(YOUR FENCE COMPANY) SAFETY PROGRAM

Life is highly valuable. We do not want our workers to take unnecessary risks with life and limb. We understand the need to be safety-conscious at all times. We not only are interested in our own safety, but the safety of others, including our co-workers. We are even interested in the physical safety of bystanders and others who may happen upon our worksites, even after we have left the site.

It is better to foresee a calamity and prevent it than to be naive and suffer terrible consequences. The construction industry in particular must pay attention to this principle, since serious injury or even death may result from inadequate safety measures. The emotional and physical impact of injury and death on a person and his family can defy measurement. It can be devastating. For this reason alone, we will each take Safety very seriously.

The goal of this Safety Program is to provide an accident-free environment for all workers at every moment of their working experience. This includes an accident-free environment at (YOUR FENCE COMPANY) property, on customer job sites, and company vehicles driven on the streets and highways in between.

This Safety Program is required reading. You may keep a copy of this Safety Program to refer to. It provides minimum safety rules and standards to be used while working. However, if due to circumstances your project manager or co-worker feels the need to increase the level of caution, we expect that all will heed the recommendation in a spirit of cooperation. Safety consciousness should never be resented or rejected.

Managers and team leaders should always make sure that their crew is qualified and trained to do the work at hand. If on-the-job training is taking place, there should be careful consideration of any potential hazards to the novice due to inexperience. All workers should willingly cooperate with training and really pay attention to safety instructions. Even in our speech to one another, we encourage all to put the safety of each other in first place, not taking lightly the well-being of his workmate. All of us can lead by example in this regard.

Thank you for cooperating wholeheartedly with our Safety Program!

(YOUR FENCE COMPANY) Inc.

Employees of (YOUR FENCE COMPANY) may be working within specific work areas. Non-construction areas, and higher-risk areas.

Office workers, shop workers, installers, salesmen and mechanics may at times enter into a different type of work area than their regularly assigned area. When this happens, be sure to heed all safety precautions pertinent to the particular work area. If we happen to be the visitor, listen to instructions from knowledgeable co-workers and do not hesitate to ask questions about safety concerns.

Customers, delivery persons, and other visitors may be encountered entering into (YOUR FENCE COMPANY) employee work areas. When possible, (YOUR FENCE COMPANY) employees will mark a "safety zone" with floor tape, hanging cord, sawhorse, safety fence, warning signage, or other means to protect passerby from potential hazards.

If your job requires you to temporarily take down a safety barrier, be conscientious about replacing it when you are finished with your task.

Make sure you know where the nearest First Aid station is. We desire to clearly mark these areas so that even visitors may discern easily where to go for supplies.

Age Requirements

(YOUR FENCE COMPANY) prohibits employees under the age of 18 and who do not have approved specialized approved training to drive motor vehicles or operate heavy equipment such as forklifts, skid steer loaders, and tractors.

(YOUR FENCE COMPANY) prohibits employees under the age of 18 and who do not have approved specialized training to operate power-driven machines and pneumatic, powder-actuated, and power tools such as nail guns, circular saws, table saws, band saws, chain saws, drills, lasers, and similar tools.

(YOUR FENCE COMPANY) prohibits employees under the age of 18 and who do not have approved specialized training to engage in structural demolition, roof work, working on elevated platforms 6' or more in height, or trench work 5' or more in depth.

Personal Health

Please make sure that you have filled out the appropriate Employee Information Sheet kept in our office which would clearly state any health issue you may have that would affect the way a First Aid or Emergency Medical Responder should treat you. This includes any allergies you may have, treatments you reject, or apparatus in your body. You must alert management and other co-workers if you are using prescription medication or other substance which may alter your job performance. This is for your own protection and is required under our Drug-Free Workplace Program. No one wants to be responsible for causing injury or death to their fellow workmate simply because of drowsiness, blurred vision, or any other impaired sense caused by medication.

Wearing protective clothing suitable to the job at hand is a must. Shorts, jewelry, casual footwear, long hair worn loosely, untied shoelaces, etc. are not recommended attire for (YOUR FENCE COMPANY) employees employed in construction and workshop areas.

It is each person's responsibility to show up for work each day well-rested and in good physical condition. Please alert management and co-workers if you are under the weather in any way. It is more important to take each job at a safe pace than to put you and others needlessly at risk.

All employees may at times be subject to extremes in heat and cold. Heat exhaustion, sunburn, dehydration, as well as frostbite and hypothermia are very real concerns. Make sure to rest and drink fluids when needed. Seek warmth and cover before losing sensation in feet, fingers, ears, and other extremities.

Take regular breaks if doing highly repetitive tasks in order to minimize injury.

Never drive while drowsy! Take a nap, or have someone more rested do the driving.

It takes a reasonable and modest person to recognize a physical limitation due to a prior injury. Be smart and inform others that you may have difficulty with a task due to this past injury. This is to prevent you from suffering a new injury, and possibly causing a co-worker to be injured. It's just not worth it.

Work Habits and Conduct

Please do not ignore safety rules and regulations. (YOUR FENCE COMPANY) will not tolerate willful negligence.

Get help when carrying bulky and heavy materials. Bend at the knees when lifting, keeping the back as straight as possible. Avoid lifting with the lower back. Even if it does not feel injured today, you might wake up tomorrow in pain.

Working alone brings its own dangers. Address the possibility that you may be injured **before** you begin working. Have a plan of how you will alert the homeowner, neighbor, emergency services, or (YOUR FENCE COMPANY) management. Inform someone of your activity before performing any high-risk task. You are not inconveniencing anyone by doing this. A quick call to the office before beginning and then a second quick call within a predetermined timeframe could prevent a serious injury from becoming deadly.

NEVER participate in HORSEPLAY. Practical jokes are never appreciated by (YOUR FENCE COMPANY) management, especially when it endangers the health and safety of our workers. **Do not even pretend** to harm someone. One mistake may result in impairing your co-worker. Safety means taking others' lives and health seriously.

No alcoholic beverages should be consumed during a workday, even in the periods just before work or on lunch time. Do not accept alcoholic beverages or any other mood-altering substance from a client or other worker. Do not carry any alcoholic beverage in a company vehicle or bring alcoholic beverages to (YOUR FENCE COMPANY) property.

Any employee who willfully disregards our Safety Program is showing a lack of concern for all of our employees and for his own well-being. (YOUR FENCE COMPANY) will not tolerate the putting of life and limb in danger, and will consider immediate removal of this employee and possible termination, depending on the severity of the offense.

Always report near-misses and close calls. We want to progressively protect our employees from harm. We can't do that if no one reports a problem!

If a tool or machine is damaged, ALWAYS report this to management. This prevents the tool from being used by someone else in a damaged state. It also ensures that the equipment is fixed quickly and put back into use.

Please wash or cleanse hands before eating. Be conscious of airborne contaminants in the area where you are eating, and change location if necessary.

No one likes to be sick. We encourage our employees to slow down the spread of disease and viruses in confined areas by coughing into the inner elbow or covering coughs and sneezes with tissue or handkerchief, marking phones if the user is sick, and washing hands frequently. Covering coughs and sneezes is not only good manners, it shows consideration for others' good health.

Blood-borne pathogens can cause disease. Avoid contact with another person's blood. If a tool, utensil, or material is contaminated with blood, it should be properly cleaned with a mixture of 10% bleach and 90% water prior to making it available again for general use.

Personal Protective Equipment (PPE)

Appropriate PPE may include safety glasses, hard hat, gloves, goggles, face shield, dust mask, respirator, hearing protection, knee protection, work shoes, and safety vest.

Please make sure that any PPE is properly fitting and in good condition. It should be comfortable enough to work in all day long. If you do not have proper PPE, request it from management before beginning your task. It should be high-quality and appropriate for the work at hand.

Your PPE has the ability to prevent or minimize serious damage to your eyes, skin, respiratory tract, fingers, and more. Make sure to keep your PPE in good repair. Replace hard hats which are beyond their date of validity. Change filters in respirators regularly. If gloves, boots or other protective clothing develop rips or tears, have them repaired or replaced.

Protection from Head Injuries

Hard hats can protect your workers from head impact, penetration injuries, and electrical injuries such as those caused by falling or flying objects, fixed objects, or contact with electrical conductors. Also, OSHA regulations require employers to ensure that workers cover and protect long hair to prevent it from getting caught in machine parts such as belts and chains.

Protection from Foot and Leg Injuries

In addition to foot guards and safety shoes, leggings (e.g., leather, aluminized rayon, or other appropriate material) can help prevent injuries by protecting workers from hazards such as falling or rolling objects, sharp objects, wet and slippery surfaces, molten metals, hot surfaces, and electrical hazards.

Protection from Hearing Loss

Wearing earplugs or earmuffs can help prevent damage to hearing. Exposure to high noise levels can cause irreversible hearing loss or impairment as well as physical and psychological stress. Earplugs made from foam, waxed cotton, or fiberglass wool are self-forming and usually fit well. A professional should fit your workers individually for molded or preformed earplugs. Clean earplugs regularly, and replace those you cannot clean.

Protection from Hand Injuries

Workers exposed to harmful substances through skin absorption, severe cuts or lacerations, severe abrasions, chemical burns, thermal burns, and harmful temperature extremes will benefit from hand protection.

Tools and Ladders

- Please use all safety features of any piece of equipment provided by (YOUR FENCE COMPANY). Safeguards are there to protect you from harm, which is our ultimate goal.
- Inspect each tool before using it to make sure it is in good working condition. Repair or remove any tool that is broken or not operating correctly, and alert management and co-workers.
- Please only use a particular tool for its specified purpose.
- Inspect ladders for broken rungs before using. Alert management and co-workers of
- any problematic ladder so that it may be repaired or discarded.
- Always place ladders on a firm footing. Keep the area at the top and bottom of the ladder clear of debris. Do not use a ladder on uneven or sloping surfaces.
- Always face the ladder when ascending or descending, maintaining at least 3 points of contact with it at all times.
- Use a tool belt or other means to haul materials up a ladder.
- Do not overreach the side of a ladder. When necessary, move the ladder to the appropriate location.
- Do not use buckets, boxes, or other unstable objects as makeshift ladders. Do not duct-tape objects to your feet instead of using a ladder!
- If a ladder is stationed in front of a doorway, mark it with a sign or have someone on hand to warn others from coming through the door.
- Use the proper ratio of 1:4 when determining the support base to ladder height.
- Never stand or sit on the top two rungs of any ladder. Only one person at a time

should use a typical ladder.

- If using a mobile platform ladder, do not attempt to move the ladder if someone is occupying it. Remove excessive mud and grease from shoes when using a ladder.
- Be wary of electrical cords used near ladders. Extension ladders should extend at least 3 feet above the landing and be secured to prevent them from moving.

SAFE WORK PRACTICES

- Each facility shall develop safe work practices to ensure minimization of accidents and losses.
- Management shall enforce such practices to the fullest extent using recognized sound management practices.
- Management shall develop work practices based on highest priority needs that is, areas where the potential for injury, damage or downtime is the greatest. Work practices should be developed for application.
 - Company-wide Departments
 - Areas
 - Jobs
 - Critical methods or processes

First line supervision should be involved in the implementation and enforcement of work practices.

Implementation requires:

- Providing good reasoning for practices
- Prior review by workers
- Worker panicipation
- Training
- Testing

Enforcement involves motivating workers by:

- Knowing safe work practices
- Setting a good example
- Applying consistently
- Disciplinary action, if needed

80% of all injuries and property damage accidents involve a violation of some rule or standard practice. When these violations are controlled, fewer accidents occur and that can mean improved:

• Profits

- Costs
- Production
- Quality
- Individual performance

Treat Your Body Right

Handling materials manually is an everyday occurrence. You may not realize it, but even simple moving tasks could exert undue pressure on your body. Normally, your body will handle extra stress, but continued abuse could take its toll.

The largest cause of on-the-job injuries is manual material handling. Twenty-five percent of work related injuries are caused during materials handling-improper lifting or lifting materials that are too heavy.

People can reduce the chance of on-the-job injuries by knowing and implementing proper manual material handling techniques.

Think Before Moving

Your head plays the most important role in preventing injuries. Think before you begin a moving job. Think about the best way to approach the job and plan bow you will move the materials before you begin. A little pre-planning could save a lot of injuries.

Avoiding Back Injuries

Millions of people suffer from back injuries-many of which could have been avoided.

People performing heavy, repetitive tasks often do not pay attention to proper lifting procedures. To help prevent back injuries, a short warm-up period before lifting heavy objects is a good idea. Occasional stretching breaks during a lifting job may also help avoid back injuries.

If you do suffer from back pains-do not ignore them! Early diagnosis and treatment is key to treating these injuries and avoiding more severe problems in the future.

Strains

Your back is not the only area where muscle strains can occur. Arm, leg and shoulder strains often occur, but can be prevented by implementing proper lifting techniques.

Hernia

Contrary to popular belief, hernias do not affect only workers in heavy industry. A hernia is an abdominal. weakness that can occur when unsafe lifting habits allow overstretching of the abdominal muscles.

Alternate Moving Methods

Lifting heavy items is not the only method of transporting materials. If possible, you should try pushing or pulling materials, instead of lifting them. H carts or dollies are present. use them whenever possible.

Always wear proper equipment to help protect yourself from possible injuries. Gloves and safety hats and shoes could help avoid potential injuries-especially if you are moving materials on or near rough. hot or slippery areas. Always be alert for sharp comers or loose materials.

Avoid Injuries Through Proper Moving Techniques.

Many work related injuries can be avoided by using the proper moving techniques. When you must move objects, use the following guidelines:

Lifting

- Evaluate the size of the load and get help if it is too large for one person.
- Bring the object close to you, the weight centered over your feet.
- Lift smoothly. avoiding quick, jerky motions.
- When carrying a heavy load. shift your feet instead of twisting your body.
- To lift a load above waist height, rest the load on a table or bench, shift your grip, then lift again.
- Evaluate a load, consider the points above and lift comfortably.

Carrying

- When necessary, use two people. Decide in advance how a load will be moved.
- Do not let the object you are moving obstruct your vision. Always have a clear view of where you're going.
- Make sure the surface you will be traveling on is clean and in good condition.
- Carry long objects on your shoulder.
- Avoid sudden twists.

Pushing and Pulling

- Whenever possible. push instead of pull
- Be sure you can see over or around the object
- Push or pull at waist height-avoid bending.
- Avoid steep ramps.

POWER OPERATED HAND TOOLS

GENERAL: All power tools must be inspected periodically for the following

- Frayed or broken cords.
- Integrity of ground wire.
- Properly operating safety guards.
- Availability of necessary properly sized and grounded extension cords.
- Properly sharpened blades or bits.
- All bolts fully tightened.
- Blades and bits properly installed and tightened.

All power tools should be operated with proper care and equipment, i.e.,:

- Always wear safety glasses.
- Never wear loose fitting or frayed clothing.
- Never operate power tools in wet conditions.
- Always detach power cord prior to changing bits or blades.
- Always have Helper secure large work so as not to compromise worker's body pans.

NAIL AND STAPLE GUNS

We are all interested in stopping accidents on the job. The following safety tips are basic. Yet, a little extra effort to enforce them on the part of everyone on the job will prevent nailing and stapling accidents.

START A REAL SAFETY DRIVE IN YOUR SHOP AND ON YOUR TRUCKS.

- These are potentially dangerous tools. Be a pro and use them properly. You need two eyes to live and work at your best. Use your head, WEAR SAFETY GLASSES AT ALL TIMES even in the field. Customers appreciate common sense being used while working in their yards.
- THESE TOOLS ARE DRIVEN BY AIR and only air. Bottled gases spell BAD TROUBLE-sometimes with a capital BOOM!
- TAKE IT EASY WITH AIR PRESSURE. Keep it at the right operating pressure. Extra air pressure doesn't make your job extra fast or extra easy. IT DOES MAKE IT EXTRA DANGEROUS.
- TO TEST, operate your stapler or nailer in solid contact with the work surface or an extra board. If your tool has safeties, they are there for your protection. CHECK SAFETIES EVERY DAY!
- Your stapler or nailer can't flre without air. Disconnect it and prevent accidents. BE ESPECIALLY SURE TO DISCONNECT AIR WHEN REMOVING A BENT STAPLE OR NAIL.

- Be good to your stapler or nailer, and it will do a good, safe job for you. Make sure screws and pans are tight and air hose is in good condition. If you have questions, ask your supervisor.
- WORK SAFELY YOURSELF, and make sure others do, too! Set up your work safely. Get an extra measure of protection by passing the word on safety.
- Only use proper size nails or staples and load them correctly. WHEN YOU PICK UP A TOOL, AWAYS ASSUME THAT IT HAS NAILS IN IT.
- DO NOT ATTEMPT TO REPAIR NAIL GUNS; repairs should only be done by trained qualified service personnel.
- NEVER TRY TO FIRE THE TOOL unless it is pressed tight against the work that is to be nailed.
- When connecting the tool to the air line DO NOT HAVE YOUR FINGER ON THE TRIGGER. Always point the tool towards the floor and away from any part of your body.
- Horseplay with staplers or nailers usual drives people to the hospital. PREVENT USELESS ACCIDENTS: No stapler or nailer should ever be aimed at any person. GET THE POINT?
- Check the manner in which these tools are routinely taken off and loaded on work trucks. You might be surprised.

ELECTRIC CIRCULAR SAWS

WARNING: When using Electric Tools, basic safety precautions should always be followed to reduce the risk of fire. Electric shock and personal injury including the following:

- KEEP WORK AREA CLEAN. Cluttered areas and benches invite injuries. Pick up unused boards or stringers while in the field.
- AVOID DANGEROUS ENVIRONMENT. Don't expose power tools to rain. Don't use power tools in damp or wet locations. Do not use tool in presence of flammable liquids or gases.
- GUARD AGAINST ELECTRIC SHOCK. Prevent body contact with grounded surfaces. For example: Pipes, Radiators, Ranges, Refrigerators.
- KEEP CHILDREN AWAY. Do not let visitors, or customers, contact tool or extension cord. All visitors should be kept away from work area.
- STORE IDLE TOOLS. When not in use, tools should be stored in dry or locked up place out of the reach of children.
- DON'T FORCE TOOL. It will do the job better and safer at the rate for which it was intended.
- USE RIGHT TOOL. Don't force small tool or attachment to do the job of a heavy duty tool. Don't use tool for purpose not intended; for example, do not use a Circular Saw or cutting tree limbs or Jogs.

- DRESS PROPERLY. Do not wear loose clothing or jewelry. Loose clothing, drawstrings and jewelry can be caught in moving parts. Rubber gloves and non-skid footwear are recommended when working. Wear protective hair covering to contain long hair.
- USE SAFETY GLASSES. Wear safety glasses or goggles while operating Circular Saw. Also face or dust mask if operation creates dust. All persons in the area where Circular Saws are being operated should also wear safety glasses and face or dust mask.
- DON'T ABUSE CORD. Never carry the saw by its cord or yank it to disconnect from power source. Keep cord from heat, oil, and sharp edges. Have damaged or worn power cord and strain reliever replaced immediately.
- DON'T OVER REACH. Keep proper footing and balance at all times.
- MAINTAIN TOOLS WITH CARE. Keep tools sharp and clean for better and safer performance. Follow instructions for lubricating and changing accessories. Keep handles dry. clean, and free from oil and grease.
- DISCONNECT TOOLS. When not in use, before servicing, and when changing accessories such as blades, guards, etc.
- AVOID UNINTENTIONAL STARTING. Do not carry plugged in tool with finger n switch.
- OUTDOOR USE EXTENSION CORDS. When saw is used outdoors, use only extension cords marked "Suitable for use with outdoor appliances store indoors when not in use."
- STAY ALERT. Watch what you are doing. Use common sense. Do not operate saw when you are tired or while under the influence of medication, alcohol or drugs.
- KEEP GUARDS IN PLACE AND IN WORKING ORDER. Never wedge or tie lower guard open. CAUTION: If saw is dropped, lower guard may be bent, restricting full return.
- KEEP BLADES CLEAN AND SHARP. Sharp blades minimize stalling and kickback.
- DANGER: KEEP HAND AWAY FROM CUTTING AREA. Keep hands away from blade. Do not reach over the fence, out of sight while cutting. Do not attempt to remove cut material when blade is moving.

CAUTION: Blades coast after turned off:

- GUARD AGAINST KICKBACK. Kickback occurs when the blade is pinched and the saw is driven back towards the operator. Release switch immediately if blade binds or aw stalls. Keep blades sharp. Don't force saw.
- USE ONLY CORRECT BLADES. Do not use blades with incorrect size holes. Never use defective or incorrect blades, washers or bolts.

- KEEP TOOL CLEAN. Periodically blow out all air passages with compressed air. Remove build up of grime resulting from working with green, treated or sappy wood. All lastic parts should be cleaned with s oft cloths. NEVER use solvents when cleaning plastic parts. CAUTION: Wear safety glasses while using compressed air.
- Should you have any questions about the safe operation or condition of a Circular saw, ask your supervisor or someone in management.

POWER EQUIPMENT

Power equipment is similar to hand operated power tools; however it is usually more powerful stationary and less forgiving of mistakes. Injuries suffered when operating power equipment are potentially more serious than from hand tools. Power equipment must be installed with great thought for location. Points which must be considered are:

- Location: Is there enough area to allow materials in sufficient quantity to be supplied to equipment to maintain production as well as to stock finished material and still provide safe work area for the operator? Moving parts must be allowed proper clearance from ails or stationary objects for equip- ment that throws off dust or chips. Locate to take advantage of walls or panitions to control effect to other work areas.
- Installation: Equipment should be secured so as to minimize vibration and creeping or upset. Proper power must be made available at the machine.
- Power Source: In many cases equipment is hardwired direct to electric panel. Label all circuits so as to be easily identified in the event of emergency or for servicing equipment.
- Lighting: Proper lighting must be provided at all times when equipment is in operation or being serviced.
- Provide easy access for operating and escape in the event of fire or emergency.
- Install proper safety equipment and guards to allow for safe operation and safe. Easy servicing or adjustment to machine.
- Provide fire extinguisher near operator's area.

HOLE DIGGERS

Hole digging equipment is specialized equipment designed for specific job functions and requires adequate and thorough instruction before it is operated. The size, power, complexity, and operating characteristics of this type of equipment would dictate that each operator must receive adequate professional instruction regarding the proper operation of the equipment planned to be used. Before attempting to use a Hole Digger, read the operating manual and material supplied by the manufacturer. BE SURE EACH OPERATOR READS AND COMPREHENDS THE CONTENTS OF EQUIPMENT MANUALS BEFORE OPERATING.

Each company should develop a comprehensive program for the safe operation of Hole Diggers by its owners and/or operator(s). Such a program should include, but is not limited to:

- Instructional requirements for operation
- Applicable OSHA requirements for operation
- Local laws and regulations
- Jobsite safety
- A Hole Digger maintenance program

Constantly organize and upgrade this program to guarantee owners and/or opera-tors' safety. Each operator must be fully instructed regarding the specifics of this safety program.

Determine that the Hole Digger is in its original factory configuration and has not been modified in any manner. Modifications can result in potentially danger-ous configurations that can lead to property damage and/or personal injury. If there is any question about modifications to your digging equipment, contact the manufacturer.

Never allow minors to operate Hole Digging Equipment. Bystanders, especially children and animals, should not be allowed in the area where a Hole Digger is in use.

Operators must be in adequate physical condition, mental health, and not under the influence of any substance (drugs, alcohol, etc.) which might impair their vision, dexterity or judgment. Working with a Hole Digger is strenuous. If you have any condition that might be aggrevated by strenuous work, check with your doctor before operating a Hole Digger.

Clothing must be sturdy and snug fitting; but allow complete freedom of movement. Never wear loose fitting jackets, scarves, jewelry, flared or cuffed pants or anything that could become caught on controls or moving parts. Wear long pants to protect your legs. Protect your hands with heavy duty nonslip gloves to improve your grip. Good footing is most important when operating a Hole Digger. Wear sturdy boots with nonslip soles. *Steel-toed safety boots are highly recommended*. NEVER wear tennis shoes or similar type shoes which afford little or no protection. Wear an approved safety hard hat to protect the operator(s) head where there is a danger of head injuries. Noise generated by the engine of the Hole Digger can damage your hearing. Wear sound barriers (ear plugs or ear mufflers) to protect your hearing. Continuous and regular operators should have their hearing checked regularly.

Usually inspect the Hole Digger, auger(s) and auger extensionts) for damaged or worn pans. Inspect each auger for the proper screw bit and teeth or blade. Look for loose and/or broken parts. Determine that all operator controls work correctly and freely, all safety devices are operative and information decals are readable. Check to see that the Hole Digger and all related accessories are in good mechanical condition BEFORE utilization.

Contact appropriate representatives to determine if and/or where hazardous items are buried under the digging site. BEFORE DIGGING. Be certain underground utilities have been called to locate underground electric, gas, telephone and etc. Record all dates and job ticket numbers given by underground utility services or companies, and be sure operator has this information. WHEN IN DOUBT -DO NOT DIG!!! Have a record of all utility emergency numbers for area you are digging in! Know how all controls operate. Know how to stop the engine quickly in an emergency.

Never exceed the recommended auger capacity of the Hole Digger. Refer to the specification manual of the manufacturer for information.

Always utilize the correct auger and auger ??????

Lasers

Set up lasers at a level where the beam cannot directly enter anyone's eyes. Cap the beam when the laser is on but idle. Turn off the laser equipment when not in use.

Motorized Vehicles and Heavy Equipment

(YOUR FENCE COMPANY) employees are to use seat belts at all times.

Operators are encouraged to avoid using cell phones while the vehicle is in motion. Drivers should endeavor to use the hands-free option if they employ cell phones while driving.

Do not respond to a cell phone call if it is not possible to safely come to a stop, or if doing so would create a potential hazard to yourself or others. No phone call is that important.

Only authorized employees should operate company vehicles. Those not properly licensed should inform management of their status so that other arrangements can be made for a suitable driver.

- Vehicles should be turned off before refueling.
- Passengers should be transported in an approved seating area only.
- Properly secure all loads. No one should ride on top of a load or on top of a vehicle.

- Oversized loads must be properly flagged to alert other drivers.
- All state and local requirements must be followed when towing trailers. Be sure to use proper safety chains, hitch safety clips, and lighting when needed.
- Make sure horns and alarms for backing up are fully operational.
- Carefully calculate and manage the capacity of the vehicle or machine. Give plenty of distance for braking, and keep speeds within safe operating parameters. Anticipate problem traffic situations before they appear.
- Competent flagmen or spotters, as well as safety devices such as cones should be implemented when work is near pedestrians or vehicle traffic.
- All heavy equipment and trucks must stay at least 10 feet away from overhead power lines.

Forklifts

Follow all guidelines for Motorized Vehicles and Heavy Equipment.

No one should be allowed under a suspended load.

Access to lift areas must always be controlled because of potential crush hazards. Only workers directly involved with the task at hand are allowed to work next to an operating forklift.

Do not ride on the forks of a moving forklift.

Do not elevate anyone on the forks of a forklift, or on a pallet carried by a forklift.

Make sure that nothing is laying on top of a load to be lifted which may fall and injure someone or affect the performance of the vehicle. Make sure all loads are fastened securely.

Do not allow anyone to perform mechanical adjustments on the forklift while it is turned on. Do not allow anything to distract you from the work at hand.

Fork lift operators shall attend fork lift operator course and shall be certified operators.

Be aware that your co-workers may not see or hear you coming as you operate a forklift. Be cautious when entering a doorway as people may be passing in front of you suddenly.

Since our forklift never leaves our facilities daily inspections will be made by our trained mechanic.

Scaffolding and Platforms

Only erect scaffolding under the supervision of a designated, competent person.

Place scaffolding legs on firm footings only. Where needed, use heavy-duty solid wood under the legs to support maximum loads.

Set all scaffolding legs and platforms plumb and level. Decking on platforms should be assembled so that no space between the planks exceeds 1 inch. Planks must overhang end supports at least 6". If they are overhanging by 12" or more they should be secured in place. Always lap planks in the same direction.

Discard and replace cracked or split planks immediately.

Use a ladder or stair tower to access the scaffolding platforms. Do not climb on end frames unless the frames are designed with built-in ladders. Never use cross braces on tubular scaffolding as a means of access or egress.

Do not overreach scaffolding. Relocate it if necessary. Do not overload scaffolding.

Open sides and platforms 4' or more in height should have guardrails.

Any platform scaffold, ladder or related equipment shall be reported to the supervisor.

All unsafe equipment shall be tagged by a supervisor and all employees are to be instructed not to use equipment until equipment is repaired and untagged by a supervisor.

Only qualified and competent personnel may repair scaffolding systems.

Excavating and Trenching

OUPS should be notified before any excavating occurs. Check with the property owner for any private underground. If there is no way to prove that underground lines are absent in the line of digging, check with management. Do not just take someone's word that there is no underground hazard. It could mean your life or someone else's.

No dollar amount can equal the loss of life and limb. Do not take unnecessary chances when digging. Stop if you feel uncomfortable or if you feel at risk. (YOUR FENCE COMPANY) may at any time reject a job if the risk of damage or injury from digging is present.

Notice any changes in smells, sounds, or vibration coming from or around the area of excavation. Smoking and the use of cell phones is not approved while digging.

Contact the office or local utilities immediately if it is suspected that there is any type of leak or contact with underground.

Trenches and excavations that are 5'deep or more or on unstable soil should be properly sloped or benched or have shoring or a trench shield installed before entering. A competent person must approve the shoring design. Be aware that weather, soil, or work conditions can change and cause trench failure or cave-in.

Any excavation when left unattended should be properly covered, barricaded, or protected from passerby falling into it.

Hot Work

Hot work can involve welding, torching, and soldering. Competent persons only should be overseeing this type of work.

Make sure a suitable fire extinguisher is available when performing any hot work. Do not perform hot work near flammable materials, including paint or heavy dust concentrations.

Make sure to have someone present while performing hot work in case of problems.

Wear eye protection to prevent exposure to arc flash. Use a non-flammable shield barrier if necessary to protect others in the vicinity.

Proper non-melting fabric clothing should be worn, along with flame resistant protective clothing.

Use extreme caution when transporting, moving, or storing compressed-gas cylinders.

Using Fire Extinguishers

When using fire extinguishers, employees should employ the "PASS" system of early-stage firefighting.

P—Pull the pin on the extinguisher

A—Aim at the base of the fire

S—Squeeze the handle

S—-Sweep at the fire, moving from side to side

Employees should be instructed that if a fire cannot be extinguished using one full extinguisher, they should evacuate the site and let the fire

department handle the situation.

Fire Prevention

Fire prevention requires segregating the three elements of the fire triangle. In practice, a method to achieve that goal is to post—and enforce—no-smoking signs around flammable liquids and gases and have fire watches on all work involving torch-applied materials of a minimum of two hours after the last torch is turned off.

Flammable and Combustible Liquids

Proper storage and handling of flammable and combustible liquids will help prevent fires from occurring; only approved, closed containers for storage of flammable or combustible liquids may be used. Such containers include safety cans or containers approved by the U.S. Department of Transportation. A safety can is a container that has a self-closing lid, internal-pressure relief and flame arrestor with a capacity of not more than 5 gallons. Inexpensive, plastic cans without those features previously mentioned, such as those typically bought at hardware stores or gas stations, are not approved for use in roofing operations. However, manufacturers do sell plastic containers that meet the OSHA requirements for safety cans.

Miscellaneous

When working in confined areas which are found to contain moderate levels of dust, mold, insulation, bird or rodent droppings, use appropriate PPE to protect eyes and lungs and inform management as soon as possible. Do not continue to work in areas found to have black mold, asbestos, or lead.

Make sure that MSDS (Material Safety Data Sheets) are filed for all known hazardous substances present and used on the job site or property.

Following proper procedures for Lockout/Tagout procedures is imperative.

Lockout/Tagout Procedure OBJECTIVE

The objective of this procedure is to establish a means of positive control to prevent the accidental starting or activating of machinery or systems while they are being repaired, cleaned and/or serviced. This program serves to:

- Establish a safe and positive means of shutting down machinery, equipment and systems.
- Prohibit unauthorized personnel or remote control systems from starting machinery or equipment while it is being serviced.
- Provide a secondary control system (tagout) when it is impossible to positively lockout the machinery or equipment.
- Establish responsibility for implementing and controlling lockout/tagout procedures.
- Ensure that only approved locks, standardized tags and fastening devices provided by the company will be utilized in the lockout/tagout procedures.

ASSIGNMENT OF RESPONSIBILITY

- *Job supervisors* will be responsible for implementing the lockout/tagout program.
- <u>Job supervisors</u> are responsible for enforcing the program and insuring compliance with the procedures in their departments.
- <u>job supervisors</u> are responsible for monitoring the compliance of this procedure and will conduct the annual inspection and certification of the authorized employees.
- <u>Job supervisors</u> are responsible for following established lockout/tagout procedures. An authorized employee is defined as a person who locks out or tags

out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under 1910.147, The Control of Hazardous Energy (lockout/tagout).

• <u>Affected employees</u> (all other employees in the facility) are responsible for insuring they do not attempt to restart or re-energize machines or equipment that are locked out or tagged out. An affected employee is defined as a person whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

PROCEDURES

• The ensuing items are to be followed to ensure both compliance with the OSHA Control of Hazardous Energy Standard and the safety of our employees.

A. Preparation for Lockout or Tagout

Employees who are required to utilize the lockout/tagout procedure must be knowledgeable of the different energy sources and the proper sequence of shutting off or disconnecting energy means. The four types of energy sources are:

- 1. electrical (most common form);
- 2. hydraulic or pneumatic;
- 3. fluids and gases; and
- 4. mechanical (including gravity).

More than one energy source may be utilized on some equipment and the proper procedure must be followed in order to identify energy sources and lockout/tagout accordingly. See Attachment F for specific procedure format.

Electrical

- 1. Shut off power at machine and disconnect.
- 2. Disconnecting means must be locked or tagged.
- 3. Press start button to see that correct systems are locked out.
- 4. All controls must be returned to their safest position.
- 5. Points to remember:

a. If a machine or piece of equipment contains capacitors, they must be drained of stored energy.

b. Possible disconnecting means include the power cord, power panels (look for primary and secondary voltage), breakers, the operator's station, motor circuit, relays, limit switches, and electrical interlocks.

c. Some equipment may have a motor isolating shut-off and a control isolating shut-off.

d. If the electrical energy is disconnected by simply unplugging the power cord, the cord must be kept under the control of the authorized employee or the plug end of the cord must be locked out or tagged out.

B. Grounding Assurance:

Job supervisors shall ensure all applicable equipment, electrical tools, extension cords, receptacles shall be equipped with proper grounding, by daily visual inspections to look for any external defects or indications of internal damage prior to use.

Damaged tools and cords shall be tagged DO NOT USE and removed from service until repaired and tested.

Injuries

If you are injured on a jobsite or on (YOUR FENCE COMPANY) property, please follow the following procedure:

If the injury is very serious, call 911 first.

Immediately contact the on-site supervisor or another co-worker who is present.

If you are alone and not able to make contact with the office, contact a capable person on-site and inform them of your injury, even if you feel it is not "serious." Have them call the office and inform them of the injury.

If you are alone and the injury is not deemed "serious" by you and the office, someone will come to get you and escort you to a medical facility, or you may be permitted to drive the company vehicle to a medical facility.

(YOUR FENCE COMPANY) does not encourage employees to continue working while injured, or to drive themselves to a medical facility. If at all possible, someone will escort you. It would be tragic to cause another injury should you faint, lose consciousness, lose a sense, or lose strength while driving.

If the injury is manageable, let your on-site supervisor know which treatment center you will choose, and have him contact the office. Have your on-site supervisor provide transportation to a medical facility. Only drive yourself if no one is available to do it for you.

Do not feel that you must finish a job or return equipment back to (YOUR FENCE COMPANY) before receiving medical treatment. You are the most important asset of our company. Your life and limb are more precious than any tool or any project.

Keep a copy of a *First Report of Injury* nearby or in the truck to help with necessary information. Have medical personnel fill out the appropriate information that pertains to them.

Bring back to (YOUR FENCE COMPANY) any paperwork given to you by the medical facility showing your treatment information and back-to-work restrictions.

Follow doctor's orders!

Anyone making a suggestion to management or independently showing initiative in order to protect others from potential hazards will be highly appreciated. (YOUR FENCE COMPANY) management is also very interested in hearing from employees regarding any near-misses. There is no penalty for reporting a near-miss. In fact, near-miss reporting is vital to protect everyone from electrocution, amputation, eye injury, sprains, strains and more.

Job supervisors shall insure that all trucks are equipped in with proper first aid kits and shall familiarize themselves with proper administration.

ACCIDENT / INCEDENT INVESTIGATION

In the event an accident, injury, or any reportable incident should occur.

Report such incident to the office, and or your immediate supervisor so that a written report can be made. This report will be a permanent record of the injury/ incident and will be kept in our office and reported to worker's comp if necessary.

HAZARD ASSESSMENT

All hazards shall be reported to job supervisors immediately and shall be passed on to the office. All hazards shall be repaired, replaced or staked off or removed until time allows to repair or replace it.

HEAT AND COLD EXTREMES

(YOUR FENCE COMPANY) Inc. Company Policy for Employees

Welcome to our company! The original (YOUR FENCE COMPANY) & Implement Company was started in 1932 by Thomas Polen, Sr., and today is a leader in commercial and residential fence erection. Our reputation for quality was founded on the excellence of past employees, and we expect that reputation to endure as we welcome new employees to our organization. Thank you for your dedication to maintaining our high standards. This helps us maintain company stability and helps ensure future employment for all employees.

Employment with our firm is based wholly on qualifications, competence and effort without regard for color, race, religion, age or gender. All employees are hired on a three-month probation period to allow us to get acquainted. If we don't suit you or vice-versa, you may quit or be terminated without marring your work record.

Name:

Classification:

Pay / Benefits

Our *pay period* runs from Thursday through Wednesday, with payday on the following Friday.

Draws or advances are against our policy and should not be requested.

<u>Normal working hours</u> are 8:00 am to 4:30 pm, with a 30 minute lunch period. Your supervisor may change these hours to suit varying conditions.

<u>Overtime pay</u> is merited when the full-time employee has actually worked over 40 hours within a week. Vacation, holiday or any other hours do not count towards the 40 hours actually worked.

<u>No sick leave</u> or time off is provided for hourly employees.

Special *extended leave* or maternity leave should be arranged with management.

<u>Paid holidays</u> for full-time workers include the approximate dates: January 1, May 30, July 4, September 5, November 24, December 25 and December 31. Additional days

may be added. If an employee elects to work on a holiday, he/she will gain regular hours in addition to the holiday pay. These hours can be used as overtime hours if more than 40 hours are worked.

<u>Vacation days</u> should be scheduled ahead of time with your supervisor so that work crews can be organized for the week. Vacation days are awarded for full-time employees as follows:

Beginning second year: 5 days per year

Beginning sixth year: 10 days per year

Beginning eleventh year: 15 days per year

Any unused vacation days must be used before March 1 of the following year.

Vacation days should be used for taking days off of work.

Vacation days are awarded to employees who are not regularly absent from work.

<u>Health insurance</u> is offered to employees who average over 38 hours per week working, and who have completed the probation period. Open enrollment periods for health insurance coverage are determined by the health insurance company used by the company.

<u>Materials sold</u> by (YOUR FENCE COMPANY) Inc. may be purchased at a special price by employees. Request must be made to management for in-house repair to any personal work-related equipment. A 5% charge on material cost and an hourly labor rate of \$25/hour will be charged.

<u>No employee may charge to (YOUR FENCE COMPANY) Inc. personal purchases</u> without management consent.

<u>Accounts</u> will not be carried except by express permission from management. A charge limit will be set and perpetual accounts will not be tolerated. Late charges will be accrued monthly.

<u>Part-time and temporary</u> employees do not receive the same benefits as full-time employees.

We expect all employees to be treated fairly and properly paid. If you are dissatisfied, please discuss it ONLY with your supervisor, or request that he/she accompany you to resolve it with his superior. We believe in treating employees with fairness and discretion.

Employee Conduct

Your honesty, appearance, behavior and performance reflect this company's image to our present customers and to the community, our future customers. The following rules are necessary for the mutual protection of all employees. Violation may result in immediate termination.

1. The use of alcohol or illegal drugs on the job or previous to reporting for work is strictly prohibited. Our company is governed by the policies of the Drug-Free Safety Program.

2. Unprofessional, abusive language or disrespectful behavior in public occupied areas will not be permitted.

3. Stealing, destruction or willful abuse of company property is unlawful. Fighting, horseplay and harrassment on the job will not be tolerated.

4. Abuse or violation of company Safety Policy will not be tolerated.

5. No employee shall engage in a second business or employment (moonlighting) without written permission from management.

6. Personal use of company tools, materials or vehicles is prohibited.

Work Procedures and Safety Review

We are <u>merit shop</u> (no craft jurisdiction) and encourage everyone to learn and perform all tasks. We will provide training and education whenever possible to develop your talents. Reaching out for additional responsibilities is appreciated. The company will supply all pwer tools and also handtools. Company tools will be picked up at the end of the work day and returned to their proper place. Any changes to this policy should be determined by management.

We prefer <u>reliability</u> over experience. Employees are expected to be present for work from 8:00 am to 4:30 pm, unless management has determined a different schedule. If you cannot be present on time due to illness, special problem or an emergency, please call the office at least 15 minutes before starting hours. Failure to call in will result in one warning and time off or termination if repeated.

In an effort to assure <u>maximum safety</u> for each individual employee, all company operations are conducted in conformity with these basic safety principles as part of our comprehensive **Safety Policy**:

1. Report all injuries to your supervisor immediately.

2. Wear hard hats, safety glasses, appropriate shoes, respirators, earplugs and other protective equipment (PPE) whenever the job calls for them and/or as directed by your supervisor or the authorities of the worksite.

3. Wear clothes suited for the job -- no dangling or loose clothing, material or jewelry around moving machinery. Do not wear soft-soled (athletic type) shoes.

4. Learn to lift the proper way. Bend knees; keep back erect. Get help for heavy loads.

5. Do not ride or get under loads that are being carried by cranes or equipment. Never ride on rolling scaffolding or stages.

6. Make sure guards and protective devices are on related equipment when such is operating.

7. Hand tools such as hammers and chisels should be kept well-dressed so that injury from flying particles can be prevented.

8. Be sure all electrical devices, power tools and so forth are properly grounded.

9. Be sure you know what is behind your vehicle before backing up. Get out and look if necessary.

10. Pile up and dismantle material carefully and keep job trucks in neat order so you know what material and tools you have at all times. This also shows consideration for anyone else who may be required to use the truck.

11. Do not throw anything from a height until you have checked to make sure there is no one below. Warn persons working below you.

12. Make sure ladders are in good condition, firmly placed and secure. Have both hands free when going up or down ladders.

13. Any damage to scaffolds or other supporting structures must be repaired or reported promptly to your supervisor. Use required scaffolds or railings.

14. If any tools or equipment are damaged or not functioning correctly, REPORT THIS IMMEDIATELY TO YOUR SUPERVISOR OR OTHER MANAGER. Do NOT return it to the yard without reporting the problem.

Additional Work Procedures

If your duties for the day include providing transportation for other workers, your *punctuality* is indispensable. Taking responsibility for this strengthens the reputation of the company and promotes future business.

When finished with a job <u>return all job paperwork</u> and folders to your supervisor or to the office immediately so that any billing or further necessary work can be scheduled. Take note of the Job Board and notify your supervisor if you know of any updates to the status of a job.

Always affix an <u>(YOUR FENCE COMPANY) Inc. sign</u> to work you have completed. Many customers specifically request this and regard it as a mark of excellent quality. Many interested persons have copied the information from our signs in order to call us for additional work.

When given a <u>Nextel phone or radio</u> for communication, keep this turned on all day. Do not shut it off, even if you are out of range. Recharging should be maintained. Report any problems or questions you may have about the phone.

When working out in the field, record on your timecard the cities *in which you have worked*. If your day includes many hours working in the shop, note this on your timecard.

* <u>Management reserves the right to effect any changes needed to this Policy. See also</u> <u>Drug-Free Safety Policy.</u> Thank you for choosing (YOUR FENCE COMPANY) Inc. as your employer. Your personal advancement will be determined by your efforts and ability. We plan to continue our growth in the fence industry and hope you will grow with us.

(YOUR FENCE COMPANY) Inc.

I have read, understand and agree to the foregoing (YOUR FENCE COMPANY) Inc. company policy and have received one copy.

Date: _____

Signature:

Print Full Name:

Please completely read this policy, sign it and return one copy to your superintendent.

Keep one copy of the company policy for your records.

If you have any questions, please let your superintendent know.

Thank you!

2/2011

DRUG FREE SAFETY POLICY FOR (YOUR FENCE COMPANY), INC. 04/11/2011

It is (YOUR FENCE COMPANY), Inc.'s policy to maintain a safe alcohol and drug-free workplace and to promote high standards of employee health. To achieve this, (YOUR FENCE COMPANY) considers the abuse of drugs or alcohol on the job to be an unsafe and counterproductive work practice. In accordance with the Drug-Free Workplace Act of 1998, we hereby emphasize and commit that (YOUR FENCE COMPANY) adopt this Drug-Free Safety Policy, implementing provisions contained herein.

DEFINITIONS:

Company premises...the term "company premises" as used in this program includes all property, facilities, land, buildings, structures, automobiles, trucks and other vehicles owned, leased or used by (YOUR FENCE COMPANY). Construction job sites for which the company has responsibility are included.

Prohibited Substances...Prohibited substances include illegal drugs, (including controlled substances, look-alike drugs and designer drugs) AND alcoholic beverages in the possession of or being used by an employee on the job.

Employee... Individual who performs work for (YOUR FENCE COMPANY), including, but not limited to, management, supervision, engineering, craft workers and clerical personnel.

Accident... Means an unplanned, unexpected or unintended event which occurs on (YOUR FENCE COMPANY) premises during the conduct of the company's business; or during working hours; or which involves company-supplied motor vehicles or motor vehicles used in conducting the company's business; or within the scope of employment, and which results in any of the following:

A. A fatality of anyone in the accident.

B. Bodily injury requiring off-site medical attention away from the company premises.

- C. Vehicular damage.
- D. Non-vehicular damage.

Reasonable Cause... Reasonable cause shall be defined as excessive absenteeism or tardiness, slurred speech, alcohol smell and erratic behavior such as noticeable imbalance, incoherence and disorientation.

Retest... Testing required to return to work after a positive drug test and proper procedural steps have been taken.

Re-analyze... A challenge of a positive drug test.

Split Sample... A sample taken at the collection site separated into two samples consistent with approved methodologies of the Dept of Health and Human Services.

Positive Drug Test... A test which exceeds the cut-off limits within the established guidelines developed by the US Dept of Health and Human Services or one that is tampered with in any way (adulterated specimen).

Negative Drug Test... A test acceptable for employment.

Adulterated Specimen... A urine screening which has been tampered with to cover the true results.

Diluted Samples... A urine drug sample which appears to have been made thinner or less concentrated by adding a liquid.

Collection Facility / Site...Approved location where participants can provide a specimen for testing.

Substance Abuse and Mental health Services Administration... SAMSHA

Gas Chromatography / Mass Spectrometry... GC/MS

Medical Review Officer... MRO

"Under the Influence of a Prohibited Substance"... As used by this Program, means the following:

A. Alcohol-- Blood alcohol level of .04 as measured by blood or breath tests.

B. Other Prohibited Substances-- Positive results based on the following thresholds for urine split sample testing:

Substance	Initial Scre	en Threshold C	onfirm	natory Test Threshold
Amphetamines	500	ng/ml	-	250 ng/ml
Cannabinoids(Marijuana,	THC) 50			15
Cocaine	150)		100
Opiates	200	0		2000
Phencyclidine (PCP)	25			25
Barbiturates	300)		200
Benzodiazepines	300)		300
Methadone	300)	-	300
Methaqualone	300)	-	300

Propoxyphene	300	300
6-Acetylmorphine	10	10

Levels for other prohibited substances shall be in accord with accepted GC/MS quantitative procedures as recommended by the Federal Government Standards.

In order to ensure that the workplace is free from drugs and/or alcohol, (YOUR FENCE COMPANY) makes the following statements of policy:

1. (YOUR FENCE COMPANY) DFSP policy statements supplant, and not detract from or otherwise modify any obligations imposed by local, state, or federal law.

2. The illegal use, manufacture, distribution, sale, or possession of narcotics, drugs, or controlled substances (including inhalants containing controlled substances) while on any (YOUR FENCE COMPANY) property, in company vehicles or on company time constitutes grounds for discharge. (YOUR FENCE COMPANY) also prohibits certain items such as drug paraphenalia and/or literature promoting illegal drug or substance use from being brought on company property or in company vehicles.

3. Illegal use of drugs, narcotics, or controlled substances off duty and off the employer's premises is not acceptable because it can affect on-the-job performance and the confidence of customers in the participating employer's ability to meet its responsibilities; such use may result in discharge.

4. The illegal sale, manufacture, or distribution of narcotics, drugs, or controlled substances off duty and off the employer's premises will result in discharge.

5. The abuse of prescription drugs to the extent that job performance or safety is compromised is prohibited. Discipline in this area will be determined on an individual basis.

6. Whether an employee is on or off duty, (YOUR FENCE COMPANY) prohibits the unauthorized use of alcoholic beverages on employer's property or in company vehicles. Such use may result in discharge.

7. Any use of alcohol that adversely affects an employee's job performance is not acceptable and may result in disciplinary action up to and including termination.

Note to Reader: It takes approximately one hour to process one shot, one beer, one glass of wine, etc. It stays in the system, and if drug-tested, could still show up after several hours.

DRUG TESTING

To provide a means to deter and detect substance abuse and to ensure that employees are fit for duty while on the premises of (YOUR FENCE COMPANY), employees shall be required to submit to drug and alcohol testing under the following circumstances:

*At a minimum, all drug testing will consist of testing for marijuana, cocaine, opiates, amphetamines and phencyclidine. When conducting Federal regulated testing, reasonable suspicion and/or post-accident testing may be conducted for any drug in schedule I or II of the Controlled Substance Act.

**New hire is defined as a worker who has not been employed by (YOUR FENCE COMPANY) in the previous 12 months.

(YOUR FENCE COMPANY) shall adopt the guidelines of the Dept of Health and Human Services (DHHS) "Mandatory Guidelines for Federal Workplace Drug Testing Programs", and subsequent amendments hereto. These guidelines shall be administered by a third party administrator engaged on behalf of (YOUR FENCE COMPANY). The Third Party Administrator shall adopt procedures for the following: split specimen collection procedures, chain-of-custody procedures, laboratory qualifications, testing methodologies, quality control procedures, and reporting requirements.

1. New Hire Drug Testing. All applicants (100%) being considered for employement who have not been hired in the previous twelve months will be subject to a new hire drug test. (YOUR FENCE COMPANY) may employ the applicant until the initial drug screen results are received. Testing the candidate will occur within the first 90 days of employment. If the applicant tests positive, he/she will be eliminated from consideration for employment and will be terminated immediately. **Additionally, any person having a blood alcohol level above .04 is considered under the influence and is prohibited from working.

2. Reasonable Suspicion Testing. Reasonable suspicion testing will occur when management has reason to suspect that an employee may be in violation of this policy. The suspicion will be documented in writing prior to the release of test findings. A reasonable suspicion test may occur when:

A. Observed behavior, such as direct observation of drug/alcohol use or possession and/or physical symptoms of drug and/or alcohol use;

B. A pattern of abnormal conduct or erratic behavior;

C. Arrest or conviction for a drug-related offense, or identification of an employee as the focus of a criminal investigation into illegal drug possession, use or trafficking. The employee is responsible for notification to (YOUR FENCE COMPANY) within five (5) working days, of any drug-related conviction.

D. Information provided either by reliable and credible sources or independently corroborated regarding an employee's substance use; or

E. Newly discovered evidence that the employee has tampered with a previous drug or alcohol test.

Reasonable suspicion testing does not require certainty, but mere "hunches" are not sufficient to justify testing. To prevent this, all manager/supervisors will be trained to recognize drug and alcohol related signs and symptoms. Testing may be for drugs or alcohol or both.

3. Post Accident. Post accident testing will be conducted whenever an accident occurs, regardless of whether there is an injury. An accident is considered an unplanned, unexpected or unintended event that occurs on (YOUR FENCE COMPANY) property, during the conduct of business, or during working hours, or which involves one of our motor vehicles or motor vehicles that are used in conducting company business, or is within the scope of employment, and which results in any of the following:

A. A fatality of anyone involved in the accident.

B. Bodily injury to the employee and/or another person that requires off-site medical attention away from the Company's place of employment.

C. Vehicular damage in apparent excess of \$1000; or

D. Non-vehicular damage in apparent excess of \$1000.

When such an accident results in one of the situations above, any employee who may have contributed to the accident will be tested for drugs or alcohol use or both.

4. Follow-up Testing after Return to Duty from Assessment or Treatment. This test occurs when an employee who has previously tested positive and the decision is made to retain the employee under a "last chance" agreement. A negative return-to-duty test is required before the employee will be allowed to return to work. If the employee fails this test, this will lead to the discontinuation of employment. Once an employee passes the drug and/or alcohol test and returns to work, management may choose to do additional unannounced tests for as long as deemed necessary. Any employee with a second positive test result will be disciplined up to and including termination from employment. Follow-up tests will be unannounced and may occur at any time for a time period that
management considers reasonable. The intent is to deter any subsequent usage that would result in a violation of this Policy and termination of employment.

5. Random Drug Testing. All existing part-time and full-time employees may be subject to random drug testing if the participation level of the program requires it. Random testing will be conducted using acceptable objective and non-discriminatory computer generated methods for random selection. Random selection for testing shall not exceed 10% of the employees. (10% is defined as the total number of (YOUR FENCE COMPANY) Full Time Equivalent employees over the previous calendar year.) Positive test results not resolved with the participating employer's third party administrator may result in employee discharge. Employees refusing to submit to testing under these circumstances or having adulterated samples will be disciplined -- up to and including discharge.

6. Testing for Cause. Employees may be required to submit to drug and/or alcohol testing at a laboratory chosen by (YOUR FENCE COMPANY) third party administrator, if there is cause for reasonable suspicion of substance abuse and/or after a work-related accident warranting such testing. Employees who refuse substance abuse testing under these circumstances, or having adulterated samples will be disciplined -- up to and including discharge.

7. Testing as a Condition for Promotion. Employees being promoted to a managerial position may be subject to a drug test before the promotion is granted.

ADMINISTRATION

1. (YOUR FENCE COMPANY) shall submit to the Third Party Administrator a list of all employees to include full name, address, city state, zip code, phone number, and a unique identification number. Additionally, each time (YOUR FENCE COMPANY) desires to hire an employee, the third party administrator shall be contacted for scheduling of alcohol and drug screen.

2. (YOUR FENCE COMPANY) specifies that only laboratories approved by the Dept of Health and Human Services (DHHS) shall be used to perform substance abuse testing.

3. The Third Party Administrator shall conduct testing consistent with the DHHS. Testing form shall be urinalysis EMIT Screen, also referred to as Drug Screen, plus a gas chromatography/mass spectrometry (GC/MS) confirmatory test for a panel of five drugs, and breath alcohol test with confirmatory Evidentiary Breath Test (EBT) for alcohol.

4. A strict chain of custody will be adopted. Procedures established by DHHS, the US Dept of Transportation (DOT), and Federal Motor Carrier Safety Administration (FMCSA) will be utilized.

5. (YOUR FENCE COMPANY) has determined that the following drug/metabolite in urine shall not exceed these levels in non-federal testing:

Substance	Initial Screen Threshold	Confirmatory Test Threshold
Amphetamines	500 ng/ml	250 ng/ml
Cannabinoids(Marijuana, T	THC) 50	15
Cocaine	150	100
Opiates	2000	2000
Phencyclidine (PCP)	25	25
Barbiturates	300	200
Benzodiazepines	300	300
Methadone	300	300
Methaqualone	300	300
Propoxyphene	300	300

6. (YOUR FENCE COMPANY) adopts a .04 Breath Alcohol Concentration as the level considered to be a verified positive test for alcohol.

SPECIMEN COLLECTION PROCEDURE

Urine specimens and breath testing will be conducted by trained collection personnel who meet standards for urine collection and breath alcohol testing. Confidentiality is required from our collection sites and labs. Employees are permitted to provide urine speciments in private, but subject to strict scrutiny by collection personnel so as to avoid any alteration or substitution of the specimen. Breath alcohol testing will likewise be done in an area that affords the individual privacy. In all cases, there will only be one individual tested at a time. Failure to appear for testing when scheduled shall be considered refusal to participate in testing, and will subject an employee to the range of disciplinary actions, including dismissal, and an applicant to the cancellation of an offer of employment. An observed voiding will only occur if there are grounds for suspecting manipulation of the testing process.

REVIEW OF TEST RESULTS

To ensure that every employee who is tested is treated fairly, (YOUR FENCE COMPANY)'s Third Party Administrator shall employ a Medical Review Officer (MRO). The MRO responsibilities include the following:

- 1. Receive Confirmed Positive Results from the laboratory.
- 2. Request, if necessary, Quantitative Description of test results.
- 3. Review and interpret Positive Laboratory Results.
- 4. Review and interpret Questionable Laboratory Results (adulterated specimens, etc).
- 5. Inform tested individual and provide test results.
- 6. Conduct a Medical Interview with the tested individual.

7. Review the individual's medical history and/or any other relevant biomedical factors.

- 8. Provide the tested Individual an opportunity to discuss the test results.
- 9. Order a re-analysis of the original sample specimen at a certified laboratory.
- 10. Consult with laboratory officials.
- 11. Do not receive urinalysis Results that Do Not Comply with mandatory guidelines.
- 12. Do not declare as Positive any Opiate-positive urine without "clinical evidence".
- 13. Determine whether a result is scientifically insufficient.

14. Determine whether a result is consistent with legal drug use.

15. Forward results of Verified Positive Test to EAP and management officials empowered to recommend or take administrative action.

EMPLOYEES' RIGHTS WHEN THERE IS A POSITIVE TEST RESULT

An employee who tests positive under this Policy will be given an opportunity to explain the findings to the MRO prior to the issuance of a positive test result to the (YOUR FENCE COMPANY) DFSP Coordinator. Upon receipt of a confirmed positive finding, the MRO will attempt to contact the employee by telephone or in person. If contact is made by the MRO, the employee will be informed of the positive finding and given an opportunity to rebut or explain the findings. The MRO can request information on recent medical history and on medications taken within the last thirty (30) days by the employee. If the MRO finds support in the explanation offered by the employee, the employee may be asked to provide documentary evidence to support the employee's position. (For example, the names of treating physicians, pharmacies where prescriptions have been filled, etc.) A failure on the part of the employee to provide such documentary evidence will result in the issuance of a Positive Report by the MRO with no attendant medical explanation. A medical disqualification of the employee will result. If the employee fails to contact the MRO as instructed, the MRO will issue a positive report to the Company.

REPORTING OF RESULTS

All test results will be reported to the MRO prior to the results being issued to the Company. The MRO will receive a detailed report of the findings of the analysis from the testing laboratory. Each substance tested for will be listed along with the results of the testing. (YOUR FENCE COMPANY)'s DFSP coordinator will receive a summary report, and this report will indicate that the employee passed or failed the test. All of these procedures are intended to be consistent with the most current guidelines for Medical Review Officers, published by the federal Dept of Health and Human Services.

STORAGE OF TEST RESULTS AND RIGHT TO REVIEW TEST RESULTS

All records of drug/alcohol testing will be stored separately and apart from the employee's general personnel documents. These records shall be maintained under lock and key at all times. Access is limited to designated (YOUR FENCE COMPANY) officials. The information contained in these files shall be utilized only to properly administer this Policy and to provide to certifying agencies for review as required by law. Designated company officials that shall have access to these records are charged with the responsibility of maintaining the confidentiality of these records. Any breach of confidentiality with regard to these records may be an offense resulting in termination of employment.

Any employee tested under this Policy has the right to review and/or receive a copy of their own test results. An employee may request from the Drug-Free Coordinator, in writing, presenting a duly notarized Employee Request for Release of Drug Tests Results form, requesting that a copy of the test be provided. The company will use its best efforts to promptly comply with this request and will issue to the employee a copy of the results personally or by US Certified Mail, Return Receipt Requested.

POSITIVE TEST RESULTS

Employees who are found to have a confirmed positive drug or alcohol test will be immediately taken off safety-sensitive duties and are subject to discipline up to and including termination. The following outline represents the general framework of discipline for employees who have confirmed positive drug or alcohol test and who are not employed in safety sensitive duties:

1. If a randomly selected employee tests positive, the following discipline takes place:

A. The employee signs a pledge to remain drug-free.

B. The employee is subjected to at least 4 unannounced tests over the next 4 months.

2. If on any Second Test the employee tests Positive, that employee has violated his/her commitment to remain drug free and is subject to the following:

A. He/she is suspended from work.

B. He/she must attend a drug/alcohol recovery program.

C. He/she will have to pass a return to work substance abuse test.

D. He/she will be subject to 5 announced tests over the next twelve months.

3. If an employee tests positive for a third time, the employee is summarily dismissed and cannot return to work for a period of at least one year.

TERMINATION NOTICES

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".

ARRESTS AND CONVICTIONS

1. The arrest of any employee for a drug-related offense shall result in immediate suspension of the employee, pending investigation.

2. If an employee is convicted under a criminal drug statute of a violation, the employee must notify his/her supervisor no later than five days after the conviction.

3. Conviction of an employee for any drug-related criminal felony, whether on or off company premises, will result in discharge.

EMPLOYEE REHABILITATION / EMPLOYEE ASSISTANCE

Employees are continually encouraged to voluntarily seek help for problems involving drugs and alcohol through treatment programs. (YOUR FENCE COMPANY) will cooperate with employees who recognize that they have an alcohol or drug problem and request assistance.

However, any employee whose use of alcohol or drugs constitutes a threat to property or safety, or any employee who violates the (YOUR FENCE COMPANY) DFSP Policy, or tests positive for illegal drug usage, will be subject to discharge. This Drug and Alcohol Policy reflects the current views of (YOUR FENCE COMPANY), Inc., and its management. However, (YOUR FENCE COMPANY) reserves the right to modify, change, or update this policy as it may deem necessary or as required by law provided that adequate notice of such change is made to all employees.

Below is a list of Local Employee Assistance programs employees may voluntarily contact for controlled substance and/or alcohol counseling:

A Center for Addiction Treatment 1-800-515-8165 Pathways to Recovery 1-800-417-6237 Community Action Against Addiction 216-881-0765 Community Challenge 440-331-3838 Drug AA & A Abuse 24-hour able helpline 330-253-2612 Quest Recovery Services 330-588-9600 University Hospitals Counseling Center 440-953-3000 American Red Cross Security 216-431-1564 Tri-County Employee Assistance 330-762-7908

TRAINING

Supervisor Training

Each supervisor and managment representative employed by (YOUR FENCE COMPANY) shall participate in supervisor level DFSP training. Consistent with the Ohio BWC, DFSP, supervisors will be required to participate in an initial training followed by annual refresher training. Supervisor training is in addition to employee training.

Employee Training

Each employee, including supervisors, shall participate in (YOUR FENCE COMPANY)-sponsored employee DFSP training. This training, at a minimum, shall include a review of the company policy, substance abuse in the workplace and community treatment programs. Consistent with the Ohio BWC, DFSP, employees will be required to participate in an initial training followed by annual refresher training.

FIRST AID

Policy

To insure that prompt and effective medical assistance is provided to the employees of the (YOUR FENCE COMPANY) Company Associates in case of workplace injury or illness, the following first aid and medical services procedure is provided.

It is the responsibility of each manager or supervisor to assure that compliance to the First Aid & Medical Services Procedure is provided.

This policy covers minimum performance standards applicable to all the (YOUR FENCE COMPANY) Company Associates employees and locations. Local practices requiring more detailed or stringent rules, or local, state or other federal requirements regarding this subject can and should be added as an addendum to this procedure as applicable.

Purpose

This First Aid & Medical Services Procedure is designed to establish specific common guidelines for the (YOUR FENCE COMPANY) Company Branches 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.

The (YOUR FENCE COMPANY) 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 as defined by OSHA (3 to 4 minutes), the the (YOUR FENCE COMPANY) Company 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 the (YOUR FENCE COMPANY) Company Associates work sites, i.e., the (YOUR FENCE COMPANY) Company offices, client job sites, etc., and includes visitors, vendors, and subcontractors.

Definitions

Established Medical Treatment Facility means the occupational medical treatment provider and/or emergency care center identified as being capable of, and established by an the (YOUR FENCE COMPANY) Company 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 'SteriStrips' or butterfly bandages
- Using hot or cold therapy
- Using any totally non-rigid means of support, such as elastic bandages, wraps, etc.
- Using temporary immobilization devices while transporting an employee, such as 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 a 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 are not limited to:

- Contact dermatitis
- Eczema
- Silicosis
- Asbestosis
- Toxic inhalation
- 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 Pathenogenic 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
- And, sprain/strain injuries to muscles, joints and connective tissues when the result 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 work sites where one or more employees are present as a condition of their employment.

REQUIREMENTS

Designated Medical Treatment Facility

The (YOUR FENCE COMPANY) Company Associates will ensure that readily available medical personnel 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.

Appendix the (YOUR FENCE COMPANY) Company outlines the format of a

posting that should be displayed in a conspicuous location at each fixed facility or fixed job site. Many medical providers have and will provide their own posting. The Branch Safety Officer must determine if the posting has the necessary elements needed to inform employees regarding the designated medical treatment facility.

First Aid

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

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 Officer. 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, OSHA regulations require that a person or persons be trained to render first aid and that first aid supplies be readily available. Although the term "readily available" has not been defined in the regulations, OSHA has indicated that 3-4 minutes is acceptable as the time frame within which to begin first aid.

OSHA's interpretation presents a challenge to a service company like the (YOUR FENCE COMPANY) Company because our "workplace" is not always in a fixed location -- it is a changing environment that follows the employee wherever they may be working. Accordingly, the (YOUR FENCE COMPANY) Company will use various strategies to provide employees with access to First Aid. These may include training the (YOUR FENCE COMPANY) Company personnel to self-administer First Aid; training the (YOUR FENCE COMPANY) Company personnel 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 the (YOUR FENCE COMPANY) Company at job sites (especially construction sites); providing access to client medical clinics; or calling 9-1-1 or local emergency phone numbers as indicated in the Health and Safety Plan.

Because of the potential for exposure to blood borne pathogens and significant liability concerns, there is no job in the Company that <u>requires</u> an employee to render First Aid or cardiopulmonary resuscitation (CPR) in the course and scope of their employment, unless such a requirement becomes necessary due to local, State 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 (YOUR FENCE COMPANY) 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 Officer is responsible for monitoring and maintaining this program, if implemented.

Elements of the First Responder Program should include:

- 1. Safety Officer must be certified in basic First Aid & CPR per a recognized certification source such as the Red Cross, local hospital, etc. The Red Cross first aid course and CPR course are approximately 8 hours in duration. CPR requires annual refreshers. First Aid requires refreshers every three (3) years.
- 2. Branch Safety Officer will seek employees who wish to volunteer to be trained and certified in basic First Aid & CPR per a recognized certification source as defined by local or State requirements. These employees must maintain "current" First Aid and CPR certification, appropriately documented, in their personnel file.
- 3. Basic First Aid & CPR will be administered by First Responders only to stabilize the employee until professional medical attention can be provided.
- 4. Due to the potential occupational exposure to First Responders, it is the responsibility of the Safety Officer or his/her designee to develop and follow an Exposure Control Program, where and to the extent such a program is required by OSHA 29CFR 1910.1030 Blood borne Pathogens Standard and Policy Section 9 Blood borne Pathogens. (This program is not required unless First Aid/CPR response is a required part of an employee's job description and function at the (YOUR FENCE COMPANY) Company. However, we will still encourage Voluntary Responders to learn and follow universal precautions.)

Employee First Aid and 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 (YOUR FENCE COMPANY) Company's intent that first Aid supplies and basic personal protective equipment against blood borne 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 blood borne 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 blood borne 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 blood borne 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 that there is a vaccine for Hepatitis B.** This must be discussed with a physician as soon as possible after a potential exposure.

Refer to the requirements of OSHA 29CFR 1910.1030 - Blood borne Pathogens Standard and Policy Section 9 – Blood borne Pathogens for more information.

First Aid Stations and 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 should be provided in each company vehicle, signed-out for use when traveling in personal vehicles and rental vehicles, or provided on the jobsite.

Whether within the facility or in a vehicle, each First Aid Kit must be stored in a properly labeled weather-proof container, stocked with the basic supplies specified in the inventory below:

- 2 absorbent compress dressings (5 x 9 inches)
- 25 adhesive bandages (assorted sizes)
- 1 adhesive cloth tape (10 yards x 1 inch)
- 5 antibiotic ointment packets (approximately 1 gram)
- 5 antiseptic wipe packets
- 2 packets of aspirin (81 mg each)
- 1 blanket (space blanket)
- 1 breathing barrier (with one-way valve)
- 1 instant cold compress
- 2 pair of nonlatex gloves (size: large)
- 2 hydrocortisone ointment packets (approximately 1 gram each)
- Scissors

- 1 roller bandage (3 inches wide)
- 1 roller bandage (4 inches wide)
- 5 sterile gauze pads (3 x 3 inches)
- 5 sterile gauze pads (4 x 4 inches)
- Oral thermometer (non-mercury/nonglass)
- 2 triangular bandages
- Tweezers
- First aid instruction booklet

(The physician's approval of the inventory list 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 Officer or Project Manager before allowing that employee to return to duty.

The Safety Officer, or someone he/she may designate, is responsible for checking and maintaining the First Aid Cabinets. Supervisors on jobsites are responsible for assuring suitable supplies are provided in the first aid kits on-site or in their vehicles. This person will take a **weekly** inventory of supplies and make sure the station or kit remains adequately stocked. A basic inventory list for First Aid Kits is provided above (See page 55)

Because of the variety of operations that the Company is involved in, it is suggested that consultation with the Facility's designated medical treatment facility be arranged to determine if the First Aid Kits are adequate for the operational exposures of your 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 whether at an (YOUR FENCE COMPANY) Company facility or at a temporary worksite. 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 (e.g. battery servicing facility), proper eyewash and body drenching equipment must be available. Although OSHA has not adopted specific requirements regarding flow rates for drenching/flushing facilities, 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 minutes.

Inspection and maintenance of eye wash systems should be provided at least weekly by assuring sanitary conditions and /or following the manufacturer's 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.

Blood borne 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 Branch Safety Officer 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. Refer to OSHA 29CFR 1910.1030 - Blood borne Pathogens Standard and Policy Section 9 – Blood borne Pathogens for specific information.

In addition to those items listed on Page 55 and/or possibly required by a consulting physician, 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

6.0 **References**

OSHA 29 CFR 1926.50

OSHA 29 CFR 1910.151

DESIGNATED MEDICAL TREATMENT FACILITY

IN CASE OF EMPLOYEE ACCIDENT OR INJURY, THE FOLLOWING DESIGNATED MEDICAL TREATMENT FACILITY HAS BEEN IDENTIFIED TO DIRECT THE INJURED EMPLOYEE FOR IMMEDIATE TREATMENT:

NAME	OF	FACILITY:
ADDRESS:		
TELEPHONE NUMBER: _		
EMERGENCY TELEPHON	E NUMBER:	
HOURS OF OPERATION:		

SUPERVISOR OR SAFETY OFFICER:

SUPERVISOR OR SAFETY OFFICER CELL / PAGER NUMBER: _____

ALL WORK-RELATED INJURIES OR ILLNESSES MUST BE IMMEDIATELY REPORTED TO THE SUPERVISOR.

EMERGENCY ACTION PLAN

Purpose

To provide a systematic method of implementing an Emergency Action Plan for a mobile and seasonal workforce, so as to ensure a minimum of confusion and injury in an emergency.

Policy

Because our employees work in a variety of client facilities and in multiple locations within a location, an Emergency Action Plan needs to be adaptable to any situation. The project superintendent on a job is responsible for coordinating with the client on the evacuation route and emergency procedures for the job, and thereafter advising all employees of that information.

Procedures

The emergency evacuation plan for a temporary job trailers or office areas shall identify the safest most direct route to the client's gate.

Due to the dispersion of our personnel around a plant it is not practical to attempt to draw evacuation maps for every unit in the facility. In lieu of evacuation plans, all personnel have been instructed to have the senior representative on their job coordinate with the client contact person to ascertain the evacuation route to be taken by client's personnel in the unit being worked at the beginning of the project. Employees will follow the individual evacuation plans to be used by client in the various jobsites. After the safe rally point has been reached, the senior employee will ask a client's representative to call the Company's site supervisor on the radio with an accurate head count and location. In the event that an employee is the first person to spot a fire or other emergency he/she is authorized to sound an alarm. Employees shall vacate the area as soon as an alarm is sounded. The most important function of all employees is to report to the senior representative on site. Employees are not employed to fight fires.

All employees are informed of their responsibilities under this plan upon initial assignment to the plant. All employees have their emergency duties reinforced in regular safety meetings.

The Company will continue to provide a detailed emergency evacuation plan and map during all jobs and projects.

HEARING CONSERVATION Purpose:

The (YOUR FENCE COMPANY) Company has established a Hearing conservation Program to protect worker from the hazards of noise 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. See attachment I for list of some common noise levels.

Responsibility:

The Manager of Operations is responsible for the developing a written Hearing Conservation Procedure and overseeing the training of all employees in the company. The Manager of Operations 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.

Procedures

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

- a. An Audiometric Testing Program when required
- b. An Employee Education and Training Program
- c. Monitoring and Analysis of Workplace Noise Levels
- d. Providing Suitable Engineering Controls when appropriate
- e. Providing Hearing Protectors when required
- f. Maintain required records for the above.

Audiometric Testing

Each new employee whose work exposes them to noise levels above the "OSHA action level" will receive an Audiometric test as part of a pre-screening physical examination to establish a baseline audiogram against which subsequent audiograms can be compared as required by the OSHA Standard.

Annually, all employees who are exposed to noise levels exceeding the 85 dB standard will be given a follow-up Audiometric examination to monitor for any significant changes in their hearing ability.

Employees will be formally notified if there is any change in their hearing as the result of the testing. The Standard has defined this shift as a change in hearing threshold relative to the baseline audiogram of an average of 10 dB or more at 200, 3000 and 4000 hz in either ear. In determining whether a standard threshold shift has occurred, allowance may be made for the contribution of aging (presbycusis) to the change in hearing level by correcting the annual audiogram according to the procedure described in Appendix F: "Calculation and Application of Age Correction to Audiograms." When audiometric testing is required, each affected employee must not be exposed to any workplace noise for at least 14 hours prior to his/her test. This requirement may be met by wearing hearing protectors which will reduce the employee's exposure to a sound level of 80 dB (A) or below.

Audiometric tests shall be performed by a licensed or certified audiologist, otolaryngologist, or other physician, or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation, or who has satisfactorily demonstrated competence in administering audiometric examinations, obtaining valid audiograms, and properly using, maintaining and checking calibration and proper functioning of the audiometers being used. A technician who operates microprocessor audiometer does not need to be certified. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist or physician. An audiologist, otolaryngologist or physician will review problem audiograms and shall determine whether there is a need for further evaluation. The company will provide to the person performing this evaluation the following information:

- A copy of the 29 CFR 1910.95 Hearing Conservation.
- The baseline audiogram and most recent audiogram of the employee to be evaluated.
- Measurement of background sound pressure in the audiometric test room as required in 29 CFR 1910.95 Appendix D.
- Records of audiometric calibrations as required by 20 CFR 1910.95 Appendix E.
- If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift as defined by OSHA, the employee will be informed of this fact, in writing, by the company within 21 days of determination.

Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, the company will ensure that the following steps are tank when a standard threshold shift occurs:

An employee not using hearing protectors will be fitted with hearing protectors, trained in their use and care, and required to use them; and An employee already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary. Refer the employee for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if the company suspect that a medical pathology of the ear is caused or aggravated by the wearing of haring protectors. Inform the employee of the need for an otological examination if a medical pathology of the ear which is unrelated to the use of hearing protector is suspected.

If subsequent audiometric testing of an employee whose exposure to noise is less than an 8-hour TWA average of 90 decibels indicates that a standard threshold shift is not persistent the company:

- Will inform the employee of the new audiometric interpretations: and
- May stop the required use of hearing protectors for that employee.

EMPLOYEE EDUCATION AND TRAINING

The (YOUR FENCE COMPANY) 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:

- 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 of 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.

MONITORING AND ANALYSIS OF WORKPLACE NOISE LEVELS

The (YOUR FENCE COMPANY) Company will 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:

NOTICE:

EAR PROTECTION REQUIRED IN THIS AREA

PROVIDE SUITABLE ENGINEERING CONTROLS

Where appropriate, The (YOUR FENCE COMPANY) 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.

PROVIDE HEARING PROTECTORS WHERE REQUIRED

The (YOUR FENCE COMPANY) Company will provide and required employees with hearing protectors if his/her 8 hour TWA is above the 85dB (A). The (YOUR FENCE COMPANY) Company will also make hearing protectors available to all employees exposed to a TWA above 85dB (A) 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 (YOUR FENCE COMPANY) Company will provide workers with a choice of at least one type of ear plug and one type of ear muff (ear muffs cannot be used with anything that prevents the seal of the ear muff. For example, items such as safety glasses). On some job sites there will be a choice of two different ear plugs. The (YOUR FENCE COMPANY) Company will make a concerted effort to find the right ear protection for each employee. Ear protection that offers the right attenuation, is accepted on the terms of comfort, and is used by the employee.

RESPONSIBILITIES

A CLIENT WILL:

• Determine all sources of noise at or above 85dD.

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

JOB SITE SUPERVISION WILL:

- Require hearing protection in all area with noise levels at or above the 85 dB (A) and for all tasks which generate such noise level (i.e., grinding, hammering).
- Require ear plugs in all areas and/or on tasks with the sound levels exceeding105dB.
- 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.
- 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.
- Make hearing protection available and enforce its use by all employees with TWA exposures at or above 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.

REMEMBER

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

RECORDKEEPING

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

- Audiometric tests
- Noise surveys
- Employee training
- Engineering controls implemented
- Record of purchase of hearing protector

WORK REQUIRING HEARING PROTECTORS

There are many jobs or types of work that generally produces noise level that intermittently or for short durations exceed the permissible TWA. It is the policy of The (YOUR FENCE COMPANY) Company to require all workers who are engaged in these jobs to wear hearing protectors. The attached list is some of those jobs. See Attachment

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 and 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) on the package. Most ear plugs have NRR of about 30.

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

POSITION	NRR
Over the head	24 (This depends on the NRR of the Ear Muff.)
Under the chin	20
Behind the head	20

COMPUTING THE HEARING PROTECTION LEVEL:

To compute the actual hearing protection level under the protector, subtract 7 dB (A) from the Noise

Reduction Rating (NRR), then divide the number by 2, and subtract the remainder form the measured noise level dB (A).

For example: NRR of 29 - 7 = 22 dB(A) $22 \text{ Db}(A) \div 2 = 11 \text{ dB}(A)$ Noise level of 95 dB (A) – 11 = 84 dB (A) Therefore, this device offers a protection level of 11 dB (A).

ATTACHMENT I

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

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

10. Welding machines

Authorized Personnel:

Name of Employee	Date Last Trained

PERSONAL PROTECTIVE EQUIPMENT (PPE) TRAINING -

Employees expected to wear Personal Protective Equipment (PPE) will be trained

as follows:

- Exposures and how to identify them, per PPE Hazard Assessment
- Types of PPE to wear as protection from each exposure
- When to wear Personal Protective Equipment
- Proper Donning training to wear PPE properly
- Proper Doffing training to remove PPE properly
- Proper selection and fitting to each affected employee
- Any damaged or defective PPE shall not be used
- How to care for, clean, maintenance, and properly store PPE.
- Any additional requirements to be met for PPE use(Medical Evaluations, Pulmonary Function Test, Respirator Fit Testing, etc.)
- Any additional PPE awareness training required

Employee owned PPE is not allowed.

HAZARD ASSESMENTS

Hazard assessments of the workplace shall be made to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE).

PPE USE -

Head Protection

Approved hard hats must be worn if employees could be struck by falling objects, are in danger of striking their heads on fixed objects, or there is a shock hazard from working near exposed electrical conductors.

Do not drill holes in the hard hat for ventilation; it destroys the integrity to protect you from blows to the head.

Hard hats shall comply with ANSI Z89.1-1986, Class A or B. Class B is required for exposure to high voltage shocks, above 600 volts.

Where there is risk of injury from hair entanglements in moving parts of machinery, combustibles, or toxic contaminants, employees shall confine their hair with nets, or other suitable restrictive devices to eliminate the hazard.

Eye and Face Protection

Employees working in locations where there is a risk of receiving eye injuries such as punctures, abrasions, contusions, or burns as a result of coming in contact with flying particles, hazardous substances, projections, or injurious light rays which are inherent to the work or environment shall be safeguarded by means of face or eye protection.

Suitable screens or shields isolating the hazardous exposure may be considered adequate safeguarding for nearby employees, i.e. welding screens.

Protection against light rays and radiant energy is spelled out in Title 8, GISO, 3382, Tables EP-1 and EP-2.

Where eye protection is required and the employee requires vision correction, the following eye protection shall be provided:

- 1. Safety glasses with suitable corrected lenses, or
- 2. Safety goggles designed to fit over glasses, or
- 3. Protective goggles with corrective lenses mounted behind the protective lenses.

The wearing of contact lenses is prohibited in working environments having harmful exposure to materials, or light flashes, except with medically approved devices.

Side shields shall be worn whenever the hazard of flying objects is angular as well as frontal.

Body Protection

Protection such as rubber aprons or sleeves may be necessary in certain environments where splashing of hazardous materials, or other common substances such as water would pose a risk to the employee. Flying metal particles or molten metal are examples of hazards that could penetrate normal clothing and injure the employee, requiring leather protective sleeves and/or vests.

In all cases, clothing appropriate for the work being done shall be worn. Loose sleeves, tails, ties, lapels, cuffs, or other loose clothing which can become entangled in moving machinery will not be worn.

Clothing containing flammable liquids, corrosive substances, pesticides, irritants, or oxidizing agents shall be removed and not worn until properly laundered.

Hand Protection

There are many types of gloves and made of many different types of materials, each with a specific application. Gloves will be worn as precaution from the following exposures:

- Chemicals check the Material Safety Data Sheets (MSDS) for listed PPE required for safe handling
- Cuts
- Hot work

No glove can protect against all hazards so select the appropriate glove for the job.

Where there is risk of injury from glove entanglement in moving parts of machinery, employees shall not wear gloves and use other methods to protect their hands from injury exposure.

Jewelry, such as rings has caused the loss of many fingers. Be aware that wrist watches, and other jewelry can be caught in moving machinery, or caught on a protruding hook or nail. Never wear metallic jewelry or other objects when working around electrically energized equipment.

Foot Protection

For work in areas where feet are in danger of:

- Being struck by falling, or heavy rolling objects and crushed or penetrated, steel-toed shoes, or steel covers are recommended.
- Working around boards with nails, or scrap metal, you need protection from punctures.

Hearing Protection

Hearing protection will be made available to all employees exposed to sources of noise 85 dB or greater, as measured by a sound level meter or identified by the contracting company. In general, anytime someone must elevate their voice to be heard, hearing protection will be worn.

Hearing protector equipment consists of <u>ear plugs (various NRR) or muffs</u> (industrial).

ATTACHMENT II

HEARING CONSERVATION PROGRAM

FOLLOW UP TRAINING RECORD

FROM:

Manager or Supervisor

The employee listed below recently was found to have a confirmed significant shift in the hearing threshold (as defined by OSHA). An investigation and additional training is required. When this form is completed and reviewed with the employee, please file in the office.

EMPLOYEE NAME: ________________(Print or type First, MI, Last Name)

Social Security Number or Employee Number

Reported Date

JOB CATEGORY ______ (Current Assignment)

The Potential for noise exposure and specific requirements for using hearing protection in their area should be reviewed with this employee within 2 weeks. If hearing protection requirements have not been established in this work area, it must be done as soon as possible.

The retraining for this employee should include:

- The temporary and permanent effects of noise on hearing
- Established hearing protection requirements
- Any questions the employee may have on the use of hearing protection
- The proper use of hearing protection
- Comments the employee has on potential off-the-job noise exposure

Comments on discussion held:

I have discussed the above items with this employee:

Signature

Date of Discussion

Manager or Supervisors Name (print)

PURPOSE:

There are various types of tools and equipment used in the workplace for many different purposes. Examples include, but are not limited to, portable hand tools, power tools, pneumatic tools, and powder-actuated tools.

The purpose of this policy is to provide employees with appropriate knowledge relating to the care and use of tools and equipment and to protect employees from hazards associated with improper use of tools and equipment and defective and poorly maintained tools and equipment.

POLICY:

Only trained and/or experienced employees may use/operate tools or equipment. Tools and equipment shall not be modified and they are to be used only for their designed purpose. It shall be the responsibility of the employee to inspect tools and equipment prior to use and to use all tools and equipment in a safe manner. Employees observed abusing, altering, modifying or misusing tools or equipment shall be subject to disciplinary action. Employees shall wear all appropriate personal protective equipment while using tools and equipment. Additionally if a tool or piece of equipment is found to be defective, the tool/equipment shall be red-tagged, taken out of service until it can be replaced or repaired by a qualified person.

It shall be the responsibility Project Manager or Site Superintendent to designate a competent person who will be assigned to be responsible for testing/inspecting and repairing all tools and equipment. All periodic inspections, maintenance and repairs of tools or equipment shall be documented.

To promote safety and efficiency, the following procedures shall be followed:

PROCEDURE:

1. **General Tool Safety** Many serious injuries have resulted from the improper use of tools and equipment. Many of these injuries could have been prevented if the following rules were followed:

2. Inspection and Maintenance

All tools shall be identified and inventoried either individually or by group.

All tools in the inventory shall have a documented inspection at least once every six months. In addition to these periodic documented inspections all tools shall be inspected prior to issue and upon return by the tool room attendants and prior to each use by the user.

All tools will be kept in good working condition with no modifications.

All periodic inspections and all maintenance & repairs shall be documented. Completed forms shall be kept in a binder in the tool room or tool trailer for one year. The binder shall contain a copy of the inspection checklist for the type for tools and/or equipment being inspected.

3. Selection

Use the right tool for the task instead of trying to make the wrong one fit.

4. Use

Keep control of yourself, the tool, and the job. When applying force with a tool, remember that it may slip, break, or just suddenly do its job. Watch your hands and your balance (body mechanics) to avoid injury.

Vibration Absorbing Gloves are to be made available to workers using pneumatic impact guns or other vibrating equipment. These gloves are required PPE for worker's operating heavy vibrating tools (i.e. jack hammers, 90 guns, impact guns etc.). The use of these gloves are designed to dampen vibration, dissipate impact and absorb shock, they can assist in the prevention of cumulative trauma injury often associated with operating this type of equipment. They only work if you use them.

Select the right protective equipment for the task and use it properly.

Do not use tools and equipment that you have not been trained to use.

5. Care

Take proper care of your tools and equipment. Keep them stored where they will not get damaged and will not present a hazard.

Check your tools and equipment prior to use for defects, wear, or damage. Immediately remove from service and tag any defective tools. Damaged tools shall be turned into the tool room for repair or replacement.

6. Supervision

Supervisors shall be responsible for ensuring that employees are trained before using a specific tool. Watch your employees at work. Ask them about their immediate assignment and take an interest in finding the safest way to do the job. Then follow up to insure that the tools and equipment in your area are being used safely.

7. Hand Tool Safety

Hand tools shall only be used for the purpose for which they are intended.

All appropriate PPE will be worn while using hand tools.

Wrenches, including adjustable, pipe and socket shall not be used when jaws are sprung to the point of slippage.

Pipe wrench parts (i.e., jaws) are not to be removed and used for anything other than the manufactured use.

The use of snipes and cheater bars or double wrenching to gain leverage is prohibited.

Always use tool holder while using hammer and knocker wrenches.

Hand tools shall be tagged and removed from service if any of the following defects are present:

- Impact tools, such as hammers, flange wedges chisels, drift pins, pin bars and knocker wrenches with visible signs of mushrooming, cracking or bending.
- Wooden handle tools, such as hammers, picks, shovels, and brooms with visible sign of cracking, loosening or splintering of the handle.
- Wrenches, such as adjustable, combo and pipe with visible signs of bending, cracking, defective handles or other defects that impair their strength.

8. Electrical Power Tool Safety

All appropriate PPE will be worn while using power tools.

Be sure that the proper permit has been obtained prior to use of electrical power tools.

GFCI's are to be used with all portable electric equipment. GFCI's are to be inspected and tested prior to each use.

Do not connect electrical power unless the operating switch is turned off.

Employee shall avoid loose fitting clothing when operating power tools.

The power source on tools shall be physically disconnected prior to attempting any repairs or attachment replacement.

Protective guards on power tools **shall not** be removed, altered or modified. All guarding will meet the requirements set forth by ANSI B15.1 1926.300 (c)

Trigger/switch locks on power tools are prohibited.

All electrical tools and power cords must be inspected per the Electrical Equipment Safety and Inspection Policy.

Electrical tools and power cords must display the current inspection color code for the current inspection period to it being placed in service.

Electrical tools shall not be hoisted or carried by their power cords.

Cords are tripping hazards. Route them so as to minimize interference in walkways. Overhead is preferred.

Electrical power tools shall be tagged and removed from service if any of the following defects are present:

- Electrical power tool cord does not have current inspection color code.
- Power cord is frayed, cut or damaged. The use of electrical tape to cover damage to cords is prohibited.
- Defective or faulty on/off switches.
- Loose or defective components

9. Air Power Tool Safety

All hoses exceeding 1/2" inside diameter shall have a safety device at the source of supply or branch line to reduce pressure in case of hose failure.

Chicago fittings shall be pinned.

Attachments on air tools shall be secured by retainer pins and rings.

Do not connect air unless the operating switch is turned off.

Do not disconnect tool until air supply is shut off and air pressure is bled off.

Air power tools **shall not** be hoisted or carried by their hoses.

Hoses are tripping hazards. Route them so as to minimize interference in walkways. Overhead is preferred.

Air power tools shall be tagged and removed from service if any of the following defects are present:

- Air power tools, such as air power grinders, impact wrenches, German hacksaws with visible signs of deformities in the body of the tool, improperly functioning actuator, bent or deformed blades, or any signs of obvious damage to the air supply line fittings.
- Hoses must be visually inspected for cracking, signs of aging, worn or damaged connecting fittings, or any other obvious deformities, such as blistering or bulges.

10. Powder Actuated Tool Safety

Only employees who have received an approved training course and license for the particular tool to be used may operate powder-actuated tools.

Toolroom personnel shall not issue powder-actuated tools unless the person requesting the tool can provide a current license for that tool.

Powder-actuated tools shall be tested prior to use to ensure all safeties are functioning.

The fastener **shall not** be loaded until ready for the shot. The tool **shall not** be left unattended unless it is unloaded.

Never point either an empty or loaded tool at any person.

Keep both hands and feet clear of the open-end of the barrel.

In the event of a misfire, the operator shall hold the tool firmly against the work surface for

a period of 30 seconds and then follow manufacturer's instructions.

Personnel, other than the operator of the tool, must stay clear of the area where the tool is being used.

Operators of powder-actuated tools shall wear goggles for eye protection while operating these tools.

A sign at least 8 x 10 inches, using boldface type no less than 1 inch in height, shall be posted within 50 feet of the area where the tool is being used. The sign shall bear the following wording:

CAUTION

POWDER-ACTUATED TOOL IN USE

Powder-actuated tools shall be tagged and removed from service if any of the following defects are present:

- Tool has visible signs of worn or damaged parts.
- Missing or malfunctioning parts or accessories.
- Missing operator's instruction manual or missing power load and fastener chart.
- Tool misfires more than one time during use.

Abrasive Wheel Machinery

Abrasive wheels shall be used only on machines provided with safety guards as defined:

- 1. The safety guard shall be mounted so as to maintain proper alignment with the wheel, and the strength of the fastenings shall exceed the strength of the guard.
- 2. Grinding machines shall be equipped with flanges
- 3. Abrasive wheel machinery guards shall meet the design specifications of the American National Standard Safety Code for the Use, Care, and Protection of Abrasive Wheels, ANSI B7.1-1970, which is incorporated by reference as specified in Sec. 1910.6.

PURPOSE:

There are various types of tools and equipment used in the workplace for many different purposes. Examples include, but are not limited to, portable hand tools, power tools, pneumatic tools, and powder-actuated tools.

The purpose of this policy is to provide employees with appropriate knowledge relating to the care and use of tools and equipment and to protect employees from hazards associated with improper use of tools and equipment and defective and poorly maintained tools and equipment.

POLICY:

Only trained and/or experienced employees may use/operate tools or equipment. Tools and equipment shall not be modified and they are to be used only for their designed purpose. It shall be the responsibility of the employee to inspect tools and equipment prior to use and to use all tools and equipment in a safe manner. Employees observed abusing, altering, modifying or misusing tools or equipment shall be subject to disciplinary action. Employees shall wear all appropriate personal protective equipment while using tools and equipment. Additionally if a tool or piece of equipment is found to be defective, the tool/equipment shall be red-tagged, taken out of service until it can be replaced or repaired by a qualified person.

It shall be the responsibility Project Manager or Site Superintendent to designate a competent person who will be assigned to be responsible for testing/inspecting and repairing all tools and equipment. All periodic inspections, maintenance and repairs of tools or equipment shall be documented.

To promote safety and efficiency, the following procedures shall be followed:

PROCEDURE:

8. **General Tool Safety** Many serious injuries have resulted from the improper use of tools and equipment. Many of these injuries could have been prevented if the following rules were followed:

9. Inspection and Maintenance

All tools shall be identified and inventoried either individually or by group.

All tools in the inventory shall have a documented inspection at least once every six months. In addition to these periodic documented inspections all tools shall be inspected prior to issue and upon return by the tool room attendants and prior to each use by the user.

All tools will be kept in good working condition with no modifications.

All periodic inspections and all maintenance & repairs shall be documented. Completed forms shall be kept in a binder in the tool room or tool trailer for one year. The binder shall contain a copy of the inspection checklist for the type for tools and/or equipment being inspected.

10. Selection

Use the right tool for the task instead of trying to make the wrong one fit.

11. Use

Keep control of yourself, the tool, and the job. When applying force with a tool, remember that it may slip, break, or just suddenly do its job. Watch your hands and your balance (body mechanics) to avoid injury.

Vibration Absorbing Gloves are to be made available to workers using pneumatic impact guns or other vibrating equipment. These gloves are required PPE for worker's operating heavy vibrating tools (i.e. jack hammers, 90 guns, impact guns etc.). The use of these gloves are designed to dampen vibration, dissipate impact and absorb shock, they can assist in the prevention of cumulative trauma injury often associated with operating this type of equipment. They only work if you use them.

Select the right protective equipment for the task and use it properly.

Do not use tools and equipment that you have not been trained to use.

12. Care

Take proper care of your tools and equipment. Keep them stored where they will not get damaged and will not present a hazard.

Check your tools and equipment prior to use for defects, wear, or damage. Immediately remove from service and tag any defective tools. Damaged tools shall be turned into the tool room for repair or replacement.

13. Supervision

Supervisors shall be responsible for ensuring that employees are trained before using a specific tool. Watch your employees at work. Ask them about their immediate assignment and take an interest in finding the safest way to do the job. Then follow up to insure that the tools and equipment in your area are being used safely.
14. Hand Tool Safety

Hand tools shall only be used for the purpose for which they are intended.

All appropriate PPE will be worn while using hand tools.

Wrenches, including adjustable, pipe and socket shall not be used when jaws are sprung to the point of slippage.

Pipe wrench parts (i.e., jaws) are not to be removed and used for anything other than the manufactured use.

The use of snipes and cheater bars or double wrenching to gain leverage is prohibited.

Always use tool holder while using hammer and knocker wrenches.

Hand tools shall be tagged and removed from service if any of the following defects are present:

- Impact tools, such as hammers, flange wedges chisels, drift pins, pin bars and knocker wrenches with visible signs of mushrooming, cracking or bending.
- Wooden handle tools, such as hammers, picks, shovels, and brooms with visible sign of cracking, loosening or splintering of the handle.
- Wrenches, such as adjustable, combo and pipe with visible signs of bending, cracking, defective handles or other defects that impair their strength.

3. Electrical Power Tool Safety

All appropriate PPE will be worn while using power tools.

Be sure that the proper permit has been obtained prior to use of electrical power tools.

GFCI's are to be used with all portable electric equipment. GFCI's are to be inspected and tested prior to each use.

Do not connect electrical power unless the operating switch is turned off.

Employee shall avoid loose fitting clothing when operating power tools.

The power source on tools shall be physically disconnected prior to attempting any repairs or attachment replacement.

Protective guards on power tools **shall not** be removed, altered or modified. All guarding will meet the requirements set forth by ANSI B15.1 1926.300 (c)

Trigger/switch locks on power tools are prohibited.

All electrical tools and power cords must be inspected per the Electrical Equipment Safety and Inspection Policy.

Electrical tools and power cords must display the current inspection color code for the current inspection period to it being placed in service.

Electrical tools shall not be hoisted or carried by their power cords.

Cords are tripping hazards. Route them so as to minimize interference in walkways. Overhead is preferred.

Electrical power tools shall be tagged and removed from service if any of the following defects are present:

- Electrical power tool cord does not have current inspection color code.
- Power cord is frayed, cut or damaged. The use of electrical tape to cover damage to cords **is prohibited**.
- Defective or faulty on/off switches.
- Loose or defective components

4. Air Power Tool Safety

All hoses exceeding 1/2" inside diameter shall have a safety device at the source of supply or branch line to reduce pressure in case of hose failure.

Chicago fittings shall be pinned.

Attachments on air tools shall be secured by retainer pins and rings.

Do not connect air unless the operating switch is turned off.

Do not disconnect tool until air supply is shut off and air pressure is bled off.

Air power tools shall not be hoisted or carried by their hoses.

Hoses are tripping hazards. Route them so as to minimize interference in walkways. Overhead is preferred.

Air power tools shall be tagged and removed from service if any of the following defects are present:

- Air power tools, such as air power grinders, impact wrenches, German hacksaws with visible signs of deformities in the body of the tool, improperly functioning actuator, bent or deformed blades, or any signs of obvious damage to the air supply line fittings.
- Hoses must be visually inspected for cracking, signs of aging, worn or damaged connecting fittings, or any other obvious deformities, such as blistering or bulges.

5. **Powder Actuated Tool Safety**

Only employees who have received an approved training course and license for the particular tool to be used may operate powder-actuated tools.

Toolroom personnel shall not issue powder-actuated tools unless the person requesting the tool can provide a current license for that tool.

Powder-actuated tools shall be tested prior to use to ensure all safeties are functioning.

The fastener **shall not** be loaded until ready for the shot. The tool **shall not** be left unattended unless it is unloaded.

Never point either an empty or loaded tool at any person.

Keep both hands and feet clear of the open-end of the barrel.

In the event of a misfire, the operator shall hold the tool firmly against the work surface for

a period of 30 seconds and then follow manufacturer's instructions.

Personnel, other than the operator of the tool, must stay clear of the area where the tool is being used.

Operators of powder-actuated tools shall wear goggles for eye protection while operating these tools.

A sign at least 8 x 10 inches, using boldface type no less than 1 inch in height, shall be posted within 50 feet of the area where the tool is being used. The sign shall bear the following wording:

CAUTION:

POWDER-ACTUATED TOOL IN USE

Powder-actuated tools shall be tagged and removed from service if any of the following defects are present:

- Tool has visible signs of worn or damaged parts.
- Missing or malfunctioning parts or accessories.
- Missing operator's instruction manual or missing power load and fastener chart.
- Tool misfires more than one time during use.

6. Abrasive Wheel Machinery

Abrasive wheels shall be used only on machines provided with safety guards as defined:

- 4. The safety guard shall be mounted so as to maintain proper alignment with the wheel, and the strength of the fastenings shall exceed the strength of the guard.
- 5. Grinding machines shall be equipped with flanges
- 6. Abrasive wheel machinery guards shall meet the design specifications of the American National Standard Safety Code for the Use, Care, and Protection of Abrasive Wheels, ANSI B7.1-1970, which is incorporated by reference as specified in Sec. 1910.6.

Policy

(YOUR FENCE COMPANY)'s policy is that employees should not enter a trench or excavation unless it is absolutely necessary. If entry is to be made into a trench or excavation greater than four (4) feet deep, specific precautions detailed in this procedure must be taken. Excavation work activities shall be conducted safely with associated exposures eliminated and/or controlled.

This policy covers minimum performance standards applicable to all (YOUR FENCE COMPANY) Associates employees and locations. Local practices requiring more detailed or stringent rules, or local, state or other federal requirements regarding this subject can and should be added as an addendum to this procedure as applicable.

Purpose

To ensure that every employee involved in excavation work is protected against foreseeable associated hazards.

Scope

Applies to all (YOUR FENCE COMPANY) Associates work sites, i.e., (YOUR FENCE COMPANY) offices, client job sites, etc., where construction and service work activities require excavation.

Definitions

General Definitions

Approved means, for the purpose of this section, authorized by ------ Associates, tested and certified by the manufacturer or any recognized national testing laboratory to possess the strength requirements specified in this section.

Competent Person means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has the authorization to take prompt corrective measures to eliminate them.

Construction Work means work for construction, alteration, and/or repair to new underground utilities.

Defect means any characteristic or condition that tends to weaken or reduce the strength of the tool, object, or structure of which it is a part.

Employee means every laborer regardless of title or contractual relationship.

Service Work means work for alteration and/or repair of existing underground utilities.

Work Area means that portion of a walking/working surface where work activities are being performed.

General Excavation Definitions

Aluminum Hydraulic Shoring means a pre-engineered shoring system comprised of aluminum hydraulic cylinders (crossbraces) used in conjunction with vertical rails (uprights) or horizontal rails (wales). Such system is designed specifically to support the sidewalls of an excavation and prevent cave-ins.

Benching (Benching system) means a method of protecting employees from cave-ins by excavating the sides of an excavation to form one or a series of horizontal levels or steps, usually with vertical or near-vertical surfaces between levels.

Cave-in means the separation of a mass of soil or rock material from the side of an excavation, or the loss of soil from under a trench shield or support system, and its sudden movement into the excavation, either by falling or sliding, in sufficient quantity so that it could entrap, bury, or other wise injure and immobilize a person.

Cross braces mean the horizontal members of a shoring system installed perpendicular to the sides of the excavation, the ends of which bear against either uprights or wales.

Distress means that the soil is in a condition where a cave-in is imminent or is likely to occur. Distress is evidenced by such phenomena as the development of fissures in the face of or adjacent to an open excavation; the subsidence of the edge of an excavation; the slumping of material from the face or the bulging or heaving of material from the bottom of an excavation; the spalling of material from the face of an excavation; and ravelling (i.e., small amounts of material such as pebbles or little clumps of material suddenly separating from the face of an excavation and trickling or rolling down into the excavation).

Excavation means any man-made cut, cavity, <u>trench</u>, or depression in an earth surface, formed by earth removal.

Faces or sides means the vertical or inclined earth surfaces formed as a result of excavation work.

Failure means the breakage, displacement, or permanent deformation of a structural member or connection so as to reduce its structural integrity and its supportive capabilities.

Hazardous atmosphere means an atmosphere which by reason of being explosive, flammable, poisonous, corrosive, oxidizing, irritating, oxygen deficient, toxic, or otherwise harmful, may cause death, illness, or injury.

Kickout means the accidental release or failure of a cross brace.

Maximum allowable slope means the steepest incline of an excavation face that is acceptable for the most favorable site conditions as protection against cave-ins, and is expressed as the ratio of horizontal distance to vertical rise (H:V).

Protective system means a method of protecting employees from cave-ins, from material that could fall or roll from an excavation face or into an excavation, or from the collapse of adjacent structures. Protective systems include support systems, sloping and benching systems, shield systems, and other systems that provide the necessary protection.

Ramp means an inclined walking or working surface that is used to gain access to one point from another, and is constructed from earth or from structural materials such as steel or wood.

Registered Professional Engineer means a person who is registered as a professional engineer in the state where the work is to be performed.

Sheeting means the members of a shoring system that retain the earth in position and in turn are supported by other members of the shoring system.

Shield (Shield system) means a structure that is able to withstand the forces imposed on it by a cave-in and thereby protect employees within the structure. Shields can be permanent structures or can be designed to be portable and moved along as work progresses. Additionally, shields can be either premanufactured or job-built in accordance with this manual section. Shields used in trenches are usually referred to as "trench boxes" or "trench shields." **Shoring (Shoring system)** means a structure such as a metal hydraulic or mechanical shoring system that supports the sides of an excavation and which is designed to prevent cave-ins.

Short term exposure means a period of time less than or equal to 24 hours that an excavation is open. Only referenced in Table A-1 (Maximum Allowable Sloping) of Appendix 16-1.

Sides. See Faces.

Sloping (Sloping system) means a method of protecting employees from cave-ins by excavating to form sides of an excavation that are inclined away from the excavation so as to prevent cave-ins. The angle of incline required to prevent a cave-in varies with differences in such factors as the soil type, environmental conditions of exposure, and application of surcharge loads.

Stable rock means natural <u>solid mineral material</u> (not soil) that can be excavated with vertical sides and will remain intact while exposed.

Structural ramp means a ramp built of steel or wood, usually used for vehicle access.

Support system means a structure such as underpinning, bracing, or shoring, which provides support to an adjacent structure, underground installation, or the sides of an excavation.

Trench (trench excavation) means a narrow excavation (in relation to its length) made below the surface of the ground.

Trench box or trench shield. See Shield.

Uprights means the vertical members of a trench shoring system placed in contact with the earth and usually positioned so that individual members do not contact each other. Uprights placed so that individual members are closely spaced, in contact with or interconnected to each other, are often called "sheeting."

Underground Installations means utility installations, such as sewer, telephone, fuel, electric, water lines, fiber optic, etc.

Wales means horizontal members of a shoring system placed parallel to the excavation face whose sides bear against the vertical members of the shoring system or earth.

Soil Definitions

- **Cemented soil** means a soil in which the particles are held together by a chemical agent, such as calcium carbonate, such that a hand-size sample cannot be crushed into powder or individual soil particles by finger pressure.
- **Cohesive soil** means clay (fine grained soil), or soil with a high clay content, which has cohesive strength. Cohesive soil does not crumble, can be excavated with vertical sideslopes, and is plastic when moist. Cohesive soil is hard to break up when dry, and exhibits significant cohesion when submerged. Cohesive soils include clayey silt, sandy clay, silty clay, clay and organic clay.

Dry soil means soil that does not exhibit visible signs of moisture content.

- **Fissured** means a soil material that has a tendency to break along definite planes of fracture with little resistance, or a material that exhibits open cracks, such as tension cracks, in an exposed surface.
- **Granular soil** means gravel, sand, or silt (coarse grained soil) with little or no clay content. Granular soil has no cohesive strength. Some moist granular soils exhibit apparent cohesion. Granular soil cannot be molded when moist and crumbles easily when dry.
- Layered system means two or more distinctly different soil or rock types arranged in layers.
- **Moist soil** means a condition in which a soil looks and feels damp. Moist cohesive soil can easily be shaped into a ball and rolled into small diameter threads before crumbling. Moist granular soil that contains some cohesive material will exhibit signs of cohesion between particles.
- **Plastic** means a property of a soil which allows the soil to be deformed or molded without cracking, or appreciable volume change.
- **Saturated soil** means a soil in which the voids are filled with water. Saturation does not require flow. Saturation, or near saturation, is necessary for the proper use of instruments such as a pocket penetrometer or sheer vane.
- **Soil classification system** means, for the purpose of this subpart, a method of categorizing soil and rock deposits in a hierarchy of Stable Rock, Type A, Type B, and Type C, in decreasing order of stability. The categories are determined based on an analysis of the properties and performance characteristics of the deposits and the characteristics of the deposits and the environmental conditions of exposure.
- **Stable rock** means natural solid mineral matter that can be excavated with vertical sides and remain intact while exposed.

Submerged soil means soil which is underwater or is free seeping.

Type A means cohesive soils with an unconfined, compressive strength of 1.5 ton per square foot (tsf) (144 kPa) or greater. Examples of cohesive soils are: clay, silty clay, sandy clay, clay loam and, in some cases, silty clay loam and sandy clay loam. Cemented soils such as caliche and hardpan are also considered Type A. However, no soil is Type A if any of the following are noted:

The soil is fissured; or

The soil is subject to vibration from heavy traffic, pile driving, or similar effects; or

The soil has been previously disturbed; or

The soil is part of a sloped, layered system where the layers dip into the excavation on a slope of four horizontal to one vertical (4H:1V) or greater; or

The material is subject to other factors that would require it to be classified as a less stable material.

Type B means cohesive soil with an unconfined compressive strength greater than 0.5 tsf (48 kPa) but less than 1.5 tsf (144 kPa); or

Granular cohesionless soils including: angular gravel (similar to crushed rock), silt, silt loam, sandy loam and, in some cases, silty clay loam and sandy clay loam.

Previously disturbed soils except those which would otherwise be classed as Type C soil.

Soil that meets the unconfined compressive strength or cementation requirements for Type A, but is fissured or subject to vibration; or

Dry rock that is not stable; or

Material that is part of a sloped, layered system where the layers dip into the excavation on a slope less steep than four horizontal to one vertical (4H:1V), but only if the material would otherwise be classified as Type B.

Type C means cohesive soil with an unconfined compressive strength of 0.5 tsf (48kPa) or less; or

Granular soils including gravel, sand, and loamy sand; or

Submerged soil or soil from which water is freely seeping; or

Submerged rock that is not stable, or

Material in a sloped, layered system where the layers dip into the excavation or a slope of four horizontal to one vertical (4H:1V) or steeper.

- **Unconfined compressive strength** means the load per unit area at which a soil will fail in compression. It can be determined by laboratory testing, or estimated in the field using a pocket penetrometer, by thumb penetration tests, and other methods.
- Wet soil means soil that contains significantly more moisture than moist soil, but in such a range of values that cohesive material will slump or begin to flow when vibrated. Granular material that would exhibit cohesive properties when moist will lose those cohesive properties when wet.

Requirements

Risk Assessment

A Competent Person shall prepare a Site Safety Plan and follow Subsurface Investigation procedure prior to and during excavation work activities (reference Safety Systems / Health and Safety Plans section (7) and Subsurface Investigation section (33) of this manual) to assess the identifiable hazards associated with work areas, occupations, and tasks.

(YOUR FENCE COMPANY) Associates, in accordance with OSHA, require that a **competent person** be on site during trenching/excavation activity or employee entry into the trench or excavation.

A competent person must have the following qualifications:

- 1) Be able to identify and predict trenching/excavation hazards.
- 2) Have authority to eliminate hazards and stop work if necessary.
- 3) Understand, implement, and meet the requirements of the standard.
- 4) Be able to evaluate shoring systems.
- 5) Be able to perform soil classification tests.

Written Work Plan (\geq 5 Ft. in depth)

A Competent Person shall develop a written work plan for every excavation exceeding five feet in depth based on the Site Safety Plan, Subsurface Investigation and the other requirements of this section.

The written Excavation Work Safety Plan shall include:

- Identification of hazards in the work area related to excavation equipment
- Describe the excavation protection system(s) to be provided
- Describe the soil type and the correct procedures for the selection, fit, use and maintenance of the excavation protection system
- Describe procedures for excavation
- Describe the method for prompt, safe removal of injured workers
- Be available on the job site
- Signature of the Competent Person

Training

Initial training of employees shall occur during orientation for employees who foreseeably will be engaged in excavation work. Hazard recognition and excavation protection systems shall be included in the training

Site specific training shall occur before the start of excavation work activities, including hazards and controls noted in the Site Safety Plan and the other provisions of the written plan.

Inspections

When employee exposure in an excavation is reasonably anticipated during the following frequencies, an inspection shall be conducted by a Competent Person:

- prior to the start of work each day
- as needed throughout the shift
- after every rainstorm

and/or when an unusual occurance affects the integrity of the Note: Where the Competent Person finds evidence of a situation that could result in a possible cave-in, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions, exposed employees shall be removed from the hazardous area until the necessary precautions have been taken to ensure their safety.

Personal Protective Equipment

Minimum Personal Protective Equipment shall consist of:

- Approved Hardhats
- Approved Safety Glasses Approved Safety-toe Boots
- If exposed to vehicular traffic, employees shall be provided with, and shall wear, warning vests or other suitable garments marked with or made of high-visibility material (and be reflective if working in dim light or at night)

Specific engineering control options

Requiring Registered Professional Engineer

Excavation protection system configurations requiring development by a Registered Professional Engineer:

- excavations greater than twenty (20) feet in depth
- any excavation <u>below</u> the level of the base or footing of any foundation or retaining wall that could be reasonably expected to pose a hazard to employees
- where the stability of adjoining buildings, walls, or other structures is endangered by excavation operations

Designs shall be in written form and will include at least the following:

- The protective system configurations that were determined to be safe for the particular project
- The identity and stamped seal of the Registered Professional Engineer approving the design

At least one copy of the design shall be maintained at the jobsite.

Sloping and Benching Systems (excavation depth \geq five ft., \leq twenty ft.)

Note: Suitable sloping or benching shall occur at \geq 4 feet in depth for unstable soil (Type C).

Classifying Soil

Soil and rock deposits shall be classified in accordance with Classifying Soil portion of this section (5.8)

Maximum allowable slope

- The maximum allowable slope for a soil or rock deposit shall be determined from **Table A** of Appendix 16-1 of this section.
- When additional weight loads to the system are present from stored material or equipment, operating equipment, or traffic, a Competent Person shall determine

the degree to which the slope must be reduced below the maximum allowable slope, and will assure that such reduction is achieved.

- Employees must not be positioned under loads handled by lifting or digging equipment and must stand clear of loads being loaded or unloaded so they will be safe in the event of the load spilling or slipping.
- When mobile equipment (trucks, etc.) is being operated adjacent to the excavation, or when similar equipment must approach the edge of the excavation and the operator does not have clear view of the edge, a warning system (barricades, stop logs, hand signals) must be in place.

Prohibition

Employees shall not be permitted to work on the faces of sloped or benched excavations at levels above other employees except when employees at the lower levels are adequately protected from the hazard of falling, rolling, or sliding material or equipment.

Shielding Systems (excavation depth \geq five ft., \leq twenty ft.)

General

Installation of a support system shall be closely coordinated with the excavation of trenches.

Shield systems shall not be subjected to loads exceeding those which the system was designed to withstand.

Employees shall not be allowed in shield systems when shields are being installed, removed, or moved vertically.

Employees shall be protected from the hazard of cave-ins when entering or exiting the areas protected by shields. This means that the acess and egress methods shall be included from within the protection of the shielding system.

Excavation of material to a level no greater than 2 feet (.61 m) below the bottom of the members of a shield system shall be permitted.

Materials and equipment.

Materials and equipment used for protective systems shall be free from damage or defects that might impair their proper function.

Manufactured materials and equipment used for protective systems shall be used and maintained in a manner that is consistent with the recommendations of the manufacturer.

When material or equipment that is used for protective systems is damaged, a Competent Person shall examine the material or equipment and evaluate its suitability for continued use. If the Competent Person cannot assure the material or equipment is able to support the intended loads or is otherwise suitable for safe use, then such material or equipment shall be removed from service. Manufactured material or equipment, in this case, shall be evaluated and approved by the manufacturer or a Registered Professional Engineer before being returned to service.

Designs for shoring in trenches shall be determined in accordance with the conditions and requirements set forth in Classifying Soil section and with the Aluminum Hydraulic Shoring for

Trenches Table (B-1) of Appendix 16-1 of this section. Other manufactured shoring systems that meet or exceed these tables are permitted.

Note: Aluminum Hydraulic Shoring is preferred to Timber Shoring. However, if Timber Shoring is more feasible or practical, it shall be utilized in accordance with OSHA CFR 29 1926 Subpart P, Appendix C.

Combination Systems (excavation depth \geq five ft., \leq twenty ft.)

If the excavation is of a depth whereby the shielding system is not of sufficient height, sloping/benching shall be utilized in combination.

Installation and removal of support

Members of support systems shall be securely connected together to prevent sliding, falling, kickouts, or other predictable failure.

Support systems shall be installed and removed in a manner that protects employees from cave-ins, structural collapses, or from being struck by members of the support system.

Individual members of support systems shall not be subjected to loads exceeding those which those members were designed to withstand.

Before temporary removal of individual members begins, additional precautions shall be taken to ensure the safety of employees, such as installing other structural members to carry the loads imposed on the support system.

Removal shall begin at, and progress from, the bottom of the excavation. Members shall be released slowly so as to note any indication of possible failure of the remaining members of the structure or possible cave-in of the sides of the excavation.

Backfilling shall progress together with the removal of support systems from excavations.

Specific Excavation Hazard Controls

Access and Egress

Structural ramps that are used solely by employees as a means of access or egress from excavations shall be designed by a Competent Person.

Ramps and runways constructed of two or more structural members shall have the structural members connected together to prevent displacement.

Structural members used for ramps and runways shall be of uniform thickness.

Cleats or other appropriate means used to connect runway structural members shall be attached to the bottom of the runway or shall be attached in a manner to prevent tripping.

Structural ramps used in lieu of steps shall be provided with cleats or other surface treatment on the top surface to prevent slipping.

A means of egress from trench excavations shall always be maintained. A stairway, ladder, ramp or other safe means of egress shall be located in trench excavations that are 4 feet or more in depth so as to require no more than 25 feet of lateral travel for employees.

Employees shall not utilize mechanical equipment to access or egress from trench excavations.

Exposure to Falling Loads

Employees shall be protected from excavated or other materials or equipment that could pose a hazard by falling or rolling into excavations. Protection shall be provided by placing and keeping such materials or equipment at least 2 feet (.61 m) from the edge of excavations, or by the use of retaining devices that are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both if necessary.

Whether inside or outside of an excavation, no employee shall be a permitted underneath load handled by lifting or digging equipment. Employees shall stand away from any vehicle being loaded or unloaded to avoid being struck by any spillage or falling materials.

Operators of such vehicles being loaded or unloaded are required to remain out of the cabs of vehicles during loading or unloading.

Hazardous Atmospheres

Where oxygen deficiency (atmospheres containing less than 19.5 percent oxygen) or a hazardous atmosphere exists or could reasonably be expected to exist, such as in excavations in landfill areas or excavations in areas where hazardous substances are or had previously been stored nearby, the atmospheres in the excavation shall be tested before employees enter excavations greater than 4 feet (1.22 m) in depth.

No (YOUR FENCE COMPANY) employee shall enter a trench or excavation containing an explosive atmosphere (greater than 10% of the lower explosive limit) or an oxygen enriched atmosphere (greater than 23.5% O_2). Likewise, personnel shall not enter if the atmosphere is oxygen deficient (less than 19.5%) unless equipped with a self-contained breathing apparatus or air-line respirators equipped with emergency escape air packs.

The use of such respiratory equipment must comply with provisions of the (YOUR FENCE COMPANY) Respiratory Protection Procedure section (27). Employees entering excavations containing levels of toxic gases or vapors may require the use of respiratory protection and other means of protection and must be addressed on a case by case nature depending upon the contaminant.

Ventilation of the excavation or other similar measures should be implemented to eliminate oxygen deficient/enriched, flammable, or toxic atmospheres prior to entry. When these measures are in place, testing of the atmosphere shall be conducted as often as necessary to ensure that the atmosphere remains safe.

In addition to air monitoring, emergency rescue equipment must be readily available where hazardous atmospheric conditions exist or can reasonably be expected to exist. This equipment, such as a breathing apparatus, a safety harness or line, etc. shall be attended by an employee trained in its use.

See the Confined Space section (10) of this manual for more information.

Mobile Equipment

When mobile equipment is operated adjacent to an excavation, or when such equipment is required to approach the edge of an excavation, and the operator does not have a clear and direct view of the edge of the excavation, a warning system shall be utilized such as barricades, hand or mechanical signals, or stop logs.

Underground Installations

Utility companies or owners shall be contacted within established or customary local response times, advised of the proposed work, and asked to establish the location of the utility underground installations <u>prior</u> to the start of actual excavation. When utility companies or owners cannot respond to a request to locate underground utility installations within 24 hours (unless a longer period is required by state or local law), or cannot establish the exact location of these installations, the work may proceed, provided the employees do so with caution, and provided detection equipment or other acceptable means to locate utility installations are used.

When excavation operations approach the estimated location of underground installations, the exact location of the installations shall be determined by safe and acceptable means.

While the excavation is open, underground installations shall be protected, supported or removed as necessary to safeguard employees. Reference section (33) Subsurface Investigation Procedures for specific information.

Water Accumulation

Employees shall not work in excavations in which there is accumulated water, or in excavations in which water is accumulating, unless adequate precautions have been taken to protect employees against the hazards posed by water accumulation. The precautions necessary to protect employees include special support or shield systems to protect from cave-ins and/or water removal to control the level of accumulating water.

If water is controlled or prevented from accumulating by the use of water removal equipment, the water removal equipment and operations shall be monitored by a Competent Person to ensure proper operation.

If excavation work interrupts the natural drainage of surface water (such as streams), diversion ditches, dikes, or other suitable means shall be used to prevent surface water from entering the excavation and to provide adequate drainage of the area adjacent to the excavation.

Protection of Employees from Loose Rock, Soil, Equipment and Materials

Adequate protection shall be provided to protect employees from loose rock or soil that could pose a hazard by falling or rolling from an excavation face. Such protection can consist of:

- Scaling to remove loose material
- Installation of protective shields / barricades at intervals as necessary on the face to stop and contain falling material
- Or other means that provides equivalent protection

No (YOUR FENCE COMPANY) employee shall enter an excavation that approaches five feet or more in depth without proper protection from cave-in.

Under no circumstances should bracing or shoring be omitted, regardless of the length of time the trench will be open.

Such rock, soil and materials and equipment shall additionally be keep at least 2 feet (.61 m) from the edge of excavations.

Fall protection

If employees or equipment are required to cross over excavations, walkways or bridges with standard guardrails shall be provided.

Employees entering bell-bottom pier holes, or other similar deep and confined footing excavations, shall wear a full-body harness with a lifeline securely attached to it. The lifeline shall be separate from any line used to handle materials, and shall be individually attended at all times while the employee wearing the lifeline is in the excavation.

Excavations shall be barricaded to prevent employees and others from falling into them. When

an excavation must be left open for the duration of the construction work, barricades and warning

signs shall be used. Upon completion of the work, excavations, pits, etc. should be backfilled.

See the Fall Protection section (17) of this manual for more information.

Classifying Soils Classification of soil and rock deposits

Each soil and rock deposit shall be classified by a Competent Person as Stable Rock, Type A, Type B, or Type C in accordance with the definitions within this section.

The classification of the deposits shall be made based on the results of at least one visual and at least one manual analysis. Such analyses shall be conducted by a Competent Person using tests described within this section.

In a layered system, the system shall be classified in accordance with its weakest layer. However, each layer may be classified individually where a <u>more stable layer</u> lies <u>under</u> a <u>less stable layer</u>.

If, after classifying a deposit, the properties, factors, or conditions affecting its classification change in any way, the changes shall be evaluated by a Competent Person. The deposit shall be reclassified as necessary to reflect the changed circumstances.

Acceptable visual and manual tests Visual tests

Observe samples of soil that are excavated and soil in the sides of the excavation. Estimate the range of particle sizes and the relative amounts of the particle sizes. Soil that is primarily composed of fine-grained material is <u>cohesive</u> material. Soil composed primarily of coarse-grained sand or gravel is <u>granular</u> material.

Observe soil as it is excavated. Soil that remains in clumps when excavated is <u>cohesive</u>. Soil that breaks up easily and does not stay in clumps is <u>granular</u>.

Observe the side of the opened excavation and the surface area adjacent to the excavation. Crack-like openings such as tension cracks could indicate <u>fissured</u> material. If chunks of soil fall off a vertical side, the soil could be fissured. Small falls are evidence of moving ground and are indications of potentially hazardous situations.

Observe the area adjacent to the excavation and the excavation itself for evidence of existing utility and other underground structures, and to identify <u>previously disturbed soil</u>.

Observe the opened side of the excavation to identify layered systems.

Observe the area adjacent to the excavation and the sides of the opened excavation for evidence of <u>surface water</u>, <u>water seeping</u> from the sides of the excavation, or the location of the level of the <u>water table</u>.

Observe the area adjacent to the excavation and the area within the excavation for sources of vibration that may affect the <u>stability of the excavation face</u>.

Manual tests Plasticity

Mold a moist or wet sample of soil into a ball and attempt to roll it into threads as thin as 1/8-inch in diameter for a length of at least 2 inches. Cohesive material can be successfully rolled into threads without crumbling.

Dry strength

If the soil is dry and crumbles on its own or with moderate pressure into individual grains or fine powder, it is <u>granular</u> (any combination of gravel, sand, or silt). If the soil is dry and falls into clumps that break up into smaller clumps, but the smaller clumps can only be broken up with difficulty, it may be <u>clay</u> in any combination with gravel, sand or silt. If the dry soil break into clumps which do not break up into small clumps and which can only be broken with difficulty, and there is no visual indication the soil is fissured, the soil may be considered <u>un-fissured</u>.

Thumb penetration

The thumb penetration test can be used to estimate the unconfined compressive strength of cohesive soils. Type A soils with an unconfined compressive strength of 1.5 tsf can be readily indented by the thumb with very great effort. Type C soils with an unconfined compressive strength of 0.5 tsf can be easily penetrated several inches by the thumb, and can be molded by light finger pressure.

This test should be conducted on an undisturbed soil sample, such as a large clump of spoil, as soon as practicable after excavation to keep to a minimum the effects of exposure to drying influences.

If the excavation is later exposed to wetting influences (rain, flooding), the classification of the soil must be changed accordingly.

Other strength tests

Estimates of unconfined compressive strength of soils can also be obtained by use of a pocket penetrometer or by using a hand-operated shearvane.

Drying test.

The basic purpose of the drying test is to differentiate between cohesive material with fissures, un-fissured cohesive material, and granular material. The procedure for the drying test involves drying a sample of soil that is approximately one inch thick (2.54 cm) and six inches (15.24 cm) in diameter until it is thoroughly dry, then:

If the sample develops cracks as it dries, significant <u>fissures</u> are indicated

Samples that dry without cracking are to be broken by hand. If considerable force is necessary to break a sample, the soil has significant <u>cohesive</u> material content. The soil can be classified as an <u>un-fissured cohesive</u> material and the unconfined compressive strength should be determined

If a sample breaks easily by hand, it is either a <u>fissured cohesive</u> material or a granular material. To distinguish between the two, pulverize the dried clumps of the sample by hand or by stepping on them. <u>If the clumps do not pulverize easily, the material is cohesive with fissures. If they pulverize easily into very small fragments, the material is granular</u>

6.0 References

OSHA 29 CFR 1926 Subpart P (Excavations)

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