

# AMERICAN FENCE COMPANY



## Corporate Safety & Health Manual

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## Statement of Safety Policy

**TO:** All Contractors, Subcontractors and Affected Employees of American Fence Company

Safety in all American Fence Company operations is not just a corporate goal, it is a requirement!

To this end, we have formulated this written policy to govern all the safety operations on American Fence Company facilities and projects.

It is a condition of employment with American Fence Company that employees adhere faithfully to the requirements of this policy, as well as the safety rules, instructions, and procedures issued in conjunction with it. Failure to do so will result in disciplinary action as outlined in the attached policy.

It is a condition of all subcontracts that this policy and the safety rules, instructions and procedures issued in conjunction with it, as well as all applicable state, federal and local codes and regulations be adhered to. Failure to comply is a breach of contract terms.

All visitors to any American Fence Company operation including but not limited to contractors, suppliers, owner representatives, agents of the architect or engineer, regulatory authorities and insurance company representatives shall be required to follow all safety rules and regulations in effect during their visit.

American Fence Company will make every effort to ensure that the operations of contractors under our control do not endanger the safety of our employees or members of the general public. To this end all employees are required to report hazardous activities of other employees to appropriate American Fence Company officials.

American Fence Company personnel have the full support of senior management in enforcing the provisions of this policy as it relates to responsibilities assigned to them.

Sincerely,

*Todd LaVigne*  
*President*

American Fence Company

## Fire Prevention Plan

The Company recognizes the dangers associated with fires. Employees have a responsibility in preventing losses associated with fires by using methods and practices, which protect themselves and others against fire. All foremen shall enforce and follow these guidelines.

### Fire Types

The National Fire Protection Association (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 special symbol and color identification. They are:

- **Class A**—this type of fire is the most common. The combustible materials are 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, 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**—Class C fires are electrical fires and a non-conducting agent must be used. Carbon dioxide and dry chemical extinguishers are to be used. Never use foam or water-type extinguishers on these fires.
- **Class D**—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.

There are only two dry chemical extinguishers that can be used on A, B, and C fires, and those are multi-purpose ABC extinguishers, either stored pressure or cartridge operated.

Multi-purpose extinguishers (ABC) will handle all A, B, and C fires. All fire extinguishers are labeled with either ABC, or A, or B, or C, so be sure to read the label.

### Housekeeping to Prevent Fires

The importance of good housekeeping ties in closely with fire prevention. If you allow debris or flammable material to accumulate, the risk of starting a fire increases. Fire prevention is part of the job of every employee. Everyone must help to keep the work area clutter-free and safe from other fire hazards, such as improperly used or stored chemicals. You need to know what to do in the case of a fire emergency. The Company must have a fire prevention plan spelling out everyone's roles and employees must know the actions they are expected to take in the event of a fire.

When a fire starts, your first thought should be of your safety and the safety of others. Only if you have been trained to use fire extinguishers, and the fire is small enough to be extinguished by a hand-held extinguisher, try to put it out by that method.

When the fire is out of control, the combustible material is unknown, or you have not been trained in the proper use of extinguishers, leave the firefighting to professionals with the proper equipment. In this case, sound the fire alarm, and then call for emergency help from a safe place.

### **Fire Checklist**

**Try not to panic.** Although fire is a panic situation, when you panic, dangerous mistakes are made. The person who stays as calm as possible, assesses the extent of the blaze, and acts quickly to contain or extinguish the blaze is the one acting responsibly.

If the fire can be contained or extinguished, a properly trained person should use the right extinguisher on the blaze. When using a typical extinguisher:

- Hold the extinguisher upright.
- Pull the pin.
- Stand back eight or ten feet.
- Aim at the base of the fire.
- Squeeze the handle.

Sweep at the base of the fire with the extinguishing agent. If you aim high at the flames, you won't put out the fire. Remember that most extinguishers have a very limited operation time, only 8–10 seconds, so act fast and spray correctly at the base of the fire, not at smoke or flames.

Time is of the essence in firefighting. You must know the location of fire alarms and extinguishers, and know your nearest fire exit and proceed to it in an orderly fashion.

Be especially aware of smoke and noxious fumes. These fumes enter the lungs and can leave a person unconscious. All fires consume oxygen to burn. Most victims of a fire suffocate from lack of oxygen. They are already unconscious or dead before the flames reach them.

Inside a building that is on fire, you should shut all doors within your reach. If you are trapped, and you can make your way to an exit, get on your hands and knees and crawl. This is important because smoke and heat rise rapidly, and you will inhale less smoke near the floor. Outside, get away from the direction of the flames and smoke to avoid inhaling smoke and fumes.

When fire extinguishers are used properly, they can and often do keep a small incident from becoming a major fire. However, you should be properly trained in their use and know their limitations. Remember that fire extinguishers are “first aid” appliances designed to answer immediate need. Early detection of a fire is essential if it is to be controlled with only an extinguisher. Call professional help immediately if the fire has spread out of control!

### **Portable Fire Extinguishers**

The following table is designed to assist personnel in determining what type of fire extinguisher is to be placed, where, under certain circumstances.

<b>Standard</b>	<b>Location</b>	<b>Type</b>	<b>Distance</b>
1926.150(c)(1)(i)	Building Area	2A	100 Foot Radius
1926.150(c)(1)(iv)	Each Floor	2A	
1926.150(c)(1)(iv)	Multi-Story Building	10B	Adjacent to Stairway
1926.150(c)(1)(vi)	5 Gallons of Flammable/Combustible Liquids or 5 Gallons of Flammable Gas	2A or Suitable for Hazard	Within 50 Feet
1926.150(c)(6)	Open Yard Storage	2A or Suitable for Hazard	100 Foot Radius
1926.152(d)(1)	Flammable Liquid Storage Room	20B	10 Feet Outside
1926.152(d)(2)	Outside Flammable Liquid Storage Area	20B	25-75 Feet
1926.152(d)(4)	Vehicles Used for Dispensing or Transporting Flammable or Combustible Liquids	20B:C	On Vehicle
1926.152(g)(11)	Service or Fuel Area	20B:C	Within 75 Feet
1926.153(l)	Liquefied Petroleum Gas Storage Area	20B:C	In Location
1926.352(d)	Welding, Cutting or Heating Areas	Suitable	In Area

### **General Instructions**

- Obey "No Smoking" signs.
- Store oily or paint-soaked rags in covered metal containers.
- When welding or cutting, make sure area is free of combustibles and a fire extinguisher is nearby.
- Store flammable liquids in proper, labeled containers.
- Report all fire hazards immediately.
- All tarps and blankets shall be of fire retardant materials.
- All gas bottles, such as oxygen, acetylene and propane shall be properly stored and tied in a vertical position in their designated area; all bottles not in use shall be capped.
- Quantities of flammable or combustible liquids in excess of 25 gallons shall be stored in an acceptable or approved cabinet meeting the requirements of 29 CFR 1926.152.

- Leakage or spillage of flammable or combustible liquids shall be recovered and disposed of promptly and safely.

## **Hazard Communication Program**

### **Purpose**

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

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200 (General Industry) and 29 CFR 1926.59 (Construction Industry) call for the development of a hazard communication program when employees may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency. In 2012, OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012. The written hazard communication program will include and address the following criteria in order to satisfy the minimum requirements of the OSHA HCS 2012:

- List of all hazardous chemicals known to be present in the workplace or individual work area
- Methods used to ensure that all containers, including pipes and holding tanks, are labeled, tagged or marked properly
- Methods used to obtain and maintain safety data sheets (SDSs)
- Methods used to provide employees with information and training on hazardous chemicals in their work areas
- Methods used to inform employees of the hazards of nonroutine work practices
- Methods used to provide the employees of other employers (e.g., consultants, construction contractors and temporary employees) on-site access to SDSs for each hazardous chemical that the other employer's employees may be exposed to while working in the workplace
- Methods used to inform the employees of other employers of precautionary measures that need to be taken to protect themselves during the workplace's normal operating conditions and in foreseeable emergencies
- Methods used to inform the employees of other employers of the labeling system used in the workplace

The hazard communication program will identify the following:

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

- How records will be maintained

### **Responsibilities**

Branch Safety Director is responsible for administering the hazard communication program, as well as the following items:

- Reviewing the potential hazards and safe use of chemicals
- Maintaining a list of all hazardous chemicals and a master file of SDSs
- Ensuring that all containers are labeled, tagged or marked properly
- Providing new-hire and annual training for employees
- Maintaining training records
- Monitoring the air concentrations of hazardous chemicals in the work environment
- Properly selecting and caring for personal protective equipment
- Directing the cleanup and disposal operations of the spill control team
- Identifying hazardous chemicals used in nonroutine tasks and assessing their risks
- Informing outside contractors who are performing work on company property about potential hazards
- Reviewing the effectiveness of the hazard communication program and making sure that the program satisfies the requirements of all applicable federal, state or local hazard communication requirements

The purchasing agent is responsible for:

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

The receiving department is responsible for:

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

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

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

### **Chemical Inventory List**

A list of hazardous chemicals used, produced and/or stored at the Company is available in every fabrication shop and on all commercial installation trucks.

This list will contain the product identifier that is referenced on the appropriate SDS, the location or work area where the chemical is used, and the personal protective equipment and precautions for each chemical product. This list will be updated annually and whenever a new chemical is introduced to the workplace.

### **Labels and Other Forms of Warning**

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

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

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

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

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label. If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.

Signs, placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual, stationary process containers as long as the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.

Where an area may have a hazardous chemical in the atmosphere (e.g., where extensive welding occurs), the entire area will be labeled with a warning placard.

Pipes that contain hazardous chemicals should be labeled in accordance with ANSI/ASME A13.1 and indicate the direction of flow. (Please note that this not a requirement of the OSHA HCS but a best practice or requirement of local jurisdiction.)

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

**Note:** After Dec. 1, 2015, distributors may not ship containers labeled by the chemical manufacturer or importer unless the label on the container meets GHS labeling requirements.

### **Safety Data Sheets (“SDS”)**

A SDS will be obtained and maintained for each hazardous chemical in the workplace. SDSs for each hazardous chemical will be readily accessible during each work shift to employees when they are in their work areas.

SDSs will be obtained from the chemical manufacturer, importer or distributor. The name on the SDS will be the same as that listed on the chemical inventory list. SDSs for chemicals or process streams produced by the company will be developed and provided by the Company’s Safety Director.

The Company’s Safety Director will maintain the master file of all original SDSs. Hard copies of the master file will be located in all fabrication shops, on the shared computer (M) drive and in all commercial installation vehicles.

SDSs for new products or updated SDSs for existing products will be obtained by the purchasing agent and forwarded to the Company’s Safety Director. The Company’s Safety Director will then update the master file with new and/or updated SDSs.

If problems arise in obtaining a SDS from the chemical manufacturer, importer or distributor, a phone call will be made to request an SDS and to verify that the SDS has been sent. The phone call will be logged and a letter will be sent the same day. The company will maintain a written record of all efforts to obtain SDSs. If these efforts fail to produce an SDS, the local OSHA office will be contacted for assistance.

### **Employee Information and Training**

Employees included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work area:

- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry)
- Operations in the work area where hazardous chemicals are present
- Location and availability of the hazard communication program, chemical inventory list and SDSs

- Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released
- Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area
- Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used
- Explanation of the labels received on shipped containers
- Explanation of the workplace labeling system
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information

**Note:** To facilitate understanding of the new GHS system, the OSHA HCS requires that employees be trained regarding the new label elements and SDS format by Dec. 1, 2013. Employers are required to update the hazard communication program and to provide any additional training for newly identified physical or health hazards no later than June 1, 2016.

### **Nonroutine Tasks**

The Branch Safety Director and the immediate supervisor of an employee performing a non-routine task, such as cleaning machinery and other process equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the non-routine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the non-routine task will be performed.

Special work permits are required for the performance of certain non-routine tasks, such as entry to confined spaces, breaking and opening piping systems, and welding and burning. For some special tasks, employees are required to follow special lockout/tagout procedures to ensure that all machinery motion has stopped and energy sources are isolated prior to and during the performance of such tasks.

### **Contractors**

Prior to beginning work, the Branch Safety Director will inform contractors with employees working on company property of any hazardous chemicals that the contractors' employees may be exposed to while performing their work. The Branch Safety Director will also inform contractors of engineering or work practice control measures to be employed by the contractor, personal protective equipment to be worn by the contractors' employees, and any other precautionary measures that need to be taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

Furthermore, the Branch Safety Director will advise contractors that they must comply with all OSHA standards while working on company property. Appropriate controls will be established with the contractor to ensure that company employees are not exposed to safety and health

hazards from work being performed by the contractor and that company operations do not expose contractors' employees to hazards.

Branch Safety Director will inform contractors of the workplace labeling system and the availability and location of SDSs for any chemical to which contractors' employees may be exposed while performing their work.

### **Recordkeeping**

Records pertaining to the hazard communication program will be maintained by the Company's Safety Director. The Company's Safety Director will keep the following records:

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

## **Bloodborne Pathogens**

This awareness program is designed to protect employees from the danger of being exposed to diseases present in the blood or other bodily fluids. All employees will be training on bloodborne pathogen awareness before their initial assignment and annually thereafter. The Company's safety plan is posted at all branches on the "safety board", including the bloodborne pathogen exposure control plan.

### **Means of Transmission**

HBV and HIV are both transmitted through body fluids, primarily through the blood and semen. Employees can become infected by:

- Sexual contact with an infected partner.
- Sharing infected needles.
- Receiving accidental lacerations on sharp objects that are contaminated with infected blood or body fluids.
- Getting infected blood or body fluids on skin, especially if the skin has open sores, nicks or cuts.
- Getting contaminated blood or body fluids in the mucous membranes of eyes, nose, or mouth.

### **Exposure Control Plan**

The exposure control plan consists of five main components. They are as follows:

- **ALL** employees will practice the **Universal Precautions**. This means treat **ALL** blood or body fluids as potentially infectious. The Company provides all appropriate required PPE at no cost to its employees.
- Proper hand washing after the handling of body fluids. If infectious material gets on your hand, the sooner you wash it off, the less chance you have of becoming infected.

Handwashing facilities are made available on all job sites or antiseptic wipes are provided in all first aid kits.

- Only employees trained in first aid will render help to an injured employee. If a fellow employee is injured and their injury involves blood or other body fluids, employees should immediately obtain assistance by notifying the Superintendent. Employees can attempt to help the injured employee by getting them a dry cloth so they can apply direct pressure to the injured area. Employees should leave the area until the applicable supervisor allows employees to return to work.
- Blood / body fluids will be immediately cleaned up with approved disinfectant. This is only to be performed by the injured employee or an employee who is trained in the proper clean-up procedures.
- Disposable items and clothing contaminated with blood / body fluids must be double-bagged in red hazardous materials bags and placed in a hazardous waste receptacle. Disposable needles, syringes, and other sharp items are to be disposed of immediately after use in puncture-resistant disposal units.

If for any reason, an employee is exposed to another employee's blood or body fluids, it must be immediately report to the Superintendent. Medical follow-up may be necessary. The Hepatitis B vaccine will be made available to employees with occupational exposure at no cost. Recordkeeping of all exposures will be maintained for the duration of employment plus 30 years. All training records are maintained for at least of 3 years.

The company feels that protecting employees from Bloodborne diseases, on-the-job, requires knowing the products, practicing good hygiene and taking a few sensible precautions. These are measures which employees can control.

### **First Aid**

In the absence of medical assistance that is reasonably accessible in terms of time and distance to the workplace, a person who has a valid certificate in CPR/1<sup>st</sup> aid shall be available to provide first aid. Certification shall be obtained by the National Safety Council, American Red Cross or other equivalent training to be verified by documentary evidence.

First aid kits are assessed periodically to ensure the availability of adequate first aid supplies. First aid kits shall include eye wash solution for washing the eyes or body in the event of exposure to injurious corrosive materials.

## **Respiratory Protection Policy**

No employee of the Company shall be required or allowed to breathe air with harmful dusts, fogs, mist, gases, smokes, sprays or vapors. The purpose of this written policy is to eliminate or adequately control occupational respiratory hazards.

The primary objective is to prevent atmospheric contamination on the job and protect the health of Company employees. This will be accomplished as much as possible using accepted

engineering controls measures, such as enclosure or confinement of an operation, general and local ventilation, and substitution of less toxic materials.

It is the responsibility of every Project Manager, Superintendent, Foreman and employee to be aware of any condition or contaminants on the job which could allow employees to breathe contaminants which are harmful to the employee's health and to immediately report these conditions to their superior for preventive action.

When effective engineering controls are not within reason, or while they are being instituted, the following procedures shall be followed:

- The Company will provide respirators to employees when such equipment is necessary to protect the health of the employee.
- Respirators shall be selected based on hazards to which the worker(s) is exposed.
- Any person required to wear a respirator shall be determined by a medical doctor to be medically fit to wear a respirator.
- Any employee required to wear a respirator shall be instructed and trained in the proper use of respirators and their limitations. A competent person skilled in the selection and use of respirators shall do this training.
- Before an employee is allowed to use any respirator with a negative or positive pressure tight-fitting face piece, the employee must be fit tested by an authorized individual with the same make, model, style, and size of respirator that will be used.
- All respirators shall be regularly cleaned and disinfected. Respirators used by more than one worker shall be thoroughly cleaned and disinfected after each use.
- Respirators shall be stored in a clean, sanitary and convenient location.
- Respirators used on an everyday basis shall be inspected during cleaning. Worn or frayed parts shall be replaced.
- Only proper, accepted or approved respirators shall be worn when such protection is required.
- Persons using airline respirators in atmospheres immediately dangerous to life and health shall be equipped with safety harnesses and safety lines for lifting or removing persons from the hazardous work area. A standby person, or persons, with suitable self-contained breathing apparatus shall be at the nearest fresh air station for emergency rescue.
- Contact lenses shall not be worn with respirators. If corrective spectacles or goggles are required, they shall be worn in a way not to affect the fit of the respirator face piece.
- Persons required to wear a gas mask canister shall be thoroughly trained in the use and selection of gas mask containers.

### **Return to Work Program**

The policy and goal of the Company is to provide a safe and healthful workplace for all employees. Although we strive to eliminate hazards in the workplace and due to the inherent danger of the construction industry, some exposures remain. When these hazards are identified, the Company will take immediate action to reduce or eliminate the exposure.

If a job related injury is reported, prompt first aid or medical treatment will be provided if necessary. Once an employee has been treated and the extent of their injuries has been determined, all injured employees are expected to return to work as soon as possible.

In accordance with the Company's Return to Work Program, transitional duty will be provided consistent with the doctor's recommendation. The program is designed to provide short-term transitional duty at no reduction in salary or benefits, until it has been determined by the treating physician that the injured employee is able to return to full duty.

Employees assigned to transitional duty work assignments are expected to report to all follow-up doctor appointments on time, on the date scheduled, unless previous arrangements have been made with the Company. In addition, all employees placed on transitional duty are expected to report to work on time each day as scheduled. Failure to do so may result in disciplinary action or termination.

It is the responsibility of the injured employee, as well as the Company, to ensure that while on transitional duty assignment, the employee does not exceed physical restrictions outlined by the treating physician. In addition, it is also the responsibility of the employee to follow the policies listed below:

- Promptly report a work related injury
- Provide accurate information to the treating physician concerning physical capabilities
- Communicate any concerns regarding the injury with the Company
- Fully cooperate with treatment and appointment schedules
- Return to full duty work as soon as possible

## **Disciplinary Procedures**

The Company is committed to providing a safe and healthy work environment for its employees, for its employees, which is free from recognized hazards. To help maintain this goal, a three step disciplinary procedure has been implemented into our safety and health written program.

### ***First Offense***

A verbal warning will be given to the employee and documented in his/her personnel file.

### ***Second Repeated Offense***

A written warning will be issued to the employee, along with a copy to his/her Supervisor and a copy on file in the office.

### ***Third Repeated Offense***

Employee will be placed on a three day unpaid suspension for repeat violations of the Company's policies. Employee may also be subject to termination, pending a decision from the Company.

This three step disciplinary action may not apply to the items listed below:

- Any Company employee engaged in fighting, creating a disturbance or horseplay on Company property, jobsites or in a Company vehicle.
- Any Company employee found with a weapon and/or firearm in their possession while on Company property, jobsites or in a Company vehicle.
- Any Company employee found working under the influence of alcohol or non-prescribed tranquilizers, narcotics, or other drugs, or possession of the same, will be in violation of the Company's Substance Abuse Policy and the employee will adhere to the penalties under that section, up to and including possible termination.
- Any act of blatant disregard for the above stated violations, will be looked upon by Management as a clear hindrance to the Company's safety goals and objectives. This consideration will influence any disciplinary action levied against an employee.

### ***Safety Rule Violation Resulting in Injury or Property Damage***

Any safety policy violation that results in injury to oneself, co-worker or significant property damage will result in an automatic five day unpaid suspension. The Company holds to a Zero Tolerance policy in regards to unsafe work behavior.

## **Emergency Action Plan**

In order to maintain a safe and healthful working environment in emergency situations, the Company has developed this emergency action plan to safeguard employees while working on construction sites. All affected employees will be trained in the use of this plan and their role in implementing it. Adherence to this policy is mandatory and must be strictly followed by all employees, in the event of an emergency situation.

### **General Evacuation Procedures:**

- Prior to the beginning of any work on a new project site, the Company's Superintendent will identify emergency escape routes and prepare detailed evacuation instructions to pass on to all employees as they mobilize onto the project site. In addition to this, the Superintendent will identify a meeting location and an alternate location where personnel are to gather following an evacuation. This location shall be a minimum of 50 feet from the building or the affected area on the project site.
- When notified of an emergency evacuation the Company's Superintendent or representative in charge will alert employees of an evacuation by radio communications or word of mouth), all employees must immediately evacuate the project site, utilizing the nearest exit to them, until further instruction is given.
- Following an emergency evacuation, all employees shall immediately meet at the predetermined meeting location, in order for their foreman to conduct a head count and confirm that all employees have safely evacuated the project site.

In the event there are employees missing and not yet accounted for, the number of employees and their last known location within the building or project site will be immediately forwarded to responding authorities. Only trained and authorized employees

shall re-enter the hazardous area for emergency rescue operations and / or to administer first aid.

- Evacuated personnel shall remain a safe distance from the affected area or project site, until authorities deem no further hazards are present and the Company's management allows work to continue.
- Appropriate authorities (police, fire, rescue, hazardous materials team, ambulance, etc....) shall be notified of the emergency as soon as possible. Signs with emergency phone numbers, instructions and the jobsite address will be clearly posted near all jobsite telephones immediately following installation of each phone.

#### **Injury to a Member of the Public:**

- In the event that a member of the general public is injured, resulting from construction activities, the Company Safety Director must be immediately notified.
- If applicable, do not allow the injured party to move themselves or be moved (unless imminent danger is present).
- Only people having been trained in Basic First Aid / CPR or beyond shall administer first aid to the injured party.
- Proper authorities (police, rescue, ambulance, fire, etc....) shall be notified immediately.
- Remember, the most important issue in this situation is the care and treatment of the injured person(s).

#### **Fire:**

- All project site employees must comply with the fire safety requirements contained in this manual.
- Firefighting equipment (fire extinguishers rated not less than 2A) shall be conspicuously located throughout the jobsite and readily accessible at all times.
- At least one fire extinguisher shall be located on the jobsite for every 3,000 square feet of protected area.
- Fire extinguishers shall be periodically tested, inspected and maintained in operating conditions.
- The travel distance from any point on the project site to the nearest fire extinguisher shall not exceed 100 linear feet.
- In the event of an emergency evacuation due to fire, the *General Evacuation Procedures* described above shall be utilized.

#### **Property Damage:**

- Any property damage resulting from a project site incident must be immediately reported to the Company's Safety Director, regardless of who the owner of the property is, or the parties who appear to be involved in the incident.
- This section includes, but is not limited to the following properties being damaged:
  - Utility lines or pipes (above or below ground)
  - Contractor vehicles located on site
  - Equipment / tools

- Project site trailers / offices
- Project site fencing / barricades

**Public Property Damage:**

- In the event that public owned property is damaged resulting from construction activities, the Company's Safety Director must be notified immediately. At this time the Superintendent will note, at a minimum, the following information:
  - Time of incident
  - Location of incident
  - Contractor(s) involved
  - Apparent cause of incident (if known)
  - Extent of damage sustained
  - Property owner's name, home address and any phone numbers (if property is a vehicle: obtain vehicle identification number, license plate number and state, color, make and model)
  - Any abnormal weather conditions or unusual jobsite circumstances
- The Superintendent collecting the above listed information must not admit guilt or make corrective recommendations. Simply collect the information.

**Bomb Threats:**

- In the event that a bomb threat is made in which the project site is named or involving any subcontractor working on site, naming any area of the project site or any combination thereof, the jobsite must immediately be evacuated of all personnel, using the steps outlined above in *General Evacuation Procedures*.
- Proper authorities (police, fire, rescue, ambulance, etc....) shall be notified immediately. The project site shall remain evacuated of all personnel, until a complete site inspection is conducted by responding emergency personnel and the situation is deemed free of hazard by the authority possessing jurisdiction.

**Weather Related Emergencies:**

- When experiencing lightning, severe thunderstorms, flooding or tornado threatening weather, the Company will warn all on site employees of the current weather conditions, as well as closely monitor up to the minute forecasts and instructions issued by local and state authorities, local media and / or the National Weather Service.
- When seeking shelter from a tornado, the preferred choice should be as far below the ground's surface as possible (cellar, basement, ditch, protected excavations, covered parking garages, etc.). If inside a building, all windows and doors shall remain open.
- Employees should avoid using equipment and small structures as a means of shelter from a tornado, nor should they position themselves in an area where there are materials, tools or equipment being stored nearby or overhead.

### **Media Exposure:**

- At no time, shall any unauthorized person relay information to the media regarding project site emergencies and / or any other publicized affair related to the project. As accurate information becomes available following a publicized incident, a member of the Company's management or a designated representative of the Company will issue any / all necessary statements to the media.

This emergency action plan will be periodically reviewed to ensure that the policies outlined above remain effective and applicable, when faced with an emergency. In the event that this policy is altered, all affected employees will be notified of the amendments and receive new emergency action plan training, if necessary, to comply with the plan.

## **Lockout / Tagout**

### **Definitions**

- Lockout – Involves using a device such as a padlock, blank pipe flange, chain key block, etc. to isolate energy from employee exposure.
- Tagout – Involves applying a tag to the energy isolating device with written information concerning the date and name of person who applied the lock and tag.

### **Lockout / Tagout Policy**

A lockout of equipment to isolate energy sources from employee exposure shall be the primary means of protection. A tagout alone does not provide the protection necessary to prevent unintentional operation of equipment and shall be used only in instances where placement of a lockout device is not achievable.

Lockout / tagout procedures shall be used to prevent personal injury and / or property damage that could result from the unexpected start-up or shutdown of electrical, mechanical, hydraulic, pneumatic, thermal or chemical process energy. Lockout / tagout procedures shall be used prior to performing tie-in operations, maintenance, repair or adjustment of any device where exposure to hazardous energy sources may occur.

### **General**

- Employees who are affected by Lockout / tagout shall receive documented training provided by their employer on general Lockout / tagout procedures and the documentation shall be submitted to the Project Management Team prior to the start of the lockout activity.
- Each person working under a lockout shall apply his / her personal lock and tag.
- Locks designated for use in lockout shall be used for no other purpose. The contractor shall provide all locks for employee lockout.
- Locks used for lockout shall have one key only. Each lock shall be individually keyed. The key shall remain under the exclusive control of the authorized employee installing the lock.
- Prior to locking out any equipment, contact a Project Management Team Representative for a copy of the energy isolation procedure for that piece of equipment.

- Tags shall be completely filled out prior to installation. Only tags approved by the Superintendent shall be used.
- Multi-lock hasps shall be used to ensure others can apply additional locks.
- Never fill the last available slot in an isolation point with your lock and tag. Use additional multi-lock hasps if necessary so others involved can lock and tag in.

### **Lockout Procedure**

- All affected employees in the area shall be notified that a lockout is being performed.
- The equipment being locked out shall be shut down using normal shutdown procedures. (i.e., operator's control station, stop button, etc.)
- Any residual energy shall be identified and dissipated at this time.
- All equipment energy sources shall be neutralized. (i.e., electrical disconnects shall be opened, valves closed, blanks inserted in piping, springs returned to neutral position, other energy sources as required.)
- The employee performing the lockout shall place his / her personal lock and tag on each energy isolation point isolated in Step 4. If more than two (2) isolation points are required to lockout the device, a group lockbox may be used. A tag indicating all persons who applied a lock, date, time, equipment type and number and duration of lockout shall also be applied at this time. A contractor representative and a Project Management Team representative shall also apply a lock at this time.
- Test the lockout by clearing area and attempting to operate the machine.
- Testing or repositioning Machine or Equipment (Bump Test)
  - Check the area to ensure completeness of work.
  - All nonessential items shall be removed from the area.
  - Safety guards shall be replaced.
  - Notify all affected employees that the machine is being tested / repositioned and clear the area.
  - Remove the necessary lockout devices to test / reposition the machine.
  - Follow steps 2-6 to reestablish the lockout of the machine.
- Upon completion of the lockout, an authorized employee must check the area for completeness of work. If the employee who initiated the lockout is available, he / she should conduct this inspection.
- Remove all tools and nonessential items from the area.
- Replace all guards.
- Ensure all employees are clear of the machine.
- Notify all affected employees in the area that the lockout device(s) are being removed.
- Remove lockout device(s).
- Restart the machine to ensure proper operation.

### **Group Lockout**

- When multiple isolation points, (three or more), must be controlled during a lockout, or when multiple persons (craft) are involved, a group lockout shall be used.
- Follow the steps for a normal lockout as documented above.

- Each key for the locks used shall be placed in a group lockout box. The group lockbox shall be kept in view of the work being performed when practical.
- A Job Control Lock shall be installed on the group lockbox by a Project Management Team Representative. This lock shall remain in place until the lockout has been completed. The key for the Job Control Lock shall be kept in the Project Management Team office.
- Each employee covered by the lockout shall apply his / her lock and tag on the group lockout box.
- Each employee shall remove their own lock when their portion of the work is completed or at the end of each shift.
- Upon completion of the work, a Project Management Team Representative shall inspect the work area for completeness.
- When all of the conditions of the lockout termination procedures have been satisfied, the Job Control Lock shall be removed from the group lockbox.

#### **Emergency Removal Lockout / Tagout Device**

- If an employee leaves the facility without removing his / her lock and tag, an effort shall be made to notify the employee that the supervisor in charge will authorize the removal of their lock. It must be deemed necessary that removal of the lock is required by at least two supervisory personnel, but only after confirming beyond any doubt it is safe to do so.
- Verify the employee has left the site.
  - Check with co-workers.
  - Check the employee's time card.
  - Attempt to reach him / her at home.
  - Verify the employee is not in the equipment.
- Visually confirm the completeness of work.
- An authorized employee, under the direct supervision of a Project Management Team Representative shall remove the lock.
- Upon return to the site by the employee involved, he / she shall be informed of the removal. A review of the incident may be conducted by Project Management Team to determine any disciplinary actions necessary.

### **Fall Protection**

One hundred percent fall protection is required for anyone working at heights of six (6) feet or more, regardless of scope of work, on all Company project sites. All exposed employees will be protected from fall hazards via the usage of personal fall arrest systems, guardrail systems, safety nets or adequate (OSHA compliant) warning line systems. Usage of "monitors", "controlled access" or "controlled decking" zone systems as a sole means of fall protection, is prohibited.

**Note:** *The above requirement exceeds current State and Federal OSHA standards for fall protection.*

## **Fall Protection Systems / Criteria**

### **Personal Fall Arrest Systems**

Personal fall arrest systems (PFAS) usually consist of an anchorage point, connectors and a full-body harness and may include a deceleration device, lifeline or suitable combinations. If a PFAS is used for fall protection, it must meet the following criteria:

- Limit maximum arresting force on an employee to 900 pounds when used with a body belt
- Limit maximum arresting force on an employee to 1,800 pounds when used with a body harness
- Have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet or the free fall distance permitted by the system, whichever is less
- The use of body belts for fall arrest is prohibited; a full body harness is required
- Personal fall arrest systems must be inspected prior to each use for wear, damage and other deterioration; defective or damaged component(s) found during inspection must be immediately removed from service
- Lanyards and vertical lifelines must have a 5,000 pound breaking strength
- When vertical lifelines are used, each employee must be attached to a separate lifeline
- Lifelines must be protected from damage
- Anchorage must be separate from suspended platforms and have a 5,000 pound capacity
- Lanyards must limit free fall to 6 feet or contact any lower level, if the shock absorbing type is installed; an additional 3 ½ feet is added to the free fall limit.
- Attachment point of the body harness is to be located in the center of the back at shoulder level or higher
- Snap hooks must be of the locking type and also be capable of a 5,000 pound capacity
- Prompt rescue must be provided in the event of a fall
- Personal fall arrest systems shall not be attached to guardrails unless the guardrail is capable of safely supporting the load

### **Guardrail Systems**

All guardrails must meet the following requirements:

- Toprail height must be between 39" and 45"
- Midrail height must be located halfway between the toprail and the working surface
- Toprail must be capable of supporting a 200 pound force applied in an outward and downward direction
- Midrail must be capable of supporting a 150 pound force applied in an outward and downward direction
- When used, vertical stanchions are recommended every 8 feet horizontally
- Railing must be at least ¼" diameter wire rope or greater

- Toe boards 1" x 3" are required on all open sides where work is being performed or walkways are located below the guardrail
- If wire rope is used to construct the toprail, it must be flagged every 6' with high visibility material
- Top edges of wire rope toprails must not deflect to distance less than 39 inches above the working surface
- Manila, plastic or synthetic rope rails may be used as long as strength and height requirements are met

### **Warning Line Systems**

#### **OSHA Definition:**

"Warning line system" means a barrier erected on a roof to warn employees that they are approaching an unprotected roof side or edge, and which designates an area in which roofing work may take place without the use of guardrail, body belt, or safety net systems to protect employees in the area.

#### **Non-Roofers**

As an alternative to traditional fall protection systems (harness and lanyard, safety nets or guardrail system), a "warning line system" may also be used by non-roofing trades, provided that all of the following conditions are met:

- Continuously erected 15' or more from the edge
- Flag with high visibility material every 6 feet
- No lower than 34" nor higher than 39"
- No tape: needs to be rope, wires or chains that have a minimum tensile strength of 500 pounds
- Stanchions – capable of withstanding a 16 pound force
- No unprotected work to take place between the warning line and the edge
- A work rule must be effectively implemented, which prohibits employees from going past the warning line

#### **Fall Protection Training Program:**

- The Company will provide a training program for each employee who might be exposed to fall hazards. The program shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards.
- The Company shall verify compliance with fall protection training by preparing a written certification record. The written certification record shall contain the name or other identity of the employee trained, the date(s) of the training and the signature of the person who conducted the training or the signature of the contractor, as well as the topics discussed during the training.

## **Project Safety and Health Rules**

Rules have been adopted for the project in order to address some of the more common construction activities. This is not an all-inclusive listing and these rules in no way alleviate any contractor or their employees from the applicable occupational safety and health standards and regulations or rulings made by government authorities.

These rules apply to all persons on site including all contractors, the Company's Project Management Team and all visitors or vendors. The most restrictive rule, regulation or policy shall apply in the event of a conflict between project, contractor, local, state and/or federal regulations.

### **Compressed Gases - 29 CFR 1926.350**

- Care shall be exercised in handling all compressed gas cylinders. They shall not be dropped, jarred, or exposed to temperature extremes.
- Cylinders shall have the valve cap or valve protection device in place at all times, except when in actual use or connected to a welding set.
- Cylinders shall not be rolled and shall not be lifted by the valve or valve cap; a suitable cradle or other device shall be used.
- Cylinders shall have their contents properly identified.
- Compressed gas cylinders, whether full or empty, shall be stored and transported in an upright position and chained or otherwise secured so they cannot fall or be upset.
- Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials a minimum distance of 20 feet or by a noncombustible barrier at least 5 feet high having a fire-resistance rating of at least one-half hour.
- Cylinders shall not be placed where they might become part of an electric circuit or within 5 feet of an electrical outlet.
- Before the regulator is removed from a cylinder, the valve shall be closed and all pressure shall be released from the regulator.
- A leaking cylinder shall not be used. Such cylinders shall be taken outdoors away from sources of ignition. The supervisor shall be notified.
- A flame shall never be used to detect gas leaks.
- The recessed top of cylinders shall not be used as a place for tools.
- Oxygen, oil, grease, or similar materials shall not be allowed to come in contact with any valve, fitting, regulator, or gauge of oxygen cylinders:
  - Oxygen shall never be used as a substitute for compressed air.
  - When an oxygen cylinder is in use, the valve should be opened fully in order to prevent leakage around the valve stem.
- Acetylene cylinders shall be properly secured and always used, transported or stored in a vertical position. Cylinders shall be protected from sparks, flames and contact with energized electrical equipment.
  - An acetylene cylinder valve shall not be opened more than 1½ turns of the spindle and preferably no more than ¾ of a turn.

- Employees shall not use acetylene in a free state at pressures higher than 15 psi.

### **Electrical - 29 CFR 1926.400**

All electrical work shall be in compliance with the latest edition of the National Electrical Code, unless otherwise specified by OSHA regulations.

#### **Working Near Electricity**

- A trained electrician who is experienced with the National Electrical Code shall only make electrical repairs and / or installations.
- No work shall be performed on or near unguarded electrical circuits unless a qualified person has tested the circuit to ensure there are no live parts.
- Lockout / tagout procedures are to be followed when the potential for employee exposure to stored energy exists.
- Buried electrical lines shall be determined prior to excavation processes. Where the exact location of underground electric power lines is unknown, workers using jack hammers or hand tools that may contact electrical lines shall be provided with insulated gloves and other protective equipment such as rubber boots.

#### **Electrical Boxes / Panels**

- Electrical receptacles shall be grounded.
- Circuit protectors, such as fuses or circuit breakers, shall be installed within the circuit to prevent excessive current flow.
- Security covers shall be installed on live electrical receptacle / panel boxes and the boxes shall be mounted and secured.

#### **General**

- The Company shall use either ground fault circuit interrupters as specified in 29 CFR 1926.404 (b)(1)(ii) or an assured equipment grounding conductor program as specified in 29 CFR 1926.404 (b)(1)(iii).
- Fuses and circuit breakers shall be so located or shielded that employees will not be burned or otherwise injured by their operation.
- Circuit breakers shall clearly indicate whether they are in the open (off) or closed (on) position.
- Temporary wiring shall be removed immediately upon completion of construction or the purpose for which the wiring was installed.
- Flexible cords shall be used only in continuous lengths without splice or tap.
- Portable hand lamps shall contain a metal shell. Paper lined lamp holders shall not be used.
- Warning signs or visible markings on the equipment or structure shall indicate the operating voltage of exposed live parts of transformer installations.
- Worn or frayed electrical cords or cables shall not be used.
- Extension cords shall not be fastened with staples, hung from nails, or suspended by wire or over sharp edges.

- Controls that are to be deactivated during the course of work on energized or deenergized equipment or circuits shall be tagged.
- Equipment or circuits that are deenergized shall be rendered inoperative and shall have tags attached at all points where such equipment or circuits can be energized.
- Tags shall be placed to identify plainly the equipment or circuits being worked on.

#### **Flammable and Combustible Liquids - 29 CFR 1926.150**

- Only approved containers and portable tanks shall be used for storage and handling of flammable and combustible liquids.
- Flammable or combustible liquids shall not be stored in areas used for exits, stairways, or normally used for the safe passage of people.
- Quantities of flammable and combustible liquid in excess of 25 gallons shall be stored in an acceptable or approved cabinet.
- Leakage or spillage of flammable or combustible liquids shall be disposed of promptly and safely.
- Flammable or combustible liquids shall be stored in approved closed containers, in tanks located underground or in above ground portable tanks.
- The dispensing hose shall be an approved type.
- The dispensing nozzle shall be an approved automatic-closing type without a latch-open device.
- Underground tanks shall not be abandoned.
- There shall be no smoking or open flames in the areas used for fueling, servicing fuel systems for internal combustion engines and receiving or dispensing of flammable or combustible liquids.
- Conspicuous and legible signs prohibiting smoking shall be posted.
- The motors of all equipment being fueled shall be shut off during the fueling operation.
- Each service or fueling area shall be provided with at least one fire extinguisher having a rating of not less than 20-B:C located so that an extinguisher will be within 75 feet of each pump, dispenser, underground fill pipe opening and lubrication or service area.

#### **Housekeeping - 29 CFR 1926.25**

- During the course of fabrication, construction, alteration, or repairs, form and scrap lumber with protruding nails and all other debris, shall be kept cleared from work areas, passageways and stairs, in and around buildings or other structures.
- Combustible scrap and debris shall be removed at regular intervals during the course of construction. Safe means shall be provided to facilitate such removal.
- Containers shall be provided for the collection and separation of waste, trash, oily and used rags and other refuse. Containers used for garbage and other oily, flammable or hazardous wastes, such as caustics, acids, harmful dusts, etc. shall be equipped with covers. Garbage and other waste shall be disposed of at frequent and regular intervals.

Accumulation of debris and waste materials not only slows the construction process and creates disorganization, but it also has the potential to evolve into unsafe work conditions. For this

reason, all contractors are required to clean their work areas on a daily basis. Failure to meet such conditions may result in back charges to the contractor for removal of trash or waste material by others from the work area or for clearing or moving tools, materials or equipment from aisles, walkways or work areas.

## **Ladders and Stairways - 29 CFR 1926.1050**

### **General Requirements**

- A stairway or ladder shall be provided at all personnel points of access where there is a break in elevation of 19 inches (48 cm) or more, and no ramp, runway, sloped embankment or personnel hoist is provided.
- A double-cleated ladder or two or more separate ladders shall be provided when ladders are the only means of access or exit from a working area for 25 or more employees or when a ladder is to serve simultaneous two-way traffic.

### **Stairways**

- Stairways that will not be a permanent part of the structure on which construction work is being performed shall have landings of not less than 30 inches in the direction of travel and extend at least 22 inches in width at every 12 feet or less of vertical rise.
- Where doors or gates open directly on a stairway, a platform shall be provided, and the swing of the door shall not reduce the effective width of the platform to less than 20 inches.
- Stairways having four or more risers or rising more than 30 inches, whichever is less, shall be equipped with:
  - At least one handrail; and
  - One stair rail system along each unprotected side or edge.
- The height of handrails shall be not more than 37 inches not less than 30 inches from the upper surface of the handrail to the surface of the tread, in line with the face of the riser at the forward edge of the tread.

### **Ladders**

- Ladders shall not be tied or fastened together to provide longer sections unless they are specifically designed for such use.
- Wood ladders shall not be coated with any opaque covering, except for identification or warning labels which may be placed on one face only of a side rail.
- Fixed ladders shall be provided with cages, wells, ladder safety devices or self-retracting lifelines where the length of climb is less than 24 feet, but the top of the ladder is at a distance greater than 24 feet above lower levels.
- Where the total length of a climb equals or exceeds 24 feet, fixed ladders shall be equipped with one of the following:
  - Ladder safety devices; or
  - Self-retracting lifelines, and rest platforms at intervals not to exceed 150 feet; or
  - Cage or well, and multiple ladder sections, each ladder section not to exceed 50 feet in length. Ladder sections shall be offset from adjacent sections, and landing platforms shall be provided at maximum intervals of 50 feet.

- Ladders shall not be loaded beyond the maximum intended load for which they were built, not beyond their manufacturer's rated capacity.
- Ladders shall be used only for the purpose for which they were designed.
- Ladders shall be used only on stable and level surfaces unless secured to prevent accidental displacement.
- Ladders placed in any location where they can be displaced by workplace activities or traffic shall be secured to prevent accidental displacement or a barricade shall be used to keep the activities or traffic away from the ladder.
- Ladders shall not be moved, shifted or extended while occupied.
- Ladders shall have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized electrical equipment.
- The top or top step of a stepladder shall not be used as a step.
- Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe usage.
- Portable ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats or steps, broken or split rails, corroded components or other faulty or defective components, shall either be immediately marked in a manner that readily identifies them as defective or be tagged with "Do Not Use" or similar language and shall be withdrawn from service until repaired.

### **Training Requirements**

- The contractor shall provide a training program for each employee using ladders and stairways, as necessary. The program shall enable each employee to recognize hazards related to ladders and stairways, and shall train each employee in the procedures to be followed to minimize these hazards.
- The contractor shall ensure that each employee has been trained by a competent person in the following areas, as applicable:
  - The nature of fall hazards in the work area;
  - The correct procedures for erecting, maintaining and disassembling the fall protection systems to be used;
  - The proper construction, use, placement and care in handling of all stairways and ladders;
  - The maximum intended load-carrying capacities of ladders used; and
  - The standards contained in 29 CFR 1926 Subpart X.
- Retraining shall be provided for each employee as necessary so that the employee maintains the understanding and knowledge acquired through compliance with Subpart X of 29 CFR 1926.

### **Material Handling - 29 CFR 1926.250**

#### **General Requirements**

- Aisles and passageways shall be kept clear to provide for the free and safe movement of material handling equipment or employees. Such areas shall be kept in good repair.

### **Rigging Equipment for Material Handling**

- Rigging equipment for material handling shall be inspected prior to use on each shift and as necessary during its use to ensure that it is safe. Defective rigging equipment shall be removed from service.
- Rigging equipment, when not in use, shall be removed from the immediate work area so as not to present a hazard to employees.
- Each day before being used, the sling and all fastenings and attachments shall be inspected for damage or defects by a competent person designated by the contractor. Additional inspections shall be performed during sling use, where service conditions warrant. Damaged or defective slings shall be immediately removed from service.
- When used for eye splices, the U-bolt shall be applied so that the “U” section is in contact with the dead end of the rope.
- Slings shall be padded or protected from the sharp edges of their loads.
- The manufacturer’s recommendations shall be followed in determining the safe working loads of the various sizes and types of specific and identifiable hooks.

### **Mobile Equipment - 29 CFR 1926.602**

#### **General Requirements**

- All equipment left unattended at night, adjacent to a highway in normal use, or adjacent to construction areas where work is in progress, shall have appropriate lights or reflectors, or barricades equipped with appropriate lights or reflectors, to identify the location of the equipment.
- Heavy equipment suspended or held aloft by use of slings, hoists, or jacks shall be substantially blocked or cribbed to prevent falling or shifting before employees are permitted to work under or between them.
- Bulldozer and scraper blades, end-loader buckets, dump bodies, and similar equipment shall be either fully lowered or blocked when being repaired or when not in use.
- Whenever equipment is parked, the parking brake shall be set. Equipment parked on inclines shall have the wheels chocked and the parking brake set.

#### **Earthmoving Equipment**

- Use seat belts when provided, except in equipment that does not have roll over protection.
- All equipment brakes shall be capable of stopping and holding the equipment while fully loaded.
- All equipment shall be equipped with an audible horn, distinguishable from the surrounding noise level. Equipment with an obstructed view to the rear shall have a reverse signal alarm or the equipment may be backed if an employee signals that it is safe to do so.

#### **Lifting and Hauling Equipment**

- Clearly post the rated capacity on the vehicle.
- Do not lift or carry more than the rated capacity of the vehicle.

- Unauthorized personnel shall not be permitted to ride on powered industrial trucks.

#### **Noise Exposure - 29 CFR 1926.52**

- Protection against the effects of noise exposure shall be provided when the sound levels exceed those shown on Table D-2 or 29 CFR 1926 Subpart D.
- When employees are subjected to sound levels exceeding those listed in Table D-2, feasible administrative or engineering controls shall be utilized. If such controls fail to reduce sound levels within the levels of the table, personal protective equipment shall be provided and used to reduce sound levels within the levels of the table according to Subpart E of the 29 CFR 1926.

#### **Personal Protective Equipment (PPE) - 29 CFR 1926.95**

All employees shall be trained on the use of appropriate PPE prior to their initial assignment and annually thereafter. Training shall include how to clean and maintain their PPE in a sanitary condition. All training records will be documented and maintained in the employee's safety file.

#### **Minimum PPE**

Employees are required to wear the following PPE 100% of the time while on the project site:

- Hard hat
- High vis vests
- Sturdy leather steel toed work boots / shoes (no tennis shoes)
- Gloves
- Eye Protection - Safety glasses shall be worn at all times.
- Full length work pants, coveralls, jeans, etc.
- At least short sleeve shirts that covers the shoulders and midriff. Tank tops and halter tops are prohibited.

All PPE is inspected on a weekly basis by the Branch Safety Director to confirm proper sizing and fit, confirming that PPE is maintained in satisfactory and sanitary condition. Any employee owned PPE must be approved by the Company prior to use. Defective PPE shall be immediately taken out of service and a replacement will be provided by the Company.

Hazard assessments will be performed at all branch locations and on all job sites prior to the commencement of work. Employees shall wear appropriate PPE based upon the certified hazard assessments.

#### **The PPE described below will be used when deemed necessary**

- Full face shields shall be worn while grinding, chipping concrete or when possible eye and face hazards are present.
- Wherever it is not feasible to reduce the noise levels or duration of exposures to those specified in Table D-2, Permissible Noise Exposures, in 29 CFR 1926.52, ear protective devices shall be provided and used.

### **Scaffolding - 29 CFR 1926.450**

The Company shall designate a “competent person” for scaffold safety. If the Company does not have a “competent person” for scaffold safety who will be present during erection / dismantling, the branch will not be allowed to erect, dismantle or use a scaffolding system.

The “competent person” shall have the authority to decide if and when fall protection is / is not feasible for those erecting / dismantling a scaffold above 10 feet. The “competent person” shall determine whether it is feasible, or would pose a greater hazard, to provide and require use of a hook-on ladder, rigidly-attached ladder or other means of safe access.

If an employee feels that a scaffold hazard exists and the “competent person is not adequately addressing it”, he / she shall inform the Superintendent of the concern.

Further use of the scaffold shall be prohibited until the scaffold can be evaluated. A qualified person shall be utilized in evaluating the scaffold at that time and hazards found shall be abated prior to any person being allowed access onto the scaffold.

### **Scaffold Platform Construction**

- Each platform unit shall be installed so that the space between adjacent units and the space between the platform and the uprights is no more than one inch wide.
- Each end of a platform 10 feet or less in length shall not extend over its support more than 12 inches unless the platform is designed and installed so that the cantilevered portion of the platform is able to support employees and / or materials without tipping, or has guardrails which block employee access to the cantilevered end.
- Each platform greater than 10 feet in length shall not extend over its support more than 18 inches, unless it is designed and installed so that the cantilevered portion of the platform is able to support employees without tipping, or has guardrails which block employee access to the cantilevered end.
- On scaffolds where platforms are overlapped to create a long platform, the overlap shall occur only over supports, and shall not be less than 12 inches unless the platforms are nailed together or otherwise restrained to prevent movement.

### **Supported Scaffolds**

- Supported scaffold poles, legs, posts, frames and uprights shall bear on base plates and mud sills or other adequate firm foundation.
- Footings shall be level, sound, rigid and capable of supporting the loaded scaffold without settling or displacement.
- Guys, ties and braces shall be installed at locations where horizontal members support both inner and outer legs.
- Ties, guys, braces or outriggers shall be used to prevent the tipping of supported scaffolds in all circumstances where an eccentric load, such as a cantilevered work platform is applied or is transmitted to the scaffold.

### **Access**

- Cross braces shall not be used as a means of access or egress.

- Portable, hook-on and attachable ladders shall be positioned so as not to tip the scaffold.
- Hook-on and attachable ladders shall be specifically designed for use with the type of scaffold used.
- Stairway-type ladders shall be provided with rest platforms at 12 foot maximum vertical intervals.
- Stair towers shall have a star rail consisting of a toprail and midrail on each side of each scaffold stairway.
- A landing platform at least 18 inches wide by at least 18 inches long shall be provided at each level of a stair tower.
- Stairways shall be installed between 40 degrees and 60 degrees from the horizontal on each stair tower.
- A competent person before each work shift and after any occurrence, which could affect a scaffold's structural integrity, shall inspect scaffolds and scaffold components for visible defects.
- Where swinging loads are being hoisted onto or near scaffolds such that the loads might contact the scaffold, tag lines or equivalent measures to control the loads shall be used.

## **Tools - 29 CFR 1926.300**

### **General Requirements**

- When power operated tools are designed to accommodate guards, they shall be equipped with such guards when in use.
- Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive and splashing objects or exposed to harmful dusts, fumes, mists, vapors or gases shall be provided with the particular personal protective equipment necessary to protect them from the hazard.
- Any tool which is not in compliance with any applicable requirement of this part is prohibited and shall be identified as unsafe by tagging or locking the controls to render them inoperable.

### **Hand Tools**

- The wooden handles of tools shall be kept free of splinters or cracks and shall be kept tight in the tool.

### **Power-Operated Hand Tools**

- The use of electric cords or air hoses for hoisting or lowering tools shall not be permitted.
- Pneumatic power tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.
- All pneumatically driven nailers, staplers and other similar equipment provided with automatic fastener feed, which operate at more than 100 psi. pressure at the tool, shall have a safety device on the muzzle to prevent the tool from ejecting fasteners, unless the muzzle is in contact with the work surface.
- The manufacturer's safe operating pressure for hoses, pipes, valves, filters and other fittings shall not be exceeded.

- The fluid used in hydraulic powered tools shall be fire-resistant fluids approved under Schedule 30 of the U.S. Bureau of Mines, Department of Interior, and shall retain its operating characteristics at the most extreme temperatures to which it will be exposed.
- Only employees who have been trained in the operation of particular powder-actuated tools in use shall be allowed to operate them.
- No fastener shall be driven into a spalled area, caused by an unsatisfactory fastening.
- All tools shall be used with the correct shield, guard or attachment recommended by the manufacturer.
- Powder-actuated tools used by employees shall meet all other applicable requirements of ANSI A10.3-1970, Safety Requirements for Explosive-Actuated Fastening Tools.

### **Abrasive Wheels and Tools**

- Grinding machines shall be equipped with safety guards in conformance with the requirements of ANSI B7.1-1970, Safety Code for the Use, Care and Protection of Abrasive Wheels.
- Floor stand and bench mounted abrasive wheels, used for external grinding, shall be provided with safety guards (protection hoods).

### **Gears, Sprockets and Chains**

- Gears shall be guarded in accordance with 29 CFR 1926.307(f).
- All sprocket wheels and chains shall be enclosed unless they are more than 7 feet (2.128 m) above the floor or platform.

### **Welding and Cutting - 29 CFR 1926.350**

#### **Gas Welding and Cutting**

- Valve protection caps shall be in place and secured.
- When cylinders are hoisted, they shall be secured on a cradle, slingboard or pallet. They shall not be hoisted or transported by means of magnets or choker slings.
- When powered vehicles transport cylinders, they shall be secured in a vertical position.
- Unless cylinders are firmly secured on a special carrier intended for this purpose, regulators shall be removed and valve protection caps put in place before cylinders are moved.
- Compressed gas cylinders shall be secured in an upright position at all times except, if necessary, for short periods of time while cylinders are actually being hoisted or carried.
- Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials a minimum distance of 20 feet or by a noncombustible barrier at least 5 feet high having a fire-resistance rating of at least one-half hour.
- Cylinders, whether full or empty, shall not be used as rollers or supports.
- Fuel gas shall not be used from cylinders through torches or other devices, which are equipped with shutoff valves without reducing the pressure through a suitable regulator, attached to the cylinder valve or manifold.

- Fuel gas and oxygen manifolds shall bear the name of the substance they contain in letters at least 1 inch high which shall be either painted on the manifold or on a sign permanently attached to it.
- Fuel gas hose and oxygen hose shall be easily distinguishable from each other.
- Torches in use shall be inspected at the beginning of each working shift for leaking shutoff valves, hose couplings and tip connections. Defective torches shall not be used.
- Oxygen and fuel gas pressure regulators, including their related gauges, shall be in proper working order while in use.
- Whenever practicable, all arc welding and cutting operations shall be shielded by noncombustible or flameproof screens which will protect employees and other persons working in the vicinity from the direct rays of the arc.

### **Operating Instructions**

- The Company shall instruct employees in the safe means of arc welding and cutting as follows:
  - When electrode holders are to be left unattended, the electrodes shall be removed and the holders shall be so placed or protected that they cannot make electrical contact with employees or conducting objects.
  - Hot electrode holders shall not be dipped in water.
  - When the arc welder or cutter has occasion to leave his / her work or to stop work for any appreciable length of time, or when the arc welding or cutting machine is to be moved, the power supply switch to the equipment shall be opened.
  - Any faulty or defective equipment shall be reported to the supervisor.
  - Additional requirements are outlined in 29 CFR 1926.406(c).

### **Fire Prevention**

- If the object to be welded, cut or heated cannot be moved and if all the fire hazards cannot be removed, positive means shall be taken to confine the heat, sparks and slag and to protect the immovable fire hazards from them.
- Suitable fire extinguishing equipment shall be immediately available in the work area and shall be maintained in a state of readiness for instant use.

### **Welding, Cutting and Heating In Way of Preservative Coatings**

- Before welding, cutting or heating is commenced on any surface covered by a preservative coating whose flammability is not known, a test shall be made by a competent person to determine its flammability. Preservative coatings shall be considered to be highly flammable when scrapings burn with extreme rapidity.



## AMERICAN FENCE COMPANY

### “WORK SAFE” PLEDGE



Workplace safety is an AFC value that guides our decisions and behavior. To maintain the integrity of that value, I pledge the following:

- I will notify my supervisor immediately of any workplace accidents/incidents
- I will work safely, wearing the appropriate personal protective equipment for the job that I am on or doing
- I will use proper lifting techniques while lifting objects to prevent back injuries. When lifting objects (a) use the assistance of a machine or other person when objects are too heavy or cumbersome, (b) lift with your legs keeping your back straight, (c) make sure your walk path is clear
- I will not talk on a cell phone when driving a company vehicle (unless an emergency exists or is absolutely necessary)
- I will wear a seat belt when riding in or driving any company vehicle
- I will report any unsafe conditions to my supervisor
- I will maintain good housekeeping of my work area and job site at all times
- I will remain alert at all times to work process and conditions around me
- I will warn others when performing tasks that could place other workers at risk
- I will obey all safety policies and procedures while working on site. If I am in a situation where I do not know what to do, I will ASK
- AFC is a drug free workplace. I will not possess, use or be under the influence of illegally controlled substances (drugs) or alcohol during working hours. This includes the consumption of alcohol during lunch breaks and upon return to the work site
- I will participate in AFC random drug testing. I understand that refusal to participate will result in immediate termination of employment
- I will notify my supervisor if I am taking prescription drugs which could affect my motor skills, alertness and ability to use any machines or equipment

Our goal is to create an injury-free workplace by recognizing and eliminating hazards in and on our work sites and workplaces. I pledge to make safety in my workplace an integral and constant part of my work day. I pledge to “Work Safe”. Furthermore, by printing my name and signing below, I acknowledge that I have read, understand and agree to abide by all safety policies and procedures as outlined in the American Fence Company Safety Policies and Procedures Manual.

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Employee Name (Print)

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Employee Signature

Date