Workplace Policy.

Employees of Desco are our most valuable resource and, for that reason their health and safety is our number one concern. Any drug or alcohol use, which imperils the health and well being of our business, will not be tolerated. The use of alcoholic beverages, illegal drugs and abuse of other controlled substances, on or off-duty, is inconsistent with the law abiding behavior expected of all citizens. Employees who drink alcohol, use illegal drugs or abuse other controlled substances on or off duty tend to be less productive, less reliable, and prone to greater absenteeism. This, in turn, can result in increased costs, delays and risks to the company's business. Drug and Alcohol use in the workplace puts the health and safety of the abuser and all other workers around him or her at increased risk. Employees have the right to work in a drug-free environment. In addition, drug abuse inflicts a terrible toll on the nation's productive resources and the health and well being of American workers.

Early recognition and treatment of drug abuse is important for successful rehabilitation. Whenever feasible, Desco will assist employees in overcoming drug abuse by providing information on treatment opportunities and programs. However, the decision to seek diagnosis and accept treatment for drug abuse is primarily the individual employee's responsibility.

Employees with drug abuse problems should request assistance from Rick Crouch. The company will treat all such request as confidential and will refer the employee to the appropriate treatment and counseling services. Employees who voluntarily request the company's assistance in dealing with a drug abuse problem may do so without jeopardizing their continued employment, provided they strictly adhere to the terms of their treatment and counseling program. At a minimum, these terms include the immediate cessation of any use of drugs, and participation, where required by a program, in periodic unannounced testing for a twenty-four month period following enrollment in the program. Voluntary requests for assistance from employees will not, however, prevent disciplinary action for violation of Desco's Drug and Alcohol-Free Workplace Policy.

Desco is instituting a zero tolerance level program. Desco is committed to maintaining a safe workplace free from the influence of drugs or alcohol. All employees and subcontractors are hereby notified that Desco will comply with the applicable regulation issued there under, as well as, when applicable, any more stringent rules promulgated by other federal agencies.

## SECTION C

## DISCIPLINARY ACTIONS FOR VIOLATING THE DRUG AND ALCOHOL-FREE WORKPLACE POLICY

1. A violation of Desco's Drug and Alcohol-Free Workplace Policy may result in disciplinary action, up to and including discharge, at the company's sole discretion.

2. In addition to any disciplinary action, the company may, in its sole discretion, refer the employee to a treatment and counseling program for drug abuse. Employees referred to such a program by the company must immediately cease any drug use, may be subject to periodic unannounced testing for a period of twenty-four

months, and must comply with all other conditions of the treatment and counseling program. The company shall determine whether an employee it has referred for drug treatment and counseling should be temporarily reassigned for safety reasons to another position.

3. Desco will promptly terminate any employee who tests positive for drugs while undergoing treatment and counseling for drug abuse, regardless of whether such treatment and counseling is voluntary or required by the company.

4. Any person who refuses screening or testing as described in this policy, or who is found using, possessing or distributing any of the substances named in this policy, or who is found under the influence of an such substances, is subject to disciplinary action including immediate discharge of an employee, or removal and future prohibition from the premises, if not our employee.

## SECTION D

## EMPLOYEE ACKNOWLEDGEMENT

I have carefully and thoroughly read Desco's Drug and Alcohol-Free Workplace Policy. I have received a copy of Desco's Drug and Alcohol-Free Workplace Policy, understand its requirements and agree, without reservation to follow this policy.

DATE\_\_\_\_\_EMPLOYEE\_\_\_\_\_

## EMERGENCY ACTION PLAN

## SECTION 17

In order to maintain a safe and healthful working environment in emergency situations, Desco has developed this emergency action plan to help safeguard employees while working on the Project Site or at the Corporate Office and Shop Areas. All employees will be trained in the use of this plan and their role in implementing it during their required pre-employment jobsite safety orientation, as well as being posted at all times for viewing in the on-site offices for Desco.

This policy is mandatory and must be strictly followed by all subcontractors and their personnel while working on this site.

## I. GENERAL EVACUATION PROCEDURES:

A. When notified of an emergency evacuation, all subcontractors must immediately evacuate their personnel from the project site.

B. When evacuating the jobsite, employees should utilize the nearest exit to them.

C. All employees shall meet at a predetermined meeting location away from the hazard, in order for management to conduct and confirm that all employees have safely evacuated the site. Only trained and authorized employees shall re-enter the site for emergency rescue operations and/or administer first aid.

D. Depending on the type of emergency, evacuated employees should be a minimum of 25 feet away from the jobsite/affected area or an equivalent safe distance.

E. Evacuated subcontractors and their personnel shall remain a safe distance from the affected area or jobsite, until a Qualified Representative deems that no further hazards are present and allows work to continue.

F. Proper authorities (site security, police, fire, rescue, ambulance, etc...) will be notified of the emergency, by Desco as soon as possible. Signs with emergency phone numbers, instructions and the jobsite address are clearly posted in the field office trailer.

## II. INJURY TO AN EMPLOYEE:

A. All injuries and/or accidents must be reported to Desco immediately. If the injury requires medical treatment, an authorization form must be completed by Desco. Representative and sent with the injured party to the predetermined clinic or hospital.

B. Transportation of the injured party, to and from the clinic or hospital, is the responsibility of the injured person's supervisor. No injured person shall leave the project unattended at the discretion of the site safety representative.

C. Directions, lists, maps, phone numbers, etc. for approved clinics and/or hospitals can be obtained from the Desco Project Office.

D. In the event that the injury is more serious or life threatening, 911 will be called and the injured party will be transported by ambulance to the nearest emergency care facility.

## III. INJURY TO VISITORS:

A. In the event that a visitor is injured during the course of construction, Desco must be promptly notified.

B. Visitors will be directed to follow instructions by subcontractors and will be accompanied at all times unless properly orientated by the safety office.

C. Do not allow the injured party to be moved (unless imminent danger is present).

D. Only people having been trained in basic first aid or CPR or beyond shall administer emergency medical care to the injured party.

E. Proper authorities (site security, police, fire, rescue, ambulance, etc...) shall be notified immediately.

## IV. FIRE:

A. All employees must comply with the fire safety requirements of the Project's written safety and health plan.

B. In the event of an emergency evacuation due to fire, the *General Evacuation Procedures* described above shall be utilized.

## V. PROPERTY DAMAGE:

A. Desco must be made aware of any damage to property on the site, regardless of who the owner of the property is.

B. Certain incidents involving property damage may require an employee evacuation from the jobsite. (An example is a rupture of an underground gas line)

C. This section could include but is not limited to the following:

- 1. Utility lines or pipes
- 2. Vehicles located on-site
- 3. Equipment/Tools
- 4. Jobsite Trailers/Offices
- 5. Jobsite Fencing/Barricades

## VI: PUBLIC DEMONSTRATIONS:

A. Any public demonstration (including but not limited to: parades, any form of rioting, labor disputes, marches, public or organizational protests, etc.) that may affect normal construction activities on the project site, will be addressed at the time of occurrence by Management of Desco.

B. If necessary, normal construction activity (this may include employee parking, delivery and visitor

traffic, entrances and exits to the site, etc.) will be altered, in order to ensure public safety during demonstrations near the Project Site.

C. If any public demonstration poses a threat to employee safety during normal working conditions, steps will immediately be taken to eliminate the hazard(s) that the above said employee(s) are exposed to. This includes notifying authorities of any unlawful act that has been committed by any member of the public.

## VII: BOMB THREATS:

A. In the event that a bomb threat is placed with Desco, any of the subcontractors working on site, naming the area of the jobsite or any combination thereof, the jobsite must immediately be evacuated by all personnel, using the steps outlined above in *General Evacuation Procedures*.

B. Proper authorities (site security, police, fire, rescue, ambulance, etc...) shall be notified immediately. The jobsite shall remain evacuated of all personnel, until a complete investigation is conducted and the situation is deemed free of hazard by the acting authorities.

## VIII: WEATHER RELATED EMERGENCIES:

A. When experiencing lightening, flooding, or tornado threatening weather, Desco will warn all on-site employees of the current weather conditions, as well as closely monitor up to the minute forecasts and instructions issued by local or state authorities, local media and/or National Weather Service.
B. When seeking shelter from a tornado, the preferred choice should be a ditch or protected excavations. If inside a building, all windows and doors shall remain open.

X. Employees should avoid using equipment, job trailers, and small structures as a means of shelter from a tornado, nor should they position themselves in an area where there are materials, tools or equipment being stored nearby or overhead.

## IX: MEDIA CONTACTS:

A. At no time, shall any unauthorized person speak to the media regarding jobsite emergencies or any other publicized affair related to the Desco Project. If necessary, proper statements will be issued by Desco Coatings, Inc. Management or by the appointed representative of the Owner.

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

## BACK INJURY PREVENTION

## **SECTION 18**

## POLICY

The Safety Representative and Project Supervisor are responsible for pre-screening projects and continuously monitoring work tasks/activities that have the potential to pose a significant risk of back injuries to employees. When feasible, a dolly, forklift or other type of lifting equipment shall be brought on-site and utilized.

## <u>SCOPE</u>

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

## <u>PURPOSE</u>

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

### A. PROCEDURES

1. Be sure to stretch before attempting to lift or move material at the start of each day. Many back and muscle injuries are due to improper stretching or straining.

2. Always size up your load. Get help for heavy or bulky loads. This may require the utilization of material handling equipment, i.e., power industrial trucks, pallet jacks, etc.

3. Inspect your path of travel. Choose the safest, not the shortest route. Be aware of tripping or slipping hazards.

4. Always bend your knees, keeping your back straight, not necessary vertical. Tuck your chin to keep it in line with your neck and spine. Never lift with a rounded back and straight legs.

5. Get a firm grip on the object with your whole hand (not just your fingers). Draw the object close to you with your weight centered over your feet.

6. Tuck your elbows and arms for more power. Lift by straightening your legs - use slow easy motions, and avoid quick, jerky motions.

7. Avoid shifting with the load. Try to point your foot in the direction you intend to go.

### AIERAL AND SCISSOR LIFT

### **SECTION 19**

This section sets forth the requirements to protect employees and jobsite workers exposed to the hazards associated while utilizing aerial and scissor lift personnel platforms during the course of work.

### <u>SCOPE</u>

This section covers the responsibilities, inspection procedures, personal protective requirements, and safety guidelines for any employee who works from or operates an aerial or scissor lift personnel platform.

### PROCEDURES

All operators and users of aerial platforms must display proficiency in knowledge and actual operation while operating or working from such equipment. Only trained and authorized employees shall be permitted to operate or use aerial platforms. Before authorizing an employee to operate an aerial platform, the Supervisor shall ensure that the employee has:

1. Been instructed by a qualified person in the intended purpose and function of each control. Read and understood the manufacturer's operating instructions and users safety rules, or been trained by another qualified person on the contents.

2. Reviewed the manufacturer's requirements before first use by accessing the operator's manual. This manual should be on the equipment or the project at all times.

3. Understood by reading or having a qualified person explain all the decals, warnings, and instructions displayed on the aerial platform.

4. Determined that the purpose for which the aerial platform is to be used within the scope of the intended applications for that specific aerial platform equipment.

5. Been provided with all fall protection devices and other safety gear for all employees in the platform.

6. Each lift will be inspected and maintained, and an "Aerial/Scissor Lift Inspection Checklist - Appendix F" shall be completed and signed by the equipment operator before the start of each shift to ensure proper operation.

7. If any condition that would adversely affect the safe operation of the lift is noticed and cannot be properly abated, the condition will be noted on the checklist and the lift shall be immediately

removed from service until the condition is properly repaired. A qualified person shall make all repairs to the aerial platform.

8. Inspection of the work area shall also be completed before using the aerial platform including but is not limited to the following:

- a. Drop-offs or holes
- b. Bumps and floor obstructions
- c. Debris

d. Overhead obstructions and high voltage conductors

- e. Hazardous locations
- f. Environmental conditions for the work area

g. Inadequate surface and support to withstand all load forces imposed by the aerial platform in all operating configurations.

9. All operators and users shall cease operation of the aerial platform in case of suspected malfunction(s) or any potentially hazardous condition(s) until proper repairs or abatements are completed.

10. Any employee, who enters an aerial platform with an extensible boom or platform, shall utilize a fall arrest harness and lanyard **AT ALL TIMES**, secured to the manufacturer's anchorage point, regardless of the working height. Platforms used for increasing working heights, that do not extend or boom outward, but remain over the base wheels at all times do not require the use of a fall arrest harness, given the user(s) have their feet firmly positioned on the floor of the lift, and the guardrails and entry point door or chains are in use at all times. Belting off to adjacent structures is strictly prohibited.

11. Before each movement or when repositioning the aerial lift platforms, all operators shall ensure the following:

a. The aerial platform is operated on a surface within the limits of the equipment for safe operation.

b. The outriggers, stabilizers, extendible axles, or other stability enhancing means are used.

c. Guardrails are installed and access gates and openings are closed.

d. The load and its distribution on the platform and any platform extension are within the manufacturer's rated capacity.

e. The operator shall ensure the area surrounding the aerial platform is clear of personnel and equipment before raising or lowering the platform.

f. There is adequate clearance from any overhead obstructions. This includes a minimum distance of 10 feet from all power lines. For work closer than this 10-foot radius, all power lines must first be deactivated and tagged out of service. Contact the Safety

Representative or Project Supervisor for assistance.

g. The path of travel has been visually inspected and will properly balance and support the aerial platform.

12. All aerial platform equipment operated in hazardous locations shall be of the approved type. Employees shall utilize personal protective equipment (i.e., face shields, safety glasses, dust masks, etc.) as required while working from or operating aerial platforms equipment.

13. When other moving equipment, motor vehicles, other workers or the general public are present, special precautions for warning others with flagging, roped off areas, flashing lights, and\or barricades shall be installed as needed.

14. The aerial platform shall not be operated from a position on trucks, trailers, railway cars, floating vessels, scaffolds, or similar equipment unless approved by the manufacturer.

15. Under all travel conditions, the operator shall limit travel speed according to conditions of the ground surface, congestion, visibility, slope, location of personnel, and other factors causing hazards of collision or injury.

16. Altering or disabling safety devices or interlocks is strictly prohibited. All modification or alterations of an aerial platform shall be made according to the manufacturer's specifications and approval.

17. Rated capacities shall not be exceeded when loads or personnel are transferred to the platform at any height.

18. Aerial platforms should not be used in high winds or gusty conditions.

19. The aerial platform shall not be positioned against another object to steady the platform.

20. The aerial platform shall not be used as a crane.

21. Care shall be taken to prevent rope, electrical cords and hoses from being entangled with the aerial platform.

22. Stunt driving and horseplay shall be strictly prohibited.

23. Personnel shall maintain a firm footing on the platform while working therein. Use of planks, ladders,

or any other makeshift devices for achieving additional working heights or reach shall be strictly prohibited.

24. Do not sit or stand on the guardrails of an aerial platform at any time. Guardrails are rated for

200-pound maximum loads, and are not designed for heavy loads.

25. Do not leave the aerial platform unattended with the key in the switch. This will prevent unauthorized use of the equipment.

26. The engine shall be shut down while fuel tanks are filled. Fueling and battery charging shall be done in well-ventilated areas free of flame, sparks, or other hazards which could cause a fire or explosion.

27. The boom and platform of the aerial platform shall not be used to jack the wheels off the ground unless the manufacturer designs the machine for that purpose.

28. The aerial platform shall not be driven on grades, side slopes or ramps exceeding those for which the manufacturer rates the aerial platform.

29. If the platform or elevating assembly becomes caught, snagged or otherwise prevented from normal motion by adjacent structures or other obstacles, such that control reversal does not free the platform, all personnel shall be removed from the platform before any attempts are made to free the platform using ground controls.

30. Before and during driving the aerial platform while in an elevated position, the operator shall:

a. Maintain a clear view of the path of travel.

b. Maintain a safe distance from obstacles, debris, drop-offs, holes, depressions, ramps, and other hazards to ensure safe elevated travel.

c. Maintain a safe distance from any overhead obstructions or hazards.

### OSHA INSPECTION GUIDELINES

### **SECTION 20**

### <u>POLICY</u>

It is company policy to fully cooperate with inspections by enforcement agencies such as the Occupational Safety and Health Administration (OSHA).

The following guidelines shall be followed when an OSHA or other agency representative arrives at our project:

### A. INSPECTIONS

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

1. As soon as the OSHA Compliance Officer arrives on site contact by telephone the Safety Representative or any other designated DESCO Coatings, Inc. representative noted in this section.

- 2. Be polite, respectful, and cooperative.
- 3. Request to see the Inspector's credentials.

4. Get a copy, if possible, of the Compliance Officer's work assignment for your site (usually a building permit or Dodge Report, or a copy of a complaint.) Desco Coatings, Inc. may want to contest an alleged violation, so record all pertinent information. The names, business affiliation and addresses of all persons present should be written down.

5. If a complaint is involved, you should ask if the party(s) filing the compliant requested that their name be withheld. If he/she made no such request, then the disclosure of the name of the party initiating the complaint is allowed. Whether the complaint was filed by a present or past employee, customer, subcontractor, material supplier, or by a person not directly employed around the workplace involved; the answers to these questions may be extremely important to us. In most cases, an inspection should not be permitted if the complaint was filed by someone other than present employees or their representative, unless the complaint involves an imminent danger situation.

### B. REASON FOR INSPECTION

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

1. Imminent Danger situations are given top priority.

2. Catastrophes and Fatal Accidents: Investigation of fatalities and accidents hospitalizing three (3) or more employees are second priority. OSHA must be notified within eight (8) hours. Investigations are made to determine if OSHA standards were violated and to avoid recurrence of similar accidents.

3. Employee Complaints: Written and signed complaint by current employee. If it is a complaint, ask for copy. (Inspections should include <u>only</u> the area of complaint accessed by the most direct route.)

4. Programmed High Hazard Inspections: A special program that targets inspections at the most dangerous work places.

5. Other Programmed Inspection (also referred to as General Inspection): Randomly chosen low-hazard and non-manufacturing sites.

6. Follow-up Inspections: Re-inspection of earlier inspections to determine whether previously cited violations have been corrected.

7. Other types of inspections could include: referrals, fax complaints, or focused inspections (very limited).

### C. **OPENING CONFERENCE**

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

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

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

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

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

### D. THE INSPECTION

It is appropriate to ask the Inspector to wait until the Company's designated representative can be notified. OSHA can allow up to one hour, or as reasonable.

The following individuals shall be contacted in the event an OSHA Compliance Officer shows up on a jobsite:

NAME		TITLE	TELEPHONE NUMBERS
	Matt Huggins	President	Corporate Office: (314) 918-9888
			Mobile: (913)708-5771
	Blake Wood	Vice-President	Corporate Office: (913) 782-3330
			Mobile: (913) 238-3046
	Jamie Fales	Superintendent	Corporate Office: (913) 782-3330
			Mobile: (816) 305-7602

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

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

### E. RIGHTS TO REASONABLE INSPECTION

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

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

If the investigation involves a complaint, the Compliance Officer may inspect and interview only with respect to matters reasonably related to the complaint. After preliminary investigation, if you believe that a request is unreasonable, you must use careful judgment and good faith in handling the situation. You can discuss the matter with the Compliance Officer and explain why you think his/her request is unreasonable.

If he/she insists on the request, then you may either give in or ask the Compliance Officer to wait until top Management can be consulted. If you have strong convictions that the request is unreasonable and unnecessary, you should consult with the DESCO's Safety Representative or another designated DESCO representative identified in this section before proceeding. There will probably be other areas that the Compliance Officer may wish to inspect while management is making a decision.

### F. AVOIDANCE OF DISRUPTION

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

### G. ACCOMPANY THE OFFICER

This is an employer's right and a most important one, since in most cases you may be the only spokesperson for the company during the inspection, as well as the eyes and ears of Management for any contest proceeding later. The Company Representative is to take the OSHA Inspector to the site to be inspected by the most direct route, providing the fewest additional opportunities for unrequested inspections. The OSHA statute gives the Compliance Officer the authority to interview employees, privately if he/she wishes, and to examine machinery or equipment. The Compliance Officer is also permitted to take photographs, use a video camera, take samples, and to use other reasonable techniques. You should also take pictures, video, and samples as near to those of the Compliance Officer as possible.

**TAKE NOTES**: It is imperative that you take as complete a set of notes as possible, identifying areas visited, equipment and material examined, employees interviewed and a written description of each <u>ALLEGED</u> hazard. There is nothing wrong with taking notes during the investigation. On top of all notes you take, handwrite the following: *"Confidential Attorney Work Product - Made in Anticipation of Litigation."* 

### H. REPRESENTATIVES AUTHORIZED BY EMPLOYEES

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

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

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

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

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

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

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

- 2. Items you may want to point out to the Compliance Officer:
  - A. Review of the Safety Task Analysis.
  - B. Copies of Jobsite Safety meeting minutes.
  - C. Copies of "Weekly Safety Meetings" or other employee training material.
  - D. Copies of "safety warnings to individuals, subs, and trade contractors".
  - E. Any other material that would help to establish "good faith compliance efforts."

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

4. Alleged Violations: The company will receive by mail a Safety Order (citation) with a cover letter stating posting requirements. If these are sent to the corporate office, the Safety Representative will see to the compliance of all Safety Order requirements. However, if it is determined after review with all concerned, that the company should contest, the Safety Representative will take the correct steps to do so. If the Safety Order is sent to the jobsite, it should be forwarded to the Safety Representative at the corporate office so it may be expedited.

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

If we decide that we cannot abate the danger without a court order, a Compliance Officer can only leave and report to his office that he/she is recommending a civil action to restrain or remove the condition.

6. Serious or Other than serious: A Safety Order for violation of a standard is either deemed serious or other than serious. Read the Safety Order carefully. Note especially the date by which alleged violations are to be corrected. If you do not contest a particular violation, it must be corrected by the date so indicated. Failure to correct puts in a position of "Failure to Abate," which fines may be assessed up to \$7,000 per day for up to ten days, the maximum fine being \$70,000.

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

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

### J. OUTSIDE PARTIES

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

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

### K. OSHA INSPECTION QUESTIONNAIRE

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

### POLICY

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

Desco's vehicle policy is detailed in separate documents "Desco Coatings Fleet Safety Management Policy" and "Desco Coatings DOT Handbook". Refer to both document for safety guidelines and policies.

### SILICA AWARENESS

**SECTION 22** 

### <u>SCOPE</u>

All employees cutting, grinding, mixing, or drilling concrete shall be trained in the exposure hazards of Silica. All employees shall be trained in the types of protection available to them.

A review of Silica Hazards and Types of Protection are as follows:

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

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

Employees must be protected from the silica hazards created during certain activities because exposures to silica exceeding the PEL might occur. The current silica dust PEL established by OSHA for the total respirable dust concentration is 10 milligrams per cubic meter  $\div$  (%SiO<sub>2</sub> + 2). The use of other abrasive blasting materials often creates dust hazards as well. Most substitute materials have a PEL of 5 mg/m<sup>3</sup> for the respirable fraction or 15 mg/m<sup>3</sup> for the total dust.

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

Administrative controls limiting exposure times to job duties where silica is present are not usually effective since the dust levels created while drilling, sanding, sweeping, cutting or grinding are so high. Rotating employees into non-exposure areas is however often effective in reducing daily exposures to abrasive dusts.

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

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

1. All work areas must be cleaned as soon as work permits with all dust removed properly to prevent further exposure to this dust.

2. Engineering controls such as water sprays, work area enclosures, and ventilation of containment structures. (For example, use water hoses to wet dust down at the point of generation.)

3. Always use the dust control system and keep it in good maintenance.

4. Use abrasives containing no silica whenever possible or less than 1% crystalline silica during abrasive blasting to prevent harmful quartz dust from being released into the air.

5. Use dust collection systems, which are available for many types of dust generating equipment. Use local exhaust ventilation to prevent dust from being released into the air.

- 6. Be aware of the health effects of crystalline silica and that smoking adds to the damage.
- 7. Know the work operations where exposure to crystalline exposure may occur.
- 8. Use type CE positive pressure abrasive blasting respirators for sandblasting.
- 9. For other operations where respirators may be required, use a respirator approved for protection against crystalline silica-containing dust. Do not alter the respirator in any way. Workers who use tight-fitting respirators cannot have beards or mustaches, which interfere with the respirator seal to the face and must be clean shaven within 24 hours.

10. If possible, employees should change into disposable or washable work clothes at the worksite; shower (where available) and change into clean clothing before leaving the worksite.

11. Do not eat, drink, use tobacco products, or apply cosmetics in areas where there is dust containing crystalline silica.

12. Wash your hands and face before eating, drinking, smoking, or applying cosmetics outside of the exposure area.

13. Regardless of the type of abrasive used, employees must be protected from the high impact velocity of the abrasives through the use of suitable PPE such as leather gloves, aprons and chaps.

Safety shoes should also be worn where heavy pieces of work are handled.

14. Respirators should only be used after dust controls are in place. Respirators should not be the primary method of protection. If engineering or administrative controls cannot keep dust levels below permissible exposure levels then respirators should be used. When engineering, work practice, and administrative controls are not employed or they are insufficient to fully control exposures to levels below the PEL, the company respirator protection program must be utilized.

### BLOODBORNE PATHOGENS HAZARDOUS EXPOSURE Section 23

### <u>PURPOSE</u>

This exposure control plan is intended to protect all employees and trainees from exposure to bloodborne pathogens, particularly the Hepatitis B Virus (HBV) and the Human Immunodeficiency Virus (HIV). This plan is written to comply with OSHA's Bloodborne Pathogen Standard, 29 CFR 1910.1030. This plan is effective immediately.

In this facility, the only employees who might come into contact with blood are those who are designated to perform first aid or CPR in case of emergencies. These employees are covered by the plan.

### I. EXPOSURE DETERMINATION

Any employee who is trained to deliver First Aid/CPR and is expected to perform such duties in the event of an on-site emergency is considered to have occupational exposure under this program. Such employees will be trained in accordance with the OSHA bloodborne pathogen standard and will be offered HBV vaccinations. All aspects of this Exposure Control Plan apply to these employees.

### II. PROGRAM ORGANIZATION

Program Administrator: \_\_\_\_\_

Position/Title: \_\_\_\_\_

Program Administrator

The program administrator is responsible for the implementation of this program. Any questions regarding the program should be directed to the program administrator. The program administrator will assure that all appropriate personnel are trained, that all covered personnel are offered and, if interested, scheduled for HBV vaccinations, that all records are properly maintained, and that this program is updated as needed.

Employees Who Are Covered by This Program

The following employees have been trained in First Aid/CPR and are expected to provide first aid treatment in the event of an emergency at the training center. They are covered by all aspects of this program.

## EMPLOYEES WHO ARE COVERED by the BLOODBORNE PATHOGEN STANDARD

NAME	POSITION TITLE	SOCIAL SECURITY NUMBER

### III. METHODS of COMPLIANCE

The following methods will be used to ensure maximum protection for employees and trainees from the health hazards associated with bloodborne pathogens:

### A. Universal Precautions

Since a person infected with HIV or HBV may have no symptoms of disease, any potential contact with blood or other materials that may be infected shall be handled as if the material were infected. Precautions shall be taken to assure that the employee administering first aid does not come in contact with blood or other potentially infectious materials, and that no possible spread of infectious materials takes place. The following precautions shall be taken any time an employee is cut or bleeding, requires first aid treatment, or requires CPR.

1. Bloodborne pathogen first aid response kits shall be available in all shop areas and any place a first aid kit is stored or required. These shall include at a minimum:

- goggles or other eye protection to protect eyes from being splashed with blood
- a water resistant surgical mask or face shield to prevent blood from entering the mouth or nose
- two pairs of powder-free non-allergenic vinyl gloves
- a red plastic bio-hazard-labeled bag for disposal
- plastic tie or duct tape for sealing bags

The program administrator shall be responsible for having emergency response kits refilled following an exposure incident. The program administrator shall also ensure that all kits are kept fully stocked with fresh materials.

### 2. First Aid Procedures

For any first aid response in which the patient is bleeding or there is a possibility she/he may start bleeding, use the following precautions when administering first aid treatment:

a. Clear the area of students and untrained personnel.

b. Wear the vinyl gloves provided in the kit. If the gloves get torn or damaged, replace them with a fresh pair immediately. In removing the damaged gloves, turn them inside out to avoid contaminating the skin.

c. If there is a possibility that blood may spray or spatter into your nose or mouth, wear the protective facemask or shield in your emergency kit.

d. If there is a possibility that blood may spray or spatter into your eyes, wear the protective goggles in your emergency kit.

e. If CPR is required, use the mouthpiece in your kit to prevent any blood or other fluids from backing into your mouth.

f. If blood has spilled in the area, clean the blood up and put all blood soaked rags into a biological waste bag for disposal. Clean the area with bleach solution or other provided antiseptic.

g. If there is broken glass or if any sharp objects have been contaminated with blood, do not use your hands to pick them up. Glass or other sharp debris should be swept up with a dustpan and whiskbroom. The debris must be sealed in a solid container like a box or jar and labeled as a biohazard. Tools should be picked up using vinyl gloves and should be wiped and disinfected, using the bleach solution. Do not allow your gloved hand to touch the tools after they have been disinfected. Use a paper towel to handle them to avoid spreading possible infection.

h. Any machinery or equipment that may have been contaminated with blood must be wiped and disinfected in the same manner as contaminated tools. No contaminated tools or machinery may be used until they have been cleaned of all traces of blood and thoroughly disinfected.

i. Cleanup

Once all visible blood has been removed from all surfaces and all blood-covered surfaces have been cleaned with disinfectant, protective clothing should be disposed of in the biological waste bag. All bags will be marked with the biohazard symbol. Always remove your gloves last. Gloves should be wiped on the outside with disinfectant before removing goggles or facemask. Seal the bag and save for proper disposal.

Hands should be washed thoroughly with soap and water. If it is not possible to wash hands immediately, use the antiseptic wipes or antiseptic gel to clean hands, and wash with soap and water as soon as possible. In washing hands, use a paper towel to turn the faucet on and off to avoid contaminating the sink. Be sure the sink is thoroughly rinsed after washing. (Remember, HBV can survive for a full week on any surface. Flush eves, nose or mouth thoroughly with water if any blood or other body fluids have gotten in them.

j. The person who has administered first aid will not eat, drink, smoke, or apply cosmetics or lip balm until all contaminated clothing has been removed and disposed of or washed and disinfected, and until he has thoroughly washed with soap and water. If you have been cut or believe you may have gotten blood or other potentially infectious fluids, fill out

k. If you have been cut or believe you may have gotten blood or other potentially infectious material in a cut, in your eyes, nose or mouth, you must fill out an incident report immediately after cleaning up. You can then be scheduled for HBV vaccination if you haven't already received it, and you will be scheduled for blood testing. If blood or other body fluids have gotten on clothing it will be cleaned by the employer at no cost to the employee. Such clothing should be placed in a plastic bag, sealed and labeled with a biological hazard sign.

### Hepatitis B Vaccination and Post-exposure Follow-up for Employees Covered by this Program

Every employee covered by this program shall be informed of his or her right to receive hepatitis B vaccine after an exposure incident occurs. They will be informed that the vaccinations will be performed by or under the supervision of a licensed physician. The vaccination series is given in three separate doses over a six-month period. The vaccinations will be performed on company time and at company expense. Employees will be notified that the vaccine is safe and is effective in preventing HBV in 85% to 97% of healthy adults, and that immunization lasts about nine years.

No employee will be forced or required to take the vaccination series. It will be strictly voluntary. Any employee who refuses the vaccination series will sign a statement of declination as required by OSHA.

All laboratory tests shall be performed by an accredited laboratory at no cost to the employee. The following policy is in accordance with OSHA's decision to exempt employees who perform first aid on an as needed, occasional basis from vaccination before exposure to blood or other body fluids. Vaccination shall be made available to employees as soon as possible after an exposure incident unless the employee has previously received the complete HBV vaccination series, antibody testing has revealed that the employee is immune, or the vaccination would interfere with the employee's health.

### Post-exposure Evaluation and Follow-up

If an employee has a possible exposure to bloodborne pathogens, the following steps will be taken:

1. An exposure incident report will be filled out and signed by the employee and the employee's supervisor. This will include a description of the incident, the date, time and location, and the routes of exposure. The name of the individual who was bleeding will be included in the report unless this is prohibited by state law. A copy of the

report will be given to the affected employee. The full report shall remain confidential. An exposure occurrence log will be filled out by the supervisor. This will include only the time, date, place, and description of the incident, but will not include any names.

2. The person who was bleeding or injured (the source individual) will be given a blood test as soon as possible after the incident unless this is prohibited by law. The blood test will only be given with the consent of the source individual. The blood will be tested for HIV and HBV. If the source individual is already known to be infected with HIV or HBV, testing for that virus will not be done.

3. The results of the blood tests will be made available to the exposed employee.

4. The exposed employee's blood shall be collected as soon as possible and tested as soon as possible for HBV and HIV after he gives his consent.

# The employee may only wish to have his blood collected but no testing done at the time of the incident. If this is the case, the blood sample shall be preserved for at least 90 days. If the employee decides within 90 days of the incident that he wants to have the blood tested, it will be done as soon as possible.

5. The exposed employee shall be examined by a physician as soon as possible after the incident. The physician will be provided with a copy of the OSHA Bloodborne Pathogen Standard, a history of the incident, a copy of the incident report, any pertinent medical records, including previous HBV vaccinations or blood tests, and results of the source individual=s blood tests, if available. The physician shall provide counseling to the exposed employee about any medical problems or conditions resulting from his exposure. The physician will also advise him on whether he should begin the HBV vaccination series. The physician will provide a written report to the employer and to the exposed employee in accordance with the OSHA standard.

### IV. TRAINING

All employees covered by this program will receive a training course annually including the following information:

- A. Background information on bloodborne diseases:
  - Modes of transmission
  - Symptoms
  - Epidemiology
  - Emphasis will be placed on sources of workplace exposure
  - Emphasis will be placed on HBV and HIV
- B. Hazard Recognition and Worker Protection
  - Videotape, Bloodborne Pathogens in the Workplace, Summit Training, 1992, will be shown.

This video covers possible workplace exposures, use of personal protective equipment, disinfection, and disposal.

- C. The OSHA Bloodborne Pathogen Standard
  - Key aspects of the Standard will be reviewed
- D. Explanation of the in-house exposure control plan
  - Contents of plan

- Location and accessibility of the plan
- Employer responsibilities
  - .....implementing the exposure control plan
  - .....medical exams, vaccination
  - .....training
- Employee responsibilities

.....first aid response procedures in the event of an emergency that might result in exposure to blood or other body fluids.

.....what to do if an employee is exposed to blood or other body fluids

The training program described above will either be included as an add-on module to an existing First Aid/CPR course or will be given as a stand alone unit to those employees who have already received First Aid/CPR training. The training will be repeated annually for each employee covered by this program.

### V. RECORDKEEPING

### A. Medical Records

Medical records required by 29 CFR 1910.1030 will be maintained for every employee covered by this plan. These records will be kept for at least the length of employment plus 30 years in accordance with 29 CFR 1910.20. Confidentiality of the records will be ensured. The information will not be disclosed or reported to anyone without the employee's express written consent. The only exceptions will be to forward these records to the examining physician in the event the employee has a possible exposure to bloodborne pathogens, as specified in 29 CFR 1910.1030 or as required by law.

The medical record shall include:

- The name and social security number of the employee.
- A copy of the employee's hepatitis B vaccination status including the dates of all hepatitis B vaccinations and any medical records relating to the employee=s ability to receive vaccination.
- A copy of all results of medical examinations, medical testing and follow-up procedures which took place as a result of an employee's possible exposure to bloodborne pathogens.
- The required written report from the physician, stating his or her professional written opinion as to the need for and status of the employee's HBV vaccination, recommendations for post exposure evaluation and follow-up evidence that the employee has been informed of the results of the evaluation and has been told about conditions that could result from exposure to infectious material. All other findings remain confidential, and shall not be included in the written report.
- A copy of the information provided to the consulting physician as a result of an exposure incident.
- B. Exposure Incident Documentation
  - Exposure incident reports will be maintained for 30 years plus the length of employment of the affected employee.

### C. TRAINING RECORDS

- Training records will be maintained for three years from the date of training
- Training records will consist of

.....an attendance sheet with the course date and the signature and social security number of each trainee

.....a training summary sheet with the date of the course, the instructor's name, each attendee's name and job title

.....copies of all graded tests or exams given

- ....a course outline
- .....a list of instructors with their qualifications

## Hepatitis B Vaccination

In order for employees to make a fully informed decision about having the Hepatitis B vaccination they will be given the fact sheet, Bloodborne Facts: Hepatitis B Vaccination - Protection for You, published by OSHA. This will be included as part of the Bloodborne Pathogen Training Program. This fact sheet will also be given to an employee following an exposure incident. The fact sheet appears on the following page: Bloodborne

Hepatitis B Vaccination B

## **Protection For You**

## facts

WHAT HBV?

IS

Hepatitis B virus (HBV) is a potentially life-threatening bloodborne pathogen. Centers for Disease Control estimates there are approximately 280,000 HBV infections each year in the U.S. Approximately 8,700 health care workers each year contract hepatitis B, and about 200 will die as a result. In addition, some who contract HBV will become carriers, passing the disease on to others. Carriers also face a significantly higher risk for other liver ailments which can be fatal, including cirrhosis of the liver and primary liver cancer.

HBV infection is transmitted through exposure to blood and other infectious body fluids and tissues. Anyone with occupational exposure to blood is at risk of contracting the infection.

Employers must provide engineering controls; workers must use work practices and protective clothing and equipment to prevent exposure to potentially infectious materials. However, the best defense against hepatitis B is vaccination.

#### WHO NEEDS VACCINATION?

The new OSHA standard covering bloodborne pathogens requires employers to offer the three-injection vaccination series free to all employees who are exposed to blood or other potentially infectious materials as part of their job duties. This includes health care workers, emergency responders, morticians, first-aid personnel, law enforcement officers, correctional facilities staff, launderers, as well as others.

The vaccination must be offered within 10 days of initial assignment to a job where exposure to blood or other potentially infectious materials can be Areasonably anticipated. The requirements for vaccinations of those already on the job take effect July 6, 1992.

#### WHAT DOES VACCINATION INVOLVE?

The hepatitis B vaccination is a noninfectious, yeast-based vaccine given in three injections in the arm. It is prepared from recombinant yeast cultures, rather than human blood or plasma. Thus, there is no risk of contamination from other bloodborne pathogens nor is there any chance of developing HBV from the vaccine.

U.S. Department of Labor

The second injection should be given one month after the first, and the third injection six months after the initial dose. More than 90 percent of those vaccinated will develop immunity to the hepatitis B virus. To ensure immunity, it is important to the hepatitis B virus. To ensure immunity, it is important for individuals to receive all three injections. At this point it is unclear how long the immunity lasts, so booster shots may be required at some point in the future.

The vaccine causes no harm to those who are already immune or to those who may be HBV carriers. Although employees may opt to have their blood tested for antibodies to determine need for the vaccine, employers may not make such screening a condition of receiving vaccination nor are employers required to provide prescreening.

Each employee should receive counseling from a health care professional when vaccination is offered. This discussion will help an employee determine whether inoculation is necessary.

#### WHAT IF I DECLINE VACCINATION?

Workers who decide to decline vaccination must complete a declination form. Employers must keep these forms on file so that they know the vaccination status of everyone who is exposed to blood. At any time after a worker initially declines to receive the vaccine, he or she may opt to take it.

## WHAT IF I AM EXPOSED BUT HAVE NOT YET BEEN VACCINATED?

If a worker experiences an exposure incident, such as a needlestick or a blood splash in the eye, he or she must receive confidential medical evaluation from a licensed health care professional with appropriate follow-up. To the extent possible by law, the employer is to determine the source individual for HBV as well as human immunodeficiency virus (HIV) infectivity.

and

Occupational Safety Health Administration The worker=s blood will also be screened if he or she agrees.

The health care professional is to follow the guide lines of the U.S. Public Health Service in

providing treatment. This would include hepatitis B vaccination. The health care professional must give a written opinion on whether or not vaccination is recommended and whether the employee received it. Only this information is reported to the employer. Employee medical records must remain confidential. HIV or HBV status must NOT be reported to the employer.

### **Hepatitis B Vaccine Declination**

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to myself. However, I decline hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, an infectious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

## EXPOSURE INCIDENT RESPONSE FORMS

### EXPOSURE OCCURRENCE LOG

The following information about an exposure incident must be filled out by the supervisor of an exposed employee the day the incident occurs. The names of the source and contaminated individuals shall not be used.

Time of Incident	Date	Place of Incident	Description	Initials of Supvr

### CONFIDENTIAL

### Exposure Incident Report

This report must be filled out anytime an employee is exposed to blood or other body fluids.	This includes getting another
person's blood on the skin, in the eyes, nose or mouth.	

This report must be filled out and signed by the employee's supervisor the day the incident occurs.

Date of Incident:	
Time of Incident:	
Location:	
Description of Incident, (including work being performed and ho	w the exposure occurred and routes of exposure).
Name of exposed employee:	
Source of exposure (include name, if it was from a bleeding per	son)
Personal Protective Equipment Used:	
> Gloves	Resuscitator
Protective Clothing	> Goggles
Face Make	Other equipment list below:
Clean-up procedures used:	
Decontamination/Disinfection method used:	
Did employee wash up with soap and water immediately afterward Disposal method (How, Where):	ards? Yes No
Additional Comments:	
Signed	
Exposed Employee:Sup	pervisor:
Date:	Date:
CONFIDE	ENTIAL
	57   Page

### POST-EXPOSURE EVALUATION AND FOLLOW-UP CHECKLIST

The following steps must be taken, and information transmitted, in the case of an employees possible exposure to Bloodborne Pathogens.

### ACTIVITY

### **COMPLETION DATE**

- > Employee furnished with documentation regarding exposure incident.
- Source individual identified.
- Source individuals blood tested and results given to exposed employee.
- Consent has not been able to be obtained.
- Exposed employee's blood collected and tested.
- > Appointment arranged for employee with healthcare professional.

### Documentation forwarded to healthcare professional.

> Bloodborne Pathogens Standards.
> Description of exposed employees duties.
> Description of exposed incident, including routes of exposure.
> Result of source individuals blood testing.
> Employees medical records.

## **TRAINING RECORDS**

All employees covered by this program will receive a two-hour training course annually including the following information:

Background information on bloodborne diseases

- Modes of transmission
- Symptoms
- Epidemiology
- Emphasis will be placed on sources of workplace exposure
- Emphasis will be placed on HBV and HIV

Hazard recognition and Worker Protection

- A videotape, Bloodborne Pathogens in the Workplace, Summit Training, 1992, will be shown.
- This video covers possible workplace exposures, use of personal protective equipment, disinfection, and disposal.

Explanation of the in-house exposure control plan

- Contents of plan
- Location and accessibility of the plan
- Employer responsibilities
  - Implementing the exposure control plan
  - Medical exams, vaccinations
  - Training
  - ► Iovoo roonoroihil
- Employee responsibilities
  - First aid response procedures in the event of an emergency that might result in exposure to blood or other body fluids.
  - > What to do if an employee is exposed to blood or other body fluids.

TRAINING INSTRUCTORS		
NAME	JOB TITLE	QUALIFICATIONS

Date of Course: \_\_\_\_\_

Location of Course:\_\_\_\_\_

INSTRUCTOR(s)\_\_\_\_\_

ATTENDEE NAME

### ATTENDEE JOB TITLE


### Bloodborne Pathogens Course Sign-In Sheet

Date of Course:\_\_\_\_\_

Location of Course:\_\_\_\_\_

SIGNATURE	SOCIAL SECURITY NO.
	SIGNATURE

### <u>PURPOSE</u>

The purpose of this plan is to establish a program and procedures for the safe use of hazardous chemical substances at Desco

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 employees 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 in order to satisfy the minimum requirements of the OSHA HCS 2012:

- List of all hazardous chemicals known to be present in the workplace or individual work area
- Methods used to ensure that all containers, including pipes and holding tanks, are labeled, tagged or marked properly
- Methods used to obtain and maintain safety data sheets (SDSs)
- Methods used to provide employees with information and training on hazardous chemicals in their work areas
- Methods used to inform employees of the hazards of non routine work practices
- Methods used to provide the employees of other employers (e.g., consultants, construction contractors and temporary employees) on-site access to SDSs for each hazardous chemical that the other employer's employees may be exposed to while working in the workplace
- Methods used to inform the employees 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
- Methods used to inform the employees of other employers of the labeling system used in the workplace
- Methods used to inform employees of the proper method to dispose of waste

The hazard communication program will identify the following:

- Key personnel responsible for the program
- Location of chemical inventory list and SDSs
- Workplace labeling system
- Good work practices and procedures to minimize exposures
- How training will be performed
- Procedures to maintain the program and update the required information
- How records will be maintained

### RESPONSIBILITIES

The Safety Coordinator is responsible for administering the hazard communication program. This person is also responsible for:

- Reviewing the potential hazards and safe use of chemicals
- Maintaining a list of all hazardous chemicals and a master file of SDSs
- Ensuring that all containers are labeled, tagged or marked properly
- Providing new-hire and annual training for employees
- Maintaining training records
- Monitoring the air concentrations of hazardous chemicals in the work environment
- Properly selecting and caring for personal protective equipment
- Directing the cleanup and disposal operations of the spill control team. See Section 10 for disposal requirements.
- Identifying hazardous chemicals used in non routine tasks and assessing their risks
- Informing outside contractors who are performing work on company property about potential hazards
- 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

The purchasing agent is responsible for:

• Contacting chemical manufacturers and/or distributors to obtain SDSs and secondary labels for hazardous chemicals used or stored in the workplace

The receiving department is responsible for:

- Reviewing incoming hazardous chemicals to verify correct labeling
- Holding hazardous chemicals in the receiving area until receipt of the SDS for the product

Employees are responsible for the following aspects of the hazard communication program:

- Identifying hazards before starting a job
- Reading container labels and SDSs
- Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers
- Using controls and/or personal protective equipment provided by the company to minimize exposure
- Following company instructions and warnings pertaining to chemical handling and usage
- Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement
- Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals
- Participating in training of removal of waste. See Section 10 for proper waste disposal.

### LABELS AND OTHER FORMS OF WARNING

Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)

- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

DESCO 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:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label. If the portable container will be used by more than one employee 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.

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. 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.

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.)

Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area throughout each work shift. If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.

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.

### SAFETY DATA SHEETS

An 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 employees when they are in their work areas.

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.

The Safety Coordinator will maintain the master file of all original SDSs.

SDSs for new products or updated SDSs for existing products will be obtained by the purchasing agent and forwarded to the safety coordinator. The (Safety Coordinator OR APPROPRIATE TITLE) will then update the master file with new and/or updated SDSs.

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.

### EMPLOYEE INFORMATION AND TRAINING

Employees 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:

- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry)
- Operations in the work area where hazardous chemicals are present
- Location and availability of the hazard communication program, chemical inventory list and SDSs
- 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
- Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area
- Measures employees 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
- Explanation of the labels received on shipped containers
- Explanation of the workplace labeling system
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information

Note: To facilitate understanding of the new GHS system, the OSHA HCS requires that employees 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.

### NON-ROUTINE TASKS

The Safety Coordinator and the immediate supervisor of an employee performing a non-routine task, such as cleaning machinery and other process equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the non-routine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the non-routine task will be performed. Special work permits are required for the performance of certain non-routine tasks, such as entry to confined spaces, breaking and opening piping systems, and welding and burning. For some special tasks, employees are required to follow special lockout/tagout procedures to ensure that all machinery motion has stopped and

energy sources are isolated prior to and during the **RECORDKEEPING** 

Records pertaining to the hazard communication program will be maintained by the Safety Coordinator. The Safety Coordinator will keep the following records:

- Chemical inventory list
- Hazardous material reviews
- Copies of phone call logs and letters requesting SDSs
- Employee training records
- Warnings issued to employees for not following the hazard communication program

### **EVACUATION PROCEDURES**

A .In the event of an emergency, employees are to first notify their immediate supervisor, and if unavailable, A Safety Committee member or management representative.

B. If an imminent hazard is noted (e.g., a fire involving flammables, or severely ill or injured person) immediately contact **911**.

C. Supervisors and Leads are responsible for acting as evacuation wardens and will be trained to immediately evacuate their personnel from the project site when notified of an emergency evacuation.

1. Their duties include:

a. Swiftly moving their employees from a danger location to a safe location and assembly point.

b. Overseeing their employees.

c. Knowing all escape routes, including primary and secondary evacuation points and assembly points.

d. Knowing all escape routes, including primary and secondary evacuation points and assembly points.

- e. Being familiar with the layout of the facility.
- f. Providing extra assistance to impaired employees.
- g. Recognizing and avoiding hazardous areas in an emergency.

h. Checking all rooms, enclosed areas, or spaces where employees could be trapped or are otherwise unable to evacuate.

i. After evacuation, take a headcount of all assigned employees, keeping them in the safe area, and be ready to report as to "all present"

•**IMMEDIATELY** report those not present to the Senior Management Person on-site. He or she will then report to the responding officials.

j. Re-entry into the facility for rescue purposes will be carried out by Fire Department Personnel.

- 1. This is to be done only after the head Count has been completed
- 2. All employees should utilize the nearest exit to them.

3. All employees shall meet at a predetermined meeting location away from the hazard, in order for the job superintendent/foreman to conduct and confirm that all employees have safely evacuated the site. Only trained and authorized employees shall re-enter the site for emergency resuce operations and/or administer first aid.

4. Depending on the type of emergency, evacuated employees should be a minimum of 25 feet away from the jobsite/affected area or an equivalent safe distance.

5. Evacuated Desco employees shall remain a safe distance from the

affected area or jobsite, until a Qualified Representative deems that no further hazards are present and allows work to continue.

6. Proper authorities (site security, police, fire, rescue, ambulance, etc...) will be notified of the emergency, by Desco as soon as possible. Signs with emergency phone number, instructions and the jobsite address are clearly posted in the field office trailer.

First aid/CPR providers will administer first aid at the safe area.

A. Evacuation of all employees will take place first, unless an injured employee cannot be moved without first providing basic first aid.

### INJURY TO AN EMPLOYEE:

A. All injuries and/or accidents must be reported to Desco iimmediately. If the injury requires medical treatment, an authorization form must be completed by Desco Representative and sent with the injured party to the predetermined clinic or hospital.

B. Transportation of the injured party, to and from the clinic or hospital, is the responsibility of the site safety representative.

C. Directions, list, maps, phone numbers, etc. for approved clinics and/or hospitals can be obtained from the Desco Project Office.

D. In the event that the injury is more serious or life threatening, 911 will be called and the injured party will be transported by ambulance to the nearest emergency care facility.

### **INJURY TO VISITORS:**

A. In the event that a visitor is injured during the course of construction, Desco must be promptly notified.

B. Visitors will be directed to follow instructions by subcontractors and will be accompanied at all times unless properly orientated by the safety office.

C. Do not allow the injured party to be moved (unless imminent danger is present).

D. Only people having been trained in basic first aid or CPR or beyond shall administer emergency medical care to the injured party.

E. Proper authorities (site security, police, fire, rescue, ambulance, etc. . .) shall be notified immediately.

### **EXPOSURE INCIDENTS**

Employees exposed to a release of hazardous waste will be treated by a qualified medical professional in accordance to the treatment guidelines provided by the SDS. Medical surveillance will be conducted if necessary based on the amount and concentration of dose in which the employee has been exposed. All medical surveillance will be conducted under the guidance of a qualified medical professional. Medical records will be maintained in a separate and secure file for duration of the exposed worker's employment plus 30 years.

### ROLES AND RESPONSIBILITIES

A. Management: Management will review this plan on a regular basis and revise/update as necessary.

B.. Trainer/Supervisors: Trainers and supervisors will provide training and ensure employees are following procedures outlined in this plan.

C.. First Responders: Under this plan, First Responders at the "awareness level" (witness or discover a hazardous substance release and initiate the Emergency response) must demonstrate competency in areas

such as recognizing the presence of hazardous materials in an emergency, the risks involved and the role they play in their employer's plan.

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

### See Attachments:

- Attachment A: Designated Persons.
- Attachment B: Trained and Authorized Employees to Fight an Incipient Fire.
- Attachment C: Roll Call Sheet to be Completed at the Safe Area Site.
- Attachment D: Emergency Action Plan and first Aid Kit Checklist.

### Attachment A: Designated Persons

Designated employees authorized to perform essential facility operations of First Aid during an emergency.

Name	Phone Number	Duties to Perform Prior to Evacuation

Date Training Completed	Employees Authorized/Trained to Operate a Fire Extinguisher and Fight an Incipient Fire	Training Conducted By
•		
<b>-</b>		
		<u> </u>

### Attachment B: Trained and Authorized Employees to Fight an Incipient Fire

### Attachment C: Roll Call Sheet to be Completed at the Safe Area Site

Date: \_\_\_\_\_ Drill or Actual Event? \_\_\_\_\_ Supervisor/Lead: \_\_\_\_\_

Names of Persons Present	First Aid Provided?

Area/Department

# Attachment D: Emergency Action Plan and First Aid Kit Checklist

Item	Action Taken and by Whom
First aid kit fully supplied an located at safe	
area?	
Emergency Action Plan and all	
attachments at safe area?	
Incident commanders in possession of	
Emergency Action Plan?	
Company management personnel in	
possession of most recent Emergency	
Action Plan?	

#### <u>SCOPE</u>

It is the company's goal to provide a safe workplace for all employees. To accomplish this goal, the company has adopted the following fitness-for-duty policy.

**Policy Statement**: All employees are to be mentally and physically fit at all times at work and, thereby, able to perform their duties as described in their job descriptions, to comply with all company policies, and to comply with all safety rules.

**Guidelines:** As with all of our policies, it is not possible for the company to anticipate every situation. The following statements are meant to be guidelines that may vary depending on the circumstances and applicable law:

All employees will receive training on safe ways to perform their jobs. The training will include the effects of medication, alcohol, drugs, and other intoxicants on job performance. This training will be repeated on a periodic basis and after any on-the-job injury.

All supervisors will receive first-aid training and safety training. Supervisors will also be taught to recognize the signs of intoxication and how to approach employees who have a problem with intoxication.

All employees will be told of benefits available if they are not fit for duty. Employees who are not fit for duty may be eligible for the following benefits:

Sick leave Intermittent leave Transfer to other open positions for which they are qualified and are fit for duty Restricted duty Reassignment of duties Short-term disability leave Long-term disability leave The employee assistance program Medical leave Personal leave Group health insurance, workers' compensation Medicaid and/or medical examination at the company's expense Employees should take advantage of these benefits and work only when they are physically and mentally fit to perform assigned duties. Employees should request a reasonable accommodation for a disability that prevents performance of assigned duties.

If there is a concern about the employee's performance, the company's policy regarding performance evaluations will be applied.

At all times, the supervisor shall take immediate action to maintain a safe workplace.

Note: If supervisors believe that the possibility of violence exists, a member of security is to be present before any contact is made with the employee. If the possibility of violence arises after contact is made, security is to be alerted immediately. Employees judged by a supervisor to pose an immediate danger may be removed from the work area, sent to an emergency treatment center, or sent home immediately.

Before a supervisor takes any action, he or she should consult with the Human Resources department, the medical department, or the next level of management, if time permits.

Generally, a supervisor will have another supervisor observe the actions of any employee before taking action on a belief that an employee is not fit for duty.

Employees are expected to take advantage of sick leave, the medical leave policy, or the reasonable accommodation policy whenever they are not fit for any duty or are not fit to perform some duties.

Generally, the guidelines of the medical leave policy or the reasonable accommodation policy will be applied when the supervisor determines that an employee is not fit for any duty or is not fit to perform some duties.

If an employee violates a company policy, such as the prohibition of intoxication while on duty, disciplinary action may be taken after consultation as previously indicated.

Supervisors may take any of the following steps:

Request an explanation from the employee.

Ask if the employee will consent to a medical examination by the company's physician.

Request the employee to provide a statement from his or her physician that he or she is capable of performing his or her job safely or to identify any restrictions on the employee.

Consult with others, as indicated.

Send the employee home with pay.

Apply other company policies, such as the medical leave policy, or request the employee to consent to a search of his or her belongings for intoxicants.

Reasonably accommodate any restrictions on abilities revealed by the employee or the employee's physician. These steps can include shorter hours, flextime, job sharing, a sign language interpreter, a reader, assigning nonessential tasks to other employees, leaves, changes in equipment, and the like.

Provide information regarding company benefits, such as group health care or employee assistance programs.

Relieve the employee of some duties, assign restricted duty, or transfer the employee to another position in which he or she can perform the essential job functions.

Suggest intermittent leave.

Place the employee on administrative leave.

Supervisors are to complete a fitness-for-duty report.

No medical examinations will be given by the company's physician without the employee's written consent. However, subject to applicable law, the company may require the employee to consent as a condition of continued employment.

All medical examinations required by the company, whether by its physician or the employee's, will be paid for by the company.

Employees will be paid for the time spent undergoing a medical examination required by the company.

Any employee who disagrees with the action taken by any supervisor with respect to the fitnessfor-duty policy may follow the procedures contained in the grievance policy. If an error is made and an employee is fit for duty, the employee will be paid for any missed time.

Other policies will be applied to employees who are not fit for duty, e.g., sick leave, maximum leave time, reasonable accommodation for a person with a disability, intermittent leave, short-term disability benefits, or long-term disability benefits.

All information concerning the health of an employee is to be maintained in confidence and revealed only to those persons with a need to know. Furthermore, all such information must be maintained in confidence in accordance with applicable law, including the Americans with Disabilities Act and the Family and Medical Leave Act.

This policy will be interpreted and applied to conform to applicable laws, including the ADA, the FMLA, the GINA, and the USERRA.

This policy will be reviewed annually.

# Sample Fitness-for-Duty Certification

Employee:					
Department/Location:					
Status:  ] Full time  ] Part time  ] On leave since:					
You have my permission to have a healthcare provider contact the heal certification for purposes of clarification related to this serious health co					
Signed Date:					
(Information below to be completed by healthcare provider.)					
Effective as of, hereby certified as fit to resume work duties as follows:	the above named employee is				
Full-time duties, no restrictions					
Full-time duties, with the following restrictions (conditions and duration)	):				
Part-time duties, no restrictions	_				
Part-time duties, with the following restrictions (conditions and duration)	): 				
Intermittent duties, with the following restrictions (conditions and duratio	 on):				
Name of healthcare provider:	_				
Address:	_				
Telephone:	_				
Type of practice/specialty:	_				
Signed Date:	_				

#### APPENDIX SECTION INDEX

- A. SUPERVISOR'S REPORT OF ACCIDENT FORM
- B. EMPLOYEE WARNING NOTICE
- C. EMPLOYEE EMERGENCY NOTIFICATION FORM
- D. CONFINED SPACE ENTRY CHECKLIST
- E. EMPLOYEE MEDICAL EVALUATION FORM
- F. AERIAL AND SCISSOR LIFT INSPECTION CHECKLIST
- G. OSHA INSPECTION DOCUMENTATION FORM

### APPENDIX A - SUPERVISORS REPORT OF ACCIDENT

JOB NAME:
ADDRESS:
NAME OF INJURED PERSON:
OCCUPATION:
WHAT WAS EMPLOYEE DOING AT TIME OF INJURY:
DESCRIPTION OF ACCIDENT:
NATURE AND EXTENT OF INJURY:
DATE AND TIME OF ACCIDENT:
UNSAFE CONDITION OR ACT:
WHAT I HAVE DONE TO CORRECT THE SITUATION:
ACCIDENT WITNESSES:
DATE FORM COMPLETED:
COMMENTS:
SUPERVISOR'S SIGNATURE:
EMPLOYEE'S SIGNATURE:

## APPENDIX B - EMPLOYEE WARNING NOTICE

EMPLOYEE				WARNING DATE / /			
LOCATIC	DN			PROJECT			
L							
	ATTENDANCE CARELESSNESS CONDUCT NSUBORDINATION VIOLATION WARNING	ОN   <b>S</b>	PERSONAL WOR REFUSAL TO WO SAFETY TARDINESS		UNAUTHORIZED ABSENCE WORK QUALITY WILLFUL DAMAGE TO COMPANY PROPERTY OTHER:		
	WARNING #	DATE	ORAL	WRITTEN	SIGNED		
	1						
	2						
	3						
				I agree with Company Statement			
				REASONS			
	SIGNED						
	TITLE		DATE				
	ACTION TA	KEN					
I have read this Warning Notice and understand it.							
	EMPLOYEE'S SIGNATURE				_DATE		
		R	ее		_DATE		
		was refused by Employ	ee		DATE		
	<ul> <li>If the must be maintai</li> </ul>	Employee Warning Notice ned in a separate medical	e, after completion, contains in file and treated as confidentia	nformation on the medical c al in accordance with applic	ondition or history of an employee, then it		

#### APPENDIX C - EMPLOYEE EMERGENCY NOTIFICATION FORM

Desco is sincerely interested in your safety. This is your personal copy of the Safety Procedures Manual. You are required to read, understand, and keep this manual for future reference. You are expected to cooperate with our safety program and abide by its procedures.

Please fill out the following Employee Emergency Notification information: (Please Print)

NAME:			
CURRENT MAILING ADDRE	ESS:		
CITY:	STATE:	ZIP:	
SOCIAL SECURITY NUMBE	R:		
HOME PHONE:			
PERFORMING YOUR JOB?	D ANY PHYSICAL IMPAIRMENTS IF YES PLEASE EXPLAIN:		
IN CASE OF AN ACCIDENT	PLEASE NOTIFY:		
RELATIONSHIP:			
DAYTIME TELEPHONE NUM	/IBER(S):		
I have read or have had read contains.	to me the Safety Procedures Manu	ual and I understand the inf	ormation it
PRINTED NAME :			
SIGNATURE:			
DATE:			

## APPENDIX D - CONFINED SPACE ENTRY CHECKLIST

Date								
Jobsite:			Job Su	pervisor:				
Equipm	ent to be worked on:							
Work to	be performed:							
<b>Pre-Ent</b> 1.	t <b>ry (See Safety Procedures)</b> Atmospheric Checks:		bility n Sulfide Monoxide			_% _% L.F.L. _PPM _PPM		
2.	Source isolation (NO Entry): Pumps or lines blanked, disconnected or locked out	N/A ( )	Yes ()	No ( )				
3.	Ventilation Modification: Mechanical Natural Ventilation Only		()	()	()			
4.	Explosive	ventilation: % gre % L.F PPM I PPM	ater than ´ .L. less tha ess than 1	an 10% T 0 PPM H	oxic	an 23.5%		
<b>Entry (</b> \$ 1.	See Safety Procedures) Has toolbox talk been held with all enti	ry and mor	nitoring pe	rsonnel		()	Yes ()	No
2.	Equipment? Direct reading gas monitor tester Safety harness and lifelines for entry Hoisting equipment Communication equipment Personal protective equipment Protective clothing	( ) ( ) ( )	N/A ( ) ( ) ( ) ( ) ( )	Yes () () () () () ()	No () () ()			

If conditions are in compliance with the above requirements and there is no reason to believe conditions may change adversely, then proceed with work. If conditions are not in compliance with the above requirements or there is reason to believe that conditions may change adversely, do not authorize entry and contact the Safety Department for further instructions.

I have reviewed the work authorized by this checklist and the information contained herein. Written instructions and safety procedures have been reviewed and are understood.

Check List Prepared by:	Approved by: (Supervisor)
Entry check list shall be sent to Corporate Office a	nd kept in the project file.

## APPENDIX E - OSHA RESPIRATOR MEDICAL EVALUATION QUESTIONNAIRE (MANDATORY)

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

Today's date:\_\_\_\_\_ 1. 2. Your name: 3. Your age (to nearest year): Sex (circle one): Male / Female 4. Your height: \_\_\_\_\_\_ft. \_\_\_\_\_in. 5. 6. Your weight: \_\_\_\_\_ lbs. 7. Your job title: 8. A phone number where you can be reached by the health care professional who reviews this questionnaire (include the Area Code): 9. The best time to phone you at this number: Has your employer told you how to contact the health care professional who will review this questionnaire (circle one): 10 Yes / No

11. Check the type of respirator you will use (you can check more than one category):

a. \_\_\_\_\_N,R, or P disposable respirator (filter-mask, non-cartridge type only).

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

12. Have you worn a respirator (circle one): Yes / No If "yes," what type(s): \_\_\_\_\_

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

- 1. Do you currently smoke tobacco, or have you smoked tobacco in the last month: Yes / No
- 2. Have you ever had any of the following conditions?
  - a. Seizures (fits): Yes / No
  - b. Diabetes (sugar disease): Yes / No
  - c. Allergic reactions that interfere with your breathing: Yes / No
  - d. Claustrophobia (fear of closed-in places): Yes / No
  - e. Trouble smelling odors: Yes / No
- 3. Have you ever had any of the following pulmonary or lung problems?
  - a. Asbestosis: Yes / No
  - b. Asthma: Yes / No
  - c. Chronic bronchitis: Yes / No
  - d. Emphysema: Yes / No
  - e. Pneumonia: Yes / No
  - f. Tuberculosis: Yes / No
  - g. Silicosis: Yes / No
  - h. Pneumothorax (collapsed lung): Yes / No

- i. Lung cancer: Yes / No
- j. Broken ribs: Yes / No
- k. Any chest injuries or surgeries: Yes / No
- I. Any other lung problem that you've been told about: Yes / No
- 4. Do you currently have any of the following symptoms of pulmonary or lung illness?
  - a. Shortness of breath: Yes / No
  - b. Shortness of breath when walking fast on level ground or walking up a slight hill or incline: Yes / No
  - c. Shortness of breath when walking with other people at an ordinary pace on level ground: Yes / No
  - d. Have to stop for breath when walking at your own pace on level ground: Yes / No
  - e. Shortness of breath when washing or dressing yourself: Yes / No
  - f. Shortness of breath that interferes with your job: Yes / No
  - g. Coughing that produces phlegm (thick sputum): Yes / No
  - h. Coughing that wakes you early in the morning: Yes / No
  - i. Coughing that occurs mostly when you are lying down: Yes / No
  - j. Coughing up blood in the last month: Yes / No
  - k. Wheezing: Yes / No
  - I. Wheezing that interferes with your job: Yes / No
  - m. Chest pain when you breathe deeply: Yes / No
  - n. Any other symptoms that you think may be related to lung problems: Yes / No
- 5. Have you ever had any of the following cardiovascular or heart problems?
  - a. Heart attack: Yes / No
  - b. Stroke: Yes / No
  - c. Angina: Yes / No
  - d. Heart failure: Yes / No
  - e. Swelling in your legs or feet (not caused by walking): Yes / No
  - f. Heart arrhythmia (heart beating irregularly): Yes / No
  - g. High blood pressure: Yes / No
  - h. Any other heart problem that you've been told about: Yes / No
- 6. Have you ever had any of the following cardiovascular or heart symptoms?
  - a. Frequent pain or tightness in your chest: Yes / No
  - b. Pain or tightness in your chest during physical activity: Yes / No
  - c. Pain or tightness in your chest that interferes with your job: Yes / No
  - d. In the past two years, have you noticed your heart skipping or missing a beat: Yes / No
  - e. Heartburn or indigestion that is not related to eating: Yes / No
  - f. Any other symptoms that you think may be related to heart or circulation problems: Yes / No
- 7. Do you currently take medication for any of the following problems?
  - a. Breathing or lung problems: Yes / No
  - b. Heart trouble: Yes / No
  - c. Blood pressure: Yes / No

- d. Seizures (fits): Yes / No
- 8. If you've used a respirator, have you ever had any of the following problems? (If you've never used a respirator, check the following space and go to question 9:) \_\_\_\_\_
  - a. Eye irritation: Yes / No
  - b. Skin allergies or rashes: Yes / No
  - c. Anxiety: Yes / No
  - d. General weakness or fatigue: Yes / No
  - e. Any other problem that interferes with your use of a respirator: Yes / No
- 9. Would you like to talk to the health care professional who will review this questionnaire about your answers to this questionnaire: Yes / No

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

- 10. Have you ever lost vision in either eye (temporarily or permanently): Yes / No
- 11. Do you currently have any of the following vision problems?
  - a. Wear contact lenses: Yes / No
  - b. Wear glasses: Yes / No
  - c. Color blind: Yes / No
  - d. Any other eye or vision problem: Yes / No
- 12. Have you ever had an injury to your ears, including a broken ear drum: Yes / No
- 13. Do you currently have any of the following hearing problems
  - a. Difficulty hearing: Yes / No
  - b. Wear a hearing aid: Yes / No
  - c. Any other hearing or ear problem: Yes / No
- 14. Have you ever had a back injury: Yes / No
- 15. Do you currently have any of the following musculoskeletal problems?
  - a. Weakness in any of your arms, hands, legs, or feet: Yes / No
  - b. Back pain: Yes / No
  - c. Difficulty fully moving your arms and legs: Yes / No
  - d. Pain or stiffness when you lean forward or backward at the waist: Yes / No
  - e. Difficulty fully moving your head up or down: Yes / No
  - f. Difficulty fully moving your head side to side: Yes / No
  - g. Difficulty bending at your knees: Yes / No
  - h. Difficulty squatting to the ground: Yes / No
  - i. Climbing a flight of stairs or a ladder carrying more than 25 lbs.: Yes / No
  - j. Any other muscle or skeletal problem that interferes with using a respirator: Yes/No

## APPENDIX F - AERIAL & SCISSOR LIFT INSPECTION CHECKLIST

DATE: JOB NAME / #:		
SERIAL NO.		
MODEL NO.		
RENTAL: ()YES ()NO		
TYPE OF EQUIPMENT: ( ) AERIAL LIFT ( ) SCISSOR	LIFT	
A - Indicates Attention Needed X – Indicates Accept	otable N/A – Not Applicable	
DECALS: PROPER PLACEMENT & QUANTITY	BATTERY CHARGER SECURE & OPER.	
DECALS: LEGIBILITY	VALVE MANIFOLD (S) SECURE	
BENT BEAM MEMBERS	PUMPS SECURE	
BROKEN WELDS	FILTER SECURE, CHANGE DATE	
ALL FRAME BOLTS TIGHT	OIL LEVEL OK, CHANGE DATE	
WHEEL BOLTS & NUTS TIGHT & COTTERS	ALL WIRES TIGHT ON TERMINALS	
UPPER CYL. BARS IN PLACE & SECURE	ALL SWITCHES SECURE	
LOWER CYL. BARS IN PLACE & SECURE	ALL FUNCTIONS OPERATIONAL	
RETAINING RINGS SECURE ON PIVOTS	EMERGENCY STOP BREAKS ALL CIRCUITS	
EMERGENCY DOWN CABLE SECURE	SLOW SPEED LIMIT SWITCH SET PROPERLY	
EMERGENCY DOWN OPERATIONAL	STEERING PRESSURE SET PROPERLY	
MAINTENANCE LOCKS SECURE & OPERATE	LIFT PRESSURE SET PROPERLY	
BOLTS ON SCISSORS MOUNTING BLOCKS	CHECK ALL FITTINGS & HOSES FOR LEAKS	
ALL RAILS IN PLACE	ALL ROLLERS TURN FREELY	
BROKEN WELDS OR BENT RAILS	BATTERIES FULLY CHARGED	
ENTRANCE GATE CLOSES FREELY	110V OUTLET SAFE & WORKING	
CHAINS IN PLACE & LATCH PROPERLY	D/C MOTOR SECURE	
EXT. PLAT. LOCKS IN STOWED POSITION	CONTRACTOR (S) SECURE	
EXT. PLAT. ROLLS FREELY	GENERATOR & PULLEYS SECURE	
EXT. PLAT. CABLES IN PLACE & SECURE	ENGINE MOUNTS TIGHT	
EXT. PLAT. LOCKS IN EXT. POSITION	FUEL LINES SECURE & FREE OF LEAKS	
POTHOLD BARS OPERATE SMOOTHLY	FUEL TANKS SECURE	
POTHOLE BARS LOCK IN PLACE	REPLAYS SECURE	
POTHOLE BAR LIMIT SWITCHES ADJUSTED	HOUR METER OPERATIONAL	
PLAT. PINS INSTALLED & SECURE	GENERATOR/CONVERTER OPERATIONAL	
STEERING CYL. PINNED	BATTERY INDICATOR OPERATIONAL	
THE ROD SECURE	ENGINE OIL LEVEL OK	
BRAKE PADS SECURE	ENGINE OIL & FILTER CHANGE DATE	
BRAKE CYL. PINNED	ALL SHIELDS & GUARDS IN PLACE	
BRAKES OPERATIONAL BRAKES ADJUSTED PROPERLY	OPERATORS, SERVICE & MAINT. MANUAL FULL BODY HARNESS	
BRAKE LOCK OPERATIONAL	LANYARDS	
BATTERY HOLDS DOWN SECURE	TIRES	
OUTRIGGERS	LOCKING DEVICES	
LOAD TEST	STABILITY TEST	

### COMMENTS: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

## APPENDIX G - OSHA INSPECTION QUESTIONAIRE

1.	Jobsite:	Job #:		
	Date of Inspection:	Time:		
	Name of Compliance Officer:			
	Office Address of Compliance Officer:			
	Your Name:			
2.	Opening Conference: Date:			
	Persons in attendance and company affiliation:			
	1)			
	2)			
	3)			
	4)			
3.	Did you attempt to contact the Safety Represent	tative?	Yes	No
	What was the result?			
4.	Did the Compliance Officer have a search warra		Yes	No
	Was the inspection based on an employee complai	nt?	Yes	No
	If yes, what was the complaint relating to?			
5.	How long did the inspection take?			
6.	Were there any photographs, videos, or sample No	s taken? (monito	ring of air/noise or other	substance) Yes
	Details:			

"Confidential Attorney Work Product - Made in Anticipation of Litigation." (Also, include this phrase at the top of any notes taken.)

7.	Were you advised of any apparent violations? YesNo
8. 9.	Did the Compliance Officer state that a citation would be issued? Yes List the specific standard number(s) that was stated by the Compliance Officer:
	1)
	2)
	3)
	4)
10.	Other problems that were noticed by you but not by the Compliance Officer:
	1)
	2)
	3)
	4)
11.	Your general comments about the inspection and the Compliance Officer:
12.	Closing Conference Date: Time:
	Persons in attendance and company affiliation:
	1)
	2)
	3)