



# **SAFETY & HEALTH HANDBOOK**

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## **SAFETY COMMITMENT**

Specialties Company, LLC believes in keeping employees fully informed about our policies, practices, and procedures. This document outlines what the Company expects from its employees and the resulting obligations assumed by its employees. The general information and guidelines provided for in this manual are designed to provide fair treatment of all employees, no matter what tier of employment, and all Company employees are expected to become familiar with these policies, practices, and procedures as a condition of their employment.


General conditions for safety, health, and accommodations will be evaluated periodically for possible improvement and will always compare favorably with, or attempt to exceed, good industry practice. Any comments or suggestions are always welcome and encouraged for future revisions to these policies.

All federal, state, and local laws and regulations shall be abided by completely. These laws and regulations include, but are not limited to, those applicable of the Occupational Safety and Health Administration (OSHA) 29 CFR 1910 and 1926, and United States Department of Transportation (DOT) / Federal Motor Carrier Safety Agency (FMCSA) 49 CFR 40 and 382.

Should you have any questions or concerns regarding any of these policies or letters, please contact your supervisor/foreman, EEO officer, Safety Director, or President.

Sincerely,

SPECIALTIES COMPANY, LLC

  
Joseph N. Hille  
President

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## SAFETY & HEALTH OVERVIEW

**Mission Statement:** Specialties Company is committed to ensuring a safe working environment for its employees; therefore, educating its employees of work place hazards, policies, and regulations is paramount.

**Safety Goal:** Specialties Company has established a goal of **Zero Accidents** for its employees. By the Company's dedication to a safer workplace and continuing safety improvement plan, we truly believe that this goal is attainable.

**Improvement Plan:** The Company is committed to improving current conditions by initiating accident prevention and investigation programs, safe work incentives, assessing OSHA log and worker compensation information, initiating health monitoring agendas, and improving engineering controls for equipment and processes.

**Government Regulation:** All federal, state, and local laws and regulations shall be abided by completely. These laws and regulations include, but are not limited to those applicable to the Occupational Safety and Health Administration (OSHA) 29 Code of Federal Regulations (CFR) 1910 and 1926. It is important to note that this handbook does not attempt to replace or summarize regulatory standards, but it does provide material necessary to meet individual standards, as well as additional information deemed necessary by the Company.

**Employee Compliance and Consequences:** Compliance with the Company health and safety policies described within this Handbook is a condition of employment. Failure to comply with the requirements of this program may result in disciplinary action. Should infractions occur, a written report will be filed by a supervisor or the Safety Director documenting the incident or occurrence. Copies of such disciplinary reports will be included in the employee's personnel file for further evaluation.

## DELEGATED "SAFETY" RESPONSIBILITIES

### Upper Management:

- To dedicate their duty to reducing the likelihood of injury or illness to employees.
- To make all necessary authorizations or expenditures for safety based upon safety law, ordinances, or recommendations of safety or prevention personnel.
- To provide safe working conditions, vehicles, and equipment.
- To provide appropriate PPE, fire protection equipment, and first aid supplies.
- To provide necessary safety personnel and safety materials.

### Safety Director & EHS Personnel:

The Safety Director reports directly to the President of Specialties Company and is responsible for EHS (Environmental Health & Safety) duties, including but not limited to the following:

- To promote safety education.
- To maintain and analyze all accident records.
- To establish, publish and update a written safety program.
- To be attentive and knowledgeable to changes in regulation.
- To insure the distribution of safety guidelines and reference materials to all managers, superintendents, and foremen for distribution to employees.
- To coordinate all safety activities, including: employee training; shop and field inspections; distribution of safety materials and forms; and implementation of safety rules, regulations, and policies.

### Superintendents:

- To participate in safety meetings as necessary.
- To report and investigate all accidents and near misses.
- To provide appropriate safety training to foremen and field crews.
- To enforce the policies directly stated in the Company's safety program.
- To insure the distribution of safety guides and supporting materials to foreman for distribution to all employees.

### Foremen / Site Managers:

- To participate and conduct site safety meetings.
- To report and investigate all accidents and near misses.
- To select and enforce the use of PPE where needed and required.
- To inspect equipment with regards to safety and report any unsafe conditions.
- To enforce the policies directly stated in the Company's safety program or provided for in safety-related training materials.

### All Employees:

- To report all unsafe conditions and accidents/incidents promptly.
  - To comply with the safety policies directly stated in this handbook.
  - To inspect equipment, machines, tools; report any/all deficiencies.
- To offer suggestions for accident prevention and safer work practices.

### Safety Clause A:

The immediate supervisor is required to report and specifically detail each incident. Failure to report an accident/incident, or the lack of serious reporting, may result in disciplinary action, up to including discharge.

### Safety Clause B:

Supervisors shall not discharge or discriminate, in any manner, against an employee because the employee has instituted a safety-related proceeding (complaint or grievance), has testified in such a proceeding, or has otherwise exercised any right afforded by law or collective bargaining agreement.

## GENERAL SAFETY RULES

Superintendents and foremen, having been identified as Specialties Company's "Competent Persons," are directly responsible for the safety of all employees and the practical enforcement of all safety rules. It is the Company's intention to comply with all applicable laws, regulations, and rules of federal, state, and local authorities having jurisdiction over the safety of persons and property. The following list, although not all inclusive, provides areas of emphasis determined from the Company's safety improvement plan.

1. Employees who suffer an injury, no matter how slight, must immediately report the injury to their supervisor. Delayed reporting may result in more serious developments in the nature of the injury. Failure to report an injury may jeopardize a victim's rights and may result in disciplinary action, or termination.  
*(See page 16 for more information on Accident, Incident, and Injury Policy)*
2. In the event of multiple injuries or a fatality, the scene of the accident must be left unchanged; however, it may be changed for the protection of other persons or property until an investigation can be undertaken.
3. Employees must immediately report any dangerous or unsafe condition, process, or practice to their immediate supervisor or Safety Director.
4. Using or being under the influence of illegal drugs or intoxicants during working hours may result in termination of employment in accordance with Company's "Drug and Alcohol Policy." *(See Alcohol & Drug Policy, Page 19, and "Addendum" located in Appendix)*
5. Horseplay / Employee Violence is PROHIBITED on Company property and jobsites.
6. Firearms on Company property/job sites, and in Company vehicles is PROHIBITED.
7. Dress Properly. Employees are forbidden to wear loose or torn clothing, jewelry, or anything that could result in entanglement with materials and equipment.
8. Hair worn touching the shoulder or longer must be contained so there is no danger of hair being caught in machinery or equipment.
9. All employees must wear a Type-III safety vest (or equivalent), safety shoes, hard hats, safety glasses, and other required personal protective equipment (PPE) when their job requires such equipment or have been so instructed by their supervisor. *(See Page 33)*
10. Employees must use eye and/or face protection where there is danger of flying objects or dust. Examples: using chop saws; while cutting, grinding or welding; during pavement demolition ops. Continuous usage of eye protection is highly encouraged.
11. All warning labels, hazardous labels, pictograms, and signs must be heeded.
12. Electronic devices (iPods, head phones, cell phones, or any other such similar personal audio device) shall not be used by an employee while operating equipment, tools, and machinery, or while directing traffic.
13. Drivers of Company-owned vehicles must abide by all traffic regulations on public roads and on private property. Drive courteously, your vehicle is identified.

14. Seat belts must be worn in all Company-owned equipment and in all Company-owned vehicles where devices are provided.
15. All employees must use three points of contact when climbing ladders, mounting or dismounting equipment. Ladders should be checked for broken rungs, slick material on rungs, and potential signs of wear affecting their integrity before use. All ladders should be composed of non-metal materials and should have non-slip feet. Use appropriate ladder for task.
16. Do not operate any equipment unless you are qualified and authorized to do so. Operators must inspect their equipment daily and repair or report any hazardous conditions. DOT Vehicles must have DVIR (Drivers Vehicle Inspection Report) completed daily.
17. Do not operate any machine unless all guards and safety devices are in place and equipment is in proper working condition. If deficiencies are observed, immediately report your findings to the appropriate supervisor.
18. Employees shall not ride on any moving equipment except where the equipment is specifically designed for a passenger or that purpose.
19. A safe distance from moving equipment should be maintained during operation.
20. All pinch points should be avoided while equipment is in operation.
21. All engines should be shut off during refueling. Smoking is prohibited within 50 feet of fuel pumps or trucks and other flammable liquids.
22. When hauling equipment or material, proper load securement is mandated.
23. When lifting heavy objects, request help. If the object is not within your lifting capabilities, do not over strain. Better to devise a more efficient way of lifting item or object. *(For more on avoiding back injuries, see Page56)*
24. Fire extinguishers and hazardous material clean-up kits should not be tampered with or moved from their designated locations. Report any damages, deficiencies or losses to your supervisor immediately.
25. Fire extinguishers are provided for and required for vehicles and equipment. If an extinguisher is deployed, the supervisor must be notified immediately so the unit can be recharged or replaced. *(See Page 29 for more information on "Fire Prevention & Awareness")*
26. Flagging personnel shall be trained and use approved flagging techniques as set forth in the "Flagging Procedures" document and as directed by traffic control supervisors.
27. Although the use of scaffolding, man lifts, scissor lifts, cranes, and rigging is uncommon at Specialties Company, all employees must contact the Safety Director for specific training *(not contained within this safety handbook)* before any of these operations are performed.
28. Do not pass under overhead loads; ours or other contractors.
29. Visitors or persons not employed by the Company will not be permitted on work sites unless proper authorization has been given. If allowed, visitors must wear approved PPE and follow all safety procedures as if they were an employee of the Company.



**All employees must comply with all policies and guidelines listed in Specialties Company's Safety & Health Handbook and all other applicable rules, regulations, or policies stated or implied in these pages as a **CONDITION OF EMPLOYMENT**.**

## **HEALTH & SAFETY TRAINING**

Company policy and federal law require that Specialties Company staff, employees, and visitors receive appropriate health and safety training. Managers are responsible for ensuring that employees and guests under their supervision receive this training so they are fully informed about potential occupational health hazards. Training must include Company health and safety orientation for new employees with additional training specific to the hazards of the employee's work type. Employees must complete this training before they can work unsupervised.

OSHA requires several specific health and safety training requirements for specific hazards. These include, but are not limited to: hazard communication for exposure to hazardous substances and employees' right to know, lock out/tag out, respirator use, hearing conservation, confined space hazards and fall protection.

Managers should identify training needs for their job classifications and work types. Specific sections in this manual provide further information and training requirements, and consultation with the Safety Director about other training needs and requirements is always available. Training not provided by EHS Department, such as on-the-job training, is the responsibility of superintendents and foremen. This includes information on procedural changes or system modifications that impact safety. The Safety Director will coordinate health and safety training courses, provide technical assistance and resources on training needs to help supervisors fulfill their training responsibilities.

Educational resources such as fact sheets, hazard summaries, and other written materials, as well as videos or slide shows, are available from the Safety Director. Note: **ALL health and safety training must be documented**. Supervisors must list the participants' names, topics discussed, instructor(s), and date of training. Supervisors are responsible for maintaining training records and forwarding a copy of this information to the Safety Director for inclusion in the Company's training data base.

### **Job Hazard Analysis (JHA), Task Hazard Analysis (THA) & Tool Box Talks (TBT):**

JHAs are prepared for each work type and/or job site. THAs shall be performed daily by all crews and shops. TBT's, covering hazards commonly found on Company jobsites, are provided to all foremen. All documentation from the acknowledgement of master JHAs, daily THAs and weekly TBTs must be submitted to the Safety Director for review and recordation.

*(See JHA, Page 72)*

### **Formal Certification:**

Employees who perform specific hazardous work will be designated by the Company to have proper certification for these tasks [Confined Space Entry (CSE), Certified Crane Operator (CCO), HAZWOPER, MSHA, et al]. All Superintendents / Foremen must have current First Aid/CPR Certifications and OSHA 30-Hour Training certificate. All employees and crew members must have completed OSHA 10-Hour training at a minimum.

# FIRST AID POLICY

## Policy

*To insure that prompt and effective medical assistance is provided to the employees of Specialties Company, LLC in case of workplace injury or illness, the following first aid and medical services procedure is provided.*

It is the responsibility of all superintendents / foremen to assure that compliance to the First Aid & Medical Services Procedure is sustained.

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

## Purpose

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

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

## Scope

Applies to all Company facilities, work sites, mobile offices, and includes visitors, vendors, and any subcontractors where applicable.

## Definitions

**Established Medical Treatment Facility** means the occupational medical treatment provider and/or emergency care center identified as being capable of, and established by the Company and/or job site-specific location to initially treat employee injuries and illnesses.

**First Aid** means the following types of treatment:

- Using non-prescription medications at non-prescription strength
- Cleaning, flushing, or soaking wounds on the skin surface
- Using wound coverings, such as: bandages (BandAids), gauze pads, etc., or using Steri-Strips or butterfly bandages
- Using hot or cold therapy
- Using any totally non-rigid means of support: elastic bandages, wraps, etc.
- Using temporary immobilization devices while transporting an employee: splints, slings, neck collars, or back boards
- Drilling a fingernail or toenail to relieve pressure, or draining fluids from blisters

- Using eye patches
- Using simple irrigation or cotton swab to remove foreign bodies not embedded in or adhered to the eye
- Using irrigation, tweezers, cotton swab or other simple means to remove splinters or foreign material from areas OTHER than the eye
- Using finger guards
- Using massages
- Drinking fluids to relieve heat stress

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

- Eczema
- Silicosis
- Asbestosis
- Toxic Inhalation
- Contact dermatitis
- Poisonings by lead, mercury, or other metals
- Poisonings by carbon monoxide, hydrogen sulfide, or other gases
- Poisonings by organic solvents or by other chemicals
- Heatstroke, Sunstroke, Heat Exhaustion, or other heat-related factors
- Freezing, Frostbite, or other cold-related factors
- Effects of Non-Ionizing Radiation (welder's flash or lasers)
- Bloodborne Pathogenic Diseases
- Microbial Exposure
- Ionizing Radiation

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

- Cut/laceration
- Puncture
- Abrasion
- Contusion/bruise
- Fracture
- Chipped tooth
- Amputation
- Insect bite
- Electrocution
- Thermal, Chemical, Electrical or Radiation Burn
- Sprain/Strain Injuries to muscles, joints and connective tissues when resulting from a slip, trip, fall or other similar accident

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

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

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

**Work Environment** means includes Company facilities and work sites where one or more employees are present as a condition of their employment.

## **Requirements**

### **Designated Medical Treatment Facility**

The Company will ensure that medical facilities are available to employees to provide advice and consultation within reason regarding matters of employee occupational health.

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

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

### **First Aid**

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

In the absence of a clinic or hospital near the workplace, regulations require that a person or persons be trained to render first aid and that first aid supplies be readily available.

Accordingly, Specialties Company will use various strategies to provide employees with access to First Aid. These may include training Company personnel to self-administer First Aid; training all superintendents and foremen who are willing to serve as "first responders" and render First Aid/CPR to others on a voluntary basis; providing access to trained individuals from other companies who work alongside Specialties at job sites; providing access to client medical clinics; or calling site-specific or local emergency phone numbers as indicated in the Health and Safety Plan.

**Because of the potential for exposure to bloodborne pathogens and significant liability concerns, there is no job in the Company that requires an employee to render First Aid or CPR in the course and scope of their employment, unless such a requirement becomes necessary due to local, State, Provincial, or Federal Safety and Health Regulations.**

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

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

### **Elements of the First Responder Program should include:**

1. Safety Director must be certified in basic First Aid/CPR from a recognized certification source such as the American Heart Association, Red Cross, or certified health provider. Refreshers shall occur every two years, or biannually.
2. Safety Director will seek employees who wish to volunteer to be trained and certified in

basic First Aid & CPR from a recognized certification source as defined by local or state requirements. However, ALL COMPANY SUPERINTENDENTS / FOREMEN will be certified. These employees must maintain "current" First Aid and CPR certification and will be refreshed biannually.

3. Basic First Aid & CPR will be administered by First Responders only to stabilize the employee until professional medical attention can be provided.

### **Employee First Aid / CPR**

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

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

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

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

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

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

### **First Aid Stations / First Aid Kits**

A First Aid Station or First Aid Kit is to be readily available to employees as described previously. For employees working off-premises, a first aid kit is provided in each company vehicle and provided on each jobsite.

Whether within the facility or in a vehicle, each First Aid Kit must be stored in a properly labeled weather-proof container and stocked with the basic supplies. A physician's approval of the contents is not required, but may be needed to address unusual exposure situations.

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

EHS is responsible for checking and maintaining the First Aid Kits. Supervisors on jobsites are responsible for assuring suitable supplies are provided for in the Kits on-site or in all vehicles.

Because of the variety of operations that Specialties Company is involved in, it is suggested that consultation with the job-site safety professional or designated medical treatment facility be arranged to determine if the First Aid Kits are adequate for the operational exposures of the particular workplace.

### **Emergency Eye / Body Wash Stations**

Where the eyes and/or body of any employee may be exposed to injurious chemical / corrosive materials, suitable eye and/or body drenching and/or flushing facilities shall be provided at our fixed locations and temporary containers in all Company vehicles at worksites. Emergency eye and/or body wash stations can be either of temporary or permanent installation.

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

At locations where hazardous chemical / corrosive materials are handled by employees (our shops), proper eyewash and body drenching equipment must be available. ANSI Z358.1 provides detailed information regarding the installation and operation of emergency eyewash and shower equipment, including the requirements for flow rate. Section 4.1 of ANSI Z358.1 specifies that emergency shower heads shall be capable of delivering a minimum of 20 gallons per minute (gpm) of flushing fluid at a velocity low enough to be non-injurious to the user. A sufficient volume of flushing fluid shall be available to supply the flow rate for a minimum fifteen minute period. As such, both temporary and permanently installed eye / body wash stations must provide at least 20 gpm for 15 mins. Inspection and maintenance of eye wash systems should be provided at least weekly by assuring sanitary conditions and /or following the manufacturers requirements for maintenance. Plumbed systems should also be provided a water flow test to minimize contaminants in the line. Inspection and maintenance should be properly documented.

### **Bloodborne Pathogens (Universal) Precautions Training**

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

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

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

### **Training Requirements**

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

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

### **First Responder Exposure**

If an employee is a First Responder or decides to be a "Good Samaritan" and provides first aid on an injured victim involving blood or bodily fluids, personal protective equipment must be used and Universal Precautions followed treating all bodily fluids as infectious.

First Aid Stations must at least include the following supplies:

1. latex gloves
2. one-way valve CPR mask
3. biohazard bags
4. plastic baggies
5. tongs

## **BLOOD-BORNE PATHOGENS**

In accordance with the OSHA Blood-borne Pathogens Standard, 29 CFR 1910.1030, the following control plan has been developed and implemented:

### **I. Exposure Determination**

OSHA requires employers to perform an exposure determination in the work place. This concerns which employees may incur occupational exposure to blood or other potentially infectious bodily fluids. The exposure determination is made without regard to the use of PPE because employees are considered exposed even while wearing PPE. The Company's determination of exposure has indicated that during the normal course of business we do not have any employees with such an occupational exposure. However, in order to best protect our employees, the Company has developed an exposure control plan which we will train on annually.

### **II. Training**

Although we have determined that during the normal course of operations the exposure to blood-borne pathogens for our employees is minimal, severe emergency situations might occur that could expose our employees to such hazards. Therefore, we will provide annual training that covers the following information based on the OSHA Standard for Blood-borne Pathogens:

- Modes of transmission for blood-borne diseases;
- Emergency procedures to follow; and
- Universal health precautions.

### **III. Emergency Procedures**

Most of our facilities and jobsites are located within or near urban areas where emergency medical response teams are close by. We expect to rely primarily on these services for emergency situations even though employees are trained in first aid. Emergency numbers are clearly posted in all facilities and jobsites. Further, the Company does not designate any employee as a first aid responder. If an employee does provide emergency response or first aid treatment to another, they provide it of their own free will. Please refer to the Emergency Action Plans (EAPs) that have been developed for all locations or jobsites.

## ACCIDENT, INCIDENT & INJURY POLICY

### Accident, Incident and Injury Reporting:

Injuries or incidents, no matter how slight, must be reported to a supervisor utilizing the "*Incident Investigation Booklet*." The EHS Department must be contacted as soon as possible for any incidents involving personal injury, property damage, an environmental spill, or government regulatory agency site visits. An "Incident Investigation Report" should be filled out by the supervisor immediately after the incident is observed or reported and sent to the EHS Department. Specialties Company will not tolerate the delayed reporting of incidents or injuries. Waiting an extended amount of time to report an incident could result in more serious developments in the problem or injury. Failure to do this could either threaten the safety of yourself and fellow employees, and/or cause unnecessary expenses.

Investigation of all incidents is an important management tool for controlling accidents and their related costs. If something is not learned from an accident, it is a total loss. The reasons or basic root causes must be determined. The information that is learned can be used to improve the operation involved and make it more safe and efficient. It is the policy of Specialties Company that the EHS Department investigates all injuries requiring a visit to a physician, clinic or hospital, and any property damage incidents or near misses that had the potential to result in an accident of like severity. Even if first aid is not administered, all incidents, including "near misses," should be reviewed using investigative techniques so that corrective action(s) may be implemented to prevent a similar incident from occurring. Accidents are usually the result of conditions or actions best controlled by the supervisor or employee. An accident is simply an unplanned event that interrupts operations and results in loss of time, property damage or bodily injury. Typically, they are equipment, material, people, or environment related.

### Purpose of Accident Investigations:

The importance and purpose of accident investigations can be summarized in one word: **PREVENTION**. The following describes how incident investigations may help prevent future occurrences:

1. Investigations reveal unknown factors which can lead to accidents, including why an employee acted or operated in the way he did, or why the physical condition developed
2. Investigations reveal personal factors which may contribute to the similar or more serious accidents.
3. By investigating accidents, we communicate to employees our concern for the employee and the Company's desire to provide a safe workplace.
4. Investigations reveal improvements in the way jobs can be performed; resulting in improved efficiency, less costs, and reduced employee exposure.

A simple, "near miss" may have had the potential to be a major loss. Without investigations of minor or near miss accidents, managers and employees alike may experience false security in perceiving that our major exposures are under control until we experience a serious loss. The purpose of investigations is not to "place blame" on anyone, but to determine what within the system went wrong so that it may be corrected and avoided in the future.

Each foreman should conduct investigations using the "Incident Investigation Report" Form as a basis. A written statement from all personnel involved or witnesses is also required. The immediate supervisor is the most knowledgeable of the work area and most capable to determine the underlying causes of an accident. Depending on the nature and/or severity of the accident and other considerations, accidents may also be investigated by the project manager/superintendent and the EHS Department.



## How to Investigate an Accident (or Incident):

The first step in any accident investigation is to ensure that all injured parties, if required, have received emergency rescue and medical assistance. After accident scene is secure, a systematic approach to determining facts surrounding the cause or causes of the accident should be initiated. A suggested approach to accident investigation is:

1. Neutralize, secure or isolate any hazardous conditions to prevent further injuries. This step may also require that an unsafe act be suspended.
2. Once the potential for further injury has been reasonably contained, the investigation should focus on determining the facts related to the accident. Accident fact finding should be conducted using a logical step-by-step process.
  - a. Secure the accident scene to protect evidence.
  - b. Take photographs and/or video of the site from different perspectives to create a visual record of the scene. A photographic record of evidence collection may be extremely valuable in the final analysis of the accident. If needed, make sketches, diagrams, or drawings of the site.
  - c. Collect and preserve evidence. Document where, when and how the evidence was collected. Document the facts only, avoid opinions. The scene will never be better for collecting evidence and determining facts than during the initial investigation immediately following the incident.
  - d. Look for hard evidence. This is factual information that is obvious and difficult to dispute. Consider equipment, site, environmental conditions, the existence or non-existence of personal protective equipment or engineering controls, broken parts or pieces, time logs, training logs, etc.
  - e. If a piece of evidence needs further analysis by an expert, such as a broken tool or damaged equipment, tag the item, document the circumstances surrounding it, and secure it for additional analysis.
  - f. An important step in any accident investigation is to interview the persons closely associated with the accident or incident. Suggested techniques:
    - i. Put the person being interviewed at ease by pointing out that the sole purpose of investigation is prevention of recurrence. Point out that the investigation is not for fault determination or blame.
    - ii. Conduct the interview at the scene if possible. This helps put the person at ease and also helps in discovering solutions.
    - iii. Conduct one-on-one interviews of all individuals involved or who witnessed the incident for their version of the accident. Do not make judgments, only collect facts. Do not conduct group interviews because important facts and details could be missed due to shy or non-participating group members or corroborators.
    - iv. Ask any necessary questions and all questions should be asked in a friendly, constructive manner. Use the "W" questions - **WHO, WHAT, WHERE, WHEN, WHY and HOW** - questions that cannot be answered with a simple "yes or no." These will oblige more descriptive answers resulting in detailed personal statements.

The underlying cause may be either an "unsafe act" or an "unsafe condition" or a combination of the two. Studies have shown that the "unsafe act" is the major contributing factor in approximately eighty-five percent (85%) of all accidents. Even though "unsafe conditions" represent much lower percentages of all accidents, it is much easier to uncover "unsafe conditions" than "unsafe acts" unless the investigation is complete and thorough. Thus, have all victims and witnesses write a statement in their own words describing only what they saw and heard. Close the interview(s) on a positive note - **PREVENTION**. Thank the person(s) for their assistance in discovering the facts and discuss what actions can be taken to prevent recurrences. One way to secure the person's involvement and continued cooperation is to solicit their opinion for prevention.

Finally, ensure that the "Incident Investigation Report" is completed in its entirety. The statements and report should be a summary of the facts, determined by evidence and employee interviews. Do not offer opinions in the report and only draw conclusions that can be supported by the facts as determined by the investigation. The report should be completed and submitted to the EHS Department within twenty-four (24) hours after the incident occurs.

Accidents involving serious injury such as fractures, severe lacerations, amputation, unconsciousness, etc. shall be reported immediately to the Safety Director, the EHS Department and the Superintendent who will conduct an immediate on-the-scene investigation of the accident.

**NOTE: All employees, whether victims, operators, or bystanders, who are involved in any accident or incident, may be subjected to Post-Accident Testing, as provided for in the Company's "Alcohol & Drug Policy."**

### **Indiana's Worker Compensation Act:**

This underlying summary does not cover all rules or regulations of Indiana's Worker Compensation Act; however, the purpose of the underlying is to inform the employee of its general requirements. The compensability of a personal injury or death is dependent upon three prerequisites having been met. The personal injury must be:

1. By accident (unexpected event or unexpected result).
2. Arise out of the duties of employment.
3. Occur in the course of the employment

The employee has the burden of proof with regard to all three prerequisites. The employee may not be covered under the Act if injury results from horseplay, self-inflicted injury, intoxication or illicit drug use, failure to use provided safety equipment, or violation of posted warning signs.

If a Workers Compensation Claim is valid, benefits available include: 1)Wage Replacement, 2) Medical Care, 3) Monetary Compensation... if medical care can't return the injured to their pre-injury health status. **The Workers Compensation Act of Indiana provides that Employers direct an injured employee's medical care.** Refusing this tendered care is grounds for having all benefits terminated. An injured employee can only receive care from their personal doctor if the employer, and the employer's insurance company, agrees to the services of the claimant's doctor of choice. If not, then all expenses related to such care will be the responsibility of the injured employee.

## **RETURN-TO-WORK (RTW) POLICY**

### **Purpose:**

This policy defines the RTW process for employees injured on the job. The Company's EHS Department administrates RTW and can be contacted at the Corporate Office (317.594.0291) for specific policy interpretation.

### **Scope:**

The RTW process is available for any employee who sustains a work-related injury or illness in which the severity has or will likely result in that employee's inability to perform his/her normal job tasks. Such an injury, commonly referred to as a lost-time injury, is an injury that is likely to result in days away from work. These injuries are very costly to the Company, the employee, and the injured employee's family. Lost time accidents in the construction industry are of

particular concern to the Company for the previously stated reasons, and their potentially non-favorable affect on our ability to secure work.

**Temporary Transitional Work (TTW):**

Employees who are medically-ordered to have work restrictions that prohibit them from performing their regular job duties will be considered for participation in a Temporary Transitional Work (TTW) assignment as part of the RTW program. These temporary or alternative duties will be developed by the EHS Department, the employee's supervisor, the employee's physician and Work Comp Provider. Employees must also meet all of the following criteria:

1. The employee must have had a compensable work-related injury or illness as defined by the governing state's Workers Compensation Act or Law.
2. The employee's physician must release the employee to TTW with stated restrictions.
3. The employee must have the potential of returning to his/her original job, and in "good faith", work towards the goal of returning to work and to the full duty of their capacity.

**ALCOHOL AND DRUG POLICY  
DRUG FREE WORK PLACE (DFWP) POLICY**

I. STATEMENT OF POLICY

Employees are an extremely valuable resource for Specialties Company, LLC's business and their health and safety is of great concern. Drug or alcohol use in the workplace can pose a serious threat to all our employees' health and safety. It is therefore the policy of the Company to prevent illegal substance use or abuse from having an adverse effect on any of our employees. The administrator of the Company's DFWP Policy, Designated Employer Representative (DER) is the Safety Director.

The Company maintains that:

- The use of illegal drugs is inconsistent with law-abiding behavior expected of all citizens. Employees who use illegal drugs tend to be less productive, less reliable, and prone to greater absenteeism resulting in the potential for increased job cost and delay.
- The use of illegal drugs or alcohol by employees can impair the ability of those employees to perform tasks that are critical to proper performance and can result in the potential for accidents in the workplace.
- The use of illegal drugs and/or alcohol by employees can affect their complete reliability, stability, and good judgment.

**Specifically, it is the policy of Specialties Company that the use, sale, purchase, transfer, possession or presence in one's system of any controlled substance (except medically prescribed drugs) by any employee while on Company premises, engaged in Company business, while operating Company equipment, or while under the authority of the Company, is strictly prohibited.**

II. PURPOSE

The Company recognizes that the use of some drugs is illegal, and that the use of drugs and intoxicants in the workplace impacts productivity, impairs abilities, increases the likelihood of accidents, and impacts judgment and reliability. The Company also recognizes an obligation to its employees, customers, and the public at large, to take reasonable steps to assure safety in the workplace, safety in the services it provides, and safety in the distribution of such services.

To this end, the Company reaffirms its Alcohol and Drug Policy, and the subsequent need for drug and alcohol awareness, education, and testing, as hereafter set forth.

### III. GENERAL PROVISIONS

#### **A. Rules & Prohibited Conduct**

The following actions are strictly prohibited:

- Reporting for work under the influence of intoxicants, illegal drugs, or prohibited substances;
- Operating Company equipment under the influence of intoxicants, illegal drugs, or prohibited substances;
- The use, manufacture, possession, transfer or trafficking of such intoxicants, illegal drugs, or prohibited substances in any manner during work hours or while on the job, on Company property, or in Company vehicles;
- In any such manner of using Company property or an employee's position within the Company to make or traffic intoxicants, illegal drugs, or prohibited substances;
- Any other use, possession or trafficking of intoxicants, illegal drugs, or controlled substances in a manner which is detrimental to the interest of the Company;
- When required to take a post accident test, using alcohol within eight (8) hours following the accident or prior to undergoing a post-accident alcohol test, whichever occurs first; or
- Refusing to submit to an alcohol or controlled substance test as required by post-accident, random, reasonable suspicion, return-to-duty, or follow-up testing requirements.

#### **B. Applicability**

All employees, including drivers, of Specialties Company, LLC are subject to this Drug and Alcohol Policy. DOT Drivers are subject to drug and alcohol testing in compliance with 49 CFR Part 382 and 49 CFR Part 40, and as adopted by reference into IC 8-2.1-24-18.

#### **C. Use or Possession of Drugs / Alcohol**

To ensure a safe and productive work environment at all Company facilities, and to protect all employees and Company property: the use, sale, transfer, or possession of alcohol, drugs, or controlled substances while on the job shall immediately subject the employee or driver to the Company's drug and alcohol testing procedure. "Under-the-Influence" is defined as being unable to perform work in a safe and productive manner, being in a physical or mental condition which creates a risk to the safety and well-being of the affected employee or other employees, the public or Company property, and/or having detectable levels in excess of the levels as set forth in the DOT/FMCSA regulations for both the initial and confirmatory tests of alcohol, illegal drugs, or controlled substances in the body. A positive test will result in the employee's immediate suspension from work without pay for a period not less than thirty (30) days. The employee will have the opportunity to discuss the positive test with his or her supervisor after consultation with the Medical Review Officer (MRO), but such consultation shall not postpone his/her immediate suspension and removal from duty.

Any employee who is taking a drug or other medication prescribed by the employee's physician for a medical condition, where such condition is known or advertised as possibly affecting or impairing judgment, coordination, or other sensory functions including dizziness or drowsiness, or which may adversely affect the employee's ability to perform work in a safe and productive manner, must notify their supervisor before any test is given. The MRO will be the final authority as to the effect of such medications on the employee's test results. Any employee violating this policy shall be suspended and subject to discharge consistent with the **Addendum: "Administrative Guide to Specialties Company, LLC Personnel – Alcohol and Drug Testing Procedures."**

#### D. Testing for Drugs & Alcohol

The Company will conduct a drug and alcohol testing program that includes six (6) types of tests to be used to detect the presence of alcohol, illegal drugs, and/or controlled substances:

- 1) **Pre-Employment Testing**
- 2) **Random Testing**
- 3) **Post-Accident Testing**
- 4) **Reasonable Suspicion Testing**
- 5) **Return-To-Duty Testing**
- 6) **Follow-Up Testing**

Drivers who are involved in a reportable accident, and any employee who sustains an injury on the job, will be required to submit to testing for the presence of drugs and alcohol after such occurrence, and as per instructions for post-accident testing.

#### E. General Requirements of Testing Procedure

The Company will test for:

**Amphetamines** – uppers, bennies, speed, etc

**Cocaine** – snow, crack, flake, coke, etc

**Opiates** – heroin, codeine, methadone, morphine, smack, horse, etc

**Marijuana** – THC, hashish, etc

**Phencyclidine** – PCP, angel dust, etc, and

**Alcohol**

Urine and/or blood samples will be collected from employees utilizing a DOT 5-Panel Drug Screen, or some other medically-accepted procedure, including an evidential breath test (EBT) as required.

#### F. Technical Requirements for Testing Procedures

Testing will be performed pursuant to the Company's Policy Addendum: "Administration Guide to Specialties Company, LLC Personnel - Alcohol and Drug Testing Procedures" and under direction of a certified Third Party Administrator (TPA), Midwest Toxicology Services, Inc. *(The "Administrative Guide" is located in Appendix)*

#### G. Discipline

Disciplinary action is appropriate in the following situations, and will be taken based on "positive" test results consistent with the terms of the Addendum:

- Any employee or driver who works, reports to work, or operates a Company vehicle or equipment under the influence of alcohol, controlled substances, or illegal drugs shall be immediately suspended, shall be subject to the Company's drug and alcohol testing procedure, and will be subject to discharge consistent with the stated terms of the Addendum.
- Any employee or driver who has returned to work and is subject to random testing, return-to-duty, or follow-up testing provisions of this policy shall be discharged if he or she fails a random, return-to-duty, or follow-up drug or alcohol screen within one (1) year of the previous positive test result consistent with the terms of the Addendum.
- Refusal to sign the authorization form associated with a drug or alcohol screen, or refusal to take a drug or alcohol screen as directed, is considered insubordination and shall result in discharge consistent with the terms of the Addendum.
- Anyone involved in the trafficking of illegal drugs or controlled substances will be subject to discharge. Trafficking will include the intent, actual sale, or distribution of controlled substances, or possessing a quantity of prescription drugs that is more than would be expected for personal use. Trafficking will also include having possession of illegal drugs or controlled substances that are packaged in a way which indicates intent to distribute.

- No employee or driver shall be on duty for the Company, in a Company vehicle, or in Company equipment and possess or use alcohol or illegal drugs. Such possession or use will subject the employee to discharge consistent with the terms of the Addendum.
- Any driver in a Company vehicle will be immediately suspended and subject to discipline, up to and including discharge, if such driver's blood alcohol concentration level is at or above 0.04, or at or above revised federal standards promulgated by US DOT and consistent with the terms stated in the Addendum.
- Any driver involved in an accident where a fatality occurs, or any other DOT-reportable incident, and who refuses to be tested for drugs and/or alcohol, shall be discharged consistent with the terms stated in the Addendum.

## DISCIPLINARY ACTION

**Compliance with Specialties Company's Safety and Health Handbook is a condition of employment.** Failure to comply with these policies and requirements may result in disciplinary action, up to and including discharge, based upon the severity of the offense. Management reserves the right to deviate from or modify this policy if the severity of the violation warrants. Discipline applies to all employees, no matter what tier of employment, and will be consistent with union agreements, where applicable.

**NOTE:** Specific disciplinary measures for violations of the Company's drug and alcohol provisions are contained in the "Alcohol & Drug Policy" and described in the separate document, Addendum: "Administration Guide to Specialties Company, LLC Personnel - Alcohol and Drug Testing Procedures."

**NOTE:** "Employee Disciplinary Report" shall document violations of the Company's safety rules and policies.

### **SAFETY POLICY VIOLATIONS:**

Safety Rules will be strictly enforced. Any unsafe act or condition committed by an employee may be reported to the EHS Department or Safety Director by an employee, foreman, super or member of management. After an investigation of the incident, the event will be classified as "**serious**" or "**other than serious**" and recorded on an "Employee Discipline Report."

A "**serious violation**" is defined as one where there is a high probability that death or serious physical harm could result from the violation, and the employee knew or should have known of the hazard. Serious physical harm is defined as any type of harm that could cause permanent or prolonged damage to the body or which could cause such temporary disability as to require inpatient hospitalization. Employee's failure to abate the hazard will be considered negligence.

An "**other than serious violation**" is one that is related to job safety and health but probably would not cause death or serious physical harm.

Confirmed violations will be recorded and will remain in effect for twelve (12) months. If an employee receives three (3) "serious violations" within 12 months, his/her employment will be terminated. Two (2) "other than serious violations" will equal one (1) "serious" safety violation within the same reporting period. Six (6) "other than serious violations" within 12 months will result in any employee's termination. Any combination of the two (2) classifications exceeding the stated limits within the prescribed time period will result in discharge.

In addition to the consequences stated above, an employee who commits a safety violation may be disciplined by verbal or written reprimand, and/or suspended without pay. Also, in keeping with the Company's employment at-will policy, after consultation with a supervisor, member of EHS, or the Safety Director, upper management may discharge an employee after any safety violation. Finally, any supervisor who is aware of and knowingly allows an unsafe act will receive the same discipline as the employee who committed the act.

## HAZARD COMMUNICATION (HAZCOM) PROGRAM

HAZCOM provides that hazards of all chemicals produced or imported into our work place are evaluated, and that information concerning their hazards is transmitted to employers and employees: this is known as "Right-To-Know." This transmittal of information will be accomplished by means of a comprehensive hazard communication program, including: container labeling, material safety data sheets and employee awareness training.

### Material Safety Data Sheets (MSDS):

- A. MSDSs supplied by the manufacturer of products must contain the following information:
  - 1) Date Prepared
  - 2) Manufacturer's Information
  - 3) Hazardous Ingredients
  - 4) Physical Information
  - 5) Fire and Explosion Hazards Data
  - 6) Reactivity Data
  - 7) Health Hazards Data
  - 8) Precautions for Safe Handling and Use
  - 9) Control measures
- B. MSDSs for products used by the Company are available to the public and all employees via the Safety Director. This includes MSDSs for all raw materials used. A hard copy master file is maintained by the Safety Director and questions regarding MSDSs should be directed to the Safety Director.
- C. As new hazardous materials, as determined by federal regulations, are brought into the workplace, MSDSs will be obtained and sent to the Safety Director for filing

**NOTE: OSHA's adoption of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) is now being implemented by our industry. GHS itself is not a regulation or standard; GHS establishes universally agreed hazard classification and communication provisions which are international in application. Most notably is the use of "pictograms" for container labeling and the standardization of chemical data sheets, now called Safety Data Sheets (SDS). Specialties Company will make this transition and become fully aligned with the revised federal Hazard Communication System.**

### Distribution of MSDSs:

- A. All customers will be sent a letter, upon request, informing them of the hazardous materials that may be found at our jobsites and maintenance shops.
- B. All sub-contractors or prime contractors will be notified, upon request, informing them of the hazardous materials that may be found at our jobsites, and maintenance shops.
- C. Our MSDSs are available to anyone upon request.

### Container Labeling:

- A. All containers leaving our premises will have the following information on the shipping papers:

- 1) Our company name.
  - 2) The identity of the hazardous material.
  - 3) Appropriate warning labels.
  - 4) Appropriate warning labels alerting any person handling our products of potential dangers.
- B. All containers on Company premises will either be appropriately labeled as hazardous material, labeled as non-hazardous, or will be in a temporary container.
- C. Labels will identify in English the material and include appropriate hazard warnings. The label does not have to include all the details found on the MSDS, but MSDS must be available to employees in the work area at all times. Signs, placards, process sheets, written operating procedures, etc may be used in place of labels. If this method is used, the information must be available to employees in the work area at all times. Labels are not required on temporary portable containers used by an individual employee to transfer hazardous chemicals from a labeled container as long as products are used by that employee during a single work shift or returned to the labeled container.

### **Employee Training:**

- A. All employees are to be informed by their supervisor/foreman about:
- 1) The Hazard Communication Program
  - 2) The Labeling System
  - 3) How to find and utilize our MSDS
- B. New employees are to receive appropriate safety and health information and training during their initial assessment. This training is to include information about hazardous materials and processes at our shops and jobsites. It should also relay the locations of MSDS or how to access the MSDS.
- C. Items to be covered in safety and health training:
- 1) General safety and health rules and procedures
  - 2) General chemical hazards
  - 3) Recognition, evaluation, and control of hazards (prevention programs)
  - 4) Hazards associated with unlabeled piping and process systems.
  - 5) MSDS and access to MSDS
  - 6) Compliance with safety and health rules and procedures
  - 7) Specific hazards present in work areas
  - 8) Federal/state requirements as to hazard communication
  - 9) Measures to protect themselves from hazards, including work practices, Company emergency procedures, and the use of PPE.
- D. The supervisor/foreman conducting the training will have the employee sign the training form, proving date and authenticity of the training.

### **Employee Re-Training**

- A. It will be necessary to provide additional training when:
- 1) New chemicals (materials) or processes are introduced into the shop or job site.
  - 2) Process or equipment changes are made that could cause new or increased employee exposure.
  - 3) Work practices are introduced or changed, which could cause changes in exposure to employees.
  - 4) Employees are transferred from one work area to another where different hazards are present.
- B. The Supervisor/Foreman conducting the re-training will make a record of training provided and request the employee to sign and date the record.

### **Non-routine Tasks:**

- A. The supervisor/foreman of an employee performing a non-routine task is responsible for properly training the employee concerning the potential hazards associated with the task.



- B. The employee also shares in this responsibility by making sure that their immediate supervisor knows that the non-routine task will be performed.

**On site contractors/sub-contractors:**

- A. All contractors/sub-contractors and their employees are to be made aware of the hazardous materials (chemicals) at our shops and job sites if there is potential for their exposure. Supervisors/foremen are responsible for this notification.
- B. It will be necessary for the respective shop or job site supervisor/foreman to ask on-site contractors or sub-contractors and their employees what hazardous chemicals (materials) they might expose our employees to so that it can be assured that our employees are not unnecessarily exposed to their hazardous chemicals.

## **CONTROL OF HAZARDOUS ENERGY LOCK OUT / TAG OUT (LOTO)**

The following program establishes procedures for controlling hazardous energy during installation, servicing, and maintenance of equipment in which the unexpected start-up of machines or equipment could cause injury to employees or damage to equipment.

**Basic requirements:**

During installation, servicing, maintenance, repair, replacement, or applicable inspections, all equipment or machines shall be shut down, de-energized, and tagged out or locked out to protect against accidental or inadvertent operation. No lock or tag may be removed except by the individual that installed the device or according to the procedures outlined in this program.

**Equipment Installation, Maintenance, and Repair:**

If possible, machine design should permit routine lubrication and adjustment without removal of safeguards. When safeguards must be removed, the maintenance and repair personnel must never fail to replace them before the job is considered complete. In the unlikely event it is necessary to oil or service machine parts while a machine is running, special safeguards may be needed to protect the individual performing the maintenance. If there is any doubt about the safety of these types of operations, machine shall be shut down and all power sources shall be locked out. The danger of accident or injury is greatly reduced by shutting off all sources of energy.

In situations where a maintenance or repair worker is exposed to electrical elements or hazardous moving machine parts, power sources must be shut off and locked out before work begins. In certain cases, warning signs or tags may be used in place of locks, but signs and tags are a second tier assurance against the untimely energizing of mechanical equipment. The first procedure for maintenance personnel when service of equipment is beyond routine oiling and adjustments, is to disconnect and tag-out or lock-out the machine from its power source whether the source is electrical, mechanical, pneumatic, hydraulic or a combination of these. **Lock-out must be used unless the equipment or machine will not accommodate a lock.** Energy accumulation devices must be "bled down".

- *Electrical:* When maintenance personnel must repair electrically powered equipment, they shall open the circuit at the switch box or power source and padlock the switch (lock it out) in the "off" position. When the power source is a battery, the cables shall be removed and protected against inadvertent contact with the battery. The switch or power source shall be tagged with a description of the work being done and the name of the person performing the work.

- *Mechanical:* When mechanical equipment must be serviced, safety blocks must be used to prevent movement of equipment that could cause injury or accident. Tags are to be installed with a description of the work being done and the name of the person performing the work.
- *Pneumatic and Hydraulic:* Valves controlling air or oil flow shall be locked out against movement when maintenance is being performed. Lines shall be "bled off" to dissipate energy that may be stored in the system that could cause any part of the machine or equipment to move. Valves shall be tagged with a description of the work being done and the person's name performing the work.

When more than one individual is working on the same piece of equipment, multiple lock-out devices or tags shall be used. These devices must be capable of accommodating several locks or tags.

### **Steps typically followed in the lock-out procedure:**

1. Alert the operator and the foreman/supervisor
2. Identify all sources of residual energy
3. Place padlocks on switches, levers, or valves, locking them in the "off" position.
4. Install tags in appropriate locations to identify the work in progress. Tags alone may be used only where equipment or machines will not accommodate locks.
5. Insure that all power sources are off and that the residual energy is "bled off". This includes current (i.e. capacitance).
6. Test the operator's controls with everyone clear.
7. Proceed with the maintenance.
8. When maintenance is completed, replace all safeguards that were removed. Make sure they are checked for proper function.
9. Remove locks and tags only after the machine or equipment is determined to be ready to perform safely and all personnel and tools are cleared from the machine or equipment.

### **Outside contractors:**

Outside contractors occasionally perform work on our premises or work sites. These individuals must be informed of our "Lock-out/Tag-out" program. It is the foreman, supervisor, or maintenance personnel's responsibility to provide them with a copy of this program and to make sure that they understand the policy. The outside contractor must comply with this policy or not be permitted to perform work on our equipment or machinery.

### **Shift changes:**

The situation may arise where more than one shift of personnel will be involved in repairs to equipment or machines. On these occasions, the first shift personnel shall remove their locks and replace them with tags that adequately inform the next shift of the conditions that are present. The supervisor must be notified of the conditions so that the second shift can be properly informed.

### **Procedure for removing the lock of an absent employee:**

In the event that an employee is absent, for whatever reason, when repairs to equipment or machinery have been completed and the absent employee's lock is on the controls of the equipment or machine, the supervisor must verify that the employee is not at the facility. The lock may be removed after documenting why the lock was removed. The absent employee must sign the document and be given a copy before returning to the work environment.

### **Purchase of new equipment or major modification of existing equipment:**

When new equipment is purchased or existing equipment is given major modifications, every effort shall be made to assure that the equipment can accommodate locks if the equipment has a hazardous energy source as outlined in this program.

### **Training and re-training:**

Every employee will be given training to assure that they understand the purpose and function of this energy control program. It is our intent that every employee has the knowledge and skill required for the safe application, usage and removal of energy controls or at least the recognition of what locks and tags signify. Each employee who will use a lock or tag for control of hazardous energy will be instructed in the recognition of applicable hazardous energy sources, the type and magnitude, and control of the hazardous energy source. Where a tag-out system, rather than a lock-out system is utilized, training will be provided on the following limitations of tags:

1. Tags affixed to energy isolating devices are warning devices only. They do not provide the physical restraint that locks provide.
2. Any tag attached to an energy isolation device must be removed only by the individual who attached the tag (except as described above).
3. Tags must be legible and understandable.
4. Tags must be durable within the environment that they are used.
5. Tags may provide a false sense of security and are only one part of the overall program of hazardous energy control.
6. Tags must be securely attached to the energy isolation device so that they cannot be inadvertently and accidentally detached.

Employees will be retrained whenever there is a change in their job assignments, a change in machines, equipment or process that presents a new hazard, or when it is determined that a change is needed in the energy control procedures. Verification of training and re-training will be by certification. This certification will include a brief outline of the training's content, the date training occurred, and a signature space.

### **Program verification:**

At least once per year, a review of the Hazardous Energy Control Program will be made to insure that the program is functioning in a manner consistent with government regulations and also in a manner that provides for the maximum amount of protection for our employees. This review will include an inspection of the energy control procedures while they are being used. The inspection will be performed by the Safety Director. The purpose of this inspection is to correct any deficiencies or inadequacies in the program and to reinforce the responsibilities of the lock-out system and the tag-out system.

### **Requirements for locks and tags:**

Locks and tags are provided for in this program. Each division is responsible for standardizing, by color, size, or shape, the types of locks and tags being used within their division. Locks are required to be substantial enough to prevent removal except by excessive force or unusual techniques. Tagging devices must be substantial enough to prevent inadvertent or accidental removal. The tag attachment must be self-locking, and able to be attached by hand, and with a minimum unlocking strength of not less than 50 pounds. The tag must warn against hazardous conditions with a legend such as "DO NOT START - DO NOT ENERGIZE - DO NOT OPERATE". This warning shall be standardized within each division. Both lock-out and tag-out devices must indicate the identity of the employee who attaches the device.

## **ELECTRICAL SAFETY PROGRAM**

### **Program Principles:**

The Electrical Safety Program is designed based on the following principles:

1. Inspect/evaluate all electrical equipment/hazards before work begins.
2. Maintain electrical insulation and enclosure integrity.

3. Plan every job and document first time procedures.
4. De-energize, if possible, before work begins.
5. Anticipate potential hazardous events to minimize danger.
6. Protect employees from shock, burn, and blast and other hazards that are due to the working environment.
7. Use and supply the proper tools for the job.
8. Assess worker abilities.
9. Audit these principles.

### **Excavation Work**

A thorough investigation must be conducted prior to beginning any excavation work. The investigation includes examining drawings, receiving information from utility or municipal resources, and inspecting the dig site area for underground obstacles. The utility and service companies must authorize or mark locations on underground services prior to the beginning of work. **INDIANA 8-1-1 / IUPPS must be notified.**

### **Overhead Utility Lines**

A thorough investigation must be conducted by the supervisor prior to beginning any construction work. The investigation should include a visual examination of the jobsite for any overhead obstructions, including bridges and overhead utility lines. All workers should be made aware of these obstructions and equipment or workers should be no closer than 15 feet to overhead energized utilities.

### **Electrical Work**

The Company has established the following controls to insure electrical safety. These controls may include, but are not limited to:

1. **Shut Down Energy Source (De-energize).** When electrical hazards exist, workers should first try to de-energize the source if applicable.
2. **Parts Are Considered Energized Until Proven Otherwise.** Every electrical conductor or circuit part is considered energized until proven otherwise.
3. **No Barehanded Contact.** No bare-hand contact is to be made with exposed energized electrical conductors or circuit parts.
4. **Development of Site Control Plan.** A written or verbal energy control plan, depending on the extensiveness of job, shall be developed relevant to the equipment, hazards and operations. Use procedures as "tools" to identify hazards to eliminate/control the hazards.
5. **Qualified Employees.** Employees will be qualified for the task to which they are assigned. Employees will be trained accordingly to the electrical hazards present for their job tasks, to qualify them for working in an environment influenced by the presence of electrical energy.
6. **Working Environment.** The overall working environment will be considered when working on electrical equipment (e.g., clearances, illumination, working on elevated areas, etc.). Qualified employees must identify and use precautions appropriate to the working environment.
7. **Safety Discussions.** Affected groups will hold pre-task safety discussions to reinforce safety procedures and heighten awareness. Annually, supervisor safety training will be held to further emphasize issues, training and incidents.

### **Electrical Work Training:**

1. All qualified persons in the Company are expected to meet the training requirements that include information and experience relating to electrical hazards and electrical safe work practices.
2. Employees will be provided with electrical safety awareness training, as appropriate. Certified electricians will perform any process wiring required.

## Electrical Work / Company Policies:

1. **Standards Policy.** Equipment shall be properly labeled and identified. Any changes or revisions made to equipment must be updated and communicated to employee users and operators.
2. **As-Built Documentation Policy (Change Management).** Drawings used in planning electrical work must reflect the current condition of equipment and installations, single-line diagrams, process and instrument (P&I) diagrams, schematics, and underground drawings must all be up-to-date so that proper planning can take place. As-built changes shall be recorded, and file copies shall be changed appropriately.
3. **Evaluation, Installation and Use of Equipment.**
  - a. Approval. The conductors and equipment required shall be acceptable only if approved and listed by a Nationally Recognized Testing Laboratory.
  - b. Hazards. Electrical equipment shall:
    - i. Be free from recognized hazards that are likely to cause serious injury to employees.
    - ii. Be suitable for installation; conform to codes, listings or labeling for its intended purpose.
    - iii. Be installed in accordance with the manufacturer's instructions.
    - iv. Have identification of any disconnecting means and circuits.
    - v. Have required working space around the equipment.
    - vi. Have required illumination of the work space.
    - vii. Provide for the guarding of live parts.
    - viii. Be in compliance with other consensus standards (NFPA, IEC)
  - c. Installation of large equipment or processes shall be approved as appropriate by a recognized inspection process, and may include certification from municipal or public inspectors.

**Abandoned Lines, Wires, or Cables.** Electrical lines, wires, and cables that are removed from service or not connected should be removed. If removal is not feasible they must be de-energized, taped and then tagged, to indicate the location of the other end. Underground wiring abandoned in place must be maintained in drawings for reference and so indicated on the drawing. Temporary wiring installed to provide power during construction must be removed when no longer required.

## FIRE PREVENTION & AWARENESS

### Purpose:

Specialties Company's policy is intended to provide compliance with all related regulations and standard safe work practices. The purpose of the policy is to prevent fires and to provide guidelines for action in the event that a fire does occur.

### Policy:

Employees shall be informed of the proper actions to take in the event of a fire. This includes, but is not limited to; notification and evacuation procedures. **It is STRESSED that AT NO TIME does the task of fighting fire supersede an employee's primary duties of:**

- Ensuring his/her own personal safety and the safety of others.
- Reporting the incident to the proper authority and ensuring personnel accountability for yourself and all subordinates at the jobsite, in accordance with Company and client policy.

## Procedure:

- All employees are responsible for good housekeeping practices to enhance fire prevention methods. Supervisors will be held accountable for the housekeeping of their job sites.
- Only approved containers will be used during fueling operations. These shall be of the self-closing type.
- Flammable material shall be kept under control. It shall be stored in compliance with applicable regulations. The quantity of flammable/combustible material shall be kept to a minimum on the job site or in Company vehicles.
- Welding, cutting and grinding sparks shall be contained.
- Hot work areas shall be kept wetted down, and a fire extinguisher maintained on each jobsite and in every Company vehicle.
- Oily rags shall be immediately disposed of in designated hazardous waste containers.
- Use bonding straps to discharge and prevent static charges during transfer of flammable liquids from one container to another.
- Report all spills or suspicious odors immediately.
- Fire extinguishers are to be kept in areas easily accessible and known to all employees. Only approved fire extinguishers are to be used and all extinguishers must have a valid inspection tag attached. Extinguishers are to be maintained in a fully charged, ready to operate state. Extinguishers are to be inspected daily before each shift and documented annually. Training is provided to all employees who may have to use fire extinguishers.
- **NEVER** put yourself or others at risk while attempting to extinguish a fire.
- **NEVER** attempt to extinguish a pressurized-fuel fed fire.
- **DO NOT** direct a fire extinguisher nozzle with a straight stream at any type of LPG fire. This action may extinguish the fire, but produce an LPG vapor cloud capable of detonation.
- **DO NOT APPLY** water to any acid or caustic release as it can cause a violent reaction. Additionally, low concentration acids or caustics become extremely corrosive, causing an increasing leak condition.

## In The Event of Fire:

- Remain calm
- Only extinguish a fire when it is clearly within your abilities and the equipment available
- Know the location of the nearest alarm and how to activate the emergency system
- Know the evacuation routes and collection points
- If the fire cannot be extinguished, leave the area immediately and report to your evacuation area
- Await further instructions from a supervisor/foreman or designated person

## Extinguisher Use:

All workers must be able to use a fire extinguisher. Remember the acronym:

**P-A-S-S (Press-Aim-Squeeze-Sweep)**

***Training on the proper operation of fire extinguishers occurs annually at the Company's All-Hands Meeting, or as determined by the Safety Director.***

If you are tasked to combat a small equipment or material fire:

1. Hold the extinguisher upright;
2. Pull the locking pin;
3. Stand back from fire or hazard 8-10 feet;
4. Aim nozzle at base of the fire;
5. Squeeze trigger, and
6. Sweep side to side at base of fire.

### **Choosing the Right Extinguisher:**

The National Fire Protection (NFPA) has classified four general types of fires, based on the combustible materials involved and the kind of extinguisher needed to put them out. The four fire classifications are A, B, C, and D. Each classification has a specific symbol and color identification.

### **Fire Classifications:**

**Class A (Ordinary combustibles-wood/paper/textiles):** This type of fire is the most common. Class A fires stem from combustible materials such as wood, cloth, paper, rubber, and plastics. The common extinguisher agent is water, but dry chemicals are also effective. Carbon dioxide extinguishers and those using sodium or potassium bicarbonate chemicals are not to be used on this type of fire.

**Class B (Flammable liquids-gasoline/oils/grease):** Flammable liquids, gases and greases create class B fires. The extinguishers to use are foam, carbon dioxide and dry chemical. Also, water fog and vaporizing liquid extinguishers can be used.

**Class C (Live electric-wiring/generators/motors):** Class C fires are electrical fires and a non-conducting agent must be used. Carbon dioxide and dry chemical extinguishers are not to be used. Never use foam or water-type extinguishers on these fires.

**Class D (Combustible metals-finely divided forms/chips, turnings):** Combustible metals, such as magnesium, titanium, zirconium, and sodium fires are class D. These fires require specialized techniques to extinguish them. None of the common extinguishers should be used since they can increase the intensity of the fire by adding an additional chemical reaction.

### **Types of Fire Extinguishers:**

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

***ALL Specialties Company work areas, job sites, and vehicles are typically outfitted with type ABC Fire Extinguishers.***

There are only two dry chemical extinguishers that can be used on A, B, and C fires, multi-purpose ABC extinguishers, either stored pressure or cartridge operated. All fire extinguishers are labeled with either ABC, or A, B, or C. The majority of all fire extinguishers on Company sites and in Company vehicles will be ABC extinguishers.

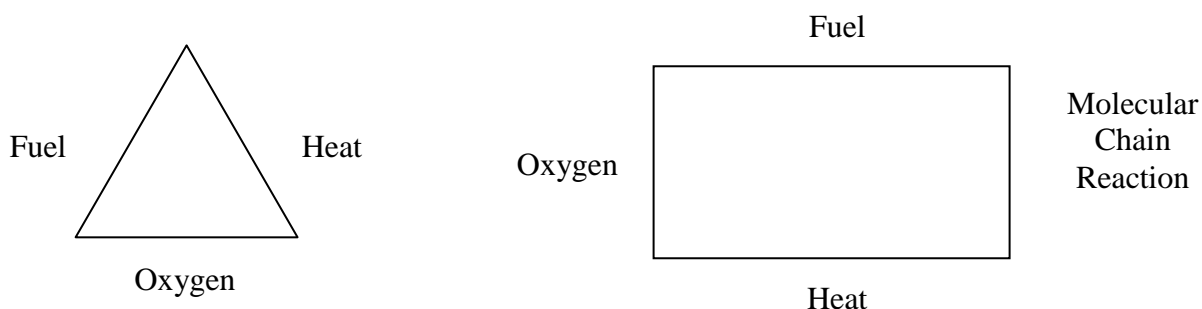
### **Personal Responsibilities of Fire Prevention on the Jobsite:**

1. Keep work areas clean and clutter-free.
2. Know how to handle and store all chemicals on the jobsite.
3. Know what you are expected to do in case of a fire emergency.

4. Call professional help immediately; don't let a fire get out of control (Call 911).
5. Know what chemicals you are working with – you might have to advise fire fighters on the scene of a chemical fire concerning the type of hazardous substances involved.
6. If a fire extinguisher is used, the immediate supervisor must be informed so that the fire extinguisher is recharged immediately
7. Finally, fire protection should never be tampered with or moved from its assigned position.

### Basic Fire Science:

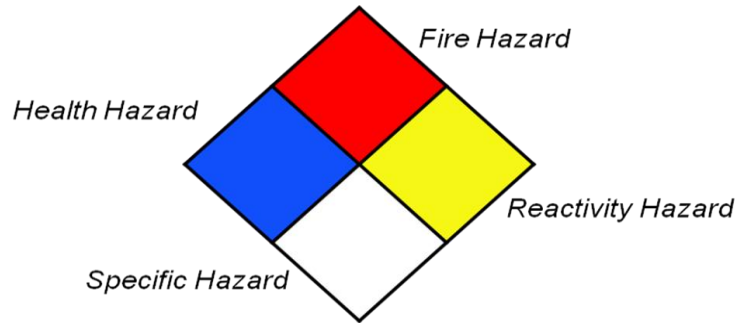
- The combination of fuel, heat, oxygen equals the well-know fire triangle. To understand fire better, a fourth factor is added, a molecular chain reaction. This is due to the fact that fire results from a series of reactions in which complicated molecules “crack” into easily oxidized fragments. Disruption of this chain, along with the removal of fuel, heat or oxygen, is recognized as a method of fire extinguishment through the use of dry chemical extinguishers.




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



**NFPA Diamond:**



Scale ranges from 0 (lowest hazard) to 4 (highest hazard)

Fire Hazard (Red)	Health Hazard (Blue)	Reactivity (Yellow)	Specific Hazards (White)
Flash Points	4 Deadly	4 may detonate	Oxidizer = OX
4 below 73° F	3 Extreme Danger	3 shock and heat, may detonate	Acid = ACID
3 below 100° F	2 Hazardous	2 violent chemical change	Corrosive = COR
2 from 100 - 200° F	1 Slight Hazard	1 unstable if heated	Use no water = <del>W</del>
1 above 200° F	0 Normal Material	0 stable	Radioactive = 
0 will not burn			

**GENERAL PERSONAL PROTECTIVE EQUIPMENT (PPE)**

The Company has determined that during the course of normal operations there are situations where Personal Protective Equipment (PPE) is advised or required. The purpose of this document is to make employees aware of the potential exposures and to inform them about the PPE that is available for their use. This document also states the Company's requirements for PPE when hazards exist.

**Hazard Assessment:**

Prior to donning PPE, a *Hazard Assessment* of the current conditions, physical and health hazards specific to the work site must be performed. When available, administrative and engineering controls must be used to abate and minimize these identified hazards; but when these controls are not feasible, PPE may be used. The Safety Director has performed general Hazard Assessments for all Company work types and has determined the PPE listed below to be applicable to all divisions. PPE descriptions which include "must wear / must use" are mandatory items as set forth by Company Policy. However, when a supervisor/foreman conducts their specific Job Hazard Analysis (JHA), they may add to but not diminish the Company's PPE selections.

**Protective Clothing:**

Employees must wear long pants and either short or long sleeved shirts at all times. Shirts must be full shirts. No tank tops or muscle shirts. A Type III high visibility safety vest, or equivalent, is MANDATORY on all jobsites unless it creates a greater hazard.

**NOTE: Type III Hi-Viz Vests are the only vests issued by the Company.**

**Foot Protection:**

Employees (including flaggers) must wear work boots at all times, and all employees should consider wearing protective footwear (e.g., steel toed or composite boots) in working areas where there is a risk of foot injuries due to falling objects, rolling objects, and piercing objects.

**Hand Protection:**

Hand protection (gloves) is advised during specific applications (e.g., materials handling) defined specifically by the supervisor. Hand protection may be provided for these applications; however, it is advised that workers use gloves at all times when there is risk of hand injury from physical hazards, high heat or caustic processes. Gloves will be made available to any employee who requests them.

**Eye and Face Protection:**

Employees must use appropriate eye and face protection when exposed to the hazards of flying particles, molten metal, harmful liquid chemicals, or potentially injurious light radiation. Safety glasses and full face protection will be provided by the Company.

**Head Protection:**

Employees must wear protective head gear when working to protect them from falling or flying objects. Head protection is required at all times; Company provides hard hats.

**Hearing Protection:**

Hearing protection will always be available to workers and is advised whenever operating or working near equipment or operations that present an excessive noise exposure (See Hearing Conservation Plan). Ear protection will be provided by the Company for all employees.

**Respiratory Protection:**

Respiratory Protection for potential dust hazards will be provided by the Company for **general voluntary use**. Respiratory protection may be required during applications deemed necessary by the Company.

***(See Respiratory Protection Program and Silicosis Prevention Program)***

**Fall Protection:**

Fall protection will be provided by the Company and is required as outlined under the fall protection section of this handbook ***(See Fall Protection Program)***.

**Safety Clause C:**

Specific PPE must be worn if instructed by a supervisor or the Safety Director.

**Safety Clause D:**

Specific PPE must be worn if designated or instructed by a contract, contractor, or local authority.

# FALL PROTECTION PROGRAM

## **Company Policy:**

It is the intent of Specialties Company to provide maximum protection to its personnel during elevated work. Fall hazards will be identified, and fall protection provided to ensure the safety of personnel. Engineering controls, administrative procedures, and the use of PPE will be utilized as forms of fall protection. The Fall Protection program must be followed where personnel could possibly fall six (6) feet or more, but does not apply "when personnel are making an inspection, investigation, or assessment of workplace conditions prior to the actual start of construction work or after all construction work has been completed." This exemption does not apply when inspections are carried out two (2) feet or less from an unprotected edge. Work conducted within six (6) feet of an unprotected edge (bridge edge) must comply with the Fall Protection Standard.

## **Training**

Fall protection training will be conducted for employees exposed to known fall hazards. Training will consist of learning to identify fall hazards, minimizing fall hazards, and the function, use, inspection, and maintenance of PFAS and other restraint equipment. Trainees will also be instructed how to identify and inspect anchor points, substantial members of the building structure, or securely rigged lines, which will safely suspend the worker in case of fall. Only attendees of the fall hazard training classes will be allowed to conduct work where potential for a fall exists. Training shall be provided by the Company to all affected workers before they are exposed to fall hazards. The Safety Director will maintain written records of employee training.

## **Applicability**

All jobsites with a potential for falls shall be inspected for fall hazards by a competent person designated by the Company. The competent person will evaluate each potential fall hazard and the need for a fall protection plan. Engineering controls (*handrails, etc.*) will be constructed where possible, and safe work practices and PPE will be used. Fall hazards include, but are not limited to: unprotected sides and edges of elevated surfaces, excavations, overhead construction and maintenance, floor holes, wall openings, and all other walking or working surfaces where personnel can possibly fall six feet or more to a lower level. At Specialties Company, fall hazards specifically include bridge rail and fence installation or maintenance work conducted where a fall of six (6) feet or more from the floor or platform is possible (not applicable to work on scaffolds or ladders). PFAS and the use of hard hats will be strictly enforced. Equipment shall not be stored within six (6) feet of an unprotected edge.

## **Engineering Controls**

The first step in minimizing work hazards is to determine if engineering controls can eliminate or lessen the hazard of the job. Engineering controls of fall hazards consist of guardrails, toe boards, covers, and other rails or barriers that prevent falls. The Company will provide engineering controls where possible to minimize fall hazards. Personnel should alert the Safety Director and/or their supervisor of potential fall hazards not already identified and controlled. Additionally, anchor points, if necessary, will be installed at locations where PFAS will be used.

## **Administrative Controls**

Safe work practices must always be followed where the potential for a fall exists. Contact the Safety Director and/or supervisor for implementation of engineering controls. Personnel must work in pairs at all times while conducting work where a potential for a fall exists. All work conducted within six (6) feet of an unprotected edge requires fall protection equipment. Only properly maintained and inspected equipment shall be used for fall protection. Equipment must be in compliance with the OSHA Fall Protection Standard. Workers shall inspect all

equipment before use; if any equipment exhibits signs of wear, it must immediately be removed from service. Equipment must be maintained, and stored where it will not be subject to wear.

Body harnesses must be worn, the lanyard must be attached to the harness securely with the locking snap hook, lifeline (if used) attached securely to the lanyard, deceleration device attached correctly and securely to the lifeline and lanyard. The lifeline or lanyard must be securely connected, by locking snap hook, to the anchor point before any work shall be conducted. OSHA requires fall protection when inspections occur two feet or less from an unprotected edge or side. The Company uses retractable lanyards/lifelines.

Inclement weather, including snow, ice, high winds or rain, pose even greater hazards during work where a potential for a fall exists. Personnel shall take additional precautions during such weather. Personnel should contact the Safety Director or supervisor to review additional precautions before beginning affected work. Work shall not be conducted on outdoor elevated surfaces during lightning or rain storms.

### **Safety Monitors**

Safety monitors shall be employed where no other alternate methods have been implemented, or as part of an overall fall protection program. The safety monitor shall be a competent person, able to properly assess fall hazards that exist in the type of work being performed. The safety monitor shall:

1. Be within sight and close enough for oral communication and at the same working level as the workers being monitored.
2. Warn monitored workers if they are unaware of a fall hazard, or if they are acting in an unsafe manner.
3. Be able to recognize fall hazards.
4. Not have any other duties which would distract from their monitoring duties.

### **PPE / Personal Fall Arrest Systems (PFAS)**

The use of PPE to minimize fall hazards shall be strictly enforced. The optimal solution is to use engineering controls, but if engineering controls do not eliminate the hazard, work practices and PPE must be used. Personal Fall Arrest Systems (PFAS) consist of a full-body harness, lanyard, and anchor point. A second option is to use a full-body harness, lanyard, lifeline, anchor point, and deceleration (grabbing) device. Only full-body harnesses shall be used, use of body belts is prohibited. Non-locking snap hooks are unacceptable for PFAS. Requirements (from OSHA 1926.502) of a PFAS include:

- D-rings and snap hooks shall have a minimum tensile strength of 5000 lbs. A proof test of 3600 lbs. is required.
- Lanyards and lifelines shall have a minimum breaking strength of 5000 lbs.
- Lanyards shall not exceed six (6) feet in length.
- Self-retracting lifelines and lanyards shall have strength of at least 3000 lbs. and limit free fall to two (2) feet or less.
- Anchor points for PFAS shall be capable of supporting at least 5000 lbs. per employee when the system is designed, installed (i.e. temporarily or permanently), and used under the supervision of a qualified person
- PFAS shall limit the maximum arresting forces to 1800 lbs. with a full body harness.
- The maximum free fall distance is six (6) feet for PFAS.
- The maximum deceleration distance is 3.5 feet.
- PFAS shall have sufficient strength to withstand twice the potential impact energy of the falling employee.
- Impacted components shall be removed from service.
- PFAS shall be inspected prior to each use.
- Lifelines subject to cutting or abrasion shall be a min of 7/8 inch wire core manila rope.
- All other lifeline applications shall use a minimum 3/4 inch manila rope or its equivalent.

Any other PPE deemed necessary for the task under the PPE Standard must be worn. This includes but is not limited to hardhats, gloves, safety glasses, and steel toed boots.

## Equipment Inspections

Equipment inspections will be conducted by personnel prior to use. If a piece of equipment shows any signs of wear, it must be immediately removed from service.

## Components - PFAS

There are three components to a PFAS. These are 1) the anchor point; 2) the harness; and 3) the connecting device. Each component is explained below:

1. **Anchor Point** - An anchor point is a secure point of attachment for lifelines, lanyards or deceleration devices and is independent from the means supporting the worker. Examples of OSHA approved anchor points are eye bolts, bolt holes, or any other structures capable of supporting 5000 pounds per attached person.
2. **Harness** - Fall protection harnesses are the second component of a PFAS. A competent person must evaluate the type of falling hazards and choose the appropriate belt or harness (most generally performed by EHS staff). A full body harness will be used by employees. The type of anchor point and available connecting devices will also be a factor in choosing a belt or harness.
3. **Connecting Device** - Lanyards, rope grabs, and deceleration devices are all examples of connecting devices. As with belt and harnesses, the proper choice of a connecting device is dictated by the other system components and the jobsite requirements.

## General Fall Protection Policies

Instructions in the use and inspection of fall protection safety equipment provided herein are meant to supplement the manufacturer's safety instructions. Employees are required to read and obtain complete understanding of the manufacturer's instructions in addition to this safety plan. In the event of a contradiction between the manufacturer's instruction and this safety plan, the manufacturer's instructions take precedence. Bring any contradictions to the attention of the Safety Director as soon as possible. All PFAS shall be ANSI and AST rated equipment.

## Site Safety Issues

The competent person, usually the site supervisor/foreman, is responsible for evaluating the safety implications of any deficiency identified in the site safety inspection. If any structure is deemed unsafe to climb by the supervisor, the Safety Director should be notified immediately. DO NOT CLIMB any structure deemed unsafe by the competent person. If the unsafe condition is not corrected prior to leaving the site, the structure should be posted with a sign reading "**Safety Hazard: Do Not Climb**".

## Proper Use of Fall Protection Equipment

Specialties Company has determined that a full body harness with D-ring in the center of the back (for fall arrest protection), a D-ring in the center of the chest (for use with ladder safety climb devices), and two (2) D-rings at the waist (for positioning and/or fall protection) will be used. A 6 ft. or shorter lanyard with integral deceleration device (for fall protection) and a 6 ft. or shorter lanyard (for positioning and/or fall protection) will be used for connecting devices. Note only self-locking hooks or self-locking carabiners will be used in fall protection safety equipment. It has been determined by the Company that this equipment best meets the requirements of the type of work to be performed by its employees.

## Special Circumstances

Specialties Company recognizes that, due to the unique nature of some of the work performed, there will be times when exceptions to the above policies will be necessary. Approval for any exceptions to the fall protection policies can only be granted by the Safety Director. ***Under no circumstances will any safety equipment ever be altered.***

# CONFINED SPACE ENTRY

## Introduction:

The purpose of this program is to inform workers of practices and procedures used by the Company to protect workers from the hazards of confined spaces entry. For our operations, the most common confined spaces are entry into pipes or manholes; however, there are a number of other situations that could present confined space hazards. For example; an open trench more than four feet deep, a poorly ventilated construction trailer and even tanks or material cargo vessels.

## Confined Space General Definitions:

1. **Acceptable Entry Conditions:** The conditions that must exist in a permit space to allow entry and to ensure that the employees involved with a permit-required confined space entry can safely enter into and work within the space.
2. **Attendant:** An individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant's duties assigned in confined space program.
3. **Authorized Entrant:** An employee, authorized by Company to enter a permit space.
4. **Confined Space is DEFINED as a space that:**
  - 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 (for example, tanks, vessels, silos, storage bins, hoppers, and pits are spaces that may have limited means of entry).
  - c. Is not designed for continuous employee occupancy.
5. **Emergency:** Any occurrence (including any failure of hazard control or monitoring equipment) or event(s) internal or external to the confined space which could endanger entrants.
6. **Engulfment:** The surrounding and effective capture of a person by a liquid or finely divided solid (flowable) substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.
7. **Entry:** The act by which a person intentionally passes through an opening into a permit required confined space, and subsequent work activities in that space. The entrant is considered to have entered as soon as any part of the entrant's body breaks the plane of an opening into the space.  
**Entry Permit:** The written or printed document to allow and control entry into a permit confined space (available from Safety Director).
8. **Entry Supervisor:** The person (foreman or other competent person) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry.
  - a. Note: An entry supervisor also may serve as an attendant or as an authorized entrant, as long as that person is trained and equipped as required by this program for each role. Also, the duties of entry supervisor may be passed from one individual to another during the course of an entry operation.
9. **Hazardous Atmosphere:** An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is escape unaided from a permit space) injury, or acute illness from one or more of the following causes:
  - a. Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL).
  - b. Airborne combustible dust at a concentration meeting or exceeding LFL.
    - **Note:** This concentration may be approximated as a condition in which the dust obscures vision at a distance of 5 feet (1.52 m) or less.
  - c. Atmospheric oxygen concentration below 19.5 % or above 23.5 %.

- d. Atmospheric concentration of any substance which exceeds the OSHA PEL.
    - **Note:** *An atmospheric concentration of any substance that is not capable of causing death, incapacitation, impairment of ability to self rescue, injury, or acute illness due to its health effects is not covered by this provision.*
  - e. Any other atmospheric condition that is IDLH.
    - **Note:** *For air contaminants for which OSHA has not determined a PEL, other sources of information, such as Material Safety Data Sheets, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.*
10. **Immediately Dangerous to Life or Health (IDLH):** Any condition which poses an immediate threat of loss of life; may result in irreversible or immediate-severe health effects; may result in eye damage; irritation or other conditions which could impair escape from the permit space.
  11. **Isolation:** The process by which a permit space is removed from service and completely protected against the release of energy and material into the space by: lockout or tagout of all sources of energy or mechanical linkages.
  12. **Non-Permitted Confined Space:** A confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.
  13. **Oxygen Deficient Atmosphere:** An dangerous atmosphere containing less than 19.5 % oxygen by volume.
  14. **Oxygen Enriched Atmosphere:** An dangerous atmosphere containing more than 23.5% oxygen by volume.
  15. **Permit Required Confined Space (Permit Space):** A confined space that has one or more of the following characteristics:
    - a. Contains or has a potential to contain a hazardous atmosphere.
    - b. Contains a material that has the potential for engulfing an entrant.
    - c. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section.
    - d. Contains any other recognized serious safety or health hazard.
  16. **Prohibited Condition:** Any condition in a permit space that is not allowed by the permit during the period when entry is authorized.
  17. **Rescue Service:** The personnel (i.e. in this case, the fire department) are designated to rescue employees from permit spaces, unless workers can be rescued without entry into the space by mean of a retrieval system.
  18. **Retrieval System:** The equipment (including a retrieval line, chest or fullbody harness, wristlets, and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.

### **Confined Space Program Responsibilities:**

1. **Safety Director**
  - a. Aid in the training program for all personnel who enter confined spaces.
  - b. Approve all monitoring equipment, safety equipment, training programs and materials for safe work operations.
  - c. Aid entry supervisors in inspecting Permit Confined Space locations for determination of hazards.
  - d. Provide periodic calibration of confined space entry monitoring equipment.
  - e. Inspect completed permits annually.
2. **Supervisors/Foremen**
  - a. Be able to identify a confined space, and contact Safety Director when the space is new, or workers are not trained in entry.
  - b. Assure affected employees receive training appropriate for their confined space duties.
  - c. Ensure that all entry permits are completed and signed upon termination of entry and that a copy is submitted to Safety Director.

### 3. **Employees**

- a. Be able to identify any new confined spaces, and contact the appropriate supervisor before entry.

### **General Requirements:**

1. **Hazard Identification.** Each permit space shall be identified and evaluated, including a determination of the severity of the hazard. Department supervisors shall report potential permit spaces to Safety Director.
2. **Permit System.** A written permit system shall be utilized for entry into permit spaces. Permit should be obtained from the EHS department, and any questions regarding permits should be directed to the Safety Director.
3. **Employee Information.** For Company-owned sites, signs shall be posted where feasible near permit spaces to notify employees of the hazards that may be present and that only authorized entrants may enter the permit space. Where signage is not feasible, potentially exposed employees shall be trained with regard to the danger of unauthorized entry of permit spaces. EHS shall be responsible for insuring proper signage of permit spaces.
4. **Prevention of Unauthorized Entry.** Unauthorized entry into permit spaces shall be prevented. Prevention measures include training, signs, and security measures. All employees in or around confined spaces shall attend confined spaces awareness training.
5. **Employee Training.** Only trained attendants, authorized entrants and personnel authorizing or in charge of entry, shall work in and around a permit space.
6. **Equipment.** Including: testing, monitoring, communication and personal protective equipment, shall be provided, maintained, and properly used. EHS will aid in specifying safety equipment for each permit space.
7. **Rescue.** Rescue procedures (see Emergency Action Plan) and equipment shall be in place prior to entry into a permit space. The use of retrieval equipment shall be required where there exists a potential for an IDLH atmosphere or engulfment. There must be adequate attachment points outside the confined space for tying-off or otherwise securing retrieval lines for all authorized entrants. Where retrieval lines themselves could constitute an entanglement hazard or otherwise cannot be used, an equivalent method for rescue shall be used. Workers will not be trained in rescue of workers for which the rescuers must enter the confined space. Trained professionals will be relied on for these emergency services.
8. **Protection from External Hazards.** Barriers necessary to protect entrants from external hazards (pedestrian, vehicle, etc.) shall be in place prior to entry into a permit space.

### **Confined Space Training**

Confined space training shall be provided for employees required to enter any location defined as a permit entry required confined space. Training shall also be provided to all attendants and entry supervisors.

### **Entry Supervisors**

1. Know the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure (refer to MSDS).
2. Verify, by checking that the appropriate entries have been made on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before approving the permit and allowing entry to begin.
3. Terminate the entry and cancel the permit as required when:
  - a. The entry operation covered by the entry permit has been completed.
  - b. A condition that is not allowed under the entry permit arises in or near the permit space.



4. Remove unauthorized individuals who enter or who attempt to enter the permit space during entry operations.
5. Determine, whenever responsibility for a permit space when entry operation is transferred and at intervals dictated by the hazards and operations performed within the space, that entry operations remain consistent with terms of the entry permit, and that acceptable entry conditions are maintained.

#### **Authorized Entrants**

1. Know the hazards that may be encountered during entry, including the mode, signs or symptoms, and consequences of the exposure (refer to MSDS).
2. Use equipment properly in accordance with training received.
3. Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to alert the attendant of the need to evacuate the space as required.
4. Alert the attendant whenever:
  - a. The entrant recognizes any warning signs or symptoms of exposure to a dangerous situation.
  - b. The entrant detects a prohibited condition.
5. Exit from the space as quickly as possible whenever:
  - a. An order to evacuate is given by the attendant or the entry supervisor.
  - b. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation.
  - c. The entrant detects a prohibited condition.

#### **Attendants**

1. Know the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure (refer to MSDS).
2. Be aware of possible behavioral effects of hazardous exposure in authorized entrants.
3. Maintain a continuous accurate count of authorized entrants in the permit space and ensure that the means used to identify authorized entrants accurately identifies who is in the permit space.
4. Remain outside the permit space during entry operations until relieved by another authorized attendant.
5. Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space.
6. Monitor activities inside and outside the space to determine if it is safe for entrants to remain in the space and order the authorized entrants to evacuate the permit space immediately under any of the following conditions:
  - a. If the attendant detects a prohibited condition.
  - b. If the attendant detects the behavioral effects of hazards exposure in an authorized entrant.
  - c. If the attendant detects a situation outside the space that could endanger the authorized entrants.
  - d. If the attendant cannot effectively and safely perform all the duties required under this section.
7. Summon emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards.
8. Take the following actions when unauthorized persons approach or enter a permit space while entry is underway:
  - a. Warn unauthorized persons that they must stay away from the permit space.
  - b. Advise the unauthorized persons that they must exit immediately if they have entered the permit space.
  - c. Inform the authorized entrants and entry supervisor if unauthorized persons have entered the permit space.
9. Perform non-entry rescue as specified by the rescue procedure.

10. Perform no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.

**Rescue and Emergency Services:**

The following information shall be provided to the emergency rescue service (fire department) for each confined space rescue:

1. Inform the rescue service of the hazards they may confront when called on to perform rescue at jobsites or Company facilities.
2. Provide the rescue service with access to all permit spaces from which rescue may be necessary so that the rescue service can develop appropriate rescue plans.
3. If an injured entrant is exposed to a substance, that MSDS or written information shall be made available to the medical facility treating the exposed entrant if requested.

To facilitate non-entry rescue, retrieval systems or methods shall be used whenever an authorized entrant enters a permit space, unless the retrieval equipment would increase the overall risk of entry or would not contribute to the rescue of the entrant. Retrieval systems shall meet the following requirements:

1. Each authorized entrant shall use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, or above the entrant's head.
2. The other end of the retrieval line shall be attached to a mechanical device or fixed point outside the permit space in such a manner that rescue can begin as soon as the non-entry rescuer becomes aware that rescue is necessary.

## SILICOSIS PREVENTION PROGRAM

### General Company Policy

The purpose of this notice is to inform you that our Company has established a Silicosis Prevention Program that includes all employees exposed to respirable silica. The program will include air monitoring to assess employee exposures, and to determine appropriateness of engineering and administrative controls to reduce silica exposures, or the addition of appropriate respiratory protection, and the implementation of employee training. The purpose of this program is to prevent occupational disease, primarily chronic silicosis, from silica exposures in the workplace.

The Safety Director is the program coordinator and has overall responsibility for the program, including review and updates to the program as necessary. Workers will receive awareness training of the possible effects of silica exposure on their health, the control measures implemented to reduce exposures, and the purpose and selection of respiratory protection when exposures are deemed hazardous to their health.

Compliance with our Company's safety and health requirements, including the Silicosis Prevention Program, is a *condition of employment*. Failure to comply with the requirements of this program will result in disciplinary action as stated in the Company's safety and health program.

**Air Monitoring:**

Air monitoring surveys are used to evaluate personal, breathing zone employee exposure levels for each process and operation. Air sampling is conducted on representative employees in each job category at risk to evaluate worst-case 8-hour average exposures to respirable silica. The monitoring results are used to:

- Determine which job task groups require administrative control or should be included in the respiratory protection program.
- Identify which equipment, employee locations, and areas are candidates for installation of engineering control measures
- Select appropriate respirators if needed to reduce employee exposures.

Air sampling and analysis are conducted using standard equipment and methods to evaluate employee exposure to respirable silica. Initial observations are conducted to evaluate representative employees' exposures during operations at Company facilities and job sites. Additional observations are conducted if changes in production, equipment, or controls are implemented to determine the effect of those changes on employee respirable silica exposures. Any employee wishing to obtain further information or monitoring results should contact the Safety Director.

#### **Engineering and Administrative Controls:**

If silica exposures exceed the OSHA PEL, feasible engineering and/or administrative controls will be implemented to reduce employee exposures to nonhazardous levels. The ultimate goal is to eliminate hazardous employee exposures to silica levels (above the OSHA PEL). However, where this is not feasible, measures to **reduce** employee exposures to respirable silica will be implemented (Respiratory Protection Program). For example, the following controls have been implemented to date:

- Engineering controls have been implemented to reduce employee exposures to airborne silica and respirable dust associated with the operation of the heavy equipment, including spreader and water trucks, mixers, etc. Examples of the engineering controls include:
  1. Providing enclosed cabs for trucks and heavy equipment.
  2. Controlling dust generated by wetting down roadways used by trucks and other mobile equipment.
- An equipment inspection, maintenance, and testing program has been established to reduce airborne silica generated by poorly maintained equipment. Periodic inspections are conducted to ensure equipment is operating properly with all enclosures and ventilation systems in place and operating effectively.

#### **Housekeeping:**

The following housekeeping control measures have been established to reduce airborne dust exposures.

- Each operator and foreman is responsible for housekeeping in his or her area.
- Cleaning with compressed air, dry sweeping silica is discouraged when possible.
- Vacuuming and washing down with water will be used in place of dust producing methods where possible.

#### **Hygiene Procedures:**

The following hygiene procedures have been included in training to reduce employee exposures at the site and to reduce the potential for contamination of the employees' vehicle and home. Each supervisor is responsible for suggesting hygiene procedures.

- General personal hygiene procedures.
- Methods for cleaning clothing (washing instead of using compressed air).

#### **Employee Training:**

All employees potentially exposed to silica may receive pamphlets on the Silicosis Prevention Program elements by supervisors during employee indoctrination. At least annually, the Safety Director will review the information presented in the initial training. Foremen and other supervisors will be trained regarding hazards and appropriate protective measures so they will be available to answer questions from employees and provide daily monitoring of safe work practices. Employee participation in training sessions will be documented. Periodic toolbox talks will emphasize at least these items;

- The effects of silica exposure on the lungs and relevant symptoms of exposure.

- The specific nature of operations which could result in exposure to silica above the PEL and the type and function of engineering controls.
- The purpose of respiratory protection, with instruction on fitting, use, and care;
- Availability and location of written procedures and health information (MSDS)..

The Safety Director will review the employee-training program and advise supervisors on training and retraining needs. As part of the assessment of the training program, the Safety Director will obtain input from employees regarding the training they have received and any suggestions for improvement.

**Record keeping:**

Records are maintained, and made available to employees upon request, for all medical examinations, air sampling surveys, and training sessions. Employee requests for records should be directed to the Safety Director.

- Survey information includes sampling and analytical methods; type of personal protective equipment, if any, in use at the time of sampling; and results.
- Records will be maintained for at least five (5) years following termination of a worker's employment.

**Additional Information:**

All employees or their designated representatives can obtain further information on the written program, the OSHA Special Emphasis Program for Silicosis, and/or records of air monitoring results or medical exams at the Company's corporate office.

**RESPIRATORY PROTECTION PROGRAM**

**Introduction**

The Respiratory Protection Program (RPP) has been established to protect the health of workers who wear respirators and assure compliance with State and Federal law. Donning of respirators is completely voluntary at Specialties Company, but every worker who wears a respirator will be included in the program. Medical monitoring, training, fit testing, maintenance and quality assurance components are basic parts of this program.

Any operation that generates harmful airborne levels of dusts, fumes, sprays, mists, fogs, smokes, vapors, or gases or that may involve oxygen-deficient atmospheres requires the use of effective safety controls. This must be accomplished, as much as feasible, by accepted engineering control measures (for example, enclosure or confinement of the operation, general and local ventilation, and substitution of less toxic materials). When effective engineering controls are not feasible, or while they are being instituted, appropriate respiratory protection must be used in accordance with Company requirements as prescribed by OSHA Standard Practices for Respiratory Protection.

Lightweight negative pressure respirators may be worn in situations where respiratory protection is used to control exposure to airborne particles. However, workers must be medically evaluated, fit tested with the make and model of respirator they will wear, instructed in its use, and meet all other maintenance and quality assurance requirements of this program.

**Responsibilities**

To ensure that the RPP is conducted in accordance with OSHA regulations, certain responsibilities are required of each employee, supervisor, Safety Director, and the Company's medical services provider. An employee has the responsibility to use provided respiratory protection in accordance with this program. Employees must remain clean shaven where a respirator touches their face to assure proper fit of the respirator under conditions of use.

**Worker Responsibilities:**

- Wearing the respirator in accordance with the instructions and training received.
- Maintaining and storing the respirator in good condition.

### **Supervisor Responsibilities:**

- Identifying those employees who may need to use respiratory protection. (Safety Director will provide assistance upon request in this determination, and also provide list of pre-determined operations recommending respiratory protection).
- Ensuring that their employees have been properly trained and fitted.
- Ensuring that their employees use the respirators as recommended.
- Surveillance of the work area. Before the start of any project, as part of the general hazard analysis, a careful determination shall be made to identify potential airborne hazards to which employees may be exposed.

**Note 1:** Volunteer users of lightweight single-use respirators “dust masks” (**See Figure**) are not required to be included in this program if they work in situations where overexposure to chemical substances will not occur and respirator misuse is unlikely. These exposures are generally described as nuisance situations where the worker is more comfortable with some form of respiratory protection. Workers may also use lightweight single-use respirators “dust masks” to control exposure to a non-occupational condition such as an allergy without being included in the program.



**Note 2:** Employees voluntarily using “dust masks” should read the following:

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

### **Safety Director Responsibilities**

- Ensure employees are medically evaluated for respirator use.
- Fit-Test employees with proper respirators and provide training for their use.
- Provide respiratory equipment.
- Evaluate employee exposures and work conditions, including inspection of respirator use.

### **Respirator Wearers Should Do The Following:**

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

## **Selection Procedures**

Respiratory protection devices will be chosen after considering the following factors:

1. Health of the worker and ability to wear a respirator.
2. Nature of the hazard, e.g. toxicity, chemical and physical properties.
3. Extent of the hazard (*concentration*) and time of exposure.
4. Work requirements and conditions.
5. Characteristics and limitations of available respirators.

## **Medical Monitoring**

Specialties Company must make available and pay for medical monitoring. The Company will contract with a local health care provider to determine the medical status for workers who use respirators. Persons must not be assigned to tasks requiring the use of respirators unless it has been determined that they are physically able to perform the work and use the RPP equipment. The Examining Physician responsible for the employee's care will determine what diagnostic method is necessary to determine whether medical conditions exist which would prohibit or limit respirator use. Pulmonary function tests, including forced vital capacity (FVC) and forced expiratory volume at one second (FEV1.0), and a medical questionnaire may be given to employees. The Respiratory Medical Evaluation Form may be used by the Examining Physician to evaluate any person, except asbestos workers, who may use a respirator.

## **Medical Certification**

Pertinent health factors, conditions on the job site, and the employee's health status will be considered by the Examining Physician. The Examining Physician will certify whether the employee is capable of wearing a respirator and describe any physical limitation.

## **Respirator Fit Testing**

Fit testing must be done whenever an equipment/process/task changes which could affect the fit of a respirator such as when an employee's facial characteristics change or the respirator design changes. Workmen with facial hair in the respirator area will not be issued respirators requiring a fit test because it cannot be determined that the respirator will fit under conditions of use. Fit testing shall include face-to-seal fit, wearing in normal air for a long familiarity period, and testing in a test atmosphere. Fit testing will be completed after the employee's first and subsequent annual medical evaluations.

## **Monitoring of Air Contaminants**

Air contaminant levels during routine operations will be monitored by the Company before the type of respiratory protection is selected. Existing operations undergoing a change that might significantly alter the concentration of air contaminants will be evaluated by the Company to determine if another method of protection is appropriate.

## **IDLH or Oxygen Deficient Atmospheres**

Oxygen deficient atmospheres require the use of an independent breathable atmosphere. Employees who work in areas where "emergency use only" SCBA pressure-demand respirators are available shall be trained in SCBA use, but medical monitoring is not required. Immediately dangerous to life or health (IDLH) conditions are defined as: Conditions that pose an immediate threat to life or health and/or conditions that pose an immediate threat of severe exposure to contaminants that are likely to have delayed adverse effects on health. If these atmospheres are present, they are likely to occur in confined spaces.

## **Respirator Selection**

Once a respiratory hazard is identified, the Safety Director will select the proper PPE based on the nature of the hazard. Selection will be made in compliance with the OSHA Respiratory

Protection Standard, and only NIOSH/MSHA approved respirators will be made available to personnel.

### **Respirator Training**

General respirator awareness training will be given annually to supervisors and foremen, and to all employees who either wear or intend to wear a respirator.

Employees who are certified to use respirators during the course of work will be given individual training on an annual basis. Training will be performed during fit testing.

Specialties Company will maintain records of training. Training certificates shall include at a minimum: employee name, date, and type of training.

### **Respirator Inspections**

Each respirator must be inspected routinely before and after each use by the employee using it. Respirators for emergency use must be inspected after each use, or at least once each month, by the employees to whom they are assigned. Inspections of emergency respirators should be done according to manufacturers' instructions.

### **Cleaning and Disinfecting**

Respirators must be cleaned and disinfected after eight hours of use, or as necessary to ensure protection for the wearer. During cleaning, an inspection shall be made, and any worn or deteriorated parts or components shall be repaired or replaced.

### **Respirator Maintenance and Storage**

Employees shall arrange for replacement or repairs by competent persons with parts designed for the respirator. Do not attempt to replace components or make adjustments or make repairs beyond the manufacturer's recommendations. After inspection, cleaning and necessary repair, store respirators to protect them against dust, sunlight, heat, extreme cold, excessive moisture, or damaging chemicals.

### **Program Evaluation and Recordkeeping**

The Company will evaluate this program through periodic and random inspections to assure that respirators are properly used, cleaned and maintained. Inspection reports will be maintained by the Safety Director. The Company will maintain the following records:

1. Names of employees who voluntarily wear respirators; number and types of respirators in use. These records must be maintained for 30 years.
2. A record of employee training programs. Records will be maintained for five years past the date of employment of that employee.
3. Fit tests performed on employees. The records will be maintained for 30 years.
4. Records on respirator inspections. These records will be maintained for five years
5. The Examining Physician will maintain medical records according to State law.
6. Date of any measurements, operations involving exposure, sample and analytic measure, number, duration and results, and type of respiratory protection worn. Records shall include the name, employee number, and exposure of employees whose exposures are represented.

## **HEARING CONSERVATION PROGRAM**

### **I. PURPOSE:**

Specialties Company, LLC (the Company) has established a Hearing Conservation Program to protect worker from noise hazards on the job. OSHA regulations require that each employer

implement a hearing conservation program when workers are exposed to noise levels exceeding 85 dB. It is not hard to exceed this level of noise on many of the jobs sites. Typically, noise levels exceeding 85 dB are experienced when working with any type of pneumatic chipper or hammer, metal saw, and grinders. Some common noise levels:

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

**RESPONSIBILITY:**

The Safety Director is responsible for developing a written Hearing Conservation Procedure and overseeing the training of all employees in the Company. The Safety Director is also responsible for the monitoring and administering this procedure.

**INTRODUCTION:**

The OSHA Standard on Occupational Noise Exposure, 29 CFR 1910.95, established the permissible limit of noise as 85 dB(A) (decibels), expressed as an eight-hour (8-hours), time-weighted average, (TWA). This standard allows short-term unprotected noise exposure up to a maximum of 115dB (A), peak sound.

The noise standard requires the identification by personnel monitoring of employees who may be exposed above the 85 db (A), 8-hour, TWA. Hearing protection is also required for specific activities or using certain types of equipment.

**II. PROCEDURES:**

The Company has taken a conservative approach to this noise hazard by establishing this program. The following elements establish the program:

- o An Audiometric Testing Program (when required)
- o An Employee Education and Training Program
- o Monitoring and Analysis of Workplace Noise Levels
- o Providing Suitable Engineering Controls (when appropriate)
- o Providing Hearing Protectors
- o Maintaining required records for all the above.

**III. EMPLOYEE EDUCATION AND TRAINING**

Company employees must be trained on the use of personal hearing protection equipment. Also each employee must know how to clean and maintain the hearing protection equipment. The training will cover the following:

- o Training will be for all employees who are exposed to noise at or above the 8-hour TWA of 85 dB.



- The training will be repeated annually for each employee included in the hearing conservation program.
- The effects of noise on hearing
- The purpose of hearing protectors, the advantages, disadvantages, and the attenuation various types and instruction on selection, fitting, use and care
- The purpose of audiometric testing, and an explanation of the test procedures.
- Access to information and training materials.

#### **IV. MONITORING AND ANALYSIS OF WORKPLACE NOISE LEVELS**

The Company may periodically, or as necessary, conduct noise level surveys of the workplace. The results of these surveys will be made available to employees upon request.

Any job area or company location found to be in excess of the allowable designated noise levels that cannot be brought into compliance with the noise standard will be designated as an area where hearing protectors are to be worn. When signs are posted employees must wear hearing protection. The signs may read as follows:



#### **V. PROVIDE SUITABLE ENGINEERING CONTROLS**

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

#### **VI. PROVIDE HEARING PROTECTORS WHERE REQUIRED**

The Company will provide and require employees with hearing protectors if his/her 8-hour TWA is above the 85dB (A). The Company will also make hearing protectors available to all employees exposed to a TWA above 85dB at no cost to the employee. Any employee who may have a significant threshold shift of hearing level will be required to wear hearing protection if they are exposed to noise TWA of 85dB. The Company will provide workers with a choice of at least one type of ear plug and one type of ear muff (ear muff can not be used when anything prevent the seal of the ear muff, such as safety glasses) The Company will make a concerted effort to fine the right protector for each employee, one that offers the right attenuation, is accepted on the terms of comfort, and is used by the employee.

#### **VII. RESPONSIBILITIES**

##### **JOB SITE SUPERVISION WILL:**

- Require hearing protection in all areas with noise levels at or above the 85dB(A) and for all tasks which generate such noise level (i.e., grinding, hammering). Ear plugs shall be required in an area and/or on tasks with the sound levels exceeding 105dB.
- To alert employees to possible hazardous noise exposures, signs shall be posted in work areas in which the sound levels may exceed 85dB. These signs will be posted by the client.

- o Evaluate the need for engineering and/or administrative controls to reduce the noise levels below the 85 dB and, where feasible, develop a plan to reduce all personnel exposures to less than fifty-percent (50%) of the OSHA allowable.
- o Make hearing protection available and enforce its use by all employees with TWA exposures at or above the fifty-percent (50%) of the OSHA allowable and/or by those who must enter or work in areas where the noise level is 85dB or above.

**The client determines if a unit or work area is classified as a high noise area. After the determination is made Company employees will be instructed to wear the appropriate hearing protection.**

## VIII RECORDKEEPING

All record-keeping for this program will be maintained in the Safety Director's office. Records will include:

- o Audiometric tests (if any)
- o Noise surveys
- o Employee training
- o Engineering controls implemented
- o Record of purchase of hearing protector

## IX. WORK REQUIRING HEARING PROTECTORS

There are many jobs or types of work that generally produces noise levels that intermittently or for short durations exceed the permissible TWA. It is the policy of Specialties Company to require all workers who are engaged in these jobs to wear hearing protectors.

## X. HEARING PROTECTORS

Employees may choose the type of hearing protection that best suits their particular assignment and personal preference for among those listed below. Each employee required to wear hearing protection is responsible for carrying hearing protection on his/her person. Hearing protection is furnished at no cost to employees.

EAR PLUGS – Most ear plugs, when worn properly, have a noise reduction rating (NRR) listed on the package. Most ear plugs have NRR of about 30.

EAR MUFFS – Adjustable muffs can be worn in three positions:

POSITION	NRR
1. Over the head	24 (dependent on the NRR of the Ear Muff)
2. Under the chin	20
3. Behind the head	20

## COMPUTING HEARING PROTECTION LEVEL

To compute the actual hearing protection level under the protector, subtract 7dB(A) from the Noise Reduction Rating (NRR), divide the number by 2, and subtract the remainder from the measured noise level dB (A).

**For example:  $NRR\ of\ 29 - 7 = 22\ dB(A)$**

**$22\ Db(A) \div 2 = 11\ dB(A)$**

**Noise level of 95 dB(A) – 11 = 84 dB(A)**

**Therefore, this device offers a protection level of 11 dB(A).**

# WELDING & CUTTING SAFETY

## Introduction

The following section contains guidelines and requirements for the safe use of flammable and/or compressed gases. The program primarily covers the use of flammable-gas systems, high-pressure gas cylinders, manifold cylinders, and compressed air.

## Hazards

All gases must be used in a manner that will not endanger personnel or property in field operations use, routine shop use, or maintenance operations. Hazards associated with handling and use of flammable and/or high-pressure gases include the following:

1. Injuries caused by flying objects accelerated by an explosion or pressure release;
2. Inhalation of flammable mixtures;
3. Asphyxiation;
4. Secondary accidents such as falls or electrical shocks;
5. Fire caused by ignition of flammable gases.

## Pressure Relief

All systems, system components, and piping subject to over-pressures must be equipped with pressure relief devices.

## Fire Prevention

Fire requires three elements: fuel, oxygen, and ignition. Any experiment or routine operation that places a flammable gas in the presence of an oxidant (air, oxygen) and an ignition source (spark, flame, high temperature) is extremely dangerous. To reduce the risk of fire, eliminate two of these three elements. Thus, when using flammable gases, (1) eliminate ignition sources and (2) prevent mixing of fuel with air or oxygen. Contain or vent fuel. Minimize the use of oxygen in high concentration. Materials not normally considered combustible burn violently in high-oxygen atmospheres. Therefore, special precautions must be taken when working with high-oxygen concentrations.

## Flammable Gas Guidelines

All personnel authorized to work with flammable gases must be familiar with the hazards and emergency measures that might be required in the event of an accident. For safe operation the following safety guidelines must be observed: Appropriate warning devices and signs, such as "No Smoking and Open Flames," must be posted on or near the work area. Good housekeeping practices must be observed; unnecessary combustible material must be kept out of flammable gas operating areas. Only the flammable gas cylinders actually required for the process should be present in the operating area. Extra cylinders must be stored in an approved area outside the work area. All ignition sources, welding torches, lit cigarettes, electric arcs, electrostatic charges, and pilot lights, must be kept away from flammable gases at all times. Ventilation must be provided to prevent entrapment of flammable gases in closed areas. If the gas is lighter than air, overhead ventilation is required. Gases denser than air must be prevented from entering trenches and manholes where they can collect and form explosive mixtures with air. Never use a flame to detect flammable gas leaks. Use soapy water or other approved methods. If a flammable gas cylinder is discovered with a small leak and the gas has not ignited, the cylinder must be moved carefully to a safe, outside area. If the leak is serious or the gas has ignited, evacuate the area and contact the Safety Director and the local Fire Department immediately.

## Compressed Oxygen

Oxygen supports combustion but is nonflammable itself. Oxygen lowers the ignition point (in air) of flammable substances and causes them to burn more vigorously. Materials such as oil and grease can burn with explosive violence in the presence of oxygen, even in minute

quantities. Therefore, oxygen cylinders must not be handled with greasy or oily hands or gloves and must not be stored near highly combustible materials such as oil, grease, or reserve acetylene. Oxygen must never be used to purge lines, to operate pneumatic tools, or to dust clothing; cloth, plastics, etc, saturated with oxygen burn explosively. Accordingly, oxygen cylinders must never be used as hat racks, clothes hangers, etc, since leaky fittings can result in accumulations of gas in the covering material.

Insects in oxygen "pigtailed" can ignite spontaneously and may cause sufficient heat and over-pressure to burst the pigtail, valve, or manifold. Don't leave pigtailed disconnected for more than a few minutes. Do not use white lead, oil, grease, or any other non-approved joint compound for sealing oxygen-system fittings. Threaded connections in oxygen piping must be sealed with joint compounds or Teflon tape approved for oxygen service. Litharge and water is recommended for service pressures above 300 psig (2.0 MPa). Gaskets must be made of non-combustible materials. When high pressure oxygen cylinders are stored, they must be separated from flammable gas cylinders by at least 20 feet or by a fire-resistive partition.

### **Compressed Acetylene**

Acetylene is used principally with welding and cutting torches. Commercial acetylene gas is colorless and highly flammable with a distinctive garlic-like odor. Acetylene, in its free state under pressure, may decompose violently - the higher the pressure, the smaller the initial force required to cause an explosion. Therefore, acetylene is stored in acetone, which dissolves 300 times its volume of acetylene. Acetylene cylinders are filled with a porous filler material that holds the acetone. The combination of filler and acetone allows acetylene to be contained in cylinders at moderate pressures without danger of explosive decomposition. Full cylinder pressure is 250 psig at 70 degrees F. When acetylene is withdrawn from its cylinder too rapidly, the gas cannot come out of solution fast enough, the downstream pressure drops, and liquid acetone is thrown out of the cylinder and may limit the flow of the pressure-reducing regulator. The following precautions are recommended when working with acetylene:

1. To prevent flashbacks, check valves are required in welding gas lines and at the welding/cutting torch. If the acetylene pressure drops, the oxygen pressure at the torch can push oxygen back up the acetylene line, where it can mix with acetylene and cause a flashback.
2. Copper must not be used in acetylene piping - copper forms an impact-sensitive copper acetylide.
3. NEVER use free acetylene gas outside the cylinder at pressures over 15 psig (30 psia) -- it can decompose violently.
4. Acetylene cylinders should be used or stored only in an upright position to avoid the possibility of acetone leaking from the cylinder. If an acetylene cylinder has been stored horizontally, the cylinder should be put upright and left in that position for no less than 30 minutes before being used.
5. When cylinders are empty of acetylene, valves must be closed to prevent evaporation of the acetone.
6. Acetylene cylinders should only be filled by the supplier.

### **Compressed Cylinders**

Only cylinders meeting Department of Transportation (DOT) regulations may be used for transporting compressed gases. Each cylinder must bear the required DOT label for the compressed gas contained, except under certain specified conditions set forth in DOT regulations. It is illegal to remove or to change the prescribed numbers or other markings on cylinders - do not deface, cover, or remove any markings, labels, decals, or tags applied or attached to the cylinder by the supplier. Each cylinder that is in use by the Company must carry a legible label or stencil identifying the contents. Do not repaint cylinders unless authorized by the owner. Compressed-gas containers must not contain gases capable of combining chemically, nor should the gas service be changed without approval from the Maintenance Department.

The cylinder-valve outlet connections on cylinders containing gas mixtures are provided by the gas supplier, based on the physical and chemical characteristics of the gases. Gas mixtures having a flammable component must have a cylinder-valve outlet connection with left-handed threads, even though the gas mixture is nonflammable, unless Maintenance Department has authorized otherwise. Regulators, gauges, hoses, and other appliances provided for use with a particular gas or group of gases must not be used on cylinders containing gases having different chemical properties unless information obtained from the supplier indicates that this is safe. Gases must not be mixed at Company sites in commercial DOT cylinders and must not be transferred from one DOT cylinder to another. Vendor-owned cylinders must not be used for any purpose other than as a source of vendor-supplied gas. Only the vendor may pressurize these cylinders. It is illegal to transport a leaking cylinder (charged or partially charged) by common or contract carrier.

### **Cylinder Handling**

Compressed gases should be handled only by experienced and properly instructed personnel. When in doubt about the proper handling of a compressed gas cylinder or its contents, consult the Maintenance Department and/or Safety Director. Compressed gas cylinders are dangerous when handled incorrectly. Always assume that a cylinder is pressurized. Handle it carefully. Never throw, bang, tilt, drag, slide, roll, or drop a cylinder from a truck bed or other raised surface. If a cylinder must be lifted manually, at least two people must do the lifting. Because of their shape, smooth surface, and weight, gas cylinders are difficult to move by hand.

A truck or an approved cylinder handcart must always be used to move a cylinder. Cylinders must be fastened in metal cradles or skid boxes before they are raised with cranes, forklifts, or hoists. Rope or chain lifting slings alone must not be used. Cylinders, even empty ones, must never be used as rollers for moving materials or as work supports. If damaged, a cylinder can cause severe injuries, including lung damage from inhalation of toxic contents and physical trauma from explosion. A pressurized gas cylinder can become a dangerous projectile if its valve is broken off. When a cylinder is not connected to a pressure regulator or a manifold, or is otherwise not in use, it is extremely important that the cylinder valve be kept closed and the safety cap be kept in place -- the cap protects the cylinder valve (do not lift cylinders by their caps). Notify the Safety Director, giving details and cylinder serial number, if you believe that a foreign substance may have entered the cylinder or valve.

Cylinders containing compressed gases should not be subjected to a temperature above 125 degrees F. Flames, sparks, molten metal, or slag must never come in contact with any part of a compressed gas cylinder, pressure apparatus, hoses, etc. Do not place cylinders where they might become part of an electric circuit. When cylinders are used in conjunction with electric welding, ensure that the cylinders cannot be accidentally grounded and burned by the electric welding arc. Cylinders must not be subjected to artificially low temperatures. Many ferrous metals become extremely brittle at low temperatures. The loss of ductility and thermal stress at low temperature may cause a steel cylinder to rupture. Never attempt to repair, alter, or tamper with cylinders, valves, or safety relief devices.

### **Working With Gases**

Always identify the contents of a gas cylinder before using it. If a cylinder is not clearly labeled, return it and secure it outside of the shop area and notify the Maintenance Department or Safety Director. Before using a cylinder, be sure it is properly supported with two metal chains or the equivalent to prevent it from falling. Contamination of compressed gas cylinders by feedback of process materials must always be prevented by installation of suitable traps or check valves. Suitable pressure-regulating devices and relief devices must always be used when gas is admitted to systems having pressure limitations lower than the cylinder pressure. Gas cylinder valves can be "cracked" (opened slightly) momentarily before regulators are attached to blow dirt off the valve seats, but the valve outlet should always be pointed away from people or equipment. After the regulator is securely attached to the cylinder valve, fully

release (turn counter-clockwise) the pressure-adjusting screw of the regulator before opening the cylinder valve. Open gas cylinder high pressure valves slowly; this gives compression heat time to dissipate and prevents "bumping" the gauges. Never use a wrench on any cylinder-valve hand wheel. Keep removable keys or handles on valve spindles or stems while cylinders are in service. Never leave pressure in a system that is not being used. To shut down a system, close the cylinder valve and vent the pressure from the entire system. Equipment must not be disassembled while it is under pressure. Be aware that any valved-off portion of the system may still be under pressure; bleed the hose, line, or vessel before disassembly to ensure that there is not enough pressure energy stored in the trapped gas or in piping distortion to propel loose objects.

Connections to piping, regulators, and other appliances should always be kept tight to prevent leakage. Where hose is used, it should be kept in good condition. Manifold pigtailed should not be left disconnected for more than a few minutes. Certain insects are attracted to pure gases and will quickly clog these lines. Never use compressed gas to dust off clothing; this may cause serious injury or create a fire hazard. About 30 psi gauge pressure (0.2 MPa) must be left in "empty" cylinders to prevent air from entering the cylinder and contaminating it; air contamination can be extremely dangerous for some cylinder types. Before a regulator is removed from a cylinder, close the cylinder valve and release all pressure from the regulator. Before returning an empty cylinder, close the valve and replace the cylinder-valve protective cap and outlet cap or plug, if used.

### **Cylinder Storage**

Cylinders not actively in use must be stored outside in areas approved by Maintenance and Safety. They must be fastened - with two metal chains or bars or in a fixture - to prevent them from falling if they are bumped or shaken. When gases of different types are stored at the same location, cylinders must be grouped by types of gas, and the groups must be arranged in accordance with the gases contained; flammable gases must not be stored near oxygen. Charged cylinders and empty cylinders should be stored separately in an arrangement that permits removal of "old stock" with minimum handling of other cylinders. Storage areas should be cool, well ventilated, and, where practical, fire resistant; must have solid, level floors or storage surfaces; and must be away from traffic. Storage in sub-surface locations should be avoided. Cylinders must not be stored at temperatures above 125 degrees F or near radiators or other sources of heat, near sparking devices, or near salt or other corrosive chemicals.

### **Compressed Air**

Compressed air for general shop or maintenance use must be restricted to 30-psig (207-kPa) maximum pressure by restricting nozzles. Compressed air at pressures up to 100-psig (700-kPa) may be used to operate pneumatic tools, certain control instruments, and research equipment with properly designed over-pressure relief devices. Building compressed air (house air) may be used to dry parts and to help accomplish many other jobs in the shop, but always ensure that no one is in line with the air stream and always wear goggles or a face shield. Compressed air must not be used for breathing unless it has been especially installed for this purpose and such use has been approved by the Safety Director.

Never apply air pressure to the body or use compressed air to clean clothing. Compressed air injected into the body openings can be fatal. Compressed air used to clean clothing drives particles into the fabric, where they can cause skin irritation and infections. When an automatic shut-off coupling is not used on air-operated tools, a short metal chain (or its equivalent) should be attached to the hose to prevent it from whipping in case it separates from the tool. When using an air-operated tool, shut off the compressed air and vent the hose before changing nozzles or fittings.

## **Welding and Cutting**

Properly protecting yourself during welding operations depends on your understanding of the hazards involved and the appropriate ways to control those hazards. Control of welding hazards includes appropriate eye protection, respiratory protection and/or ventilation of the work area, protective clothing, and using the appropriate welding equipment.

Eye hazards include exposure to ultraviolet and infrared light. Welders and their helpers should wear filter glasses with shades ranging from 2 to 14, depending on the type of welding being done, to protect their eyes. Unless a welding arc is behind a screen, not only the welder, but also people nearby may need eye protection. Other workers should be excluded within a 30 foot radius from gas or low powered arc welding, or also be protected with appropriate filter lenses. Heavy welding requires a 100 foot radius. Inert gas welding produces 5 to 30 times as much ultraviolet light as arc welding and requires shielding for even greater distances. Keep in mind that ordinary untreated plastic lenses absorb ultraviolet light very poorly and should not be relied on for protection.

Virtually all welding processes generate gases, fume and dusts. Gases generated include carbon monoxide, carbon dioxide, ozone, and nitrous gases. Other gases may also be formed in the presence of chemicals which may be on the material being welded. Welding and cutting can also generate fumes from cadmium, lead, cyanide, beryllium, arsenic, fluorides, nickel, cyanide, and other materials which can be hazardous if inhaled. The best type of protection to use can be determined by reading the Material Safety Data Sheet for the material being welded, or the manufacturer of the rod or flux being used.

Mechanical ventilation at the rate of 2,000 cubic feet per minute per welder is required if there is a ceiling height of less than 16 feet, or in confined spaces where structural barriers significantly obstruct cross ventilation. Additional specific ventilation requirements are necessary for fluorine compounds, zinc, lead, beryllium, cadmium, mercury, and for stainless steel that is oxygen cut using either a chemical flux or iron powder or gas shielded arc cutting. Where it is not possible to provide this ventilation, the EHS department should be contacted regarding respiratory protection. Oxygen should never be used for ventilation.

All parts of the body should be protected from radiant energy, sparks, and molten metal splashes. Clothing made from wool, or wool blends, is generally better than cotton. Some cutting operations such as inert-gas metal arc welding will cause exposed cotton clothing to rapidly deteriorate. Questions regarding clothing requirements for specific welding applications should be directed to the EHS personnel. Leather capes, jackets, leggings, and aprons provide additional protection may be applicable in some applications. All welding equipment should be inspected each day prior to use. Report any defects found in regulators, torches or electrical components to a person that is qualified to make the necessary repairs.

## **Ventilation**

The fumes produced in a welding operation can be hazardous to the welder or workers in the near vicinity. Reducing the exposure to fumes through an effective local exhaust or area ventilation system is the first line of defense in preventing discomfort or illnesses from toxic welding fumes. The short duration and nature of welding activities performed by workers during the normal course of work at the Company, will yield small air contaminant exposures, and can be controlled effectively by means of local exhaust ventilation or natural outdoor ventilation. However, for expected long welding durations or confined space welding, the EHS department should be contacted. When the level of the exposure cannot be entirely eliminated by an exhaust ventilation system (i.e. potentially during these operations), some form of respiratory protection may be required when these welding operations are performed. Highly toxic or concentrated welding fumes may require the welder to use a supplied air hood-type respirator, no matter what type of ventilation is in place. Testing equipment is needed to effectively evaluate exposure levels for long duration confined welding. Many toxic fumes are colorless and odorless, and chronic effects of overexposures may not be immediately

detectable. Harmful levels of welding fumes cannot be determined by relying on your body's senses. You may see smoke in the air, smell an irritant and not be adversely affected. In order to accurately determine the level of the contaminants present, air quality testing equipment in the way of air sampling pumps may be placed in the area and on the welder. This equipment pulls air through a filter for a specified amount of time. The sample is then evaluated at a laboratory to determine the levels of the exposure.

The degree of exposure present determines which type of ventilation system is most appropriate. In field locations, such as construction projects and shipyards, 'sucker' hoses can be set up to pull fumes from the welding zone. Determining proper ventilation and/or respiratory protection procedures must be taken very seriously. The EHS department should be contacted by the site supervisor before potentially hazardous conditions occur, allowing personnel to systematically evaluate the process, exposures and possible controls to determine which will help ensure providing an employee a safe place to work. Once protective measures have been determined, it is the responsibility of each welder and their supervisor to make sure they are being used properly.

## ERGONOMICS: AVOIDING BACK INJURIES

### Simple Lifting Guidelines:

1. **Decide if the weight is too heavy.** If the weight of the object is too much, ask your fellow employees for help.
2. **Bend your knees when you lift.** When lifting or picking up an object, bending your knees helps lessen the stress on your back.
3. **Do not twist your body when you are carrying, picking up, or sitting down the object.** These processes are not recommended because they can place unnecessary stress on your back.
4. **Make sure the load is steady and close to your body.**
5. **Make sure you can safely navigate the path you are carrying the object through.** Path should be clear and establish proper footing before you move an object.
6. **When you lower the load, bend your knees.**
7. **Choose to "push" rather than "pull" an object when possible.**

### Reporting Back Injuries:

It is always better to report the slightest pain in your back. Back injuries have been known to worsen over time and it is important to record the circumstances that caused the initial pain. To establish an injury as work-related, the injury must be reported immediately. If the pain does not go away, or is accompanied by weakness or numbness in your lower limbs, it is vital that you seek treatment as soon as possible.

(Refer to Accident Reporting guidelines)

## HAND & POWER TOOLS: GUIDELINES FOR PROPER USE

### Grinders

1. Do not use grinding wheels that have chips, cracks or grooves.
2. Do not use a grinding wheel if it wobbles. Tag it "Out of Service."
3. Adjust tongue guard so that it is no more than 1/4 inch from the grinding wheel.
4. Do not try to stop the wheel with your hand, even if you are wearing gloves.



## **Drills**

1. Do not use dull, cracked or bent drill bits.

## **Hydraulic/Pneumatic Tools**

1. Do not point a compressed air hose at bystanders or use it to clean your clothing.
2. Tag defective or damaged tools "Out of Service" to prevent usage of the tool.
3. Do not use tools that have handles with burrs or cracks.
4. Do not use compressors if their belt guards are missing. Replace belt guards before use.
5. Turn tool "off" and let it come to a complete stop before leaving it unattended.
6. Disconnect tool from the air line before making any adjustments or repairs to it.

## **General Hand Tool Safety**

1. Tag worn, damaged or defective tools "Out of Service" and do not use them.
2. Do not use a tool if its handle has splinters, burrs, cracks, splits, or if head is loose.
3. Do not use impact tools such as hammers, chisels, punches or point bars that have mushroomed heads.
4. When handing a tool to another person, direct the sharp points and cutting edges away from yourself and the other person.
5. When using knives, shears or other cutting tools, cut away from your body.
6. Do not carry sharp or pointed hand tools such as screwdrivers, scribes, snips, scrapers, chisels or files in your pocket unless the tool or pocket is sheathed.
7. Do not perform "make-shift" repairs to tools.
8. Do not throw tools from one location to another or from one to another.
9. Transport hand tools only in tool boxes or belts. Do not carry tools in your clothing.

## **Powder Actuated Tools (i.e. very limited roadway use)**

1. Wear impact resistant safety goggles or face shields when operating any powder actuated tools.
2. When using powder actuated tools, do not drive fasteners into structural steel without first looking to see if the steel is backed by a steel plate or barricade, and verify all personnel are away from the direct line of fire.
3. Do not attempt to fasten material through a pre-drilled hole unless the powder actuated tool has a "hole" locator.
4. Keep your head and body behind the powder actuated tool when firing it.
5. Do not fasten steel beams at a distance closer than 1/2 inch from the edge of the steel.
6. Before using powder actuated tools, do not alter, bypass, or remove the shield or guard at the muzzle end of the powder actuated tool.
7. Do not load a powder actuated tool until you are ready to fire it.

# **EXCAVATION SAFETY PROGRAM**

## **(Utility Locate Process)**

### **Introduction**

The Excavation Safety Program has been established to protect workers during and while working around site excavations. The following information is a component of competent person training for excavations, but primarily acts as an informative document for all workers in regards to excavation work.

**Excavation** is defined as (IC 8-1-26-6 Sec.6): “an operation for the movement, placement, or removal of earth, rock, or other materials in or on the ground, by use of tools or mechanized equipment...including augering, backfilling, boring, digging, ditching, drilling, driving, grading, jacking, plowing in, pulling in, ripping, scraping, trenching, and tunneling.” In short, any penetration or disturbance of the earth’s surface by man or equipment.

### **Excavation Preparation**

Before starting work, a competent person must construct a hazard assessment of the site, or Excavation Safety Plan of the work area. During this stage, it is important to understand the nature of the work area. Some work areas may require limited action on the part of workers, but other work areas may have specific characteristics that may require special precautions or procedures when working around underground utilities.

- **Underground Utilities:** Before any work is performed, a complete location survey of underground utilities and infrastructure shall be performed. Employees must utilize the “ONE CALL” system which coordinates the location of most all utilities in a given excavation area. Even though this should be coordinated by the supervisor, it is the competent person’s (foreman’s) responsibility to determine that all utilities have either been marked or confirmed that there are no underground lines present before any excavation work begins. Any underground utilities exposed by our work shall be protected from physical damage and contact by crew members.
- **Utility Locate Process:**
  1. Contact the utility locating service for coordination of locate requests.
  2. Document the locate ticket numbers provided by the service.
  3. Review as-built drawings (if available) with Prime or General Contractor.
  4. Schedule joint meeting with member utilities, utility locating service, and Prime or General Contractor.
  5. Super and/or Foreman to ensure that markings are painted and flagged.
  6. Review locations with crew members
  7. Pot-hole utility crossings and conflict areas; observe Tolerance Zones.
  8. Excavate with caution.
- **Vibration Sources:** Heavy traffic and heavy equipment working in close proximity, or other vibration sources need to be assessed for their affect on underground facilities or infrastructure.
- **Unguarded Perimeter:** The excavation perimeter needs to be assessed for possible accidental ingress to the excavation edges. Footpaths, sidewalks, or shortcuts likely to be used, or areas where hedges or other growths may conceal the excavation, may need to have either barricaded or warning tape placed to prevent unauthorized or accidental ingress.

## **HEAT & COLD STRESS PROGRAM**

### **Preventing Heat-Related Illnesses (Heat Stress)**

When the body heats up faster than it can cool itself, mild to severe illnesses may develop. It’s important to recognize the symptoms of heat-related illnesses and understand how to prevent, control, and respond to their effects.

Air temperature, humidity, and clothing can increase the risk of developing heat- related illnesses. So can age, sex, weight, physical fitness, nutrition, alcohol or drug use, or pre-existing diseases like diabetes. How can you prevent or control heat- related illnesses?

- Drink water - Drink small amounts of water frequently, about a cup every 15-20 minutes. (Alcohol increases the loss of body fluids.)
- Limit exposure time and/or temperature. Try to schedule hot jobs for cooler times of the day or cooler seasons of the year.
- Take rest breaks in cool areas.
- Add additional personnel to reduce workload or work day.
- Acclimatization: Gradually adapting the heat will reduce the severity of the heat stress.
- Engineering Controls: Mechanize heavy jobs or increase air movement with fans and coolers.
- Wear loose, lightweight clothing; clothing can affect heat accumulation.
- Do Not take salt tablets. Taking salt tablets can raise blood pressure, cause stomach ulcers, and seriously affect workers with heart disease.

Someone with a mild reaction to heat may have a rash called "prickly heat" or painful muscle spasms, better known as heat cramps, during or after activity. A mild reaction may also include fatigue or dizziness. You may notice a change in physical or mental performance and an increase in accidents. A person with a moderate reaction or heat exhaustion will have some or all of the following symptoms: excessive sweating, cold, moist, pale or flushed skin, thirst, extreme weakness or fatigue, headache, nausea, lack of appetite, rapid weak pulse, or giddiness. If not properly treated, the victim may collapse.

Anyone with mild or moderate symptoms should be moved to a cool, shaded place with circulating air. They should lie down and, if conscious, be given small sips of cool water at frequent intervals. If symptoms continue, a doctor should be called.

In severe cases of heat illness, a heat stroke may result. The victim's face is flushed red and their skin is hot and dry with no sweating. They develop a severe headache with deep, rapid breathing. They have a very high fever and may become delirious. They may become unconscious, have convulsions, or lapse into a coma. This condition is fatal unless emergency medical treatment is obtained; immediately call for medical help. In the meantime, get the victim out of the hot environment. Loosen clothing and pour water over the entire body. Get air circulating around the body.

Recognizing the warning signs and symptoms of heat-related illnesses and using preventive and control measures can reduce the frequency and severity of heat illness while increasing worker productivity.

## **Preventing Cold-Related Illnesses (Cold Stress)**

Working in the cold for prolonged periods of time can cause many physical problems. You should take precautions to prevent cold stress in the workplace. There are several types of cold stress that a person can suffer.

### **Different Types of Cold Stress**

Hypothermia is the most common type of cold stress. Hypothermia occurs when your body temperature drops from prolonged exposure in a cold environment. Your body stores energy and that keeps you warm at first but as you stay in the cold your body burns that energy and cannot replace it as quickly. That is how your temperature drops below normal.

Some of the Symptoms of Hypothermia are a slowed heart beat and irregular breathing. You could also become drowsy or feel extremely exhausted. Many people often suffer from memory lapse and difficulty speaking after hypothermia has set in. If you suspect a person is suffering from hypothermia call for medical attention immediately. While waiting for help you should keep the person in a warm room. Remove any wet clothing and wrap them in a

blanket. Give them a warm drink such as hot tea. This will help raise their body temperature.

The second most popular form of cold stress is Frostbite. Is caused by the body literally beginning to freeze and usually starts in the toes or fingers which lose heat the fastest. In severe frostbite cases the tissue is permanently damaged and has to be amputated to stop the spread of dead tissue.

There are a few symptoms of frostbite the first is numbness of the area. Second is tingling or aching feelings and the third is a blue-ish, waxy skin. If someone is showing symptoms of frost bite call for medical help as soon as possible. Try not to use the area of body that is suffering Frostbite it is your hands try not to touch or pick up things. If your feet are frostbitten do not continue to walk on them it could cause more damage. Use warm water to help restart circulation; never rub the area it could cause the frostbite to spread. Never use a fireplace, stove or other heat source to warm up. Since the skin is numb you could get too close and cause burns.

### **How to Prevent Cold Stress**

There are simple and easy ways to prevent cold stress in the workplace. It is really all about working safely and wearing the right protective gear. This is the best way to prevent cold stress in the workplace.

- Wear insulated work boots and wool socks.
- Never wear tight clothing. Air has to be able to circulate.
- Keep a change of socks and other clothing to change into if anything you are wearing gets wet or soiled.
- Wear gloves and a hat at all times.
- Keep warm by drinking hot liquids such as tea, coffee, and hot chocolate. You can also eat soup to help warm up your core temperature.
- If possible, take breaks in warm areas, including inside equipment cabs or trucks.

## **EMERGENCY ACTION PLAN**

### **Introduction:**

Appropriate emergency response procedures must be developed in advance so that employees are prepared to deal with emergency situations. **"Responding to Emergencies"** is one of the tasks which must be considered during site planning. Although many jobs require similar action plans, it is important that all workers understand their responsibilities for these plans, and have them readily available. The different types of emergencies may include: "medical", "weather", "fire", "chemical spill" situations. The procedure for contacting emergency services should be known and easily available. All projects should include a plan for emergency evacuation of employees.

### **Emergency Action Plans (EAP)**

EAPs are required and must be posted for Company-owned locations. Field locations should also have separate EAPs, designating specific procedures for typical operations created by the jobsite supervisor.

### **Essential EAP Components:**

#### ***EAP (Non-variable components for jobsite supervisor-specific plan):***

- List of emergencies that may be reasonably expected in the workplace.
- A plan must be developed for each "reasonably expected" emergency. This means a plan for fire, a plan for tornado, a plan for an explosion, etc.

- Designated safe meeting place for all personnel and a means of communication, such as a cell phone call list for accountability.
- In most emergencies, evacuation will be necessary, but the safe haven location would be different for a tornado than for a flood. One of the most important parts of the plan is a method to account for everyone.
- Primary person (supervisor) for the workers to contact should be specific.
- Who will call emergency response personnel? Who will meet emergency response personnel and direct them to emergency? Who to contact after hours?
- Everyone must know the emergency procedures (training must be included); the EAP must be available to all workers (specific location in foreman's truck).

**EAP (Variable components for jobsite supervisor-specific plan):**

- Address and location of jobsite.
- Location of the nearest medical facilities which can provide emergency services.

*Note: Company-owned sites will always be site-specific and non-variable in nature, specific to the office, shop, garage, etc.*

**Superintendent / Foreman Responsibilities:**

“Appendix A” (separate document available) may be used as a template to develop EAPs for each area or jobsite, particularly those that are in remote locations. If you have questions about your specific situation or responsibilities for the EAP, or need help for any other reason, contact the Safety Director.

**JOB HAZARD ANALYSIS (JHA)**

**Introduction:**

The Job Hazard Analysis (JHA) process is an important component of a proactive occupational safety and health program. Properly applied, this process insures that the safety and health of employees is fully considered prior to arrival at the job site.

JHAs are formal and include all key job steps with much detail. JHAs are typically done for the recurring and/or repetitive tasks and should describe SOPs along with maintenance procedures associated with the specific work type or process. They must be retained, referenced and updated often, if necessary.

JHAs consider each potential hazard within a work type or process; then procedures that will ensure that employees are not exposed to such hazards are established and implemented prior to beginning any work on the project. To be properly understood and implemented, the JHA should be viewed as a problem-solving process. The problem is defined in terms of hazards which may be encountered by employees when they perform their work tasks on any given project. The solution is the product of a specific set of actions (mitigations) which create a safer work environment through safer work procedures.

A safe work environment and safe work procedures are integral parts of any project or activity. They are as important as more commonly recognized outputs, such as plan design, contracts-administration, progress scheduling, etc. Providing for a safe work environment and safe work procedures requires similar planning activities as those which ensure the projects specifications are accomplished and standards met. This process provides the format for building safety into every project. **Conducting and documenting JHAs before beginning work on a project is a requirement for all Specialties Company jobsites.** Properly understood and implemented, a Job Hazard Analysis is a powerful tool to insure that work is conducted safely.

**Process:**

The purpose of a JHA is to ensure that unique and potential hazards related to a specific project or activity are anticipated and abated before work begins. The JHA is an invaluable tool for supervisors and foremen to use in meeting their obligation to reduce employee exposure to health and safety hazards. Two basic steps of a JHA are:

1. The project superintendent and/or foremen must identify each unique potential hazard, which might exist due to:
  - a. The characteristics of the work site and the procedures; and/or
  - b. Tasks that are involved in the project; and
2. Determine actions necessary to prevent employee exposure to such hazards.

During each of these steps, the person(s) conducting the analysis should gather information from and draw from such resources as:

- His/her personal experience;
- Job-site reconnaissance;
- Input from employees who will be working or worked on similar projects;
- Safety Director / EHS Department;
- Material safety data sheets (MSDS);
- Equipment manuals, manufacturers' technical representatives;
- Specialties Company's Safety and Health Programs;
- Prime Contractor's existing health and safety plans for the project and their jobsite safety handbooks
- Safety Regulations.

When workers are performing ordinary tasks but in an extraordinary situation, the sheer nature of that situation may require specific equipment and unfamiliar approaches, and the JHA should include these activities. Use the following steps to create a JHA:

1. Hazard Identification: Identify and analyze jobsite hazards.
2. Hazard Prevention: Develop techniques for reducing jobsite hazards.
3. Hazard Management: Review processes and revise hazard mitigation if necessary.

Used effectively, JHAs are an invaluable tool to protect employees during the work day and create hazard awareness and recognition among all members of the crew.

**Scope:**

A JHA should cover any and all work performed by Company personnel. A JHA does not specifically address the work of other contractors' employees; however, the JHA should address any hazards or activities these employees create for our own personnel. JHAs for projects that include subcontractors of the Company or subs working alongside the Company, should address exposures and hazards of work performed by all groups and its effect on each other. Finally, JHAs must be updated as needed to reflect changes in the work and/or worksite conditions.

**Jobsite Safety Plan**

The Job Hazard Analysis (JHA) Form should be completed before beginning work on any project. Such documentation provides specific information for a written "Jobsite Safety Plan". This documentation will facilitate communication about hazards and abatements to employees who will be working on the project. Documentation of abatement actions creates provides a record of the safety action plan to be followed in case of an accident. A copy of the JHA must be submitted to the Safety Director for review

## TASK HAZARD ANALYSIS (THA)

### Introduction:

Similar to the JHA, but more site-specific and crew-oriented, Task Hazard Analysis (THA) planning is unique to each worksite or daily operation that employees report to every day.

Hazards and procedures which are unique to each jobsite should be considered. Common practices consistent with everyday work, such as PPE requirements, equipment start up procedures and maintenance, need not be listed on the THA since they have been listed on the JHA produced for each work type. It is more important to note the conditions and exposures that affect the crew and equipment on a specific day, noting such conditions as environmental and actual site conditions, and other construction activity which may contribute to the specific site hazards that exist on that day or mobilization.

**THAs primary focus is to raise awareness and maintain focus on that day's activities.**

### Process:

The purpose of a THA is to ensure that unique and potential hazards, as observed or noted that day, related to present conditions, are considered, discussed, and abated before actual work begins. The THA is supplemental and remains invaluable to the foreman as a means for meeting their obligation to reduce employee exposure to health and safety hazards.

THA steps are:

1. The foreman, in collaboration with their crew, must identify each unique potential hazard, which might exist due to:
  - a. The characteristics of the work site and the procedures; and/or
  - b. Tasks that are involved in the project; and
2. Determine actions necessary to prevent employee exposure to such hazards.

Again, the foreman should:

- Draw from his/her personal experience;
- Perform job-site reconnaissance;
- Actively solicit input from crew or who may have worked on similar projects, or in similar conditions.
- Consult the Safety Director / EHS Department or Company Programs;
- Consult with the Prime/General Contractor for site-specific safety plans or rules.

***JHAs and THAs are both tools for identifying and controlling potential hazards. The three major differences are: timing, level of detail, and use. Both processes can be helpful in accident prevention, and both processes require training on hazard recognition, evaluation and control. Most importantly: Both require your participation!***

## TOOL BOX TALKS (TBT)

Tool Box Talks (TBTs) are also informal safety training sessions designed to continuously reinforce the Company's safety program. Topics will be provided weekly to Supers and Foremen for presentation to their crews. Original or self-produced TBTs are welcome anytime from anyone.

**TBTs are supplemental and do not replace the Company's requirement for Daily THAs!**

# SAFETY INSPECTION PROGRAM

## Introduction

Jobsite safety inspections are visible signals to Company employees that safety is working. In addition, they provide for the identification of potential loss areas and can be used constantly to monitor the effectiveness of our Company's working Safety and Health Program. Planned inspections go beyond routine site checks. The result of these inspections should be the establishment of goals for future improvements. These inspections make use of detailed checklists, but also allow for identifying additional hazards not present within the checklist. The purpose of facility or jobsite inspections can be outlined in the form of five (5) basic objectives:

- To maintain a safe and healthy working environment for employees to work.
- To evaluate compliance with Company, state and federal regulations.
- To control and correct the unsafe actions and behaviors of people.
- To train supervisors/foremen in hazard recognition, evaluation and control.
- To maintain operational profitability and to measure the program's effectiveness.

## Inspection Types:

The Company uses several types of jobsite inspections. A description of each type, along with personnel responsibilities are outlined as follows.

### Safety Director Inspections

The Safety Director's inspections shall be unannounced and may be conducted several times throughout construction season or year. These inspections will be a comprehensive inspection of all working units and will also include an inspection of supervisors'/foremen's truck, equipment, and subordinate personnel. Disciplinary action may be taken for severe or multiple repeat violations. Notes on violations will be provided onsite during inspection, and each supervisor will be issued a formal report of inspection. Depending on the results, the Safety Director will report findings directly to senior management. Inspections may also be conducted by outside consulting specialists or insurance representatives.

### Continuous Inspections

Each Company foreman (or supervisor) shall make daily inspections of their work areas as part of their everyday duties. These inspections should be designed to include communication with specific employees in the workplace rather than just a site check. This type of inspection will assist the supervisor in determining unsafe acts or hazardous conditions on a routine basis. When an outside agent, such as an insurance company representative/consultant or OSHA Compliance Officer, engages in an official inspection of Company jobsites, they are to be accompanied by the Safety Director, if possible, and always by the foreman/super.

### Employee Safety Observations

Informal employee safety observations should be made continuously by jobsite foremen, supervisors and safety director. Positive feedback and/or corrective action should be a routine part of the informal observation process. Formal employee safety observations, that can be documented, should also be conducted, and may be considered disciplinary when appropriate.

### Follow-up

With any jobsite safety inspection, audit or employee observation, recommended corrective actions and a procedure for documented follow-up must be implemented to ensure that corrective actions have been carried out and completed. An effective follow-up program is crucial to the success and continuous improvement of the jobsite safety program. Without proper follow-up, inspections, audits and observations will yield little if any benefit.



# SAFETY INCENTIVE PROGRAM

## **Introduction:**

The Company Safety Incentive Program has been designed to focus attention on accident prevention and to reward employees who consistently work in a safe and thoughtful manner. The program will recognize employees who have adopted safety as a personal value as exemplified in their work efforts and positive safety performance. "Safety Points"(SPs) will be awarded to such individuals for redemption of items located in the E&B Paving Merchandise Store located within E&B Paving Extranet.

## **Safety Points Disbursement:**

WHEN	AWARDED POINTS (SPs)	WHY
Whenever	5 – 10	Spot Award (Discretionary)
Report Safety Improvement	5 / 25	You Care (via E&B Extranet)
Online EE Safety Training	5 – 10	You Care (via E&B Extranet)
Class / Course Completions	10 – 15 / 25	Each Day of Class / Course
Crew / Division Audits (1)	60 (Possible – Not Guaranteed)	Inspections-Submittals-Referrals
Crew / Division Audits (2)	60 (Possible – Not Guaranteed)	Inspections-Submittals-Referrals
Whenever	-5 / -10 / -25 (Deducted)	Infractions-Violations (Safety)

## **Individual Safety Points**

Every employee may earn SPs by completing additional safety training outside the Company, examples include: participating in craft-sponsored courses; manufacturers'-sponsored programs; Company-sanctioned meetings, events, or online training (available on E&B Paving Extranet). Also, an employee's immediate supervisor may recommend them for "spot awards" of SPs based on their actions during the course of a work day or work event. Safety director may award points to individuals based on observations or recommendations.

## **Crew Safety Points**

Field crews, members thereof, may be awarded SPs for specific actions they have performed at a particular jobsite or as result of a positive site audit or safety inspection. Award of these points is at the discretion of superintendents, management, or safety director. Crew/Site Audits include completion of THAs, TBTs, favorable Site Safety Inspections of personnel, equipment, and required documents, manuals and Company materials.

## **Division Safety Points**

Each division within the Company may be awarded SPs for the overall safety performance of their work type over a period of time. Criteria is similar to that described for Crew/Site Audits. Employees who "primarily" work in the specific division at the time of reward will be eligible for SPs, or can be included upon recommendation of their immediate supervisor should they be re-assigned at time of award.

## **Program Rules:**

- Safety Points are a privilege, NOT a right.
- Supervisors/Foremen will directly affect your points award.
- Points are only valid for the E&B Paving Merchandise Store.
- Points will be awarded by the end of the month following the month in which they were earned or given.
- If an employee's employment is terminated for any reason other than temporary layoff, all eligible SPs will be forfeited.

- **IMPORTANT** – Safety Points may be deducted for violations of the Company's Safety & Health Policies. Removal of points is discretionary, but may be taken in 5, 10, or 25-point increments up to, or including, the balance of points on hand.

**Program Access:** Contact Safety Director or any member of EHS Team for additional details and instructions.

The safety and health of every employee is paramount in all our endeavors, including this Safety Incentive Program. It is the intent of this program to be fair, straight-forward, and motivating to those who wish to actively participate. We hope that you will find the program as something that will assist you in working safely and supplemental to promoting your positive safety performance.

***The Company reserves the right to modify, change, or discontinue this program at any time if the desired results are not achieved.***



# EMERGENCY ACTION PLAN (EAP)

JOB NUMBER  
(Location)

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In case of an emergency, the following will take place:

- 1) \_\_\_\_\_ (individual) will make emergency calls and contact the appropriate personnel.
- 2) \_\_\_\_\_ (individual) will meet emergency response personnel at the site entrance.
- 3) \_\_\_\_\_ (individual) will assemble all personnel at (safe haven / rally point) \_\_\_\_\_ where further instructions will be given.
- 4) All on site personnel will be accounted for by (individual) \_\_\_\_\_
- 5) Three primary company contacts (name, title, phone)
  1. \_\_\_\_\_
  2. \_\_\_\_\_
  3. \_\_\_\_\_
- 6) Other necessary contacts (name, title, phone)
  1. \_\_\_\_\_
  2. \_\_\_\_\_
  3. \_\_\_\_\_
- 7) \_\_\_\_\_ (individual) will determine (based upon emergency responder's information and/or site assessment) whether employees can return to work.
- 8) Other important information:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

## ADDENDUM

### **“Administration Guide to Specialties Company, LLC Personnel Alcohol and Drug Testing Procedures”**

#### I. Purpose

The purpose of this administrative guide is to set forth the procedures for the implementation of controlled substance and alcohol use and testing of employee applicants, current employees and employees pursuant to the Company's Drug and Alcohol Policy. These procedures are intended as a guide only, and are in no way intended to alter any existing relationship between the Company and any employee. The Company's DER (alcohol and drug program administrator), who is designated to monitor, facilitate, and answer questions pertaining to these procedures, is the Safety Director.

#### II. Specific Provisions

##### A. Applicability

This policy applies to all “Regulated” Specialties Company employees that utilize a Commercial Drivers License (CDL) in the course of their employment. A valid CDL is required to operate the type of equipment listed below:

1. A vehicle having a Gross Vehicle Weight Rating (GVWR) as assigned by the manufacturer of 26,001 pounds or more; or
2. A combination vehicle having a Gross Combo Weight Rating of 26,001 lbs or more.
3. A vehicle that is designed to transport 16 or more passengers, including the driver; or
4. A vehicle requiring a placard to transport hazardous materials.

This policy also applies to all other “Non-Regulated” Company employees that:

1. Drive any type of Company vehicle
2. Hold “safety-sensitive” positions
3. Hold full-time hourly positions
4. Hold full-time, salaried positions
5. Are deemed: Casual, Intermittent or Occasional Employees

##### B. Prohibited Conduct

The following describes “prohibited conduct” for purposes covered by DOT/FMCSA in this document of this policy for all Regulated employees

1. No employee shall report for duty or remain on duty requiring the performance of safety-sensitive functions while having an alcoholic concentration of .04 or greater. An employee is considered to be performing a safety-sensitive function if he/she is actually performing, ready to perform, or immediately available to perform any of the following on-duty functions:
  - All time spent at a facility waiting to be dispatched;
  - All time inspecting, servicing, or conditioning any commercial motor vehicle at any time;
  - All driving time or time spent at the driving controls of a commercial vehicle in operation;
  - All time, other than driving time, in or upon any commercial vehicle in operation;

- All time spent loading or unloading a vehicle, supervising, or assisting in the loading or unloading, attending a vehicle being loaded or unloaded, including completion of any related paperwork; and remaining in readiness to operate the vehicle;
  - All time spent repairing, assisting, or attending to a disabled motor vehicle;
  - All time performing those duties required of an employee involved in a vehicle accident
2. No employee shall be on duty or operate a commercial vehicle while the employee possesses alcohol.
  3. No employee shall use alcohol while performing safety-sensitive functions.
  4. No employee shall perform safety-sensitive functions within four (4) hours after using alcohol.
  5. No employee required to take a post-accident test shall use alcohol for eight (8) hours following the accident or until he or she undergoes a post-accident test, whichever occurs first.
  6. No employee shall refuse to submit to a post-accident, random, reasonable suspicion, return-to-duty, or follow-up alcohol or drug test.
  7. No employee shall report to duty or remain on duty when the employee uses any controlled substance, except when use is pursuant to the written instructions of a physician who has advised the employee and the Company that the substance does not adversely affect the employee's ability to operate a commercial motor vehicle.

The following describes "prohibited conduct" for all Non-Regulated employees, those not covered by DOT/FMCSA, and for Regulated employees covered by DOT/FMCSA when they are not performing safety-sensitive duties:

1. No employee shall report for work or remain at work while having an alcohol concentration of .04 or greater.
2. No employee shall possess or use alcohol while on duty.
3. No employee required to take a post-accident test shall use alcohol for eight (8) hours following the accident, or until he or she undergoes a post-accident test, whichever occurs first.
4. No employee shall refuse to submit to a post-accident, random, reasonable suspicion, return-to-duty, or follow-up alcohol or drug test.
5. No employee shall report for duty or remain on duty when the employee uses any controlled substance, except when use is pursuant to the written instructions of a physician who has advised the employee and the Company that the substance does not adversely affect the employee's ability to perform their duties safely.

### C. Refusal to Test

Refusal to submit to the types of drug and alcohol tests employed by the Company will be grounds for refusal to hire employee/applicant(s) and to discipline existing Regulated or Non-Regulated employees covered by this policy. A refusal to test would include any of the following situations:

1. Failing to appear for any test within a reasonable time after being so directed.
2. Failing to remain at the testing site until the testing process is completed.
3. Failure to provide a breath sample, saliva sample or urine sample as directed.
4. Failure to permit, if the situation requires, the observation or monitoring of providing for a urine specimen.
5. Failure to provide a urine, breath or saliva specimen within required time frames may be considered a refusal. If an employee cannot provide a sufficient quantity of urine or breath, he/she will be directed to be evaluated by a physician of the Company's choice. If the physician cannot find a legitimate medical explanation for the inability

- to provide a specimen (either breath or urine), it will be considered a refusal to test. In that circumstance the employee has violated one of the prohibitions of the regulations.
6. Failure or decline to take an additional drug test the Company or collector has directed you to take.
  7. Failure to undergo a medical examination or evaluation, as directed by the MRO, as part of the verification process, or as directed by the DER as part of a "shy bladder" or "insufficient breath" situation.
  8. Failure to cooperate with any part of the testing process and/or conduct that would obstruct the proper administration of a test. (e.g., refusing to empty pockets when so directed by the collector or behave in a confrontational way that disrupts the collection process).
  9. For an observed collection, failure to follow the observer's instruction to raise your clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if you have any type of prosthetic or other device that could be used to interfere with the collection process.
  10. Possess or wear a prosthetic or other device that could be used to interfere with the collection process.
  11. Admit to the collector or MRO that you adulterated or substituted the specimen.
  12. Refusing to sign step two (2) of the alcohol testing form.
  13. A report from the MRO that you have a verified positive, adulterated, or substituted test result.

#### D. Types of Tests

All employees subject to this policy will also be tested for drugs and/or alcohol, if applicable, for the following reasons: pre-employment (drug testing only), post-accident, random, reasonable suspicion, return-to-duty, and follow-up testing, as described below.

##### 1. Pre-employment Testing

This applies to all applicants applying for a CDL position and to all other positions defined under Section II-A, "Applicability" in this document. As a condition of employment, the employee applicant shall provide the Company with a written authorization for all previous employers within the past three (3) years to release drug and alcohol testing records as the DOT/FMCSA regulations require. Within thirty (30) days of performing a safety-sensitive function, DOT regulations require that the Company obtain, to the extent available, certain drug and alcohol testing records from the employee's previous employers for the previous three (3) years. All applicants who are required to have or obtain a CDL must submit to a urine drug test unless a qualifying pre-employment exemption can be documented.

##### 2. Random Testing

The Company conducts random drug and alcohol testing on all employees covered by this policy. A random pool will be established for Regulated/DOT employees, and a separate pool will be established for all other Non-Regulated Company employees. The Company's TPA will submit all employees' names to a random selection system. The random selection system provides an equal chance for each employee to be selected each time random selection occurs. Random selections will be reasonably spread throughout the year. The Company will drug test, at a minimum, fifty (50) percent of the average number of employee positions in each calendar year or at a rate established by the DOT for the given year. The Company will select, at a minimum, ten (10) percent of the average number of employee positions in each calendar year for random alcohol testing, or at the rate established by the DOT for the given year. Random selection, by its very nature, may result in employees being selected in successive selections and/or more than once in a calendar year.

If an employee is selected at random, for either drug or alcohol testing, a Company official will notify the employee. Once notified, the employee must proceed to the designated collection site immediately. If the employee does not go to the collection site as soon as possible after notification, such conduct may be considered a refusal to test.

3. Post-Accident Testing

Following any accident, the employee must contact the Company as soon as possible. Employees holding a CDL must submit to a Federal DOT drug and alcohol test any time he or she is involved in an accident where:

- A) A fatality is involved; or
- B) The employee receives a citation for a moving violation arising from the accident that involved:
  - injury requiring medical treatment away from the scene, or
  - one or more vehicles having to be towed from the scene.

The employee shall follow the instructions from the Company or its representative to complete required testing. All employees are subject to this policy, in addition to the testing requirements outlined above for those holding a CDL and may be tested after any of the following:

- Any accident/incident involving injury or death.
- Any accident/incident involving property damage.
- Any accident/incident where the employee receives a citation under state or local law for a moving traffic violation arising from the incident.
- Any accident/incident in which an employee's involvement or actions may have contributed or cannot be completely discounted as a contributing factor to an accident/incident which results in damage over \$ 500.00 or personal injury.
- The accident/incident results in a lost time injury.

The employee, either Regulated or Non-Regulated, shall follow the instructions from the Company or its representative to complete required testing.

Any time a post-accident drug or alcohol test is required, it must be performed as soon as practical. If no alcohol test can be made within eight (8) hours, attempts to perform an alcohol test shall cease. If no urine collection can be obtained for the purpose of post-accident drug testing within thirty-two (32) hours, attempts to make such collection shall cease. An employee is prohibited from consuming alcohol between the time of the accident and the test.

In the event that federal, state, or local officials conduct breath analysis or blood test for the detection of alcohol use, and/or urine tests for the detection of controlled substances use following an accident, employees must comply with law enforcement personnel requests. The Company may request testing documentation from such agencies, and may ask the employee to sign a release allowing the Company to obtain such test results.

In the event an employee is so seriously injured that the employee cannot provide a sample of urine, breath or saliva at the time of the accident, the employee must provide necessary authorization for the Company to obtain hospital records or other documents that would indicate the presence or non-presence of controlled substances or alcohol in the employee's system at the time of the accident.

4. Reasonable Suspicion Testing

Reasonable suspicion for requiring an employee to submit to drug and/or alcohol testing shall be deemed to exist when an employee manifests physical, behavioral, speech or performance symptoms or reactions commonly attributed to the use of controlled substances or alcohol, or when use is observed. For DOT employees, such employee conduct must be witnessed by a supervisor who is trained in compliance with Part 382.603 of the Federal Motor Carrier Safety Regulations.

A supervisor observing such conditions will take the following actions immediately:

- Confront the employee involved, and keep under direct observation until the situation is resolved.
- Secure the DER's concurrence to observations. After discussing the circumstances with the DER, arrangements will be made to observe or talk with the employee. If the DER believes, after observing or talking to the employee, that the conduct or performance problem could be due to alcohol or substance abuse, the employee will be immediately required to submit to a breath test or urinalysis. If the employee refuses to submit to such testing for any reason, the employee will be informed that continued refusal would result in a violation of this policy, and for DOT covered employees, disqualification from performing any safety-sensitive function.
- Employees will be asked to release any evidence relating to the observation for further testing. Failure to comply may subject the employee to subsequent discipline or suspension from driving duties. All confiscated evidence will be receipted for by signatures from the receiving supervisor or DER, as well as the provider.
- The DER shall, within 24 hours or before the results of the controlled substance test are released, document in writing the particular facts related to the behavior or performance problems that led to the reasonable suspicion test and maintain this documentation in appropriate personnel files.
- The DER shall remove or cause the removal of the employee from the Company-owned vehicle and ensure that the employee is transported to an appropriate collection site and thereafter to the employee's residence, or, where appropriate, to a place of lodging. Under no circumstances will that employee be allowed to continue to drive a Company vehicle, or his/her own vehicle, until a confirmed negative test result is received.

5. Return to Duty Testing

A return to duty test will be required for all employees who have violated this policy (test positive, have an adulterated or substituted specimen, or refuse to test). The employee may not return to duty for thirty (30) days and until he or she tests negative on a drug test and/or tests below 0.02 for breath alcohol, and the MRO, and/or SAP, and the Company have determined that the employee may return to duty.

6. Follow-up Testing

Any employee who has returned to work following a violation of this drug and alcohol policy will be subject to follow-up testing. At a minimum, six (6) follow-up tests will be required within the first twelve (12) months following a Non-Regulated employee's return to work, and less frequently during the next four (4) years. Employees covered by DOT will be tested in accordance with DOT regulations and/or the recommendations of the SAP, but not less than schedule stated above. *Follow-up tests are separate from and in addition to other policy testing (random,*



*post accident, or reasonable suspicion), and all costs associated with this testing shall be borne by the employee. The Company will withhold the costs of such testing from the employee's accrued pay.*

### III. Controlled Substance Testing Protocol

#### A. Collection Procedures:

1. The testing procedure starts with the collection of a urine specimen.
2. Collection procedures will follow the specific guidelines set forth by the U.S. Department of Transportation (DOT) as outlined in the published collection procedures guidelines.
3. Employees will be directed to empty their pockets and display the contents to the collector.
4. Employees will be allowed privacy during the collection process, except as noted in Number Five (5) below.
5. Observed collections are required by DOT if:
  - a. The specimen is determined invalid and there is no medical explanation.
  - b. The specimen is determined to be negative-dilute with a creatinine value >2mg/dl but <5mg/dl.
  - c. The collector observes evidence of an employee's attempt to tamper with the specimen.
  - d. The temperature of the specimen is out of procedural range.
  - e. The specimen appears to have been tampered with.
  - f. Follow-up testing.
6. Observed collections may be required on return-to-duty and follow-up tests.
7. As part of the collection process, the specimen provided will be split into two portions; a primary specimen and a secondary (split) specimen.
8. If the employee is unable to provide 45 ml of urine, the DOT "Shy Bladder" Rule will apply. The employee will have up to 3 hours to provide the required 45 ml, and may consume up to forty (40) ounces of fluids during this time period. The employee will be monitored during this waiting period.
9. After collection, the specimen will be submitted to a SAMHSA certified laboratory for testing.

#### B. Laboratory Procedures:

Drug testing will be performed through urinalysis. Urinalysis will test for the presence of drugs and/or metabolites of the following controlled substances: marijuana, cocaine, opiates, amphetamines and phencyclidine (PCP). The SAMHSA certified laboratory will perform initial screenings on all primary specimens. In the event that the primary specimen tests positive, a confirmation test of that specimen will automatically be performed. If the confirmatory test is positive, it will be reported to the MRO as a positive.

#### C. Validity Testing:

The laboratory must also perform validity testing on each specimen received. The purpose of validity testing is to determine whether certain adulterants or foreign substances were added to the urine, if the urine was diluted, or if the specimen was substituted. The following will be measured: creatinine level, specific gravity, and pH. In addition, all specimens will be tested for known adulterants. An initial validity test is performed first, followed by a confirmation test if required. All laboratory results will be reported by the laboratory to a MRO designated by the Company or its agents.

#### D. MRO (Medical Review Officer) Procedures:

1. All tests results will undergo a review process by the MRO.
2. Negative test results will be reported directly to the Company by the MRO.
3. Positive, adulterated or substituted results will be handled in the following manner by the MRO:
  - a. Before reporting a positive, adulterated or substituted test result to the Company, the MRO will attempt to contact the employee to discuss the test result.
  - b. The employee is required to discuss the result with the MRO. The employee will be allowed to explain and present medical documentation to explain any permissible use of drugs or controlled substances.
  - c. For adulterated or substituted results, the employee must demonstrate that he or she did produce or could have produced urine, through physiological means, a specimen meeting the creatinine and specific gravity criteria of a substituted or adulterated specimen.
  - d. If the MRO is unable to contact the employee directly, the MRO will contact the DER, as designated in advance by the Company, who shall, in turn, contact the employee and direct the employee to contact the MRO. Upon being so directed, the employee shall contact the MRO immediately or, if the MRO is unavailable, at the start of the MRO's next business day.
  - e. For employees covered by DOT/FMCSA: If, after failing to contact the MRO within 72 hours after being instructed to do so by the DER, or if the employee cannot be contacted within ten (10) days, or the employee expressly declines the opportunity to discuss the test, the MRO may verify the test as a positive or a refusal.
  - f. For testing not authorized by DOT/FMCSA: If, after failing to contact the MRO within 72 hours after being instructed to do so by the DER, or if the employee cannot be contacted at all, or the employee expressly declines the opportunity to discuss the test, the MRO may verify the test as positive or a refusal.
  - g. In the MRO's sole discretion, a determination will be made as to whether a result is verified as positive, negative or considered a refusal.
  - h. After any verified positive or refusal to test determination, the employee may petition the MRO to reopen the case for reconsideration.

#### E. Diluted Specimens

##### **For Regulated/DOT covered employees:**

If a test is reported as negative and diluted, it will be the policy of the Company to require an immediate recollect for another test. The employee will be given the minimum possible advance notice to report for another test. The result of this second test will become the test of record. If the second test is also negative, then the diluted test will be accepted as a valid test and no additional testing will be required. If the employee is directed to take another test and declines to do so, this will be considered a refusal to test and will carry the consequences of a refusal to test. If a test is reported as positive and diluted, it will be treated as a positive drug test.

##### **For Non-Regulated employees:**

The Company does not accept a diluted specimen as a valid specimen and will require another test if a test is reported negative diluted. The DER, or appropriate supervisor, will explain the diluted result to the employee, instruct them on their fluid intake prior to re-testing, explain the consequences if the second test is diluted again, and instruct the employee as to where and when the re-test will occur. If a test is reported as positive and diluted, it may be treated as a positive drug test.

#### F. Medical Information Disclosure:

Pursuant to DOT regulations, if, in the MRO's opinion, any information provided may mean a medical disqualification or represent a safety hazard, such as the use of certain prescription drugs, the MRO must disclose this to the employer. Individual test results for employee applicants and employees will be released to the Company and will be kept strictly confidential unless consent for the release of the test result has been obtained. Any individual who has submitted to drug testing in compliance with this procedure is entitled to receive the results of such testing upon written request. This process also applies to non-DOT employees.

#### G. Safeguards / Integrity of the Drug Testing Process:

- The collector must obtain photo identification from the donor or identification by supervisor prior to administering the test.
- The employee will be asked to wash their hands.
- The donor signs the chain of custody form signifying the correctness of personal data for test reporting.
- Electronic communication of test results exists from the laboratory into the MRO reporting system with no external human intervention.
- The specimen container and specimen bottles are individually wrapped and unwrapped in donor's presence.
- After the specimen is provided in a reasonable time, the collector inspects it for sufficient volume, temperature, and signs of tampering. If a specimen is not provided, the employee will be referred to a MRO to determine whether there is a valid medical reason for not providing. If there is, the employee must still attempt to provide a specimen each time their name is drawn.
- After the specimen is given to the collector, the remaining collection procedures are conducted within the donor's view.
- The specimen bottles and shipping container are sealed with tamper evident seals.
- The donor will be asked to sign the seals covering the specimen bottles identifying they were sealed in their presence.
- The specimen bottle seals match the identifying seals on the chain of custody form.
- The laboratory will check the specimen bottles upon receipt to insure the seal has not been broken. If the seal has been broken the laboratory will report the test as cancelled.
- Blind sample submission exists through the laboratory for quality control.
- A collector, who has completed the qualification training as mandated in CFR Part 40, as amended, will perform the collection in all cases of testing for all employees.

#### IV. Split Specimen Testing Protocol

An employee may request that the "split" portion of his/her specimen be tested at a different SAMHSA laboratory if he/she was notified by the MRO that his/her test result was positive, adulterated or substituted. The request must be made to the MRO within 72 hours of being notified of a verified positive, adulterated or substituted result. The MRO will arrange for all procedures to be done in accordance with split specimen testing procedures.

The cost of a split specimen test will be the responsibility of the employee. The Company will withhold the amount of the cost of testing the split specimen from the employee's pay unless other arrangements are acceptable to both the employee and the Company. If the employee makes a timely request (within 72 hours) to the MRO for the split portion to be tested, the MRO shall immediately make arrangement with the laboratory to initiate the process.

## V. Alcohol Testing Protocol

Alcohol tests will be conducted by a trained Breath Alcohol Technician (BAT) or Screening Test Technician (STT). Screening tests may be done using an evidential breath testing device (EBT) or non-evidential screening device approved by the National Highway Traffic Safety Administration. Confirmatory tests will be done by a trained BAT using an evidential breath testing device. The employee shall report to the alcohol testing site as notified by the Company. The employee shall follow all instructions given by the alcohol technician.

If the result of a screening test is a breath alcohol concentration (BAC) of less than 0.02, no further testing is authorized. Any initial test indicating a BAC of .02 or greater will be confirmed on an EBT operated by a BAT. The confirmation test will be performed no sooner than fifteen (15) minutes and no later than thirty (30) minutes following the completion of the initial test. In the event the confirmation test indicates a BAC of .020 to .039, the employee shall be removed from duty for twenty-four (24) hours or until his/her next scheduled on-duty time, whichever is longer. Employees with tests indicating a BAC of .04 or greater are considered to have engaged in prohibited conduct, which may result in disciplinary action up to and including termination. All alcohol tests shall be performed just prior to, during, or just after performing a safety sensitive function.

### Alcohol Testing Safeguards For employee's Protection:

1. The BAT must obtain donor's photo identification prior to administering the test.
2. An individually wrapped mouthpiece will be opened and inserted into the EBT for the donor's test.
3. The National Highway Traffic Safety Administration approves the EBT that is used.
4. Calibration checks are frequently performed to insure the EBT is working efficiently.
5. If the screening test indicates a 0.02 or greater, a confirmation test will be administered.
6. An air blank will be administered prior to the confirmation test with a 0.000 reading.
7. An individually wrapped mouthpiece will be inserted for the confirmation test.
8. The BAT has completed the required training course in the correct operation of the EBT.

## VI Educational Materials

The Company shall provide:

1. Educational materials will be given to DOT covered employees that explain the requirements of Part 382.601 of the Federal Motor Carrier Safety Regulations, consequences of violating the regulations, and the Company's policies and procedures with respect to meeting these requirements.
2. Non-Regulated employees will also receive information that explains the Company's policy, the consequences of violating the regulations, and the Company's policies and procedures with respect to meeting these requirements.
3. The materials supplied to both classes of employees may include information on additional Company policies with respect to the use or possession of alcohol or controlled substances. For example, the consequences for an employee found to have specified alcohol or controlled substances levels based on the Company's authority independent of Part 382.601 of the Federal Motor Carrier Regulations. Materials will also be provided concerning the effects of alcohol and controlled substances use on an individual's health, work and personal life.

Employees are required to attend educational meeting(s) to discuss the Company's policies and procedures and to review all materials covered by this procedure. DOT covered employees will be required to sign a statement (Form-C) certifying that he/she has received a copy of the materials described in Part 382.601 of the FMCSA regulations. The Company shall provide these materials to each employee prior to the start of alcohol and controlled substance testing and to each employee subsequently

hired or transferred into a position requiring the operation of a commercial motor vehicle.

## VII. Rehabilitative Procedures / Discipline Policy

Any employee who has a positive test for alcohol (.04 BAC or greater) or controlled substances, or has refused to test, is considered in violation of this policy. The employee is not qualified to drive a commercial motor vehicle or perform safety-sensitive duties, and will be immediately removed from such duty, and/or discharged. The employee, should management agree not to terminate, may be subject to the following rehabilitative or disciplinary procedures.

Employees, if not terminated, electing the rehabilitation process, must notify the Company within ten (10) days of being notified by the MRO (and/or DER) of a positive urine drug and/or alcohol test. The employee must begin the rehabilitation process within fifteen (15) days after their consultation with the MRO, and inform the Company (DER) of their intent to enter a SAP Program. Further, the employee must request reinstatement with the Company within ten (10) days upon successful completion of the rehabilitation program.

### A. Rehabilitative Procedures:

1. First Positive: The employee will be placed on an immediate leave of absence for not less than thirty (30) days and referred to a Substance Abuse Professional (SAP) by the MRO for mandatory participation (see Section IV of this Policy, below). The employee cannot return to duty until a Company approved SAP or physician releases the employee to return to regular and complete job duties and responsibilities as outlined in their SAP Program.
  - The mandatory thirty (30) day leave of absence that must be taken after a positive alcohol or drug test is without pay. However, the employee may use any accrued, unused vacation, personal days, or sick days to receive compensation during the leave.
  - While undergoing treatment, an employee shall not receive any of the benefits provided by this Policy or Supplements thereto, except continued accrual of seniority.
  - All fees and expenses as result of an employee's participation in the SAP Program, including any follow up testing, are the sole responsibility of the employee. An employee may be entitled to benefits from their respective union's Health and Welfare or Medical Expense Benefit Plans.
  - All test results, assistance requests, and treatment records will be maintained in files separate from the employee's personnel file and will be held in the strictest confidence, disclosed only to those having a legitimate need to know such information.

*(See Section VI of this Policy, below)*
2. Second Positive: If within one (1) year of release from the SAP Program an employee again tests positive for either alcohol or drugs, the employee will be discharged for the positive test result.

### B. Discipline Policy:

Depending upon the seriousness of the offense, any violation of the Company's Alcohol and Drug Policy will result in discipline, up to and including discharge, even for a first offense. All employees with a verified positive result will be removed from service and placed on an unpaid leave of absence for a minimum of thirty (30) days.

- **The failure or refusal to complete the necessary paperwork, to submit to a drug test, or to undergo treatment pursuant to the requirements of the SAP Program, will be grounds for immediate termination.**
- **In those cases where substance testing results in the termination of employment, all termination notices will list “misconduct” as the reason. Termination shall be deemed “for cause.”**

## VIII. Substance Abuse Evaluation, Return To Duty, and Follow Up Testing

Any employee who is removed from service is not qualified to perform safety-sensitive duties requiring a commercial driver's license. Such an employee shall be provided with the names, addresses, and telephone numbers of qualified substance abuse professionals (SAPs), approved by the TPA. For reinstatement to a CDL position or duty, the following steps must be completed and reported to the DER:

1. Complete an initial evaluation with a SAP.
2. Complete any rehabilitation and/or education required by the SAP.
3. Complete a second evaluation with the SAP and obtain written confirmation of satisfactory progress and/or completion of all recommendations.
4. Complete a return-to-duty test that is issued with a negative result.
5. As a condition of continued employment, the employee will be required to submit to a minimum of six (6) unannounced follow up tests over the next twelve (12) months after reinstatement, or as prescribed by the SAP.

Follow-up testing is separate from and in addition to Specialties Company, LLC's reasonable suspicion, post-accident, and random testing procedures. The schedule for follow-up testing shall be unannounced and in accordance with the instructions of the SAP. Follow-up testing may continue for a period of up to sixty (60) months following the employee's return to duty. No fewer than six (6) tests shall be performed in the first twelve (12) months of the follow-up testing, or as prescribed by the SAP. **The cost of any SAP evaluation, prescribed treatment and follow-up testing shall be borne by the employee, and may be withheld from their pay.**

An employee who does not contact or initiate a program with the SAP within fifteen (15) days of their consultation with the MRO, or an employee who does not complete the recommended education / treatment program suggested by the SAP, shall be deemed to have made a “voluntary termination” of their employment.

## IX. Voluntary Disclosure

Specialties Company, LLC encourages personnel to seek help if they feel they have a problem with drug or alcohol misuse before it becomes a matter of discipline with the Company. The Company will assist any employee who voluntarily discloses to the Company that he/she believes that they have a drug or alcohol problem in seeking professional help to address their problem. This voluntary step of self-identification is the responsibility of the individual, and with the exception of certain conditions, will alleviate the requirement for disciplinary action if brought to the Company's attention prior to any testing conducted by the Company. Upon disclosure of a problem to Company personnel, the employee will be removed from all safety-sensitive duties without pay until completion of all steps as outlined in Section IV of this Policy. **The employee will be responsible for all costs associated with this process.** If the employee makes no commitment to overcoming the problem and achieving a satisfactory level of performance, attendance, or behavior, then termination of employment will result.

## X. Confidentiality and Release of Information

Under no circumstances, unless required or authorized by law, will alcohol or drug testing information or results for any employee or applicant be released without expressed written consent or request from the applicable employee.

The Company may release information as follows:

1. Copies of the results of alcohol or drug testing to an identified person provided the employee has provided written consent.
2. Copies of information requested by the Secretary of Transportation, any DOT agency, or any State or local official with regulatory control over the Company or any of its employees.
3. The results of post-accident testing when requested by the National Transportation Safety Board as part of an accident investigation.
4. For any legal proceedings, to include:
  - Lawsuits (e.g., wrongful discharge action).
  - Grievances (e.g., an arbitration concerning disciplinary action taken by the Company).
  - Administrative proceedings (e.g., an unemployment compensation hearing) brought on by, or on behalf of, an employee and resulting from a positive DOT drug test or alcohol test or a refusal to test (including, but not limited to, adulterated or substituted test results).
  - Criminal or civil actions – to the decision maker in the proceeding (e.g., the Court in the lawsuit)

Employees are entitled, upon written request, to obtain copies of any records pertaining to their use of alcohol or controlled substances, including any records pertaining to his or her alcohol or controlled substance testing.

## XI. Responsibility

- A. Employees - All Company employees are responsible for abiding by this Alcohol and Drug Policy as a condition of their employment.
- B. Management Officials and Supervisors

All supervisors and Company officials are responsible for being alert to employee conduct that raises a reasonable suspicion that an employee is using or is under the influence of alcohol or controlled substances while on duty or otherwise performing Company business.

**This policy is not intended nor should it be construed as a contract between the Company and the employee. This policy may change at any time at the sole discretion of the Company and/or to comply with changes in Federal DOT regulations and Drug Free Work Place mandates by Federal or State Governments.**

## Abbreviations and Terms

### **Abbreviations:**

<b>BAT</b>	Breath Alcohol Technician	<b>CDL</b>	Commercial Drivers' License
<b>CMV</b>	Commercial Motor Vehicle Representative	<b>DER</b>	Designated Employer
<b>DHHS</b>	Dept. of Health and Human Services	<b>DOT</b>	Department of Transportation
<b>EAP</b>	Employee Assistance Program	<b>EBT</b>	Evidential Breath Testing Device
<b>MRO</b>	Medical Review Officer	<b>STT</b>	Screening Test Technician
<b>SAMHSA</b>	Substance Abuse and Mental Health Services Administration		

### **Definitions:**

#### **Adulterated Specimen**

A specimen that contains a substance that is not expected to be present in human urine, or contains a substance expected to be present but is at a concentration so high that it is not consistent with human urine.

#### **Alcohol**

Intoxicating agent in beverage alcohol, ethyl alcohol, or other low molecular weight alcohol including methyl and isopropyl alcohol.

#### **Alcohol Concentration** (or content)

Alcohol in a volume of breath (shown as grams of alcohol/210 liters of breath) as indicated by an evidential breath test.

#### **Alcohol Use**

Consumption of any beverage, mixture, or preparation, including medications, containing alcohol.

#### **Breath Alcohol Technician (BAT)**

An individual who instructs and assists individuals in the alcohol testing process and operates an evidential breath measurement (EBT) device.

#### **Confirmation Test**

*In alcohol testing:* a second test, following a screening test with a result of 0.02 or greater, which provides quantitative date of alcohol concentration.

*In controlled substances testing:* a second test to identify the presence of a specific drug or metabolite. In order to ensure reliability and accuracy, this test is separate from and uses a different technique and chemical principle from that of the screening test.

#### **Confirmation Validity Test**

A second test performed on a urine specimen to further support a validity test result.

#### **Controlled Substances**

In this regulation, the term 'drugs' and 'controlled substances' are interchangeable and have the same meaning. Unless otherwise provided, these terms refer to: \*marijuana, \*cocaine, \*opiates, \*phencyclidine (PCP), \*amphetamines, including methamphetamines.

#### **Designated Employer Representative (DER)**

An employee authorized by the employer to take immediate action(s) to remove employees from safety-sensitive duties and to make required decisions in the testing and evaluation processes. The DER also receives test results and other communications for the employer.



**Dilute Specimen**

A specimen with creatinine and specific gravity values that is lower than expected for human urine.

**EBT (or evidential breath testing device)**

An EBT approved by the National Highway Traffic Safety Association (NHTSA) for the evidential testing of breath and placed on NHTSA's "Conforming Products List of Evidential Breath Measurement Devices" (CPL).

**Employee**

DOT-regulated employee: Any person who operates a commercial vehicle (CMV), including: full time, regularly employed employees; casual, intermittent or occasional employees; leased employees; independent, owner-operated contractors who are either directly employed by or under lease to the Company or who operate a commercial motor vehicle at the direction of or with the consent of the Company.

Non-regulated employee: Any employee who operates any type of non-commercial Company vehicle; holds a safety-sensitive position; holds a full-time hourly or salaried position; or is a casual, intermittent or occasional employee.

**Evidential Breath Testing (EBT) Device**

A device used for alcohol breath testing that has been approved by the National Highway Traffic Safety Administration.

**Initial Validity Test**

The first test used to determine if a specimen is adulterated, diluted, or substituted.

**Initial Drug Test**

The test used to differentiate a negative specimen from one that requires further testing for drugs or drug metabolites.

**Medical Review Officer (MRO)**

A licensed physician (medical doctor or doctor of osteopathy) responsible for receiving laboratory results generated by an employer's drug testing program. The MRO must have knowledge of substance abuse disorders and appropriate medical training to interpret and evaluate an individual's confirmed positive test, medical history and other relevant biomedical information.

**Performing (a safety sensitive function)**

An employee is considered to be performing a safety-sensitive function when he or she is actually performing, ready to perform, or immediately available to perform any safety-sensitive function.

**Primary Specimen**

The urine specimen bottle that is opened and tested first by the laboratory to determine whether the employee has a drug or drug metabolite in his or her system; and for the purpose of validity testing. The primary specimen is distinguished from the split specimen, defined in this section.

**Safety-Sensitive Function**

DOT Employee (USDOT/FMCSA Part 382.107):

- All time waiting to be dispatched
- Loading or unloading, or supervising loading or unloading
- All time at the driving controls
- All time in or on the CMV, with the exception of time spent resting in a sleeper berth
- All time servicing or conditioning a CMV
- All time repairing or getting assistance with a disabled vehicle

Non-Regulated Employee:

Any position requiring the performance of duty which could endanger the safety of fellow employees or the general public if prohibited drug or alcohol usage were present.

**Screening Test (initial test)**

*In alcohol testing:* a procedure to determine if an employee has a prohibited concentration of alcohol in his or her system.

*In controlled substance testing:* a screen to eliminate 'negative' urine specimens from further consideration.

**Split Specimen** means a part of the urine specimen that is sent to a first laboratory and retained unopened, and which is transported to a second laboratory in the event that the employee requests that it be tested following a verified positive test of the primary specimen or a verified adulterated or substituted test result.

**Substituted Specimen**

A specimen with creatinine and specific gravity values that are so diminished that they are not consistent with human urine.

**Substance Abuse Professional (SAP)**

A licensed physician (medical doctor or doctor of osteopathy), or a licensed or certified psychologist, social worker, employee assistance professional or certified addiction counselor with knowledge of any and clinical experience in the diagnosis and treatment of alcohol and controlled substances-related disorders.

**Third Party Administrator (TPA)**

A certified provider of alcohol and drug testing procedures who also oversees the administration of DFWP policy in compliance with US Department of Transportation (DOT) regulations, and acts as a professional management consultant for federal, state mandated, and private DFWP policies on behalf of the Company.

Specialties Company's TPA is:  
Midwest Toxicology Services, Inc  
603 E Washington Street, Suite 200  
Indianapolis IN 46204  
317.262.2200