



Safety Manual

Davis, Pickering & Company Inc.

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Reference:

29 CFR 1926 Construction Industry Standards

29 CFR 1910 General Industry Standards

NFPA 70 & 70E Standards & Practices

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Near Miss Report

Job Briefing And Planning Checklist

Job Safety Analysis Form

Confined Space Entry Permit

Energized Work Permit

Evacuation Plan

Audit Form & Inspection Forms

PPE Hazard Assessment & Respirator Hazard Assessment Forms

PMCA Substance Abuse Policy

PMCA Back-ground Check

New Employee Packet w/site Safety Check List



SAFE TEAM MEMBERS

Jeff Williamson	President
Dan Flieman	Ohio Operations
Josh Blue	Employee Representative
Brian Anderson	Project Manager
Scott Hupp	Safety Coordinator
Randy Hinkle	Employee Representative
Scott Ferrell	Employee Representative
Mike Smith	Safety Coordinator

SAFETY MISSION STATEMENT

Davis Pickering & Co. (DPC) believes that training is one of the most proactive tools to preventing injuries that any company can take. Safety on the jobsite is implemented through the combined efforts of employee's knowledge and training and good company policy and procedures. These initiatives ultimately comprise a company's injury prevention and loss control programs. Training is the backbone of DPC's safety program. All project managers, supervisors, foremen and employees working on our construction projects have had extensive OSHA Safety Training & current updates. Supervisors & Foremen have all attended OSHA-30 hour and in most classes advanced courses dealing with updates, changes, and refresher training. This training is well documented with Parkersburg Marietta Contractors Association (PMCA) through the Smart Card System as well as in our own records. This is in addition to craft specific safety training such as OSHA & NFPA courses. Furthermore all supervisors receive advanced leadership courses and Drug Free Workplace Training. The extensive training of our employees, through all company, union, and building-trades sponsored safety courses in addition to our many years experience; help ensure DPC and our employees safety service along with our electrical contracting and data services. Our Safety Mission is to complete ALL projects in a safe, productive, loss free, customer satisfied environment.

Jeff Williamson, President

DRUG FREE WORKPLACE

- ✓ Davis, Pickering & Co., Inc. (DPC) has participated in a Federal DFWP for many years.
- ✓ DPC also currently participates in the Ohio and West Virginia State sponsored Drug Free Workplace Programs (DFWP). The program is administered by Marietta Parkersburg Occupational Health Agency and Parkersburg Marietta Contractor's Association (PMCA).
- ✓ Marietta Memorial Hospital (MMH) and the Mid Ohio Valley Occupational Health Partnership services are utilized for drug education and Employee Assistance Programs (EPA).

See enclosed DFWP Policy. Consult DPC Employee Handbook pages 11-13 for further guidance.

CURRENT DRUG PROGRAM INCLUDED IN APPENDIX

SUBSTANCE ABUSE TESTING POLICY

Site: Ohio State Funded Projects

Scope

Pursuant to the Executive Order passed this September 2002, requiring ALL Ohio State funded construction projects to be drug free workplaces, Davis, Pickering & Company., has updated our current substance abuse policy with the following:

- I. This addendum to our current substance abuse policy applies to all employees that will be working on any Ohio State funded construction project.
- II. Substance testing that is now required on state funded projects are the following:
 - a. Pre-employment and/or new hire to the construction site
 - b. Post-accident with accident including fatality, off-site medical, vehicular or property damage
 - c. Reasonable suspicion verified by a trained supervisor
 - d. Follow –up or negative return to duty
- III. Random testing at a minimum 5% and covering all construction site personnel.
- IV. Training for employees and supervisors – 1 hour for employees and 2 hours for supervisors.
- V. Assistance resources will be identified for construction site employees testing positive or requesting information.
- VI. Substances tested for and cut-off levels will remain the same as outlined in our current policy.

COMPANY SAFETY STATEMENT

As an employee of Davis, Pickering and Company, Inc. (DPC) we hope you feel, as a member of our Company, that a safe working environment is absolutely essential to both yourself and the company. You are expected to work at any operations under our care in a safe and efficient manner.

DPC has developed this safety program for many reasons. Our competitive position is improved through your cooperation due to reduced cost of insurance, labor, field overhead, replacement of equipment, etc., and the reputation of our company will be an asset as potential clients consider the use of our services.

Safety consciousness must be constantly in your thinking and planning. You must not only work safely and prevent obvious unsafe acts on the part of those you work with, but you must be alert to potential hazards and take the proper steps to alleviate them. You must recognize that working in an unsafe manner is counter-productive to both you and DPC.

To make our approach to safety more effective and uniform throughout the organization, you are receiving this manual, outlining and formalizing the DPC Safety Program. This will help you to understand exactly what is expected of you and of every employee of DPC. They are not restrictive measures and will create no hardship on any individual, but rather are rules of common sense that will help you stay alive and healthy. Making these rules work is the job of just one person – YOU.

Failure to comply with the safety rules of DPC can lead to IMMEDIATE disciplinary action, from temporary layoff to discharge, as warranted by the circumstances. We CANNOT afford to overlook a single safety pre-caution, as someone else's safety violation could cause YOU injury.

It is our sincere hope that you will have a SAFE and profitable period of employment with us.

If at any time you need additional information concerning safety or have any questions at all please contact the DPC Safety Department.

ENFORCEMENT POLICY

- **FIRST** violation of Company Safety Policy:
 - Verbal reprimand to be noted in employee's personnel file.

- **SECOND** violation of Company Safety Policy:
 - Written reprimand to be posted in employee's personnel file.

- **THIRD** violation of Company Safety Policy:
 - Three days suspension without pay, to be noted in employee's personnel file.

- **FOURTH** violation of Company Safety Policy within a period of six months:
 - Automatic dismissal.

NOTE: Any procedures outlined in employee handbook takes precedence over this enforcement policy. Management reserves the right to look at each individual infraction and surrounding circumstances when deciding level of enforcement to be taken, as well as the gravity of infraction. Reference DPC handbook page 25 for additional information.

SAFETY RULES

The following are some of the general rules applicable to Davis, Pickering & Company, Inc. operations that must be enforced on every project contracted by our company. This is a partial listing only. The pertinent requirements of OSHA Regulations CFR 29, Part 1926 Safety and Health Regulations for Construction with CFR 29 Part 1910 Identified as Applicable to Construction, also apply. These Safety Regulations are a minimum; additional procedures may be required by our company or by specific site requirements of our customers. Our customer's safety program will be followed whenever equal or more stringent than our own. Consult the applicable section in the manual for further information.

GENERAL SAFETY RULES

If you do not have current First Aid Training, do not move or treat an injured person unless there is immediate peril, such as profuse bleeding or stoppage of breathing or unless the injured is subjected to further injury by remaining where they are. Call emergency services immediately. All electricians should be trained in CPR, AED, and First Aid. These courses are continually provided through the Parkersburg Marietta Contractors Association (PMCA).

- Appropriate clothing, headgear, eyewear and footwear must be worn on the job at all times.
- Safe work practices are to be used on all job operations.
- Other personal protective equipment must be used as directed by your supervisor.
- Horseplay is specifically prohibited.
- Employees are expected to utilize proper judgment in their personal habits. When they report to work and they must be in fit condition to meet daily obligations.
- The use, possession, transportation, solicitation or sale of ALCOHOL OR DRUGS, including illegal drugs and misuse of prescription drugs on company premises is prohibited.
- The company prohibits any employee from being at work or working under the influence of alcohol or drugs. Violation of this rule will lead to immediate disciplinary action, up to and including possible dismissal, even on the first violation.
- The employee must report to Davis Pickering Co., Inc. upon employment, any legally prescribed drugs and medications that will in any way adversely affect their working ability, alertness, coordination, response, or the safety of others on the job.
- Never remove or by-pass safety devices.
- Do not approach operating machinery from the blind side – let the driver see you.
- Make sure that you understand your assigned task completely before starting work.
- Avoid mental distractions; keep your mind on your work. The ultimate responsibility of your personal safety belongs to you.
- Maintain a general condition of good housekeeping in all work areas at all times.
- Obey all traffic regulations when operating company vehicles or other mobile equipment.
- Know your site emergency and evacuation plan and locations of all emergency equipment (i.e., first aid kits, fire extinguishers, etc.).

- Take extra safety precautions when working close to power lines.
- Place “DO NOT USE” tags on all tools, machinery, equipment, and devices that are unsafe and/or under repair.
- Know where emergency telephone numbers are located.
- When in doubt...ASK. Call safety Department or your supervisor with any safety related questions.



GENERAL INFORMATION

Periodically, works for some owners require stricter safety regulations than herein stipulated. In all instances we put forth our best effort to ensure a Hazard Recognition Program is in place to address all safety related items. It is the responsibility of the jobsite foreman to have received the safety indoctrination from the owner's representative and to pass the information to other journeyman/apprentice. On The Job Training is always taking place in addition to the ultimate individual responsibility for complying with the safety regulations and law.

Any electrician who is requested to perform work which he/she feels is in an unsafe manner shall so notify the foreman, who will take action to ensure safe working conditions; request further training. Courses are regularly scheduled though the PMCA; NFPA 70 & 70E classes are also available.

Unless otherwise noted, negligent violation of any safety rule shall be cause for a warning by the foreman, with documentation of the warning being sent to the Safety Officer. See enforcement policy. Any subsequent violation shall be cause for immediate dismissal, subject to evaluation of the severity of the violation and the attitude of the employee.

Any employee noticing deficiencies in protective equipment shall report them immediately to their foreman for correction.

All accidents, regardless of size, are to be reported immediately to management. At no time shall the delay in reporting accidents exceed eight (8) hours. A foreman or superintendent/designee shall accompany any victim of an accident to the medical treatment facility whenever possible to act as company representative. Notify the safety department of an incident as soon as possible.

Notify the site coordinator of any work which may affect the safety of others. All sub-contractors will adhere to site conditions and rules and regulations in accomplishing mutual projects.

FIRST AID AND CPR & AED

PURPOSE:

Shock and burns are the leading hazards associated with working in the electrical industry today. A trained and prepared work force is a proactive approach to providing work place safety, and promotes craft specific hazard awareness. It is also a “take safety home theme”. These skills can make society safer as a whole.

POLICY:

If you are not trained in CPR, AED or Multi-Media First Aid or need updated and or other training contact the Safety Officer, your supervisor or **PMCA** office at **304.485.6322**. You can also contact your local IBEW union hall with questions. This training is offered periodically and even upon request at convenient time and at **no expense to the employee**. Training can and currently is conducted at convenient locations. All electricians, confined space attendants, emergency responders, electricians working with over 50 Volts, or anyone else, per handbook that is required to have this training. Consult your DPC Handbook for further guidance. An electrician’s greatest hazard is the hazard associated with “shock and burns” any tools an employee take to the work environment or home is an asset. If a co-worker receives a shock a swift response with an automated electronic defibrillator (AED) is probably their best chance to survive without any permanent damage.

Emergency Services should always be called even if employee would be revived with AED or CPR.

RESPONSIBILITY:

All DPC employees working in the field or office and working “on or near energized equipment”; those taking OSHA 30 Hour courses. For further information consult the DPC handbook page 24.

PERSONAL PROTECTION & RELATED EQUIPMENT

NOTE: All personal protective equipment **MUST** meet or exceed ANSI, OSHA, or NFPA standards.

- 1) Clothing CONSULT NFPA 70 E PPE matrix and charts for the handling or working on energized circuits.
 - a. Shirts shall cover the shoulders. Pants shall cover the knees and ankles. Shirt tails shall be tucked in (except when welding).
 - b. Complete body protection is necessary for some operations, ie welding. Some customers require Nomex or other flame resistant (FR) clothing. In these instances FR clothing will be provided by DPC.
 - c. Keep clothing tight enough to body to prevent getting caught in moving equipment. Sleeves and jacket cords have been shown to be hazardous.
 - d. Rings and other jewelry should not be worn around rotating machines and similar equipment, including electrical distribution equipment which could be energized.
- 2) Hard-hats (we use type E)
 - a. Hard-hats shall be worn on all project sites where required.
 - b. Hard-hats shall be worn wherever falling debris is possible.
 - c. Electrical resistant Hard-hats will be replaced upon request. Good up to 20,000 volts.
- 3) Safety Glasses
 - a. Safety glasses shall be worn on all project sites where required.
 - i. Prescription and non-prescription safety glasses shall comply with ANIS standard Z87.1
 - b. Non Prescription safety glasses will be furnished by the contractor, in good condition. Damaged glasses will be replaced upon request.
 - c. Safety glasses or in some cases goggles shall be worn while engaging in any activity. A face shield also may be necessary if possibly liberates particulates into the air, including, but not limited to:
 - i. Cutting or threading conduit
 - ii. Welding, brazing or cutting with a torch
 - iii. Grinding Operations
 - iv. Drilling or hammer drilling operations
 - v. Spraying paint.
 - d. Working in proximity to operations liberating particulates also requires safety glasses.
 - e. Safety glasses shall be worn while using any activated tools.
 - f. Special purpose protection will be required for some of these operations and will be provided. If you do not have the proper eye protection, do not perform the work!
- 4) Hearing protection is required as follows (OSHA Standards):
 - a. Noise levels exceeding 90 dBA (Sound Pressure level).
 - b. Exposure to noise levels at 85 dBA exceeding 8 hours. (DPC ACTION Level.)
 - c. Where otherwise posted **see Hearing Conservation Policy in the Manual.**

- 5) Fingers and Hands
 - a. Gloves shall be provided for handling specialized materials and chemically treated items.
 - b. Gloves are recommended for conduit and wire installation activities.
- 6) Feet
 - a. Industrial quality steel toe safety shoe is mandatory for work in designated areas and for certain customers. Contact your foreman for permission to work with Steel toed "tennis shoes." Special electrical footwear may be required.
- 7) Respiratory
 - a. Dusty atmosphere and tasks releasing vapors require proper ventilation techniques. Use mask in areas of:
 - i. Painting
 - ii. Dust from cleaning or grinding
 - iii. Installation of insulation
 - iv. Where specified by the owners
 - v. During Cad-Weld mold operations where appropriate ventilation is not adequate.
 - b. Ventilation is required in areas where:
 - i. Welding and grinding of galvanized metals.
 - ii. Using spray paints and lubrications
 - iii. Similar areas releasing chemical vapors
 - c. Your foreman will inform you of any work areas requiring respiration equipment due to the industrial environment.
- 8) Fall Protection Equipment
 - a. Harnesses are required on ladders, elevated and open platforms etc. where:
 - i. Roof heights exceeding six (6) feet
 - ii. Within six (6) feet of roof edge
 - iii. On scaffolds without handrails or decking incomplete, six (6) feet or greater
 - iv. In other cases where no protection is available to protect the worker from free fall
 - v. In bucket truck per OSHA requirements
 - vi. An employee can work safely from a ten (10) foot ladder, under certain circumstances and within customer site conditions
 - vii. According to customer requirements.
 - b. Inspect your personal fall arrest system before each use and understand its use. Get training if needed. Request training at PMCA, supervisor, safety department, company handbook reference or managers, and local IBEW unions.
 - i. Damaged equipment should be reported and immediately removed from usage. Tag when necessary.
 - c. When working in proximity to traffic areas, wear yellow safety vest, barricade when possible, control access zones (CAZ'S).
 - d. When working in an area where it is possible to fall into water, life jackets are required.

- e. If you have not been furnished the proper safety equipment for your task, it is your responsibility to request this equipment and be assured that it is in good operating condition prior to commencing work.

Consult Fall Protection Policy in Safety Manual.



PPE POLICY

PURPOSE:

The purpose of this policy is to ensure all hazards are evaluated in the workplace to ensure the needed Personal Protective Equipment (PPE) is available and utilized by all employees on any particular project. This includes any hazards that might require respirator usage. A new assessment will be completed at every new project, and yearly, or as needed, or as determined by the Safety Department. Customer site-conditions take precedence.

SCOPE:

Before any job commences the Project Manager, Foreman, Safety Department or other “qualified” individual will complete a Survey of Hazard Assessment for Personal Protective Equipment and a Respirator Hazard Assessment. This will be submitted to the Safety Department for review. Based on these written assessments, the appropriate PPE will be determined and communicated to all employees. After the appropriate PPE is determined, this equipment will be made available to all employees. The PPE will be required by DPC from this point further. Any needed training will also be provided at this time. If respirators are determined to be required, fit testing, training, and pulmonary function testing will be arranged through the building trades and Marietta Memorial Occupational Health.

RESPONSIBILITY:

It is the competent person on each jobsite to ensure compliance with policy. If additional training is necessary the Safety Director will provide.

SURVEY OF HAZARD ASSESSMENT FOR PERSONAL PROTECTIVE EQUIPMENT - FORM

Job Name/Number:	Department:
Supervisor's Name:	Date:

Eye and Face Protection (1910.133) Does the employee work in areas where there is exposure to eye and face hazards from flying particles, molten metal, liquid chemicals, acids, caustic liquids, chemical gases or vapors or potentially injuries light radiation?	— Yes	If Yes, Please describe the job task & hazard:
	— No	

Head Protection (1910.135) Does the employee work in areas where there is a potential for injury to the head from falling or moving objects?	— Yes	If Yes, Please describe the job task & hazard:
	— No	
Does the employee work in areas where they are exposed to electrical conductors which could be contacted by the head?	— Yes	If Yes, Please describe the job task & hazard:
	— No	

Foot Protection (1910.136) Does the employee work in areas where there is danger of foot injuries due to falling and rolling objects, or objects piercing the sole, and where such employee's feet are exposed to electrical hazards?	— Yes	If Yes, Please describe the job task & hazard:
	— No	

Hand Protection (1910.138) Does the employee work in areas where there hands are exposed to skin absorption of harmful substances: severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns and or harmful temperatures extremes?	— Yes	If Yes, Please describe the job task & hazard:
	— No	

If any of the above blocks were answered YES, Personal Protective Equipment is required for this job. It is now necessary for proper selection, fitting, communication, training and use of Personal Protective Equipment to take place.

HEARING CONSERVATION

PURPOSE:

To ensure DPC employees are not exposed to harmful levels of noise during construction or maintenance projects.

SCOPE:

This policy applies to all DPC employees that are or could be exposed to noise levels at or above 85 dBA (decibels A scale) which is DPC's action level for our hearing conservation program.

RESPONSIBILITY:

It is the responsibility of all supervisors, managers, and employees to comply with this policy.

OSHA has set the permissible exposure level (PEL) of noise at 90 dBA. Any employee that is exposed to noise levels in the range of 85 dBA or greater is to utilize hearing protection devices (HPD's).

In most cases our host employer's have areas designated already that require HPD's. Employees will adhere to all host employers' rules considering the use of HPD's. When tasks are being performed by DPC's employees with noise levels at 85 dBA regardless of the host, general contractor, or owner policies and/or practices, it is the responsibility of our company employees to utilize HPD's. The following time weighted average (TWA) table can be used to regulate when and where the use of HPD's is worn. This system is to be used whenever noise levels exceed the action level for this policy.

If any foreman, manager, safety, or other employee feels that noise level samples need to be measured to ensure compliance and are at safe levels, contact the safety department or your supervisor to arrange a sound level survey and HPD's will be worn until samples are taken and analyzed using a sound level meter or measuring device.

▪ 85	Action Level
▪ 90dBA	8 hours (PEL)
▪ 92dBA	6 hours
▪ 95dBA	4 hours
▪ 97dBA	3 hours
▪ 100dBA	2 hours
▪ 102dBA	1.5 hours
▪ 105dBA	1 hour
▪ 110dBA	half hour
▪ 115dBA	15 minutes or less

BARRICADES, HOLES, AND WALL OPENINGS

- Excavations and openings in working surfaces must be protected with barricades or hole covers.
 - Yellow- proceed with CAUTION
 - Red and/or black – DANGER
- Floor openings shall be guarded by topsails, mid-rails, and toe boards or covers.
- Every open-sided floor or platform six feet or more above the Adjacent floor or ground level shall be guarded by a standard railing or equivalent, on all open sides except where there is a stairway, ramp, or fixed ladder.
- All exterior wall openings are to be guarded with standard railings where the bottom of the openings is less than three (3) feet above the floor.
- Guard rails should be constructed to withstand a side impact of 200 pounds, top-rail; mid-rail 150 pounds.
- All flights of stairs with four (4) or more risers or 30 inches shall have handrails.
- No materials should be dropped through a floor or wall opening without prior safety planning.
- Entrance steps and landing platforms leading into a job trailer must:
 - Have hand railing if they are four (4) risers or more or more high
 - Have a twenty (20) inch clearance from the edge of the platform when the door is open
- Barricades and/or signs shall always be provided as warning of hazards such as overhead work, crane swing, and excavations.
- These precautions must be taken immediately, when the hazard is produced and/or recognized.

FIRE PROTECTIONS

- When utilizing heat producing equipment, make sure that the area is clear of all fire hazards and the sources of potential fire are eliminated. Utilize hot work permits.
- Do not use salamander or other open flame devices in confined or enclosed structures. Vent heaters to the atmosphere and make sure they are located an adequate distance from walls, ceiling and floors.
- Have fire extinguishers available at all times when utilizing heat producing equipment.
- Know the location of firefighting equipment in the work area and have knowledge of its use and application.
- Turn in all fire extinguishers after use for recharge. Check all fire extinguishers for good condition, full charge, and inspection tag showing monthly inspection documentation on the back.
- **Report all fires, no matter how small and how fast they were extinguished.**
- When at a job site where the customers have their own firefighting equipment, be aware of their emergency phone number to call should a fire emergency arise.
- All personnel shall be trained in the proper use of a fire extinguisher (PASS).
- Smoke only in designated areas.
- No "Strike Anywhere" matches allowed.
- Obtain Hot Work permits before starting work where required. It is the responsibility of the foreman to know where permits may be required.
- Know the fire alarm signals, evacuation procedures and how to initiate an alarm.
- Know where the nearest appropriate class of fire extinguisher is and how to use it.
- Fire extinguishers shall be furnished to the jobsites as a part of the mobilization procedures. It is the responsibility of the foreman to assure the extinguishers are charged and to arrange for recharging as required.
- When using a fire extinguisher follow the basic procedure of PASS
 - **P** - Pull the pin
 - **A** - Aim the extinguisher at the base of fire
 - **S** - Squeeze the trigger
 - **S** - Sweep the fire extinguisher at the base of the fire
- When a fire occurs use the RACE method to ensure all steps are taken in order and quickly. Attempt to put out small fires only.
 - **R** - Rescue
 - **A** - Alarm
 - **C** - Contain fire/close i.e., all doors/use fire extinguisher small fire ONLY
 - **E** - Evacuate

EMERGENCY ACTION PLAN

PURPOSE:

It is the goal of DPC to protect their employees and property during regular work schedules as well as during any emergencies situations.

SCOPE:

All emergency numbers will be posed at every construction trailer. An evacuation plan will be posted and a primary and a primary and alternate meeting location will be pre-designated at each jobsite for emergency situations. All employees will be familiar with fire extinguisher locations as well as any other safety equipment location. When applicable evacuation routes will be posted with "safe areas" sheets (MSDS), safety manual, and all other emergency equipment will be made readily available at all construction sites.

RESPONSIBILITY:

It is the foreman's responsibility to ensure all job sites comply with this policy and that it is fully implemented. The safety department will ensure all equipment is available and provide any additional training.

NOTE:

The following Evacuation Plan must be completed and posted at every job site.

EVACUATION PLAN - FORM

<i>The following Evacuation Plan must be completed and posted at every job site.</i>	
<i>Job Site Name:</i>	
<i>Foreman:</i>	
<i>Foreman Cell #:</i>	
<i>Head Count Location:</i>	
<i>Location of Phone/Radio(s)</i>	
<i>Location of Fire</i> <i>Extinguishers:</i>	
Emergency Phone Numbers:	
<i>Ambulance</i>	
<i>Hospital</i>	
<i>Police</i>	
<i>Fire</i>	
<i>Davis Pickering & Co</i>	<i>740.373.5896</i>
<i>DPC Safety Coordinator</i>	<i>740.236.0093 Cell Phone for Scott Hupp</i>
<i>MSDS Request</i>	

HOUSEKEEPING

- ✓ *Proper housekeeping is the foundation of a safe work environment. It helps prevent fires, accidents and presents a workman like atmosphere.*
- ✓ *Rubbish, scraps and debris shall be removed as soon as practical, at least once a day.*
- ✓ *Pile or store material in a stable manner*
- ✓ *Containers shall be provided for collection and separation of all refuse. Put waste into the proper containers. Covers shall be provided for containers holding combustible material.*
- ✓ *All passageways shall be kept free of trip/slip/fall hazards.*
- ✓ *Cap all protruding rebar, conduit, etc., to prevent impalement or injury by spearing.*
- ✓ *All flammable, combustible and hazardous materials must be stored properly. Refer to MSDS.*
- ✓ *Keep all tools and materials in their places.*
- ✓ *Keep the work area clean. Housekeeping is the responsibility of the Foreman.*
- ✓ *Stabilize all heavy equipment which may roll or fall.*
- ✓ *Maintain clear access ways.*
- ✓ *Keep air lines and extension cables at least seven (7) feet overhead.*
- ✓ *Maintain safe lighting levels over the work areas and minimum lighting for egress.*
- ✓ *Cigarette butts go in ashtrays and smoking is limited ONLY to designated areas.*

MATERIAL HANDLING

- ✓ *Always block or chock cylinder shaped materials to prevent rolling.*
- ✓ *Stack materials so that they will not slide, roll, fall or collapse.*
- ✓ *Always allow clear access to stored materials.*
- ✓ *When manual lifting must be performed remember to*
 - *Size up the load before lifting and test it for weight and stability*
 - *Keep material to be lifted between the height of the knuckles and the shoulders*
 - *Keep the load close to the body; avoid twisting the body and sudden motions or jerking*
- ✓ *Use gloves and other PPE.*
- ✓ *Label all chemicals.*

LADDERS AND STAIRWAYS

- All employees are responsible to check that ladders are free from defects before use and that they have slip resistant safety feet. All defective ladders must be tagged and removed from service.
- Step ladders should not be used as extension ladders.
- Step ladders should be spread and locked when being used.
- Straight ladders must be secured from movement (tied off).
- Do not use metal ladders in proximity to electric lines or circuits.
- Ladders in doorways, walkways, or other congested areas must be barricaded or guarded.
- Do not use the top two steps.
- Keep belt buckle between side rails.
- Always use the three point rule. Two hands and one foot or two feet and one hand on ladder at all times.

TOOLS

- The right tools should be utilized for the right job.
- Keep tools in good working order. Any tools with frayed cords or without grounding plug shall be tagged and taken out of service
- Do not use tools that you do not know how to operate.
- Never remove equipment guards without proper authorization.
- Never repair tools without proper authorization.
- Take special precautions when using tools on scaffolding or ladders.
- Be sure the power tool is off and has stopped rotating before putting it down.
- Disconnect tool from power source to change drill bits, blades, etc.
- Do not use compressed air for cleaning unless the pressure is reduced to less than 30 psi and then only with effective chip guarding and proper protective clothing.
- Pneumatic power tools shall be secured to the hose in a positive manner to prevent accidental disconnection.
- Safety clips or retainers shall be securely installed on pneumatic impact tools and on hose connectors
- The manufacturer's safe operating pressure recommendations for all fittings shall not be exceeded.
- Ground Fault Circuit Interrupters will be used on all tools that are not connected to a Ground Faulted Outlet.
- Do not use tools with mushroomed heads, broken handles, or damaged electrical connections.
- Explosion-activated tools will be used ONLY by trained employees.

- Before mounting abrasive wheels, inspect for cracks, chips or other defects.
- Gasoline driven tools *SHALL NOT* be refueled while the engine is hot or running.
- Fuel shall be stored in approved containers with self closing lids and screen arrestors only.
- Do not alter or remove the guard or other protective equipment from a tool. It is not permitted to operate a tool with a disabled safety device under any condition. This includes flash protectors which should be installed and maintained in gasoline cans and containers for combustible liquids.
- Inspect tools daily, prior to use.
- Make sure power tools are properly grounded or “double insulated”.
- Inspect power cords prior to each use.
- “Bleed down” pneumatic tools prior to disconnecting
- Be cautious of torque available if a drill or threader jams. Maintain good footing, keep a good grip on the tool and keep other body parts back.

All power actuated tool operators need to arrange a training date in advance of need with manufacture representative from Hilti. You will be issued a certificate or card for this training. Attendance needs documented.

FALL PROTECTION

INTRODUCTION:

The Fall Protection Plan was developed for accident prevention and to initiate and develop specific safety plans for different types of work. Many of these plans are contained within the Safety and Health Regulations for Construction and must be readily accessible for workers on the job site for review.

Falls lead all other work related causes of injuries and deaths in the construction industry and the risks are continuously present throughout the work areas. The practice of reporting to work with the proper fall protection equipment and the knowledge to use it is essential to the overall safety of everyone. Therefore, prior to the start of work an assessment must be made of working conditions and utilize the appropriate resources necessary for performing the work safely.

Recognized hazards of falls are inherent to the following; this list is not complete in content, there may be other hazards that need to be recognized.

- Any walking working surface with questionable strength and structural integrity unprotected sides and edges
- Unprotected sides and edges, leading edges

- Hoist areas
- Holes
- Formwork and reinforcing steel
- Ramp/runways and other walkways
- Excavations
- Dangerous equipment
- Overhead bricklaying and related work
- Low-slope roofs
- Steep roofs
- Pre-cast concrete erection
- Residential construction
- Wall o-rings
- Floor openings
- Scaffolding work
- Aerial lift operations
- Tower erection
- Overhead rescue work
- Elevated access points to work
- Chimney work
- Bridge work
- Demolition work
- Derrick work
- Open-sided floors platforms
- Personnel platform
- Elevating work platforms
- Window washing
- Overhead painting
- Tuck pointing
- Uses of ladders
- Safety net installations
- Wood truss installations
- Overhead rigging

FALL PROTECTION EQUIPMENT

- Body Harness
- Lanyard
- Lifeline
- Anchorage Devices
- Deceleration Devices
- Locking Snap Hooks
- Safety Net
- Guardrail System (topsail, mid rail, and toe board)
- Barricades
- Signs/Tags
- Aerial Lifts, Platforms, Scaffolds, and Ladders
- Warning Lines

FALL PROTECTION PLAN

NOTE: This method of protection against the hazards of falls is permitted only for those employees engaged in leading edge work, pre-cast concrete erection work or residential construction work who can demonstrate that it is not possible or it creates a greater hazard to use conventional fall protection equipment. The employer has the responsibility of establishing the appropriate fall protection plan. The employer is also required to prepare the plan in writing and keep the plan updated on a daily basis.

FALL PROTECTION POLICY

The employer is responsible for providing and installing all fall protection systems required by the Safety and Health Regulations for Construction, 29 Code of Federal Regulations Part 1926. Subpart M – Fall Protection before any employee begins the work that necessitates the fall protection.

FALL PROTECTION SYSTEMS

- Guardrails
- Safety net systems
- Personal fall arrest system
- Positioning devices system
- Warning line systems
- Controlled access zones
- Safety monitoring systems
- Covers (marked with “HOLE or “COVER” and affixed)
- Protection from falling objects systems
- Fall protection plan

FALL PROTECTION TRAINING

All employers are required to train their employees in the recognition and avoidance of unsafe conditions and the regulations applicable to their work environment to control or eliminate the hazards. Only those employees who have received hands on training and are certified in writing, qualify as being in compliance and eligible for work.

Training Provisions

- Fall Hazard Recognition
- Fall Protection Standards
- Fall Protection Procedures
- Certification of Training

FALL PROTECTION INSPECTIONS

Inspection by qualified/competent persons required at different intervals where fall protections is implemented so that the integrity of the training, equipment, materials, maintenance and usage is consistent with the applicable safety regulations.

- Qualified Person
 - One who has a degree, certificate or professional standing, has the ability to resolve problems.
- Competent Person
 - One who recognizes hazards and has the authority to stop the work and correct any hazards.
- Inspection Provisions
 - Inspect personal fall arrest system before use
 - Inspect positioning devices system before use
 - Inspect safety net system before use and weekly
 - Inspect guardrail system frequently
 - Inspect work areas frequently and on regular basis

FALL PROTECTION PROCEDURES

Safety Monitoring System: Low Slope Roofs and Fall Protection Plans Use of safety monitoring is permitted only where there are unprotected sides six (6) feet or more above a lower level and/or a written fall protection plan is utilized.

- The monitor must be certified in fall protection training requirements
- The monitor must be designated by the employer
- The monitor must be capable of recognizing existing and predictable fall hazards and authorized to eliminate them
- The monitor must perform only monitoring duties
- The monitor must stay at the immediate work area at all times
- The monitor must be within view of all employees in the work area
- The monitor must be within distance to orally communicate with all employees in the work area
- The monitor must warn all employees of pending fall hazards as they occur
- The monitor must prevent non employee from entering the work area
- The monitor must prevent mechanical equipment from being in the work area

WARNING LINE SYSTEM: LOW SLOPE ROOFS

Use of warning line systems is permitted only where there are unprotected sides six (6) feet or more above a lower level.

- The warning line must have a minimum tensile strength of 500 pounds
- Each line must be maintained at a height no less than 34 inches from the walking/working surface or no more than 39 inches from the walking/working surface
- Each line must be flagged/marked on six (6) foot intervals with high visibility material
- All lines must be supported by sections that resist tipping over and prevent sag
- The lines must be installed around all sides of the roof work area no less than six (6) feet from the roof edge
- When mechanical/motorized equipment is used, the line must be installed not less than six (6) feet from the roof edge that is parallel to the moving equipment not less than ten (10) feet from the roof edge that is perpendicular to the moving equipment
- Two lines must be provided on all access paths to other areas and be arranged so that persons cannot enter directly into the work area

CONTROLLED ACCESS ZONES (CAZ)

CAZ Procedure

- All control lines must have a minimum breaking strength of 200 pounds
- Each line must be installed no lower than 39 inches no higher than 45 inches above the walking/working surface.
- Each line must be flagged or marked on six (6) foot intervals with high visibility materials
- Control line(s) are to be installed no less than ten (10) feet from the work edge(s)
- Control lines must enclose the work area(s)

LEADING EDGE WORK

Use of CAZ for leading edge work is permitted only where work area are more than six (6) feet or more above a lower level and a written fall protection plan is utilized.

CAZ Procedure

- All control lines must have a minimum breaking strength of 200 pounds
- Each line must be installed no lower than 39 inches nor higher than 45 inches above the walking/working surface
- Each line must be flagged or marked on six (6) foot intervals with high visibility materials
- Control line(s) are to be installed no less than six (6) feet no more than 25 feet from unprotected edge(s)
- Control lines must extend along the entire length parallel to the unprotected edge(s) and connect on each side to a guardrail system or wall.

FALL PROTECTION GUIDELINES

- **Floor Openings** – Install standard guardrails or covers at any elevation above a lower level.
- **Suspended Scaffolds** – Use personal fall arrest equipment at any elevation above lower level. All standard guardrails should be in place.
- **Aerial Lifts** – Use PFAS device at any elevation above a lower level.
- **Access to Work Area** – Install stairways or ladders or equivalent means of safe egress at elevations 19 inches or more between levels
- **Narrow scaffolds** – Install standard guardrails or use personal fall arrest equipment or platform widths less than 45 inches at elevations 4 to 10 feet or more above a lower level.
- **Wall Openings** – Install standard guardrails when bottom of openings is less than 39 inches above working surface and 6 feet or more above a lower level.
 - **Open-Sided Floors/Platforms** – Install standard guardrails at elevations 6 feet or more above a lower level.

- **Tying Reinforcing Steel** – Use personal fall arrest equipment at elevations 6 feet or more above a lower level.
- **Hoist Areas** – Install Standard guardrails and use personal fall arrest equipment at elevations 6 feet or more above a lower level.
- **Other Scaffolds** – Install standard guardrails at elevations (ten) 10 feet or more above a lower level.
- **Slope Roof (4 on 12)** – Install catch platform or use personal fall arrest equipment at elevations (six) 6 feet from eaves to a lower level.
- **Build up Roofing** – Use motion stopping equipment, warning lines, and safety monitor at elevations (six) 6 feet from eaves to lower level.
- **Netting Provisions** – Install safety nets at elevations 25 feet above a lower level when other safeguarding is not feasible.
- **Erection Floor Edges** – Install ½ inch wire rope safety railing at elevations six (6) feet or more above a lower level.
- **Leading Edge Work** – Use personal fall arrest equipment, safety nets, standard guardrails, control lines and or safety monitor system.
- **Holes** – Use personal fall arrest equipment or install standard guardrails or covers at elevations six (6) feet or more above a lower level.
- **Formwork** – Use personal fall arrest equipment or install safety nets at elevations six (6) feet or more above a lower level.
- **Walkways** – Install standard guardrails at elevations (six) 6 feet or more above a lower level.
- **Excavations** – Install standard guardrails, fences, barricades or covers at elevations six (6) or more above a lower level.
- **Low-Slope Roofs** – Use personal fall arrest equipment or install standard guardrails or safety nets at elevations six (6) feet or more above a lower level.
- **Steep Roofs** – Use personal fall arrest equipment or install standard guardrails or safety nets at elevations six (6) feet or more above a lower level.
- **Pre-cast Concrete Erection** – Use personal fall arrest equipment or install safety nets, standard guardrails or use a written fall protection plan at elevations six (6) feet or more above a lower level.
- **Residential Construction** – Use personal fall arrest equipment or install safety nets, standard guardrails or use a written fall protection plan at elevations six (6) feet or more above a lower level.
- **All Other Work** – (within Subpart M guidelines) – Use personal fall arrest equipment or install safety nets or standard guardrails at elevations six (6) feet or more above a lower level.
- **Unprotected Sides and Edges** – Use personal fall arrest equipment or install safety nets, standard guardrails at elevations six (6) feet or more above a lower level.

HAZARD COMMUNICATION PROGRAM

OBJECTIVE

It shall be the policy of Davis, Pickering & Co., Inc. to implement the various requirements of the Chemical Hazard Communication Regulations as required by the US Department of labor Occupational Safety and Health Administration and the Hazard Communication Act of all applicable states. We employ a system of MSDS's, collection/record keeping located in the Hazardous Communication Manual and also utilize 3E's "fax on demand compliance system.

RESPONSIBILITY

- DPC Safety Coordinator is the overall responsible person of the company program.
- Unless notified otherwise, the jobsite General Foreman and/or Foreman at each jobsite are designated as the implementing person responsible for program.
- Compliance Procedures
 - Maintain a list of hazardous chemicals that are on each jobsite: Hazardous Chemical Inventory Sheet. Foreman check manual to ensure an MSDS is retained for each new chemical introduced into the work place. You can request MSDS's from any manufacturer or supplier.
 - Obtain and retain in the jobsite records and in the home office Material Safety Data Sheets (MSDS) on substances which contain one or more hazardous chemical.
 - Explain the MSDS to employees as part of the ongoing safety training. Employees have a right to receive data contained on the sheets. Employees will not be discharged or discriminated against for exercising their rights in this regard.
 - Provide information and training to all employees relative to the Hazard Communication Regulation and about the potential exposure to hazardous chemical.
 - Make available to and share with other contractors or subcontractors Employee's Acknowledgment of Training. The Safety Coordinator will conduct safety meeting(s) and document Employee's Acknowledgement of Training and shall provide at least the following.
 - Information on which hazardous chemicals are in the work area
 - How to read, interpret and comply with the information MSDS and hazardous communication labels
 - Signature verification of specific training
 - Make available to and share with other contractors or subcontractors MSDS information on hazardous chemicals on the jobsite

MATERIAL SAFETY DATA SHEETS

MSDS is the abbreviation used to identify a material safety data sheet. MSDS is a document which supplies information about a particular hazardous chemical. A sample MSDS issued by the US Department of Labor is included with this written program.

ACCESS TO INFORMATION

This written hazard Communication Program is available, upon request, to employees, their designated representative, etc. A copy will also be on each jobsite.

Copies of MSDS for hazardous substances to which employees of this company may be exposed are kept in the field office and the General Foreman and/or Foreman will be responsible for obtaining and maintaining the data sheet system for the company.

The Safety Coordinator and General Foreman will review incoming data sheets for new significant health/safety information and will see that any new information is passed onto affected employees and subcontractors at the jobsite.

LABELING

- Labels - Materials received at the jobsite are required to be properly labeled. If the labels are not provided, contact the supplier for specified labels. Information contained on labels must not conflict with federal, state, or local laws, and/or regulations in labeling requirements. These labels should provide the following.
 - Identify the chemical product or substances in the container. All chemicals are to be kept in original containers
 - Hazard warnings
 - List name, address and telephone number of the manufacturer or other responsible party
 - Target organs affected by chemical
- Use of Labels
 - The labels must not be removed and shall be replaced if illegible.
 - All containers of chemical products, including laboratory bottles, solvent cans and dispensers must be labeled.
 - For smaller containers (less than one gallon or 3.7 liters); labels must be consistent with the standards that are specified above. Only those chemicals that can be classified as “immediate use” are exempt from the labeling procedures described above.

- *Immediate use is defined as the hazardous chemicals under control of and used only by the person who transfers it from the labeled container and only within the work shift in which it is transferred.*

TRAINING

Employee Training

New employees are to attend health and safety orientation, prior to starting work, for information and training on the following.

- ✓ An overview of the requirements contained in the Hazard Communication Regulation including their rights under the regulation
- ✓ Inform employees of any operation in their work area where hazardous chemicals are present
- ✓ Location and availability of the written
- ✓ Physical and health effects of the hazardous chemicals
- ✓ Methods and observation techniques used to determine the presence of or the release of hazardous chemical in the work area.
- ✓ How to lessen or prevent exposure to these hazardous substances through usage of engineering controls, work practices, and/or the use of personal protective equipment
- ✓ Steps the companies have taken lesson or prevent exposure to these chemicals
- ✓ Emergency and first aid procedures to follow if employees are exposed to hazardous substances
- ✓ How to read labels and review MSDS to obtain appropriate hazard information
- ✓ Have each employee trained in the above and sign the Employee Acknowledgment form, included with this written program
- ✓ Conduct an annual review of the Hazard Communications program with all employees and maintain a record of those in attendance

Note: When new hazardous chemicals are introduced, the General Foreman will review the above listed items as they relate to the new chemical in a safety meeting.

General Contractor/Subcontractor Responsibilities

Access of information by other employers – when employees of a subcontractor may be exposed to hazardous chemical while working on the jobsite, the general contractor shall provide a list of the hazardous chemicals being used at that jobsite by the appropriate company's superintendent and make available the applicable MSDS for all required protective measures. Likewise, it shall be the responsibility of all hazardous chemicals being used by their company at the jobsite. When exposure to a hazardous chemical exists, employers are responsible for the appropriate training of their employees. If requested, names, addresses and telephone numbers of suppliers or manufactures of the hazardous chemicals being used shall be provided.

RECORDKEEPING

The following records will be kept at the jobsite.

- ✓ Material Safety Data Sheets (MSDS) and request for any MSDS not furnished.
- ✓ Hazardous chemical inventory list
- ✓ Records of employee training and signed Employee Acknowledgement Form
- ✓ Records of any employee's accidental over-exposure to a hazardous chemical
- ✓ Records of any environmental testing

ADDITIONAL INFORMATION

Further information on this written program, the Hazard Communication Standard, and applicable MSDS's are available from the DPC Safety Coordinator.

Employee Orientation Packet

HAZARDOUS SUSTANCES

You Have a Right To Know

New Regulations require that employers make available to employees, their physicians or their authorized representatives, upon request, Material Safety Data Sheets (MSDS) for each hazardous material used at a place of employment. In order to meet these requirements the following information about MSDS's provided.

MSDS is the term used to identify a Material Safety Data Sheet. An MSDS is a document which supplies information about a particular hazardous substance or mixture. You should read the MSDS for all the materials you work with. They contain the information you need to know in case of a personal exposure, spills or other kinds of accidents when you use potentially hazardous materials.

If during your work you handle or are accidentally exposed to highly toxic substances, having read the MSDS for those substances can make a big difference.

The MSDS normally contains the following information:

- A substance's chemical and trade name
- Any hazardous ingredients
- Physical data
- Fire and explosion data
- Health hazard data and first-aid procedures
- Reactivity data
- Spill and leak procedures
- Special personal protection information
- Other special precautions
- Manufacturer's name, address and phone number.

If you have any questions about information contained in an MSDS for a particular substance, please ask your supervisor or contact the Safety Department.

Chemical Family

METAL/COMPRESSED CASES

- Definition
 - *Metals* may be found as a solid or fume if heated. A *compressed gas* is any material under pressure. The pressure may be low or high, depending on the material. A compressed gas may be an inert material (argon, hydrogen) corrosive, solvent or a metal.
- Examples
 - Acetylene (welding)
 - Argon (welding)
 - Oxygen (welding)
 - Cadmium (welding rod)
 - Silver (welding rod)
- Uses
 - On a construction site metals and compressed gases are used in welding. Metals are used on ductwork, piping and framing.
- Dangers (metals)
 - Metal dusts and fumes can cause a pneumonia-like illness, or can be irritating to the skin. Some metals are very toxic like beryllium, cadmium, and nickel. These are suspected of causing cancer.
- Dangers (compressed gases)
 - Compressed gases may possess the same toxicity as the material in another physical form or may be more toxic. Compressed gases are dangerous if released too fast. Some gases are FLAMMABLE. Some gases displace oxygen and act as an asphyxiant.
- Handling
 - Store compressed gases in a *cool dry place out of the sun* - especially important. Some gases must be separated due to flammability, toxicity or incompatibility. Valves must be protected; full and empty cylinders must be marked. Metals have no special storage requirements. Stored metal dust must be kept dry and away from ignition source.
- First Aid
 - Depends on metal and its physical form. Some metals do not act on the body for several hours after exposure.
 - For compressed gases, first aid is typically the same as the material in its other form.

Definitions of Key Words Appearing In The Right To Know Law

Absorption: The ability of the body to drink in or suck up (like a sponge) liquids and gases; this is an automatic body action.

Acute: Defines a single exposure to a toxic product that may result in severe personal injury

Antidote: Something to counteract (reverse) the effects of a poison

Asphyxiate: A vapor or gas that can cause unconsciousness or death by suffocation (lack of oxygen); a potential hazard when working in a small enclosed area.

Boiling Point: The temperature at which a liquid changes to a vapor at a given pressure. This is usually expressed in degrees Fahrenheit.

Carcinogen: A substance that tends to cause cancer; one of the kinds of toxic or hazardous substances covered by law.

CAS: (Chemical Abstract Service) an organization under the American chemical Society that indexes chemical information from all over the world. CAS numbers identify specific chemicals or mixtures and, under the law, may be used to protect trade secret information.

C. or Ceiling: The maximum legally allowable human exposure limit for airborne substance. This is not to be exceeded even for a split second (see PEL/TLV)

Chemical Family: A group of chemicals that have the same origin or base such as acids, alkalis, etc.

CO₂: (Carbon Dioxide) A heavy colorless gas, produced by combustion (burning) causing a breakdown of chemical substances. It is relatively non-toxic but in confined spaces can be hazardous because of its lack of oxygen.

Combustible: A term used by the NFPA and DOT to describe and classify certain liquids that will burn (flash point) at low temperatures. Combustible liquids have a flash point of 100 degrees Fahrenheit or higher.

Concentration: The amount of one substance in proportion with others when combined.

Corrosive: A term used by the DOT, to describe solids or liquids that can cause visible destruction or irreversible changes in human skin tissue at the site of contact. It can cause irreversible material changes to other materials as well (such as containers, boxes, etc.) at point of contact. Corrosive materials may be registered by ACRA or the EPA as a hazardous waste.

DOL: (Department of Labor) U.S. Department of Labor or the various State Departments of Labor and Industries - One of the agencies with authority to administer the law. This department includes the Occupational Safety and Health Administration (OSHA).

DOT: (Department of Transportation) This department regulates the transportation of all substances to aid in the protection of the public. There are detailed and specific label warnings that must be used for various substances when being transported.

DPH: (Department of Public Health) A third agency with the authority to administer the law.

EPA: (U.S. Environmental Protection Agency) A federal agency established to regulate and enforce environmental protection laws.

Exhaust: To draw out, remove, or make weak and worthless. To us exhaust fan to keep fresh air coming into the workplace.

Explosive: The identification of a substance that will burst or blow up violently; to explode.

Fahrenheit: A temperature reading scale.

Flammable: A flammable liquid, as declined by the DOT and NFPA, has a flash point of 100 degrees Fahrenheit or higher. They will burn quite easily.

Flash Point: The lowest temperature point at which a liquid will give off enough flammable gas to ignite.

Hazardous Chemical: Defined by OSHA as any chemical that presents a physical hazard or health hazard.

Hazardous chemicals require certain action and handling under OSHA standards.

Ignitable: A solid, liquid or gas that will burn at a flash point below 140 degrees Fahrenheit.

Incompatible: Materials that should not be mixed together because dangerous reactions may take place.

Inflammatory: An aroused or irritated condition of the body caused by a physical or chemical injury. It is characterized by redness, pain, heat and swelling.

Ingestion: The taking in of a substance through the mouth (see ORAL).

Inhalation: The breathing in of a substance in the form of gas, vapor, dust, or mist.

Irritant: A substance that by contact in sufficient amounts or over a period of time, can cause an inflammatory reaction or response to the skin, eyes, or respiratory (breathing) system. OSHA defines an irritant as a chemical that is not corrosive, but that cause a reversible inflammatory effect on living tissue by chemical action at the site of contact.

Lethal: Death

MSDS: (Material Safety Data Sheet) the required document that is used to identify hazardous or toxic substances. It is an information sheet that identifies the manufacturer of the product, risks if any associated with the product, and methods of eliminating or reducing those risks.

Mutagen: A substance that lends to increase mutation (genetic changes of cells); one of the types of hazardous or toxic substances cover by the law.

NFPA: (National fire Protection Association) a worldwide organization that has established safety procedures for the protection of life and property against fires. The law requires that certain labels include the NFPA codes.

Neurotoxin: A substance that affects the nervous system -one of the types of hazardous or toxic substances covered by the law.

NIOSH: (National Institute of Occupational Safety & Health) this is a department of the Public Health Service, the U.S. Dept. of Health and Human Services (DHHS). This agency tests and certifies respiratory (breathing) protective devices.

Oral: Taken into the body through the mouth.

OSHA: (The Occupational Safety and Health Administration) a division of the Department of Labor with authority to regulate and enforce the OSHA laws.

Overexposure: To be exposed for too long a period of time or in too high a concentration to a toxic or hazardous substance. There are two limits: Acute has immediate effects; Chronic has long-term effects.

Oxidizer: A material that readily gives off oxygen to support and stimulate combustion (fire). It is also a method of decomposing certain materials.

PEL: (Permissible Exposure Limit) an exposure limit established by OSHA to limit the time and concentration of exposure to certain substances in an eight hour day.

Poison: A term used to describe extremely dangerous gases, liquids, or semisolid substances that can be dangerous to life. Poisons are listed in two classes; Class A is extremely dangerous; Class B is more of an irritant or toxic material but still dangerous.

Respiratory System: The breathing system, including the mouth, nose, lungs, air passages, nervous, and circulatory parts of the body.

RCRA: (The Resource Conservation and Recovery Act) the federal law administered by the EPA, designed to control the generation, storage, transportation, and disposal of hazardous waste.

Teratogen: A substance that tends to cause birth defects-one of the types of hazardous or toxic substances covered by the law.

TLV: (Threshold Limit Value) the maximum amount of airborne substances to which someone can safely be exposed in an eight hour day without having any adverse effects. This exposure can be repeated during each workday.

Toxicity: The measure, in total, of the adverse effects to the body that are a result of exposure to certain substances. Some substances can be poisonous.

Vapor Pressure: The pressure exerted by the vapor of a substance above its liquid state in a closed container. Vapor pressures as reported on MSDS forms are usually low.

Ventilation: To exhaust or change the air where we are working. To draw out, remove, or make weak and worthless - to use an exhaust fan to keep fresh air coming into the workplace.

Volatile: Evaporates very quickly.

Employee Acknowledgment of Training of Right to Know Law – Form

I hereby acknowledge that at the date and time noted under my signature below, I received the (New Employee Annual) Training in the state and federal Right to Know laws.

I have been instructed in how to read the hazardous substance list and the Material Safety Data Sheets (MSDS). I have been told where these materials are kept and that I have access to them at all times.

I have been instructed in the reading and identification of hazardous materials warning labels and know what safety precautions to be taken when dealing with potentially dangerous substances.

I have been instructed to the location of emergency medical supplies, personal protective equipment, and other steps to take to assure a safe work environment.

I have received the training listed and understand the information provided.

Signature _____

Date _____

Time _____ AM/PM

Right To Know Coordinator _____

Date _____

FOR OFFICE USE ONLY – RETAIN ORIGINAL IN EMPLOYEE FILE

Printed material used _____

Audio visuals used _____

Training Coordinator _____

Comments _____

BLOOD BORNE PATHOGENS (BBP)

PURPOSE

To provide all employees with information and training of what they need to do in case of an emergency. DPC employees are expected to call **911** where available or the closest **Emergency Medical Services** (EMS) when injuries occur (list of numbers posed in trailers and in industrial sites throughout the area). However, an employee has a reasonable expectation that first aid or CPR will need to be performed until medical services arrive if and when a serious injury does occur. This policy identifies hazards associated with Blood Borne Pathogens (BBP) and identifies methods of reducing employee risks associated with BBP's if they would ever come into contact through the rendering of first aid/CPR or other inadvertent exposure. In addition, this policy outlines protective measures through the use of spill kits, latex or non-latex gloves, and the safe handling of BBP's in general. Ultimately, the purpose of this policy is to minimize and or prevent workplace exposure to Blood Borne Pathogens, thus preventing the occurrence of work-related illnesses.

POLICY

In the handling of BBP's, specific precautions must be taken in order to protect the health of the employees. It is the policy of DPC to communicate any hazards associated with the handling of BBP's. This will include First Aid/CPR courses, as well as refresher classes, and training on the hazards of BBP's in general through initial training and weekly "toolbox safety" meetings. Any employee that is involved in first aid/CPR where the potential of exposure to a blood borne pathogen existed will be offered the Hepatitis-B vaccine series within 24 hours.

Those responsible for following the BBP Policy and applicable OSHA regulations it represents:

- ✓ Foreman
- ✓ Site Supervision
- ✓ Individual
- ✓ Management
- ✓ Safety Department

The employee's responsibility is to follow safe practices as outlined in First Aid/CPR courses and additional training around preventing and minimizing exposure to Blood Borne Pathogens.

DEFINITIONS

BBP – Blood Borne Pathogens

CPR - CARDIOPULMONARY RESUSCITATION

PROCEDURES

Proper “Donning and Duffing” of Latex and non-latex gloves

Use of Spill Kit

Minimizing and Prevention of exposure BBP’s

Training

The employees identified below, will be provided with appropriate training, demonstration, and orientation of approved practices of “donning and duffing” Latex or non-latex gloves, use of spill kit, location of equipment such as gloves, CPR Protector, first aid kit, and the procurement from office of any needed materials. An established set of procedures for the proper handling of BBP’s will also be addressed in refresher CPR and first aid courses as well as added to the weekly “toolbox safety” topic rotation.

- All employees that have an interest
- All employees that have a need
- All employees that would be performing basic first air/CPR on the jobsite
- Any employee that would have a role in the cleaning up of any BBP’s with a spill kit, and disposal of BBP’s

BBP EXPOSURE CONTROL PLAN

PURPOSE

The purpose of this exposure control plan is to eliminate or minimize DPC employee occupational exposure to blood or other infectious body fluids. Other potentially infectious body fluids include semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures, and any body fluid visible contaminated with blood.

RESPONSIBILITY

Hepatitis B vaccinations shall be administered through the Marietta or Parkersburg Occupational Health Center. The Parkersburg Marietta Contractor's Associations (PMCA) provides ongoing training to our employees thru first aid, environmental, AED AND CPR training.

ENGINEERING AND WORK PRACTICE CONTROLS

Universal precautions will be observed by all DPC employees in order to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious materials will be considered infectious regardless of the perceived status of the source individual.

Engineering and work practice controls will be utilized to eliminate or minimize exposure to employees working for DPC.

- Employees must wash their hands or other skin with soap and water, or flush mucous membranes with water, as soon as possible following an exposure incident (such as a splash of blood to the eyes or an accidental needle stick). **
- Employees must wash their hands immediately (or as soon as feasible) after removal of gloves or other personal protective equipment. **
- No eating, drinking, smoking, applying cosmetics or lip balm, or handling contact lenses is allowed in a work area where there is a reasonable likelihood of occupational exposure.
- No food or drinks shall be kept in refrigerators, freezers, cabinets, shelves, or on counter tops or bench tops where blood or other potentially infectious materials are present.
- *Employees must perform all procedures involving blood or other potentially infectious materials in such a manner as to minimize splashing, spraying, splattering, and generation of droplets of these substances.*

HOUSEKEEPING

Decontamination will be accomplished by utilizing the following materials:

- ✓ 10% (minimum) solution of chlorine bleach
- ✓ Lysol or other EPA-registered disinfectants
- ❖ All contaminated work surfaces, tools, objects, etc. will be decontaminated immediately or as soon as feasible after any spill of blood or other potentially infectious materials. The bleach solution or

disinfectant must be left in contact with contaminated work surfaces, tools, objects, or potentially infectious materials for at least 10 minutes before cleaning.

- ❖ Equipment that may become contaminated with blood or other potentially infectious materials will be examined and decontaminated before servicing or use.
- ❖ Broken glassware will not be picked up directly with the hands. Sweep or brush material into a dustpan.
- ❖ Known or suspected contaminated sharps shall be discarded immediately or as soon as feasible in a container that is closable, puncture-resistant, leak-proof on sides and bottom, and marked with an appropriate biohazard label. If sharps container is not pre-labeled, biohazard labels are available through EHS.
- ❖ When containers of contaminated sharps are being moved from the area of use or discovery, the containers shall be closed immediately before removal or replacement to prevent spillage or protrusion of contents during handling, storage, transport, or shipping.
- ❖ Reusable containers shall not be opened, emptied, or cleaned manually or in any other manner that would expose employees to the risk of percutaneous injury.

OTHER REGULATED WASTE

Other regulated waste shall be placed in containers that are closable, constructed to contain all contents and prevent leakage of fluids during handling, storage, transportation or shipping.

The waste must be labeled or color-coded and closed before removal to prevent spillage or protrusion of contents during handling, storage, or transport.

LAUNDRY PROCEDURES

Laundry contaminated with blood or other potentially infectious material will be handled as little as possible. Such laundry will not be sorted or rinsed in the area of use.

PERSONAL PROTECTIVE EQUIPMENT

Where occupational exposure remains after institution of engineering and work controls, personal protective equipment shall be utilized.

All personal protective equipment will be chosen based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach the employee's clothing, skin, eyes, mouth, or mucous membranes under normal conditions of use and for the duration of time for which the protective equipment will be used.

Employees Must

- ✓ Utilize protective equipment in occupational exposure situations
- ✓ Remove garments that become penetrated by blood or other potentially infectious material immediately or as soon as feasible

- ✓ Replace all garments that are torn or punctured, or that lose their ability to function as a barrier to blood borne pathogens
- ✓ Remove all personal protective equipment before leaving the work area
- ✓ Place all garments in the appropriate designated area or container for storage, cleaning, decontamination or disposal.

HEPATITIS B VACCINE

The Hepatitis B vaccination shall be made available after the employee has received the training in occupational exposure and within 10 working days of initial assignment. It shall be made available to all employees who have potential occupational exposure unless the employee has previously received the complete Hepatitis B vaccination series, antibody testing has revealed that the employee is immune, or the vaccine is contraindicated for medical reasons.

If the employee initially declines Hepatitis B vaccination, but at a later date decides to accept the vaccination, the vaccination shall then be made available.

All employees who decline the Hepatitis B vaccination offered shall sign the OSHA-required waiver indicating their refusal.

If a routine booster dose of Hepatitis B vaccine is recommended by U.S. Public Health Service at a future date, such booster doses shall be made available at no cost to the employee at Parkersburg/Marietta Occupational Health. The vaccine shall also be offered to emergency responders.

POST-EXPOSURE EVALUATION AND FOLLOW-UP

All exposure incidents shall be reported, investigated, and documented. When the employee incurs an exposure incident, it shall be reported immediately to their supervisor.

Following a report of exposure incident, the exposed employee shall go to Marietta Occupational Health for a confidential medical evaluation and follow-up, including at least the following elements.

- ✓ Documentation of the route(s) of exposure
- ✓ A description of the circumstances under which the exposure occurred
- ✓ The identification and documentation of the source individual; the identification is not required if the employer can establish that identification is impossible or prohibited by state or local law
- ✓ The collection and testing of the source individual's blood for HBV and HIV serological status
- ✓ Post exposure treatment for the employee when medically indicated in accordance with the U.S. Public Health Service
- ✓ Counseling
- ✓ Evaluation of any reported illness.

The Healthcare professional evaluating an employee will be provided with the following information.

- ✓ A copy of this plan

- ✓ A copy of the OSHA Blood Borne Pathogen regulations (29 CFR 1910.1030)
- ✓ Documentation of the route(s) of exposure
- ✓ A description of the circumstances under which the exposure occurred
- ✓ Results of the source individual's blood testing, if available
- ✓ All medical records applicable to treatment of the employee, including vaccination status

The employee will receive a copy of the evaluating healthcare professional's written opinion within 15 day of the completion of the evaluation.

The healthcare professional's written opinion for Hepatitis B vaccination is limited to the following: (1) whether the employee needs Hepatitis B vaccination (2) whether the employee has received such a vaccination. The healthcare professional's written opinion for post exposure evaluation and follow up is limited to the following information (1) the employee was informed of the results of the evaluation (2) the employee was informed about any medical conditions resulting from exposure to blood or other infectious materials that require further evaluation or treatment.

All other findings or diagnoses will remain confidential and will not be in a written report.

All medical evaluations shall be made by or under the supervision of a licensed physician or by or under the supervision of another licensed healthcare professional. All laboratory tests must be conducted by an accredited laboratory at no cost to the employee. All medical records will be kept in accordance with 20 CFR 1910.1020.

TRAINING

All high risk employees shall participate in a training program. Training will occur before assignment to a task where occupational exposure may take place and at least annually thereafter. Additional training will be provided when changes such as modification of tasks or procedures affect the employee's occupational exposure.

Any employee who is exposed to infectious material shall receive training, even if the employee was allowed to receive the HBV vaccine after exposure. The training program will include at least the following elements.

- An accessible copy of the regulatory text of 29 CFR 1910.1030 and an explanation of its contents
- A general explanation of the epidemiology and symptoms of blood borne diseases
- An explanation of the modes of transmission of blood borne pathogens
- An explanation of the employer's exposure control plan and the means by which the employee can obtain a copy of the written plan
- An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood or other potentially infectious materials
- An explanation of the use and limitations of methods that will prevent or reduce exposure, including appropriate engineering controls, work practices, and personal protective equipment

- Information on the types, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment
- An explanation of the basis for selection of PPE



HEPATITIS B VACCINE DECLINATION FORM

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

Print Name: _____

Signature: _____

Date: _____

PROCESS SAFETY MANAGEMENT

PURPOSE

To provide all employees with the information, training, and in general, of what employees are expected to know and understand while performing work for DPC in Industrial sites that fall under the Process Safety Management Standard. 29 CFR 1910.113 addresses OSHA expectations in prevention or minimization of the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals. As a contractor working in these types of facilities OSHA also includes a CONTRACT EMPLOYER RESPONSIBILITY section in the standard

POLICY

Davis Pickering & Company understands that there is an extensive list of procedures that the host employer needs to adhere to in order to comply with 29CFR 1910.119. While working at these sites all DPC employees will abide by customer rules and regulations concerning PSM and all safety precautions will be taken to ensure processes are not disrupted. DPC will ensure that all employees working in a PSM covered facility will be familiar with all hazards associated with tasks to be performed. Any hazard of fire, explosion, or toxic release of chemicals, as well as the sites emergency procedures will also be addressed in employee training. Often the host employer will cover these hazards since they are the ones familiar with these. It is the responsibility of the foreman, site supervision, individual, management, and safety department, to follow this policy and the applicable OSHA regulations.

PROCEDURES

- The contract employer shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.
- The contract employer shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to employee and the process, and the applicable emergency action plan.
- The contract employer shall document that each contract employee has received and understood the training required by this paragraph. The contract employer shall prepare a record which contains the identity of the employee, date of training, instructor, and the means used to verify that the employee understood the training.
- The contract employer shall assure that each of their employees follow the safety rules of the facility including safe work practices.
- The contract employer shall advise the employer of any unique hazard presented by the contract employer's work, or of any hazards found by the contract employer's work or created by the contract employer.

Note: Contract employer refers to Davis Pickering & Company.

GENERAL ELECTRICAL SAFETY

All temporary wiring and extension cords must be of a three wire conductor. GFCI's are required in lieu of an assured grounding program.

Check and test extension cords daily. Damaged cords are to be reported to your supervisor.

Do not make electrical repairs, connections, or installations unless you are qualified to do so.

Protect extension cords and wiring from damage from such hazards as being run over, contacting sharp corners, and pinching.

All temporary light wiring should be supported eight (8) feet off the floor and not be hung on nails or by wire that is not insulated. All temporary lighting must have a pre-molded unit designed for that purpose. The temporary fixture must not be supported by the wires. **Romex and pigtails are no longer allowed as temporary lighting.**

All temporary light bulbs exposed to contact shall be guarded.

To prevent accidental contact find out the location of electrical wiring before beginning such work as drilling, jack hammering, or excavating.

All temporary wiring shall be installed with approved overload protection.

Main feed and secondary conductors shall be no less than eight (8) feet above the floor or ground level unless they are in rigid or other conduits, such as nonmetallic sheathed cable or metallic sheathed cable, which provide equivalent protection and support. Temporary wiring run as open conductors shall be on insulators spaced no more than ten (10) feet apart and shall not be exposed to mechanical damage. Extension cords shall not be considered as secondary conductors. No branch circuits or feeder conductors shall be laid on the floor, except properly maintained extension cords feeding portable power tools.

All receptacles shall be grounded effectively.

All lamps for general illumination shall be protected from accidental contact or breakage. Protection shall be provided by elevation of no less than seven (7) feet from normal working surfaces or by a suitable fixture or lamp holder with a guard.

All temporary circuits shall be grounded effectively.

No bare conductors or earth returns shall be used for wiring any temporary circuit.

Approved disconnecting switches or plug connectors shall be installed to permit the disconnection of all ungrounded conductors of each temporary circuit.

All 120 volt single phase 15 and 20 ampere receptacle outlets that are not part of the permanent wiring of the building or structure shall have ground fault circuit interrupters or the implementation of an assured equipment grounding program on construction sites.

Each cord set, attached cap, plug and receptacle of cord sets and receptacles that are fixed and not exposed to damage shall be inspected before each day's use for external defects, such as deformed or missing pins or insulation damage, and for possible internal damage. Damaged or defective equipment may not be used until repaired.

If receptacles are not a part of the buildings or structure's permanent wiring, and cord and plug connected equipment is required to be grounded, grounding conductors shall be tested for continuity and shall be electrically continuous.

Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductor.

The equipment grounding conductor shall be connected to its proper terminal.

All required tests shall be performed before the first use, before the equipment is returned to service following repairs, before the equipment is used after an incident which could have caused damage, and at intervals not to exceed three months. Cord sets and receptacles that are fixed and not exposed to damage shall be tested at intervals not exceeding six (6) months.

All energized equipment exposed to contact shall be guarded.

Portable lights in wet or damp locations shall not exceed 12 volts.

Extension cords used with portable electric tools and appliances shall be the three wire type and have a GFCI.

Three wire extension cords to lights or electrically powered tools or devices shall be equipped with a three wire grounding receptacle and attachment plug of nonconductive material. Splicing shall be done by the vulcanized or plastic molded splice method. Insulation shall be equal to the cable being spliced and wire connections shall be soldered.

Where different voltages, frequencies or type of current (alternating or direct) are to be supplied by portable cords, receptacles shall be designed so that attachment plugs used on such circuits are not interchangeable.

ELECTRICAL SAFETY AND EMPLOYEE WORK PRACTICES WORKING ON OR NEAR ENERGIZED EQUIPMENT

PURPOSE:

It is the policy of Davis Pickering & Company (DPC) to adhere to all OSHA standards and NFPA 70E regulations and guidelines concerning employee electrical safe work practices when working on or near energized circuits. Strict adherence to these standards is followed with the safety of employees in mind, as well as compliance and quality assurance.

SCOPE:

This policy applies to all DPC employees, supervisors, and management personnel that may be working on or near energized electrical components.

POLICY:

Accidents do not just happen; they are caused. Most accidents are the result of multiple causes. These causes can be minimized by following employee safe work practice guidelines set forth in CFR 1926, CFR 1910, and the NFPA 70E standards. The following policy will outline minimum procedures for working on or near energized electrical equipment. Management, safety and supervising foremen, as well as qualified employees will be responsible for ensuring these guidelines are followed when employees are working on or near energized equipment.

It is the policy of DPC that all work will be performed only on de-energized or equipment that has been put into an electrically safe work condition (see definition) unless it can be documented that an additional or increased hazard will be created, or it is infeasible due to equipment design or operational limits. This applies to all equipment operating in excess of 50 volts to ground. Consult safety department for further guidance when questions arise concerning if work can be performed on or near energized equipment.

If work can be performed after equipment is put into an electrically safe work condition, initiate lockout/tag out procedures. On the rare occasion that work will need to be performed on or near energized equipment employees will need to follow procedures outlined in the following procedures at a minimum.

PROCEDURES:

Initiate a permit for all work on or near energized equipment. Additionally, all hazard classifications 3 and 4 and/or any work performed in the restricted or prohibited boundary must have management's counter signature a copy of DPC's energized work permit is attached at the end of this policy. Hazard classifications and boundaries can be calculated by determining nominal voltage and using the NFPA 70E charts attached at the end of this policy.

1. A customer's permit for working on or near energized equipment will suffice if the customer requires their own procedures and/or permit to be followed.

2. Complete all sections of energized work permit. The permit process is designed to trigger employees to follow all safe practices associated with working on or near energized equipment.. Job safety analysis (JSA) or safety task analysis (STA) is also additional tools to ensure nothing is overlooked. Consult with safety department with any questions concerning permits and/or required use.

Determine nominal voltage employee will or could be exposed to.

Determine all possible sources of electrical supply to the specific equipment. This would include all primary and secondary sources. Consult applicable up-to-date drawings, diagrams, and identification tags.

Conduct a flash hazard analysis.

- 1) A flash hazard analysis shall be done before a person approaches any exposed electrical conductor or circuit part that has not been placed in an electrically safe work condition.
 - a. For systems which are 600 volts and below, in most cases the flash protection boundary shall be 4 feet, based upon the product of clearing times of 6 cycles (0,1 seconds) and available bolted fault current of 50kA or any combination not exceeding 300kA cycles.
 - b. In most cases this boundary (4 feet) will be further than the limited or outermost shock boundary up to 600 volts. E.G. the outermost shock boundary, which is the limited boundary, is 3 feet 6 inches for exposed fixed circuit parts up to 750 volts.
 - c. **For any employee or non-employee** to enter the flash boundary (4 feet at 600 volts and less) they need the proper personal protective equipment (PPE). The proper PPE can also be determined by using the NFPA 70E charts or the quick reference chart attached at the end of the policy.
 - d. Unless the customer has determined the incident energy exposure and determined the flash boundary, default to the standard approach distance for voltages over 600 volts and up to 50kV, which is 10 feet. Alternatively NFPA 70E 2-1.3.3.2 can be used in calculating flash boundaries for voltages over 600 volts. So your flash boundary will be 4 feet for 600 volts and less and 10 feet for voltages greater than 600 volts up to 50kV. Above 50kV it is 10 feet plus 4 inches for every additional 10kV or .4 inches for every 1kV. Working on or near exposed electrical energized circuits should never happen unless all alternative de-energizing measures are explored. Safety should be consulted for all work on or near energized circuits if needed to ensure de-energizing is not an option/requirement.
 - e. Alternative measures such as guarding, protective shields, isolating or insulating should always be used to ensure employees cannot come into

direct contact with any energized circuit directly or indirectly through conductive materials, tool, or equipment.

- f. **At no time** shall an “unqualified employee” enter or cross the limited shock boundary (3 foot 6 inches up to 750 volts for fixed energized conductors) unless escorted by qualified individual.

Using nominal voltage to ground determine your shock boundaries by cross referencing voltage on NFPA 70E chart 2-1.3.4 (attached at the end of this policy).

Once permit has been completed and reviewed by all affected employees and recognized boundaries have been established, proper PPE selected and donned, as well as other types of shielding, barricading, isolating and/or other hazards identified on permit have been addressed, work may begin.

RESPONSIBILITY:

It is the responsibility of every electrician employed by DPC that this policy be utilized in the field when working on energized equipment. Company managers stress the importance of these protections. DPC is responsible for training and supplying tools, equipment, and Proper PPE for safe operations.

Hot Work Permit

(Energized)

Can this task/job be done de-energized? ____ Yes ____ No

Specific tasks to be done:

Determine nominal voltage _____ All sources identified _____

START LOTO Procedures _____ Absence of voltage verified _____

Perform Flash Hazard Analysis (use charts)

Determine Hazard/Risk Classification _____

Determine Flash Boundary _____/Feet

Type of boundary to be used i.e., tape, cones, barrier, locked door, controlled access zone (CAZ) other _____

Required electrical _____

PPE _____

Determine shock boundaries :

1. _____ limited 2. _____ restricted 3. _____ prohibited

Required tools: _____

Required materials e.g. cones, barricade tape, rubber mats, testers, lumber, _____

Other _____

Additional hazards _____

Additional PPE requirements _____

_____/_____/_____ / _____/_____/_____

Qualified electrician/Date

Management representative/Date

LOCK/TAG/TRY/TEST PROCEDURES

PURPOSE: It is industry standard that contract employers adopt and follow host or controlling employer's LOTO program. This is to avoid any confusion between contract employees and host employees. If host employer's LOTO program is not implemented or as stringent as DPC'S – these LOTO procedures will be utilized. Always ask when in doubt.

The purpose of the Lockout/Tag out procedure is to render inoperative electrical systems, pumps, pipelines, valves, and all other energy systems that may accidentally be energized or started up while employees are working on them or before they are mechanically ready for service.

Lockout systems shall be administered by the jobsite foreman only, and only after the approval of the owners established lockout procedures.

Tag any locks which you install.

Tags and locks may be removed only by the foreman whose name is on the tag or who installed the lock. The only exception to this rule is under emergency conditions.

PURPOSE:

Lockout/Tag out procedures is designed to prevent injury and death due to the unexpected energization or start-up of machines or equipment, or the release of stored energy during servicing and maintenance. It shall be used to ensure that the machine or equipment is stopped and isolated from all potentially hazardous energy sources, locked out, and tested for residual energy before employees perform any servicing or maintenance.

SCOPE:

Lockout/Tag out covers the following activities: constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment, including lubrication, cleaning or clearing jams in machines or equipment and making adjustments or tool changes, where the employees may be exposed to the unexpected energization or start- up of the equipment or release of hazardous energy.

DEFINITIONS:

- A. Service – Any time a worker has to interrupt normal operation to adjust or clear a jam in a piece of equipment or machinery.
- B. Authorized employee(s) are the designated workers responsible for coordinating a lock out.

NOTE: An authorized employee and affected employee may be the same person when the affected employee's duties include performing maintenance or service on a machine or equipment.

- C. Affected employee(s) are workers who operate or use the equipment that is going to be locked out.
- D. Other employee(s) – workers in the area where lock out is to be done.
- E. Completely de-energized is the act or neutralizing energy going to or within a piece of equipment or machine.
- F. Potentially hazardous energy source- energy stored or produced by electrical, mechanical, chemical, thermal, hydraulic, or pneumatic sources.

RESPONSIBILITY:

It is the responsibility of the employer and all supervision to administer this policy and procedure, train their employees in its proper use, and insure that their employees follow lockout/tag out procedures.

It is the responsibility of the authorized employee as well as the supervisors and employees to see that machinery and equipment has been made inoperative and has been properly locked out, tagged and tested, before any type of work or service is done.

Failure to comply with lockout/tag out procedures or unauthorized removal of any lock out or tag out device shall result in disciplinary action outlined in the David Pickering Company, Inc. Policy and Procedures Manual.

(Alternatively, a more stringent enforcement policy may be used.)

Whenever contractor/subcontractor personnel are engaged in an activity covered by this procedure, company and contractors representatives shall acquaint each other with their respective lockout/tag out procedures.

Contractor/subcontractor shall use this procedure as a minimum.

LOCKOUT/TAG OUT DEVICES:

Lock out devices and tags must be:

1. Durable
2. Standardized
3. Substantial
4. Clearly labeled to indicate identity of the employee(s) applying the device
5. Never used for any other purposes
6. Non-duplicating

PROCEDURES FOR SHUTDOWN:

These steps should be performed in sequence:

- A. Before shutdown:
 1. The authorized employee(s) and/or supervisor must know the Type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means to control the energy.
 2. The authorized employee(s) and/or supervisor must notify all affected employees of the lock out.
- B. Shutdown
The authorized employee(s) and/or supervisor must shut down the machine or equipment by the normal stopping procedure (pressing the stop button, moving the switch to the “off” position, etc.)
- C. Isolation
The main power switches, circuits, or other sources of energy must be moved to the “off” position or rendered inoperative.
- D. Lockout
 1. Locks are placed on switches or other energy sources in the OFF position.
 2. In group lockout, other employee(s) must apply their locks also.
 3. Warning tags need to be placed with the lock(s).
- E. Energy Release
All potentially hazardous stored or potential energy (like that is springs, fly wheels, air, gas, steam, etc.) shall be relieved, disconnected, shall make safe by repositioning, blocking, bleeding, purging, etc.
NOTE: If there is a possibility of accumulation of stored energy to a hazardous level, verification of isolation shall be continued until the servicing or maintenance is completed or until the accumulation no longer exists.

F. Testing

After personnel are out of the exposed area and checking to be sure the energy sources are disconnected the authorized employee(s) and/or supervisor must test push button or other normal operating controls to make sure the equipment or machine will not operate.

NOTE: Return operating controls or buttons to the “neutral: or “OFF” position after testing is completed.

PROCEDURE FOR RESTART:

A. Inspect

Before lockout and tag out devices are removed and energy is restored to the machine or equipment, inspect the work area to ensure that tools and other items have been removed from the area and guards have been reinstalled.

B. Check

After inspecting the machine or equipment, check to see employee(s) positioning and notify your intention to restart.

1. Make sure employee(s) are in a safe area
2. Notify affected employee(s) that the lock out and tag out devices have been removed.

C. Remove

Remove locks and other devices from each energy isolating switch or source by the employee(s) who placed them.

NOTE: If the employee who applied the lock and tag is not available to remove it, special procedures must be followed, contact your supervisor. Never remove the device without permission.

GENERAL:

- A. Locks and tags must be attached, whether the disconnects or valves are 2 inches or 200 yards away from the equipment or machine on which maintenance or service is being performed.
- B. For more complex systems, more comprehensive procedures may need to be developed, documented, and utilized.

When in doubt about the procedure, ALWAYS ask questions.

JOB SAFETY ANALYSIS (JSA)

PURPOSE:

Job safety analysis (JSA) and job task analysis (JTA) are techniques that are simple but also effective and a comprehensive means to determine the hazards involved as well as potentially unsafe conditions most likely to occur in a given task or job. This analysis is used to reduce hazards and to train workers in safe procedures as well as hazard recognition. A JSA is essential to any effective safety program. It should be one of the first steps you take when there is a possibility of worker injury from unsafe acts or conditions. The best way to efficiently and safely perform a job can be determined only by carefully studying each element or step involved in any particular job or task. A JSA serves two valuable purposes. It provides a systematic means of taking advantage of workers previous experience and knowledge to establish safe work practices and procedures, and it promotes employee involvement in establishing safety awareness while ensuring a safe work environment.

POLICY:

It is the policy of Davis Pickering & Company to provide a safe work environment for all of its employees. So that an employee better understand how to perform tasks, and to also help employees recognize hazardous actions or conditions. JSA's will be completed. Whenever a non-routine task is to be performed, the JSA will be reviewed with the employee or employees that will do the work. OSHA defines non-routine tasks as ones that have not been performed in the last year or there is an expectation that the task will only be performed annually. The foreman, safety, or other "qualified individual: will complete the JSA review. If there is no JSA on any particular task, the foreman will contact the Safety Department to initialize the JSA process. Safety will meet with the foreman and employees that are to perform work and facilitate a JSA.

RESPONSIBILITY:

It is the responsibility of every job foreman, supervisor, and project manager to ensure that a JSA and or job briefing for routine tasks is completed before work begins.

PROCEDURES:

A Job Safety Analysis form will be used to complete JSA's. A JSA form is located in the appendix of this manual. If host employer provides JSA form, DPC will default to their form and policy concerning JSA's. The individual best suited to supply information concerning the steps of the work to be performed as well as the individual most

knowledgeable with the particular hazards associated with the task will meet with safety and the foreman to initiate the JSA process. All JSA's will be put on file at the main office for future use. After the JSA is completed, employees will review the JSA with the foreman, safety or other "qualified" employees before commencing work.



Safety Works for Construction

Job Safety Analysis

Job: _____ **Date:** _____

Title of worker who performed job: _____ Foreman/Supervisor: _____ Analysis by: _____

Specific work location: _____ Section: _____ Reviewed by: _____

Required and/or recommended personal protective equipment

Sequence of basic job steps	+	Potential accident or hazards	+	Recommended safe job procedures
	+		+	
	+		+	
	+		+	
	+		+	
	+		+	
	+		+	
	+		+	
	+		+	
	+		+	
	+		+	
	+		+	

ACCIDENT/INCIDENT INVESTIGATION

PURPOSE

It is the policy of Davis Pickering & Company (DPC) that all accidents, incidents or near-misses that have the potential to or does result in personal injury, illness or property damage over \$250 shall be reported and investigated. This investigation process is a proactive measure to determine the direct cause and any contributing factors to help prevent or minimize future accidents/incidents. This operating procedure establishes a systematic process to ensure that accidents are reported in a timely manner, that all causes (direct and contributory) are identified and that the corrective actions are taken.

SCOPE

This policy applies to all DPC employees, supervisors, and management personnel.

POLICY

Accidents do not just happen, they are caused. Most accidents are the result of multiple causes. These causes can be determined by an effective accident/incident investigation.

- A. Management, safety and supervising foremen will be responsible for investigating all incidents whether they involve, or could have involved, personal injuries or property damage or not.
- B. Investigations should be directed toward fact finding, not fault finding.

PROCEDURES

- A. Investigating personnel will consider the following:
 - 1. Evaluate all accidents regardless of how minor
 - 2. Review the accident scene for any hazards that could cause another accident and immediately secure the area if necessary.
 - 3. Investigate accidents as soon as possible after they occur while the facts are fresh in everyone's mind using the appropriate OSHA 301 or near miss form at the end of this section.
 - 4. Avoid jumping to conclusions or placing blame
 - 5. Take corrective action to eliminate the cause and prevent reoccurrence
 - 6. Ensure accident/incident is reported to all appropriate personnel
 - 7. Follow up later to see that corrective measure taken was satisfactory

- B. The steps necessary in investigating an accident/incident are as follows:
1. Survey the area where incident occurred
 - a. Carefully examine where the injury or property damage occurred
 - b. Reconstruct as much as possible the chain of events leading up to the injury or property damage, and attempt to determine the single event responsible for the incident
 - c. Draw a diagram of the location if it will be helpful in arriving at a conclusion
 - d. Sketch in machinery, equipment, and any nearby physical objects, together with the places where any witnesses were standing
 2. Write it down
 - a. Make notes on all facts that may relate to the cause of the injury or property damage
 - b. Write down any procedures used, misuses of equipment, or other factors not in accordance with work rules or safety guidelines
 - c. Write down such items as: the time of incident, lighting conditions, the weather conditions, or any other information that might be pertinent
 3. Collect evidence
If injury, near miss or damage to property occurs it is essential to determine what failed and why
 4. Interview witnesses
Interview witnesses at the scene immediately or as soon as possible; make brief notes and identify who gave them. Take a written statement and have the witness sign it. These statements are vital to the investigation and often will reflect different views of the same scene.
 5. Interview the injured employee or employee's directly involved in the incident
 - a. Never argue with someone who says they were injured. Simply send them for medical care and drug testing as needed and complete all appropriate forms.
 - b. Time is important. If the injury is minor, the interview should be made as soon as the investigation of the accident is completed and the employee has returned from receiving any medical attention.
 - c. If the injury is serious, selecting the right time can be a judgment factor. Too soon afterward or waiting too long will lead to answers that are confusing and/or inaccurate.
 6. Determine the "who, what, where, when, how, and why" of the accident. Decide what acts, conditions or circumstances caused or permitted that accident to occur.
 7. Recommend and or take corrective actions. Do not place blame. The purpose of corrective actions is to make changes in tools, equipment, materials, work practices and/or administrative procedures to prevent a similar accident in the future.

- C. Once all the facts relating to an accident/incident have been evaluated, the combination of unsafe acts and/or conditions that caused the accident can be determined. Supervisors and/or safety personnel should recommend corrective action to prevent future accidents. These recommendations should be directed toward correcting ALL contributing factors leading to the unsafe condition or act that caused the accident/incident.
- D. Corrective action is the key to preventing similar incidents in the future. It is management's responsibility to ensure these corrective actions are taken. If resources are needed to contact the safety coordinators who will help ensure corrective actions are taken in a safe and effective manner.

DPC

COMPANY POLICY FOR REPORTING AN ON-THE-JOB INJURY OR ILLNESS TO ALL EMPLOYEES:

The West Virginia Workers' Compensation Commission insures you for any on-the-job injury or illness. Workers' compensation provides the following benefits:

Medical Care: All approved medical and hospital bills in relation to the compensable injury.

Disability Income: If hospitalized or unable to work for more than three days as a result of your on-the-job injury or illness, you will receive temporary total disability payments equal to 66 2/3% of your average weekly wage, up to the maximum allowable by law. If your injury or illness results in a permanent impairment, permanent partial disability benefits may be awarded.

Vocational Rehabilitation: If your on-the-job injury or illness prevents you from returning to your pre-injury job, you may be eligible for vocational rehabilitation.

Death Benefits: Should an on-the-job injury or illness result in death, a benefit may be paid to your dependents.

Effective immediately, the following policy will be in effect:

- 1) Report all injuries within 24 hours to your immediate manager or supervisor. This includes minor injuries that may only require first aid. Failure to report all injuries or illnesses may result in a delay in benefit payments.
- 2) Any injury requiring emergency treatment should be treated at the nearest emergency treatment facility immediately following the injury. CALL 911 when emergency assistance is needed.
- 3) For medical treatment other than an emergency, you may seek treatment from a company pre-selected physician or physician of your choice. If you go to a medical provider of your choice you must notify your Return-to-Work Coordinator or Supervisor. Arrangements will have to be made regarding the company's Return-to-Work Program.
- 4) Should the treating physician restrict you from regular duty because of an on-the-job injury or illness, you must immediately provide your manager or supervisor with the NOTICE TO PHYSICIAN form outlining your restrictions. Whenever possible, we will attempt to accommodate your restrictions by providing appropriate modified or alternative work for you while you are unable to perform your normal duties.
- 5) Workers' Compensation fraud is a felony in West Virginia. Any person who files or contributes to the filing of a false workers' compensation claim is committing a crime punishable by a prison sentence and/or fine.

In order for this system to work most efficiently, we must have your cooperation. Please see your immediate manager or supervisor should you have any questions.

I have read the above information and agree to comply with the stated company policy.

Employee Name	Employee Signature	Date

An Equal Opportunity Employer

www.davispickering.com

DPC reporting procedure is 8 hours

NEAR MISS REPORT

A near miss is a potential hazard or incident that has not resulted in any personal injury. Unsafe working conditions, unsafe employee work habits, improper use of equipment or use of malfunctioning equipment have the potential to cause work related injuries. It is everyone's responsibility to report and/or correct these potential accidents/incidents immediately. Please complete this form as a means to report these near-miss situations.

=====
Department/Location _____ Date _____

Time _____ AM _____ PM

Please check all appropriate conditions:

_____ Unsafe Act

_____ Unsafe equipment

_____ Unsafe Condition

_____ Unsafe use of equipment

Description of incident or potential hazard: _____

Employee Signature: _____ Date _____

(OPTIONAL)

NEAR MISS INVESTIGATION

Description of the near-miss condition: _____

Causes (primary & contributing): _____

Corrective action taken (Remove the hazard, replace, repair, or retrain in the proper procedures for the task): _____

Signed: _____ Date Completed: _____

Not completed for the following reason: _____

Management _____ Date: _____

WV WORKERS' COMPENSATION RETURN-TO-WORK PROGRAM

Davis, Pickering & Co., Inc. is committed to returning their employees to modified or alternative work immediately following the injury. The following are guidelines to accomplish this commitment:

THE EMPLOYER'S ROLE

- When Davis, Pickering & Co., Inc. has an on-the-job injury or illness, we will take the time to handle the injury appropriately.
- We will provide first aid immediately.
- If the injured employee requires medical attention, we will, when possible, accompany the injured employee to the treating physician or medical facility. It is our responsibility to let the medical provider know that we have a Return-to-Work Program and intend to bring this employee back to work as soon as possible. When possible, all employees should return to their work-site immediately after initial treatment to avoid unnecessary lost time.
- If an injured employee is unable to return to work immediately, Davis, Pickering & Co., Inc. will keep in contact with them. We will let the employee know of our concern for their condition and assure him/her that they are a valuable asset to this company.
- David, Pickering Co., Inc. will let the injured employee know that we will make every reasonable effort to accommodate their temporary physical limitations with a modified or alternative position.
- We will welcome back all employees into both temporary and permanent return-to-work positions.
- David, Pickering & Co., Inc. will notify West Virginia Workers' Compensation Commission of our efforts to return injured employees as it may impact an injured employees rights to temporarily disability payments or partial loss of wage disability payments.

Modified/alternative positions

- All temporary, modified, or alternative positions are considered "transitional positions" and are designed to help the injured employee return to their usual and customary duties as soon as possible.
- The injured employee will be expected to keep regular medical appointments with their treating physician to help monitor the progress of their recovery.
- The manager or supervisor will discuss the recovery progress with the employee and the medical provider, as needed, to determine how they are progressing, when and if any additional duties can be added to the modified or alternative position, and when or if the employee can be returned to their usual and customary position.
- If the employee is not able to return to their usual and customary duties within 30 days, a complete re-evaluation of the situation may be made in cooperation with the West Virginia Workers' Compensation Commission, the treating physician, and the employee.

(President/CEO/Management)

(Employee)

(Date)

ACCIDENT PREVENTION PROGRAM

Davis Pickering Company, Inc. Safety Training Policy

Training of employees is key to the effectiveness of the Davis Pickering Company, Inc. safety program and to the prevention of as many injuries and illnesses as possible.

Training for the construction industry also is mandated by OSHA in the Safety Training and Education Standard, in Title 29, Code of Federal Regulations, Part 1926.219B0. The standard states:

“The employer shall instruct each employee in the recognition of hazards in the work environment to control or eliminate any hazards or other exposure to illness or injury.”

All employees will be instructed to recognize and avoid general workplace hazards, as well as hazards and regulations specific to a particular line of work. Certain employees will be required to attend specialized training classes to become certified in particular areas, or to become designated as a “competent person.”

In addition, all employees will be taught to understand and to follow all company safety policies and procedures.

Documentation will be maintained for each training program – including attendance lists, subjects covered and questions or suggestions discussed. Unexcused absences from training classes could lead to disciplinary action.

Safety training will be an ongoing process and will be for all employees, including office management and field personnel. It may be conducted in a group setting or with an individual, depending on the topic and circumstances.

COMPANY SAFETY RULES

Each employee shall become familiar with the Davis Pickering Company, Inc. safety rules before beginning work. A signed acknowledgment that the employee has read or has been trained in the rules and understand the rules will be maintained on file.

SUPERVISOR TRAINING

Site supervisors will receive periodic instruction to maintain and enhance their communication and instructional skills, as well as their knowledge of the safety regulations and practices which they supervise. All supervisors will be trained in OSHA 30 hours and NFPA 70E.

WEEKLY SAFETY MEETINGS

Jobsite safety meetings or “tool box meetings” will be held frequently at a specific time, to reinforce company rules and to discuss site-specific conditions. Attendance at the meetings is mandatory for all crew members.

Conducted by a superintendent or foreman, each meeting will discuss a topic pertinent to the specific jobsite – such as ladder safety, scaffolding or fire prevention, etc.

POSITION TRANSFER OR CHANGED CONDITIONS

Employees changing to a new position or to a new jobsite will be trained in site-specific requirement and safety procedures for their newly-assigned tasks. The employer will not assume that the employee has been trained for a new task simply because he or she already works for the company.

Also, when a new phase of a job operation begins, employees will be made aware of new or added potential hazards and the action they must take to eliminate or control the unsafe conditions.

COMPANY SAFETY TRAINING PROGRAMS

HAZARD COMMUNICATION TRAINING

Employees will be trained in the Davis Pickering Company, Inc. Hazard Communication policy before beginning work. The training will include information on the “Haz-Com” standard, physical and health hazards of pertinent chemicals, non-routine tasks, and the use and availability of the company’s Material Safety Data Sheets (MSDS) and labels.

EQUIPMENT

When issued personal protective equipment or tools, employees will be instructed how to use the equipment properly and safely.

SUPERVISOR RESPONSIBILITY

To achieve the safety standards desired by this organization, it is necessary to augment an accident prevention program through all levels of our company. Training in hazard recognition is essential to prevent accidents. The following is a summary of our accident program. **THAT IS TO BE SUPPORTED AND MAINTAINED BY ALL EMPLOYEES.**

The supervisor in charge of each job site is responsible for insuring that:

- A. The Federal (or State) OSHA Poster, Emergency Telephone Numbers, OSHA Form 300, and other notices required by OSHA are properly posted.
- B. Ambulance and medical services has been arranged for employees at the site. This action must be coordinated with the Safety/Site Supervisor,

- C. A properly equipped first aid kit is at the job site and is checked on a regular basis to see that expended items are placed.

STATE OPERATED COMPLIANCE PROGRAMS

- A. Certain states are now operating under State Plans for occupational safety and health rather than the Federal OSHA program. These states have adopted Federal OSHA standards and procedures or may have developed their own.
- B. Where this firm is subject to State occupational safety and health plans. Our safety policy and program will be on State requirements. It is the responsibility of the Safety Officer/Company Owner to verify which OSHA regulations (Federal /State) apply to our company's operations.

RECORDS

- A. It is company policy, as well as Federal Law, that certain records associated with accidents experienced on our jobs be kept up to date and retained for a period of five (5) years. The purpose of the record keeping requirement is to identify recurring accidents of a similar nature, thereby allowing for the development of corrective action eliminating the possible causes. The following is a summary of these requirements.
- B. Accident investigating and reporting procedures are developed by the Safety Officer/Company Owner. An accident on appropriate forms must be prepared within twenty four (24) hours of each reportable incident. Reportable incidents consist of fatalities, lost work day cases or non-fatal cases without lost days but requiring medical treatment.
- C. Depending on the hazard, there may be Federal/State requirements for maintaining records of exposure to hazardous/toxic materials. Check with the Safety Officer/Company Owner for requirements.
- D. Maintain OSHA log from all reportable occupational injuries and illnesses for each job site. In some cases, this log may be kept at a central location for jobs subject to common supervision. This involves posting the information from the initial accident report on a Master Log (OSHA Form 300) within six (6) working days after the accident has occurred. This form must be available for OSHA review. The Summary Section of OSHA Form 300 must be posted at each job site by February 1 of the following year and must remain in place for ninety (90) calendar days thereafter.

EMPLOYEE RIGHTS

Employees have the right to view his or her medical records.

SUBCONTRACTORS COMPLIANCE

- A. Concern for our fellow employees will be conveyed to our Subcontractors working our projects. We will observe our Subcontractors operations and where deficiencies are located identify them to the Subcontractor, verbally and in writing, and document the incident.

- B. All contracts issued to Subcontractors require that Federal and State laws concerning safety are followed by the Subcontractor. Failure to fulfill this requirement is a failure to meet the conditions of the contract. Safety on the project extends through all Subcontractors operations.
- C. The above instructions apply to all Contractors on the job site. Failure to observe good safety practices by anyone affects the health and well-being of everyone. Report any safety violations to your supervisor who will in turn report to the Safety Officer.

SAFETY INSPECTIONS

The company has a definite policy and procedure for conducting inspections of safety conditions on the job site. Inspections performed weekly by safety coordinator, competent persons and/or company managers.

OSHA INSPECTION

When an OSHA inspection of the job site occurs, use the following procedures. Upon the arrival of the OSHA inspector (OSHA):

1. Check his/her OSHA identification and credentials
2. Determine the reason for the inspection
3. Find out what and where he/she will inspect
4. Inform home office Safety Officer or Company Owner than an OSHA inspection is being conducted.

The Safety Officer is responsible to develop procedures for handling OSHA citations, penalties, abatement deadlines, and as applicable, contests of unjust citations/penalties.

VARIANCES

OSHA has established procedures for permitting temporary or permanent variances to certain standards when valid circumstances preclude compliance. All supervisory personnel should recommend to the Safety Officer any standards for which a variance may be needed. The Safety Officer will take the appropriate action, following the procedures of OSHA Regulations 29 CFR Part 1905.

INSPECTION GUIDE

POLICY

The following ground rules govern the company's safety inspections:

- A. Establish and update safety procedures as necessary.
- B. Review safety program on a semi-annual basis.
- C. Establish Safety "Chain of Command" for safety responsibilities
- D. Identifies Davis Pickering Company, Inc. safety goal to employees
- E. Conduct the following inspections at each job site by those designated:
 1. Weekly inspection – Company Owner
 2. Monthly inspection – Safety Officer
 3. Announcement Inspection – Company Office

NOTE: Designated inspection duties should be staggered – inspections will be conducted without prior notice.

CHECKLIST

1. First aid and health equipment (if allowed on job site)
2. Posters, signs required by OSHA
3. Emergency Evacuation Plan
4. Emergency phone numbers posted
5. Accident reporting records
6. Identify and eliminate (from use) all unsafe equipment
7. Employee training performed (i.e. – tool box meetings, worker orientation, etc.)
8. Protective devices (available, proper maintenance and in operating condition)
9. Housekeeping
10. Lighting for adequacy and safety
11. Personal protective equipment
12. Sanitation, water, toilets, etc.
13. Noise hazards, to comply with OSHA regulations
14. Ventilation, gases, vapors, fumes and dust
15. Head protection, respirator devices, safety belts, safety harness, life lines, etc.
16. Fire protection, prevention and control
17. Temporary buildings
18. Open year and interior storage
19. Storage of flammable and combustible liquids
20. Temporary heating devices
21. Tools (hand, power, welding)
22. Electrical system and ground fault protection
23. Openings – floor, wall, and railing
24. Material handling equipment and elevators
25. Trenching and shoring for compliance with OSHA requirements

- 26. Ladders and scaffolds
- 27. Other items as appropriate

ON COMPLETION OF CHECKLIST

- A. Discuss all discrepancies with persons responsible for creating the Conditions and those responsible for correcting it.
- B. Where other hazards are caused by Conditions on the job, discuss this with the Safety Officer; then identify the problem to the Owner, General Contractor, and other Contractors involved
- C. Insure that recommended changes are transmitted to the proper person for correction
- D. Follow-up on corrections, changes, and other actions necessary.
- E. Provide a copy of the completed checklist to the Safety Officer, along with statement of corrective actions taken or still required

Site/Location: _____ Contact: _____ Date: _____

Company: _____ Inspector : Scott Hupp Time: _____

SAFETY

ITEM	X	SCORE	OBSERVATIONS
Postings			
Respiratory Protection			
Machine Guarding			
Hazard Communication			
Lock/Tag/Try			
Waling/Working Surfaces			
PPE			
Housekeeping			
Material Storage			
Flammable Liquid Storage			
First Aid			
Fall Protection			
Floor Openings			
Ergonomics			
Stairways			
Ladders			
Electrical			
Tools			
Rigging			
Machinery Other			
Motorized Equipment			
Welding/Cutting			
Confined Spaces			
Means of Egress			
Working Habits			
Total Score			

0 = No Effort Shown 1-Poor 2 -Needs Improvement 3-Satisfactory 4-Excellent

Foreman Signature

Comments: _____

These services are supplied on an advisory basis strictly for the purpose of aiding the contractor and employer in his own company safety efforts. It is expressly understood and agreed that the contractor has and will continue to have responsibility for establishing and maintaining an adequate safety program for his or her employees and those who frequent the site(s).



EMPLOYEE SITE SAFETY CHECKLIST

Employee Name: _____ Jobsite: _____

Date: _____

COVER EACH AREA AND ENSURE EMPLOYEE UNDERSTANDS. EMPLOYEE SHOULD INITIAL EACH TOPIC TO DEMONSTRATE TOPIC COVERED AND UNDERSTOOD BY EMPLOYEY

-Emergency Alarm Procedures _____

-Emergency Contacts _____

-Accident and Injury Procedures _____

-Personal Protective Equipment required for site and/or specific tasks _____

-Full Protection Requirements _____

-Permitting Procedures _____

-Site-Specific Hazardous Chemicals and/or Substances _____

-Site-Specific High Hazard Processes _____

-All known Fire, Explosion, Toxic Release Hazards Related to Job and Process _____

Housekeeping _____

-First Aid and Medical _____

Employee Signature

Date

NEW JOB CHECKLIST

Jobsite: _____

Foreman: _____

Date: _____

Location of Safety Supplies:

Will gang-box, trailer, and/or other area serve as central location of safety supplies?

_____ Yes _____ No _____ Truck/Van _____ Other

OSHA Required Training

Mark Training completed at this jobsite	Responsibility
___ Hazardous Communication Training	Safety Department
___ Emergency Action Plan (EAP) Training	Foreman
___ New Employee Safety Orientation	Safety Department
___ Personal Protective Equipment	Safety Department
___ Paperwork/Documentation	Foreman, Steward, or Safety Department
___ Site-specific Safety Training	Foreman, Steward, or Safety Department
___ Other: _____	

OSHA Required Materials

Mark materials present at jobsite:

___ Medical/first aid kit

___ Fire extinguisher

___ OSHA Posters

___ Material Safety Data Sheets (MSDS)

List MSDS Needed as jobsite: _____

___ Safety Manual

___ Site Specific Personal Protective Equipment (PPE) – Dust masks, fall protection, etc.

List PPE Needed at jobsite: _____

Upon completion, forward to Safety Department (Phone and Fax: 304-464-1260) for review

Reviewer: _____ Date Reviewed: _____

Equipment or Training needed at site: _____

EMERGENCY ACTION PLAN (EAP)

EVACUATION CHECKLIST

1. Emergency Phone Numbers
2. Head Count Area(s) must be Designated for employees to meet in the event of an emergency
3. Person assigned to take head count
 - A. This duty needs to be in place every day. If regularly assigned employee is absent, another employee should be assigned.
 - B. Person responsible for head count must be aware of what employees are working on each shift.
NOTE: OSHA requires that, in the event of an emergency, a complete head count be taken in the assigned meeting area.
4. Plan Coordinator, whose duty is to:
 - A. Contact the proper emergency service
 - B. Assure that the proper authorities have been notified of the Occurrence of an emergency.
 - C. Notify or summon key company personnel
 - D. Designate an alternative location for head count if original location is deemed to be unsafe.
 - E. Assure that the head count has been conducted and that the information is conveyed to the emergency services that are involved.
5. An AUDIBLE ALARM must be in place to warn every individual on the work site of an emergency: Upon sounding:
 - A. Employee must immediately evacuate to the designated head count location
 - B. ALL employees shall HAVE SAFETY ORIENTATION including a review of the Emergency Evacuation Plan BEFORE work starts at the construction site.
 - C. ALL employees are to be aware of the Emergency Evacuation Plan and shall review it periodically.

(The continuous blowing of a vehicle horn is an acceptable audible alarm on a construction work site.)

EVACUATION PLAN

PLEASE COMPLETE AND POST

JOB SITE NAME: _____

FOREMAN: _____

HEAD COUNT LOCATION: _____

LOCATION OF PHONE/RADIO(S): _____

LOCATION OF FIRE EXTINGUISHER: _____

EMERGENCY PHONE NUMBERS

AMBULANCE: _____

HOSPITAL: _____

POLICE: _____

FIRE: _____

DAVIS/PICKERING: _____ **740-373-5896** _____

D/P SAFETY DEPARTMENT MSDS REQUEST: _____ **1-800-451-8346** _____

EMPLOYEE ENTERING THE WORK PLACE

1. FIRE EXTINGUISHERS
2. FIRST AID KITS
3. PHONE LOCATIONS
4. EMERGENCY ALARM DEVICE

The FORMS showing LOCATIONS of the above items shall be listed and SHALL BE POSTED in a central location so that ALL EMPLOYEES are AWARE of and have ACCESS to them.

In the event that there is NO JOB TRAILER located at the work site, the above information may be kept in the SUPERVISOR'S VEHICLE.

In the event that the supervisor's vehicle must leave the work site during a shift, an alternate location for the evacuation plan shall be designated.

EVACUATION PLAN and AUDIBLE ALARM shall be TESTED a minimum of once (1) during a work site project of less than one year or TESTED on an annual basis at a work site project lasting one year or longer.

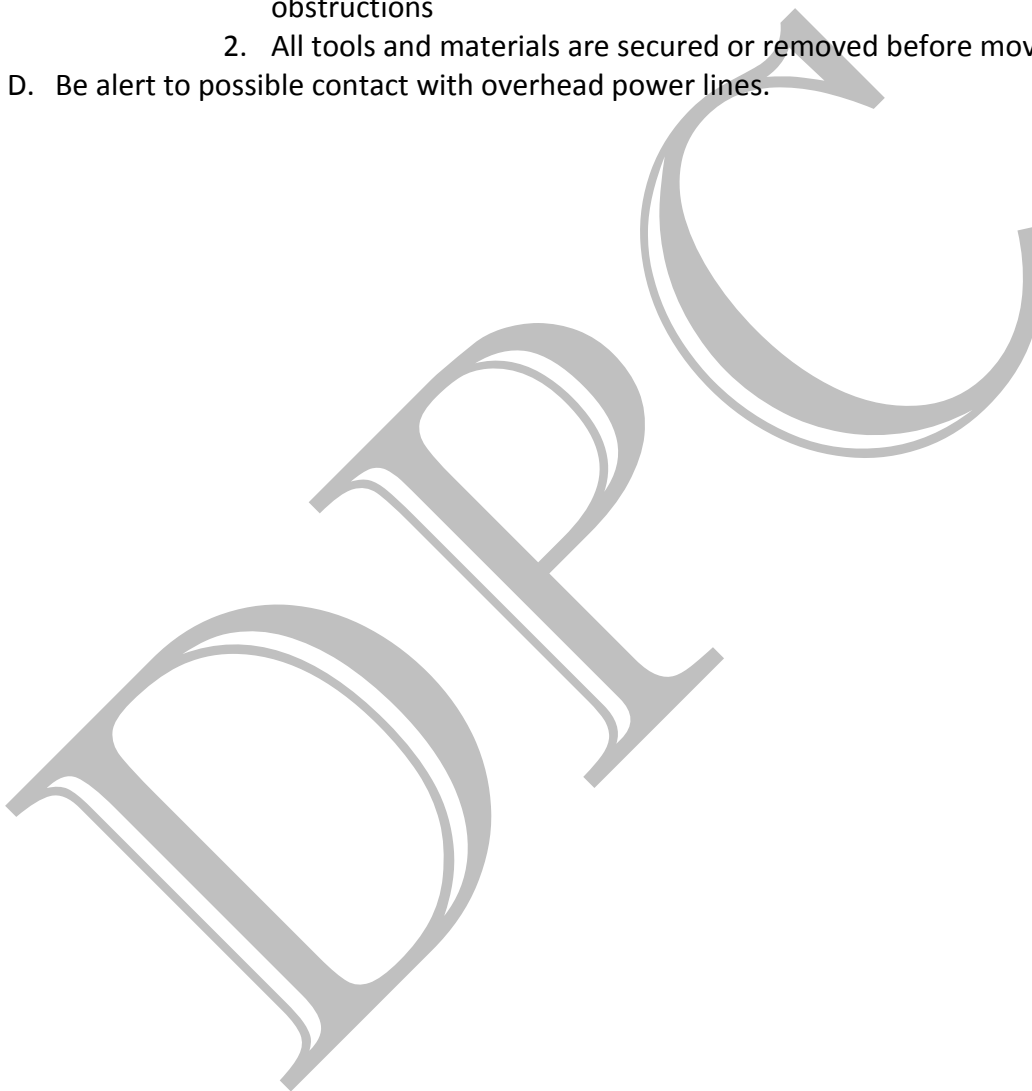
Items required to be at each job site are: Evacuation plan, Hazard Communication, Safety Policy & Procedure Manual

SCAFFOLDS (USER ONLY)

1. Scaffold members must be checked during erection and any defective Members shall be removed from service.
2. All working surfaces of scaffolds shall be provided with handrails, mid-rails and toe boards. If this is not possible, then some other means of fall protection shall be provided.
3. Scaffold plank ends shall overlap a minimum of six (6) inches, maximum of twelve (12) inches and be secured from movement.
4. A ladder must be used to gain access to the work platform unless the scaffold end frame has a built-in ladder for this purpose. Do not climb the bracing.
5. Overhead protection should be erected on scaffolds when there is a possibility of objects being dropped from above.
6. The top of the ladder must extend thirty **six (36) inches above the contact point/landing.**
7. When working on a suspended scaffold, you must AT ALL TIMES be wearing a safety harness attached to a life line, which is secured independently of the scaffold suspension.
8. Key points to employ in the safe erection of scaffolds:
 - a. NO SCAFFOLD SHALL BE ERECTED, MOVED, DISMANTLED, OR ALTERED EXCEPT UNDER THE SUPERVISION OF A COMPETENT PERSON(S). DPC contracts out the erection; dismantling of all scaffolding in the rare chance we would use scaffolding. If scaffold other than user training is necessary or required contact the Safety Department or ask your supervisor.
 - b. There must be a substantial level base.
 - c. Pin sections together
 - d. Insure the end frames are plumb, level and not damaged
 - e. SCAFFOLD MUST BE TIED OFF VERTICALLY AT THE CLOSEST FRAME HEADER OR BEARER ABOVE 5 TIMES THE MINIMUM BASE DIMENSION. THE SCAFFOLD MUST BE TIED OFF AT HORIZONTAL INTERVALS NOT TO EXCEED 30 FEET.
 - f. Do not mix different manufacturer's sections
 - g. Completely deck work platforms
 - h. Erect guard rails and toe boards (42" hand rail, 21" mid rail)

MANUALLY PROPELLED SCAFFOLDING

- A. Must have diagonal-horizontal brace.
- B. The force necessary to move the mobile scaffold shall be applied near or as close to the base as practical.
- C. Employees should not ride on the scaffold while moving from one location to another unless:
 - 1. The floor is within 30 degrees of level, free from pits, holes and obstructions
 - 2. All tools and materials are secured or removed before moving
- D. Be alert to possible contact with overhead power lines.



AERIAL AND PLATFORM LIFTS

PURPOSE: DPC only allows authorized and capable employees to operate bucket trucks, scissor lifts, JLG's, and other mechanized lifts. Employees will be trained in operation and safety by their foreman or other qualified trainer and/or safety department.

POLICY: The safety rules concerning these types of equipment follow this policy. Each employee should ensure he has been trained and authorized by DPC to operate and aerial lift. Inspect before every use. Use all required fall protection (PFAS).

RESPONSIBILITY: This policy covers all employees of DPC Training requirements will be addressed by safety department. Foremen are to arrange training with safety department whenever they need to certify new employees or re-training is necessary.

Any place of equipment can be dangerous if not operated properly. YOU are responsible for the safe operation of this equipment. The operator must carefully read and follow any warnings, safety signs, and instructions provided with or located on the equipment. Do not remove, defeat, or render inoperable any of the safety devices or warnings on this equipment. If any safety devices or warnings have been removed, defeated, defaced or rendered inoperable, **DO NOT USE THE EQUIPMENT!!!** The use and operation of this equipment, accessories, and its component parts contain a chemical(s) known to cause cancer, birth defects, and other reproductive harm.

ELECTROCUTION HAZARD! Check for overhead obstructions and high voltage power lines. A minimum distance of 10 feet from energized high voltage conductors shall be maintained at all times.

DO NOT OPERATE UNLESS AUTHORIZED AND TRAINED TO RUN LIFT!

1. Ensure that work platform is on a firm and level surface. Do not drive on soft or uneven terrain. Failure to take caution could cause lift to tip-over. The aerial work platform shall not be driven on grades, side slopes or ramps exceeding those for which the aerial work platform is rated by the manufacturer.
2. Inspect the work area thoroughly for all obstacles, debris, drop-offs, holes, slopes and depressions.
3. Inspect the lift thoroughly before each use. Test all functions before raising platform. Check fluid levels, tire pressure, hoses for leaks, breaks in the cable and elevating assembly. **NEVER OPERATE DAMAGED MACHINE.**
4. Ensure that all guard rails are properly secured and gates and openings are closed. Do not sit, stand, lean, or place loads on guard rails.
5. Personnel shall maintain a firm footing on the platform at all times. Do not use ladders or other objects on the lift to gain additional height. **ALWAYS** keep your two feet on the platform.
6. Hard hat, safety glasses and safety shoes should always be worn by operator.
7. If unit has outriggers, do not raise platform until outriggers are extended fully and stabilizers are down.
8. Know the rated capacity of the aerial lift. Distribute the load evenly over the platform. **DO NOT OVERLOAD.** Serious injury could occur.
9. Do not operate lift when the wind velocity exceeds 25 MPH or in thunderstorm conditions. **Extreme wind could cause the lift to tip-over.**
10. Do not drive with the platform raised! When raised, move only to maneuver!
11. Do not allow ropes, cords, etc. to become entangled in the elevating parts.
12. **STUNT DRIVING AND HORSEPLAY COULD RESULT IN INJURY OR DEATH. BE SAFE**
13. The operator is responsible for ensuring that all personal protective equipment is used.
14. The aerial work platform shall not be used as a crane.
15. Before operating any aerial work platform, operators shall have read and be familiar with the operator's manual and shall abide by the safety rules and practices.

If the person receiving this handout will not be the user of the equipment, forward these instructions to the operator. If there is any doubt as to the operation or safety of the equipment, DO NOT USE!!! CALL US IMMEDIATELY!!!

FAILURE TO FOLLOW THESE INSTRUCTIONS COULD RESULT IN INJURY OR DEATH.

Any piece of equipment can be dangerous if not operated properly. YOU are responsible for the safe operation of this equipment. The operator must carefully read and follow any warnings, safety signs and instructions provided with or located on the equipment. Do not remove, defeat, deface or render inoperable any of the safety devices or warnings on this equipment. If any safety devices or warnings have been removed, defeated, defaced or rendered inoperable, **DO NOT USE THE EQUIPMENT!!!** The use and operation of this equipment, accessories, and its component parts contain a chemical(s) known to cause cancer, birth defects, and other reproductive harm.

ELECTROCUTION HAZARD! Check for overhead obstructions and high voltage power lines. A minimum distance of 10 feet from energized high voltage conductors shall be maintained at all times!

DO NOT OPERATE UNLESS AUTHORIZED AND TRAINED TO RUN LIFT!

1. Ensure that boom lift is on a firm and level surface. Do not drive on soft or uneven terrain!! Failure to take caution could cause lift to tip-over! The boom lift shall not be driven on grades, side slopes or ramps exceeding those for which it is rated by the manufacturer. Boom and basket load limits specified by the manufacturer shall not be exceeded
2. Modifications or alternation of the boom lift shall be made only with prior written permission of the manufacturer.
3. **DO NOT** alter or disable interlocks or other safety devices.
4. Inspect the work area thoroughly for all obstacles, debris, drop-offs, holes, slopes and depressions.
5. Inspect the lift thoroughly before each use. Test all functions before raising platform. Check fluid levels, tire pressure, hoses for leaks, breaks in the cable and elevating assemblies. **NEVER OPERATE DAMAGED MACHINES!!!**
6. Ensure that all guard rails are properly secured and gates and openings are closed. Do not sit, stand, lean, or place loads on guard rails
7. Personnel shall maintain a firm footing in the basket at all times. Safety harnesses/ lanyards must be worn at all times. Do not use ladders or other objects on the lift to gain additional height. **ALWAYS KEEP YOUR TWO FEET ON THE FLOOR OF THE BOOM BASKET.**
8. Hard hat, safety glasses and safety shoes should always be worn by operator
9. Never operate gasoline engine inside a building without proper ventilation.
10. Do not use boom for any purpose other than to position personnel and their tools and equipment. **DO NOT USE AS A CRANE!**
11. Do not operate lift when the wind velocity exceeds 25 MPH or in thunderstorm conditions. **EXTREME WIND COULD CAUSE THE LIFT TO TIP-OVER!**
12. Do not drive with the boom basket raised! When raised, move only to maneuver!
13. Do not allow ropes, cords, etc., to become entangled in the elevating parts.
14. **STUNT DRIVING AND HORSEPLAY COULD RESULT IN INJURY OR DEATH! BE SAFE!!!**
15. Before operating any boom lift, operators shall have read and be familiar with the operator's manual and shall abide by the safety rules and practices.

If the person receiving this handout will not be the user of the equipment, forward these instructions to the operator. If there is any doubt as to the operation or safety of the equipment, **DO NOT USE!!! CALL US IMMEDIATELY!!!**

FAILURE TO FOLLOW THESE INSTRUCTIONS COULD RESULT IN INJURY OR DEATH.

RIGGING GUIDELINES

1. Good rigging is essential for moving construction materials, equipment and at the same time keeping them under control.
2. Do not overland any part of your rigging. Check loads for stability, near the ground before hoisting,
3. Wire ropes, chains, ropes and other rigging equipment should be inspected prior to use. Any defective material should be removed from service.
4. Job or shop hooks and link, or makeshift fasteners, formed from bolts, rods, etc., or other such attachments shall not be used.
5. Do not "Christmas Tree" loads.
6. Never secure wire rope cable by tying knots in the rope.
7. Wire rope is to be spliced ONLY in accordance with applicable safety regulations and by a qualified splicer.
8. Cable clamps are to be install ONLY with the "U" part of the bolt on the dead or short end of the cable with the saddle on the long or line end of the wire rope.
9. When not in use, all rigging equipment shall be stored to prevent damage (i.e. hang up sling type equipment).
10. Wire ropes shall be taken out of service when one of the following conditions exists:
 - a. In running ropes, six (6) random distributed broken wires in one lay or three (3) broken wires in one strand or lay.
 - b. Wear of one-third (1/3) of the original diameter or outside
 - c. Kinking, crushing, bird caging, heat damage or any other damage resulting in distortion of the rope structure.
 - d. In standing ropes, more than two (2) broken wires on one (1) lay in sections beyond the connections, or more than one (1) broken wire at an end connection.
11. Know use of chain falls, come-a-longs, chokers, shackles, clamps
12. Never raise a load over people or for any reason put yourself underneath a raise load
13. Use tag lines to control loads
14. Know weight capacities or rigging equipment and load weights prior to using equipment
15. Use all provided safety latches
16. Hard-hats are strictly required for performing this work
17. Under NO CIRCUMSTANCES shall equipment be allowed to be operated within 15 feet or any energized overhead or exposed wiring unless equipment is insulated and the specific purpose of repairing said equipment.
 - a. Some owners have specific permits to allow close proximity work. Verify any such proximity work and strictly follow owner's instructions. Owner's representatives must be present to direct the operation.
 - b. Violation of this item shall be cause for immediate dismissal.
 - c. Assume that a current voltage test is in effect prior to working energized lines.

CRANES, HOISTS, ELEVATORS AND CONVEYORS

1. Only properly trained and authorized personnel shall operate cranes, hoists, etc. and documentation of training shall be provided.
2. Cranes shall have certified annual inspection and a copy of the Certificate shall be in the cab.
3. Operator manual shall be located in the crane cab at all times.
4. The crane operator shall not pick up an improperly rigged load
5. Never swing loads over the heads of workers in the area
6. Trained flagmen and signalmen are to direct operations, using hand signals that are standard for the industry.
7. Only one person should be designated to give signals to the crane operator; standard hand signals should be used
8. Tag lines are to be used to control loads
9. Never leave a suspended load unattended without making it secure
10. Never allow loads, booms or rigging to approach within ten (10) feet of energized power lines fifty (50) KV or lower unless the lines are de-energized, or conductors insulated. For lines rated great than fifty (50) KV, follow OSHA regulations (four inches for every 10KV). Assume all power lines are energized. For they generally are.
11. Always operate cranes on firm, level grounds or use mats, particularly for near capacity lifts.
12. Rope off or barricade a space 360 degrees around all cranes operating on your site, to the extent of the swing radius of the rear of the rotating structure.
13. Riding loads or crane hooks is prohibited.
14. All hoisting equipment should be regularly inspected to assure that guards are on all gears, belts, and shafts. Documentation of daily inspections must be kept
15. A fully charged fire extinguisher should be in the crane cab
16. Broken or cracked glass in the crane cabs should be replaced
17. Operators must be capable of reading and understanding load charts
18. Consult load capacity chart & boom angle indicators before making a lift
19. Make certain you know the weight of the load to be lifted
20. TO BE EFFECTIVE, outriggers must be fully EXTENDED WITH PADS ON FIRM GROUND OR MATS
21. Plan your picks. Before setting up to make a pick, LOOK FOR THE POWER LINE EXPOSURE. If it is present, take action to prevent contact.

HOISTS, MATERIAL AND PERSONNEL

1. Always comply with the manufacturer's specifications and limitations
2. Rated load capacities, recommended operating speeds, and special hazard warnings shall be posted on the operating platform and cars
3. Hoist way entrances shall be protected with substantial gates or bars
4. Safety harness shall be worn at all times when operating equipment from a platform
5. No equipment shall be used in a manner not intended (i.e., lifting a man on tow motor forks)

CONVEYORS

1. When using conveyors to transport materials to another level, the perimeter of the loading area shall be barricaded
2. The EMERGENCY stop needs a reset button. (So that there will not be automatic start-up should stoppage be due to temporary power loss.)
3. There shall be an emergency stop at the operator's station
4. Conveyors shall have an audible alarm for start-up
5. Do not perform maintenance on any conveyor until the starting switch has been Locked Out/Tagged out of service

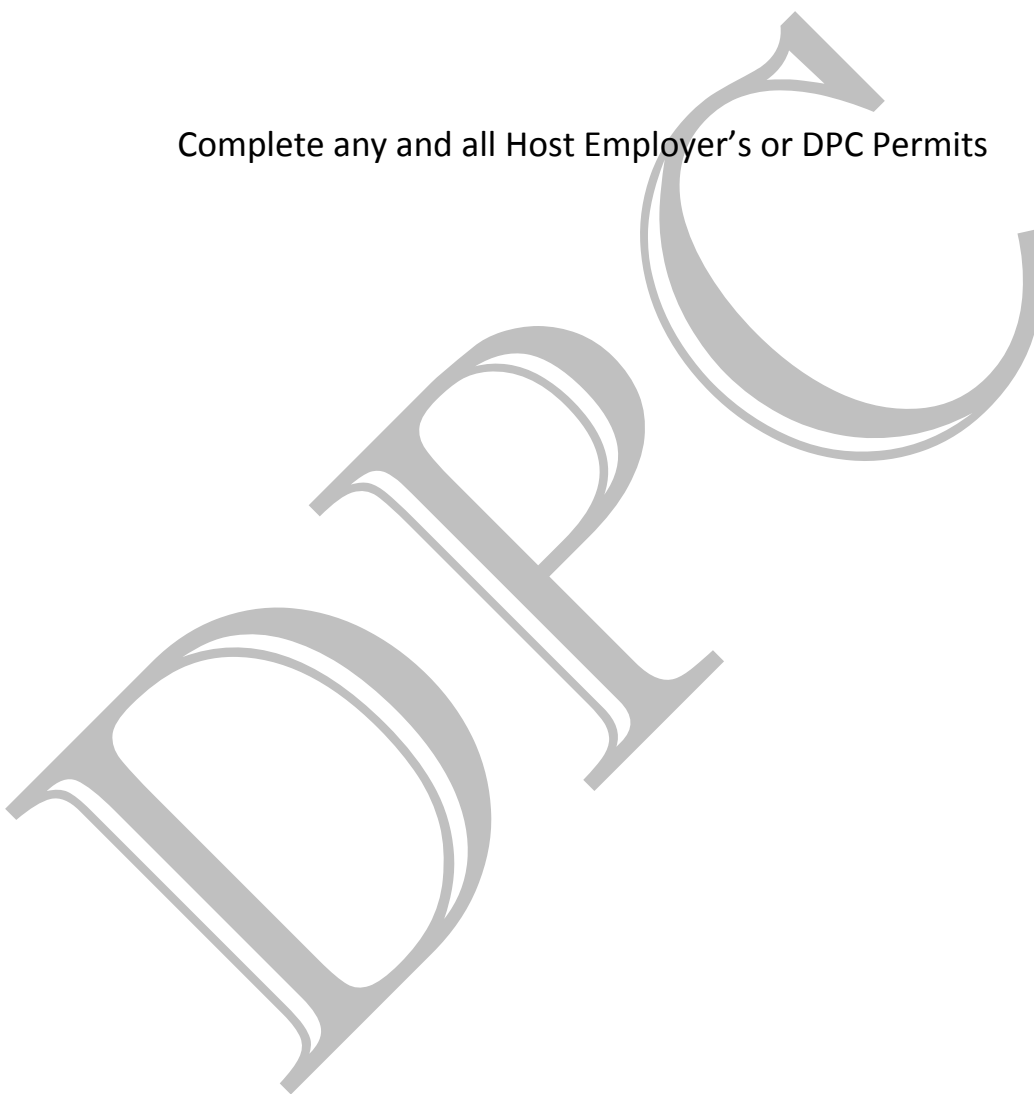
WELDING AND BURNING

ALL WELDERS NEED TO BE CERTIFIED THROUGH A RECOGNIZED WELDING PROGRAM CARDS WILL NEED TO BE ON FILE

1. Always keep area clear below cutting and welding operations. Use a Fire watch when necessary.
2. Use leak proof welding helmets and burning goggles for eye protection and to prevent flash burns. Always wear eye protection to guard against slag while chipping, grinding and dressing of welds.
3. Use manual electrode holders specifically designed for arc welding.
4. Make sure that all parts subject to electrical current are fully insulated against the maximum voltage encountered to ground.
5. A ground return cable shall have a safe carrying capacity equal to, or exceeding the specified maximum output capacity of the arc welding unit that it services.
6. Make sure that all welding leads, cables and connections are placed so that they do not present a fire or tripping hazard.
7. Use welding screens where practical
8. Have a fully charged fire extinguisher on hand
9. Be sure that there is proper ventilation when cutting, welding or heating in a confined space.
10. When electrode holders are left unattended, the electrodes should be removed and the holders protected that they do not make electrical contact with employees or conducting objects.
11. Any defective leads or cables should be replaced.
12. All employees performing welding or cutting operations shall wear suitable clothes in addition to correct head and eye protection. Welding gloves shall be worn and sleeves pulled down.
13. Welder's helper shall wear proper personal protection equipment (i.e., colored glasses, long sleeve shirt, etc.).
14. Obtain Hot Work Permits and Welding Permits when required in applicable areas. Contact the owner's representative for details.
15. Remove or protect combustible materials beneath and beside welding or burning operations.
16. Hoses and leads should not be run through doorways unless absolutely necessary, and then only if the door has been blocked open.
17. Do not weld or turn any tank which previously contained material until decontaminated.

18. Inspect equipment prior to use. Torches and regulators should be in good condition and clean.
19. Monitor the area you are welding or burning in for 30 minutes after the operation to assure safe conditions.
20. Welding and burning in proximity to cable trays or other exposed wiring should be done with extreme caution. Use welding blankets, many owners require fire watches during these operations – verify this with your foreman.

Complete any and all Host Employer's or DPC Permits



MECHANIZED EQUIPMENT

1. All equipment left unattended at night adjacent to highway or construction site shall have reflectors, and/or barricades to identify the location of equipment.
2. A maintenance log shall be kept on all pieces of major equipment and should be checked on a daily basis prior to use.
3. Rated load capacities shall be conspicuously posted on all equipment at the operator's state.
4. An accessible, fully charged fire extinguisher of five (5) BC rating or higher shall be available to the operator.
5. When vehicle/mobile equipment is stopped or parked, parking brakes must be set. Equipment on inclines should have wheel chocks.
6. All vehicles, where applicable, shall have:
 - a. Two (2) headlights
 - b. Two (2) taillights
 - c. Brake lights
 - d. An audible backup warning device
 - e. An audible warning device (horn) at the driver's station
 - f. Seat belts properly installed
 - g. Seats firmly installed for each person
 - h. Service, parking and emergency brake system operating
7. Operators shall not use motor equipment having a limited rear view unless:
 - a. Vehicle has an audible reverse signal alarm
 - b. In the case of a failed backup alarm, use an observer
8. Be sure that the load you are carrying is secure
9. Do not transport other employees unless the vehicle is designed to do so
10. When equipment is being repaired, make sure the blades, buckets, dump bodies, or similar parts are lowered or blocked to prevent movement.
11. Do not inflate, mount or dismount tires with split rims or lock rings unless protected by a safety cage and then only after bring properly trained.
12. Backhoe operators shall use extra caution when digging in the area of buried utilities. Make sure your foreman has contacted the utility company for location identification.
13. Backhoe operators should maintain a distance of ten (10) feet between the boom/bucket and electrical lines.

MOTOR VEHICLES

1. Motor vehicles are to be operated by authorized personnel only.
2. Be sure you are checked out in the correct operation of your vehicle prior to operating equipment. Use all safety equipment required.
3. Tie off and stabilize all loads.
4. Know and observe speed limit and other regulatory signs.
5. Look to the rear and sound horn prior to backing your vehicle.
6. Shut off motor and set emergency brake prior to leaving vehicle.
7. Use a flagman to direct a backing vehicle in congested areas.
8. Wear seat belts at all times!! It is the driver's responsibility to insure that this rule is strictly enforced at all times.
9. Shut off motor when refueling. To refill generators and such equipment, allow the equipment to cool off.
10. Gasoline and other flammable liquids shall be stored in OSHA approved suitable containers and shall be clearly identified with the appropriate labels. These containers should be stored in climate controlled environments which are well ventilated if possible, and should not be transported in vehicles any more than absolutely necessary.
11. Personnel may not ride in the bed of a pickup truck unless proper seating is arranged.
12. No more than (3) three people are allowed in the cab of a pickup truck at any time unless the truck is equipped for more passengers.
13. All accidents involving motor vehicles shall be reported to the management group or proper authorities immediately, regardless of the extent of the damages. Report any injuries to the Safety Officer in a timely manner. The primary responsibility, however, in any accident, is the safety of everyone involved and the administration of first aid and medical treatment. No rules herein, however, shall preclude a person from responding in an emergency situation.
 - a. So not remove persons from a wrecked vehicle unless absolutely necessary, as internal injuries could be complicated.
14. Loads extending over the rear of the truck shall be properly flagged in accordance with state laws.

FLAGGING PROCEDURES

1. Flagging persons should be properly dressed; i.e.
 - a. Orange or red vest (reflective at night)
 - b. Hard Hat
 - c. Red Flag 918" x 18") or STOP/SLOW sign
2. Always stand on the berm next to the traffic you are controlling or in the barricaded lane. UNDER NO CIRCUMSTANCES stand in the lane being used by traffic. Stand sufficiently in advance of workmen to warn them of approaching danger, such as out-of-control vehicles.
3. Always face the traffic you are controlling.
4. To STOP traffic, hold flag/STOP sign straight out from the side of the body towards the lane to be controlled. Hold up the other hand in front of you to indicate STOP! Stand on the berm until the first vehicle is topped; then move to a position where other drivers approaching can see you.
5. To START traffic, drop flag or sign to side or reverse sign to SLOW, wave on traffic with other hand.
6. To SLOW DOWN oncoming traffic, hold the flag/sign straight out from the side of the body. Wave slowly with other hand, indicating traffic to proceed slowly.
7. Be sure advance warning signs are in place before starting to flag.
8. The use of cones ahead of flag person's location keeps traffic in line.

TRAFFIC CONTROL

1. Barricades should be erected to detour the passage of persons or vehicles from hazardous areas.
2. If there are questions about which signs should be used, refer to the State Traffic Control Manual for guidance.
3. Try to maintain a reasonable working space between the wall and Excavation, a minimum of three (3) feet.

COMPRESSED GAS CYLINDERS

1. Employees should be instructed in the proper use of gas welding or cutting operations.
2. All compressed gas cylinders should be clearly marked as to contents.
3. Cylinders must be secured in an upright position, including both storage and transfer
4. Cylinder valves must be protected at all times, use caps when not in use
5. All leaking cylinders must be removed from service and tagged as inoperable
6. Cylinders shall be kept at a safe distance during welding or cutting operations
7. Cylinders shall be kept at as safe distance from electrical circuits.
8. Regulators are to be kept serviced and in proper working order
9. Oxygen and flammable gas cylinders shall be stored at least twenty (20) feet apart or by a noncombustible barrier at least 5 feet high having at least a ½ hour rated fire resistance between them.
10. Store oxygen and acetylene cylinders in a location well removed from oil, combustibles, and other physical damage
11. Make sure regulators, hoses, coupling, and torch tips are in good condition before using (no breaks, damaged or cracked glass) and free from oil and grease
12. When leaving torch unattended, turn off gases at the tank valves and purge hoses
13. Do not weld or cut in or near flammable or combustible materials, especially paints, dusts, gases, or vapors
14. Do not use matches, butane lighters, or hot work to light torches. Use a striker designed for that purpose.
15. Special precautions should be taken when cutting materials that have been galvanized or special coated metals.
16. Do not use oxygen for comfort cooling, blowing dust from clothing, or for cleaning off work area.
17. Compressed gas cylinders must be stored at least 5 (five) feet or more from open flames or intense heat.

DEMOLITION

DPC DOES NOT DO THIS

NOTE: A WRITTEN DEMOLITION PLAN IS REQUIRED BEFORE DEMOLITION WORK MAY COMMENCE

1. Protect the public and employees from falling debris by using barricades and/or overhead protection
2. Make sure floors will support all loads by inspecting for structural soundness before loading time
3. Install shoring or bracing, as required
4. Cover all floor openings. Guard all wall openings to a height of forty two (42) inches
5. Know what to do in the event of an unplanned collapse.
6. Close off all access ways not to be used. Keep used access ways clear of debris.
7. Do not drop anything down a chute unless the drop area is protected. Chute openings must be kept closed when not in use
8. Make sure curbs or stop-logs are in place at dump openings to halt equipment from going into the opening
9. When operating mechanical equipment (dozers, front end loaders, etc.,) make sure it has adequate overhead protection
10. Use appropriate protective equipment as conditions dictate (heavy boots, gloves, respirators, hard hats, etc.)

David Pickering and Company

WIRE PULLING

PURPOSE:

It is the policy of David Pickering & Company (DPC) to adhere to all industry accepted safety standards while conducting wire pulls. All wire pulls need to be checked against the included charts before the wire pull and just before setting up the rigging for the pull. If the wire-pull falls within the criteria set forth in the charts; a safety audit will be triggered to ensure safety of employees. Stresses placed on cable will not exceed recommended stress for the size of wire or cable to ensure cable is not damaged.

SCOPE:

This policy applies to all DPC employees, supervisors, and operations managers that may be involved in wire or cable pulls.

POLICY:

It is the policy of Davis Pickering & Company that a *wire pull safety form* be completed for all pulls that have criteria that places the pull in the areas with an X. These types of pulls are to be determined by consulting the following charts. The *wire pull safety form* will be completed by foreman, safety personnel/operations manager, and tool department. An audit of pulling components will be performed by safety personnel whenever a wire pull has an X based on the included charts. All pulling components' manufacturer's rated capacities, condition of pulling components, length of pull, cable size as well as additional information will be logged on the *wire pull safety form*. The wire pull rigging setup will be audited by operations manager and signatures recorded on wire pull form. In some circumstances stress gauges will be used to ensure stresses placed on cable does not exceed manufacturer's recommendations.

PROCEDURES:

1. Concerning applicable wire or cable pulls, the safety department and /or tool department will inspect pulling components before toll are sent to jobsite. Manufacturer's rated capacities for ropes, slings, connectors, sheaves, and the pulling tugger's force. Overall conditions will also be inspected and any components found in substandard condition will be removed from service and alternative pulling components sent to jobsite.
2. All pulling components will have a minimum manufacturer's rated capacity greater than that of the pulling tugger's pulling force. When feasible, greater manufacturer's rated capacity components will be used than the pulling force of the tugger. The "weak link" needs to be the tugger itself. If an equipment failure would occur it would be the tugger's chain or the tugger stalling out. **It should be noted that manufacturer's rated capacities are for new equipment that has never been used.** Stress gauges will be used when needed to ensure these stresses are not exceeded.

3. Pulling equipment also needs to be inspected a second time by the foreman or designate employee before being utilized for pull. The same standards apply. If substandard components are found equipment needs to be pulled from service and replacement components need to be obtained. If components are found that do not have a greater manufacturer's rated capacity – than that of the pulling tugger's force, replacement components need to be requested from office or purchased that do have a greater rated capacity than the pulling tugger's force. A
4. After wire pull rigging is in place operations manager needs to inspect for proper rigging. Operations manager will request any changes or modifications needed and sign off on wire pulling form after they are made.
5. After these steps have been taken, wire pull can begin.

Electrical Contractors

Jobsite: _____

Foreman: _____ Date: _____

Individual in Charge of Pull: _____

Type of cable/wire pull: _____

Size of wire: _____

Length of pull: _____

Any conditions that could affect pull: _____

Maximum Rated Capacity:

Condition:

Tugger _____

Rope _____

Sheaves _____

Clevises _____

Slings/straps _____

Notes: _____

+ _____

+ _____

+ _____

+ _____

SAFETY OFFICER

OPERATIONS MANAGER

An equal opportunity employer

GENERAL WIRE PULL SAFETY

- Always inspect all wire pulling components before use. If any are found defective remove from service immediately
- Get approval from your foreman before rigging from any structural support member to ensure that it will support the tension of the pull
- Always inspect and verify the maximum load-bearing capacity or maximum strength of all structural supports, pulling system components and anchoring systems before setting up the puller. Any component that cannot withstand the maximum cable-pulling forces could break and strike nearby personnel causing injury
- All wire pulling components should have at a minimum, preferably greater, manufacturer's rated capacity than the puller
- Never allow anything other than the pulling rope to contact the capstan. A grip, swivel, or other component could break and strike nearby personnel
- Never stand in the "line of fire" of a cable pull. Also never stand directly under a vertical pull. Cable could fall from conduit.
- Always locate the puller so that it is close to the conduit. Rope, cable, or connectors can break under tension, causing the rope to whip violently.
- An under-rated or worn rope or sling may break and whip violently. Always use a double-braided composite rope with the following characteristics:
 1. Maximum rated capacity at least that of the puller
- Always check the condition of the entire rope before use; remove from service if found damaged or worn
- Do not maintain a stationary rope on a rotating capstan. The wear may cause rope to break
- Attach the pulling rope with appropriate connectors. Select connectors with a maximum-rated capacity of at a minimum of the pullers maximum rated capacity
- Never put fingers through holes in elbow units. This is a shear point and rotating parts may cut off fingers
- Keep hands away from the capstan, rope could crush hands
- Never wrap rope or slings around hands, arms, waist or other body parts
- Do not stand on spent coiled or tailed rope. Always hold rope so that it can be released quickly
- Never allow rope to become overlapped on the capstan. If an overlap brings to develop, relax the tailing force immediately and shut off the cable puller
- Only use rigging components for intended purposes. Never use cable pullers as a hoist or winch
- Always inspect puller and all accessories before use. Replace any worn or damaged components with appropriate manufacturer parts
- Wire pulling poses an entanglement hazard. Do not operate the cable puller while wearing loose clothing or jewelry. Restrain long hair

- Eye protection must always be worn when operating cable puller. Whenever feasible, erect barriers between the wire pull and the employee. If a component would fail it will strike plywood or other barrier and not the employees conducting the wire pull
- Follow floor mounting instructions carefully. An improperly attached floor mount can become loose and break away striking nearby personnel
- Do not attach the floor mount to masonry, brick, or cinder block
- If any of the floor anchors would spin before the minimum torque is achieved, abandon mount location and start elsewhere. An improperly installed mount could allow the puller to break free causing injury or property damage
- Set up cable pullers so that the rope will approach the capstan at an angle of 90 degrees. Angles outside of this may cause the rope to over lap

NOTE: Remember that manufacturer's rated capacities are for new equipment that has never been used. It is very important that all wire pull components are rated at or greater than the cable puller's pulling force. Any and all defective, worn, frayed, cut, chemical soaked rope or slings shall be discarded and not used. Defective connectors will also be removed from service. Any sharp burrs or edges on any components will be filed down before using to ensure rope and slings are not cut or damaged.

RESPIRATORY PROGRAM

PURPOSE

This instruction is designed to address employee selection and use of respiratory protection devices (commonly called respirators) in order to protect against breathing harmful atmosphere contaminants.

RESOURCE MATERIALS

The procedures and practices published herein are designed to meet requirements of the following regulations/policy:

1. OSHA 29CFR 1910.134 – Respiratory Protection
2. ANSI Z88.2 – 1980 Practices for Respiratory Protection
3. ANSI Z88-6 – 1984 Respirator Use – Physical Qualifications for Personnel

SCOPE

This instruction addresses the following thirteen areas in order to provide information and guidance necessary for the proper selection, use and care of respirators.

1. Responsibilities/Authority
2. Hazard assessment and work area surveillance
3. Medical review and certification (PFT's)
4. Limitations
5. Fit testing
6. Inspection
7. Cleaning, repairs, and storage
8. Compliance verification
9. Emergency situations
10. Training
11. Physical, initial and annually, or after medical conditions change
12. Issue or respirator and/or locations of Emergency Self Control Breathing Apparatus
13. The overall program Administrator is the Safety Coordinator at each site will be determined

RESPONSIBILITIES

Management:

Assuring employees are trained in the proper selection, use and care of respiratory protective equipment and developing standard procedures for respirator selection and use.

Supervisor:

The supervisor shall provide approved respiratory protective equipment for company employees when necessary and shall enforce the use of respirators when effective engineering controls are not feasible or while they are being instituted. In most cases the supervisor will be the administrator of programs on-site.

Training Coordinator:

The training coordinator shall:

1. Coordinate and schedule classroom training for those who are designated in the plant safety program to wear respiratory protection devices.
2. Provide training during orientation and annually thereafter.
3. Maintain a central file record of respiratory training. Ensure that training activities are recorded into the plant training file database for each employee.

Environmental/Safety Personnel

Members of the plant environmental and safety group shall conduct/oversee the plant industrial hygiene monitoring program to confirm work place exposures. They will also:

1. Select and standardize respiratory protective equipment used
2. Prepare necessary training materials and develop procedures appropriate to respirator selection and use.

Specialist, Health, and Safety

They are responsible for scheduling employees who may be required to wear a respiratory protective device for a health and physical review. The review is to verify if they are physically capable of wearing a respirator, (i.e., no respiratory problems, physical limitation, etc.) Refer to Section 6.0, Medical Review/Certification.

Employees

Employees shall use respiratory provided in accordance with instructions and training. Employee shall:

1. Be responsible for properly maintaining, cleaning, sanitizing, and storing their equipment.
2. Immediately report any malfunction to their supervisor and remove the equipment from service. (The supervisor will notify the Safety Engineer who will arrange for repair or replacement as noted in Section 11.0, *Repairs*).
3. Notify their supervisor if they experience changes in their physical condition that may affect their ability to wear a respirator. The supervisor will then contact the Specialist, Health & Safety to schedule a re-evaluation of the employee's ability to wear a respirator. (For example, if the person has experienced a heart attack, is pregnant, etc., a re-evaluation is required).
4. Check to ensure a positive seal before each use of a respirator.
5. Maintain facial hair to meet the OSHA requirements for not permitting the use of a respirator when conditions prevent a good seal. (I.e., beard, mustache, or sideburn must not extend into any portion of the sealing area of the respirator).

Hazard Assessment

Environmental/safety personnel will make assessments of employee exposure, in and the work place, to harmful dusts, vapors, etc. to determine if respirators are needed and the appropriate type to be used. Work areas will be re-assessed whenever a change to process, equipment, chemicals, or other activity indicates a possible change to employee exposure.

The attached respirator selection chart provides a list of plant activities requiring the use of respirators. This chart will be modified by members of the environmental/safety group as changes in chemicals or employee monitoring indicates it is appropriate. (Attachment 1 – Respirator Selection Based on Potential Exposure Hazards).

Medical Review/Certification

All employees who are required to use a respirator must first be medically certified to be capable of wearing one. The content of the health and physical review is outlined in the Respirator Exam contained in *OSHA 1910.1324 Periodic Medical Exam Programs manual*. A physician must complete the review.

All new employees will be reviewed during the employee pre-placement exam. Re-evaluation will be done in conjunction with the periodic health evaluation examination or other exposure – specific or job specific exams.

The form, *Medical Certification for Respirator use (GO-1310)* is used to document these assessments. These Specialist, Health & Safety maintain a copy of the completed form in the employee's medical file.

The Specialist, Health & Safety provides written notification to the affected employee's Training Coordinator, Safety Engineer, and the employee's department manager if the employee does not pass the evaluation

Limitations

Special limitations must be taken into account when using respiratory equipment.

1. In order to provide a consistent seal with a respirator, employees are to report to work with no interfering facial hair. As noted in Section 4.5, only sideburns, mustaches and beards that do not extend into the sealing area of the respirator are permitted.
2. Eyeglasses with temples or straps which pass through the face piece sealing area of a full-face piece respirator shall not be worn. Employees who wear prescription eyewear and are assigned full face respirators will be provided with spectacle kits for their respirators. (Limited to those whose driver's license requires them to wear prescription eyeglasses while driving.
3. Both soft and gas-permeable contact lenses may be worn when using respiratory protective equipment. Non-gas permeable contact lenses are not allowed.
4. Respiratory equipment can greatly reduce the distance of speech transmission. This can be overcome by using special equipment and/or establishing a signal. Good communications between all involved is very important and must be included in the planning stage of any work requiring a respirator.
5. Personal Protective Equipment (PPE) required by Company Policy, Personal Protective Equipment, or the MSDS for materials involved, must be worn. (Safety glasses are not to be worn with full-face respirators.)

Fit Testing

The Safety Engineer or his/her designated representative (PMCA), will perform a qualitative fit test during initial training. In addition, the test must be repeated anytime that an employee experiences a significant facial change. (I.e. scars, weight loss, dentures, etc.).

1. Employees are responsible for successfully completing a positive pressure field fit check each time respiratory protective equipment is donned.

Inspection

Respirators must be inspected on a regular basis. All routinely used respirators are to be inspected before and after each use. They must also be inspected when they are cleaned.

Self-Contained Breathing Apparatus (SCBA) and all emergency-use respirators shall be inspected monthly as a minimum and after each use. The assigned work group will conduct these monthly inspections. Findings will be recorded on the appropriate *Weekly Safety Inspection Sheet Checklist*. Minor deficiencies will be corrected at the time of inspections (i.e. improperly loosened straps, mask not bagged properly, etc.) The checklist shall be turned in to

the appropriate shift or maintenance supervisor who may initiate further corrective action. (Refer also to Section 11.0 – Repairs)

Cleaning

Employees who use respiratory protective equipment are responsible for forwarding the used equipment to the Safety Engineer who will have it professionally cleaned and sanitized. Respiratory equipment shall not be passed from one user to another until it has been properly cleaned and sanitized. Respirators used as part of emergency response shall be properly decontaminated before being given routine cleaning as recommended by the manufacturer.

Repairs

Repairs to respiratory protective equipment shall only be made by qualified personnel or an outside service contractor. Any respiratory protection equipment needing repairs or replacement must be submitted to the Safety Engineer.

A service contractor using certified Class D Breathing Air must perform the refilling of the SCBA cylinders.

Storage

When respirators are not in use, they shall be protected against dust, sunlight, heat, extreme cold, excessive moisture, and damaging chemicals. Respirators shall be stored sealed in a clear plastic bag, or other container that services this purpose. Respirators shall not be kept in lockers or toolboxes unless they are in a protective carrying case or carton.

Compliance Verification/Program Evaluation

This instruction and the respiratory protection program will be evaluated under process safety management reviews and the plant audit program.

The Safety Coordinator will do random inspections of respiratory protective equipment in order to determine compliance verification. This will help ensure the respirators are being properly selected used cleaned, and maintained. Employees, who use respirators, and their supervisors, will be consulted concerning the performance of the respirators.

Audit results and any corrective action taken will be documented and tracked by the Safety Engineer to ensure noted deficiencies are corrected.

Emergency Situations

In spill or release situations, the host plant or his/her designated representative, must determine if there is a need for respiratory protection prior to initiating emergency response. Monitoring is to be conducted in the following order:

1. O₂ level
2. % Lower Flammable level (LFL)
3. Airborne concentration of the material released

O₂ levels below 19.5% LFL above 10%, airborne concentrations at or above the Permissible Exposure Level (PEL) of the Time Weighted Average (TWA) listed on the MSDS require the use of Self-Contained Breathing Apparatus. LFL of 50% or greater prohibit entry into the vapor cloud. In any of these situations a standby person (located in the safe area) must observe and maintain contact with employees entering the vapor cloud. The qualifications and duties of the standby are identical to the attendant for confined space entry.

Sub-Contractors

Subcontracted personnel and others assigned to work with Davis, Pickering & Co., Inc. will be instructed in respiratory program requirements by a company representative.

RESPIRATOR HAZARD ASSESSMENT

JOB SITE: _____

DATE: _____

Respirator Usage:

Never _____

Rarely _____

Sometimes _____

Often _____

Tasks that might require respirators: _____

+ _____

+ _____

+ _____

+ _____

Summary: _____

+ _____

+ _____

+ _____

+ _____

CONFINED SPACE PROGRAM

Prepared by
Safety Department
For
Davis Pickering & Company
Reviewed & Revised 2006

INTRODUCTION

Entering and working in confined spaces has been and will be an occasional part of DPC's employee job duties. This document has been developed to ensure the safety of personnel required to enter and conduct work in confined spaces. The program contained herein describes reasonable and necessary policies and procedures for any and all facilities, departments, and individuals who are associated with confined space entry operations. This program and all parts of 29 CFR 1910.146 shall apply to all confined space entry operations conducted by Davis Pickering & Company. As it is the policy of DPC to provide its employees with the safest work environment possible, DPC requires compliance with the procedures set forth in this manual. A site-specific program may be used, providing it meets or exceeds the requirements listed in this manual.

CONTENTS OF THIS POLICY

This policy and procedure has been organized into four sections:

1. Identifying Confined Spaces

Foremen or other designated competent persons should determine if any personnel under their supervision are required to enter or conduct work in confined spaces as defined in this section

2. Identifying Confined Space Hazards

This section of the manual gives information of the types of hazards that may be present in a confined space. It should be reviewed whenever the hazards of a confined space are being evaluate

3. Confined Space Entry Program

It if is determined that department personnel are required to perform duties in confined spaces, the program outlined in page 5, paragraph 2 – The Permit System – should be implemented.

4. Responsibilities and Training Requirements

This section lists the responsibilities and training requirements of each individual involved in a confined space entry.

IDENTIFYING CONFINED SPACES

Recognition is an important aspect of making a safe entry into a confined space. Not all confined spaces will be considered permit-required confined spaces and being able to identify the difference between the two is important. To clarify what constitutes a Confined Space, the following definition will be used:

A Confined Space is any space that has the following characteristics:

1. It is large enough or so configured that an employee *can bodily enter and perform assigned work*.
2. It has *limited or restricted means for entry or exit*. Confined space openings are limited primarily by size and location.
Openings may be small and may be difficult to move through easily. However, in some cases openings may be very large; for example, open-topped spaces such as pits or excavations. Entrance and exit may be required from top, bottom, or side. In some cases, having to access the work area by a fixed ladder may constitute limited or restricted entry or exit. Size or location may make rescue efforts difficult.
3. Is not designed for continuous employee occupancy
Most confined spaces are not designed for employees to enter and work on a routine basis. They may be designed to store a product, enclose materials and processes, or transport products or substances. Because they are not designed for continuous occupancy, frequently they will not have good ventilation or lighting. Therefore, occasional employee entry for inspection, maintenance, repair, cleanup, or similar tasks

can be difficult and dangerous. The danger associated with entry may come from chemical or physical hazards with the space.

A Non-Permit Confined Space is a confined space that does not contain nor has the potential to contain, any hazard capable of causing death or serious physical harm (with respect to atmospheric hazards). Examples of non-permit required confined spaces might include the interiors of HVAC units, certain air plenums and pipe chases, attics, walk-in freezers or refrigerators, and some building crawl spaces.

A Permit-Required Confined Space (permit space) is a confined space that is potentially hazardous. A permit-required confined space has one or more of the following characteristics:

1. *Contains or has a potential to contain a hazardous atmosphere*
2. *Contains a material that has the potential for engulfing an entrant.*
3. *Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly-converging walls or by a floor that slopes downward and tapers to a smaller cross-section; or*
4. *Contains any other recognized serious safety or health hazard. Examples of serious safety or health hazards might include:*
 - a. Fall Hazards
 - b. Unguarded machinery
 - c. Extreme heat or cold
 - d. Steam pipes or chemical lines
 - e. Hazardous noise levels
 - f. Electrical hazards
 - g. Presence of asbestos
 - h. Potentially hazardous levels of dust (such as might occur at a Feed Mill)

Because of the lack of ventilation in most confined spaces, they will have the potential for a hazardous atmosphere. Therefore, they must be designated “permit-required”, and the procedures for making entry into a permit-required space must be followed. Examples of permit-required confined spaces include sewers, electrical vaults, steam tunnels, sump pits, certain mechanical rooms, some excavations, and other types of enclosures.

Any space that is accessed by lifting a manhole cover shall be considered a permit-required confined space. Additionally, some roofs, certain grain storage facilities, and equipment access areas may be designed permit-required confined spaces even though they don't technically meet the definition (i.e., they may not really have limited or restricted means of entry or exit). These areas shall be clearly marked as permit-required spaces.

Foremen are directly responsible for ensuring the safety of their employees in regards to confined spaces. It is their responsibility to evaluate potentially hazardous spaces within their scope of work and areas to ensure that the proper precautions are taken for safety. This includes clearly marking permit-required confined spaces, training employees, and ensuring proper entry procedures are followed. These responsibilities may be delegated to another

competent person provided he/she is qualified. The Safety Department should be immediately notified whenever a confined space entry is to take place so that refresher training can be provided.

Supervisors are responsible for ensuring their employees are properly trained to do the jobs they are sent to do. This includes recognition of confined spaces and proper procedures for making entry into permit-required confined spaces whenever necessary. **No DPC employee shall be sent on a job that potentially involves work in a confined space or any respirator use unless they have been properly trained in confined space entry procedures, fit tested, and deemed medically fit to wear a respirator.**

It may be determined that a space presents no real danger for employees. However, it is required that all spaces be considered potentially dangerous until they have been evaluated and tested.

IDENTIFYING CONFINED SPACE HAZARDS

Once a space has been identified as confined, the hazards that may be present within the confined space must be identified. Confined-space hazards can be grouped into the following categories: 1) Oxygen-deficient atmosphere, 2) flammable atmosphere, 3) toxic atmosphere, and 4) mechanical and physical hazards.

Every confined space must be evaluated for these four types of hazards. The three types of atmospheric hazards are often the most difficult to identify since they might not be detected without the assistance of a gas monitor.

1. Oxygen-Deficient Atmospheres

The normal atmosphere is composed of approximately 21% oxygen and 79% nitrogen. An atmosphere containing less than 19.5% oxygen shall be considered oxygen-deficient. The oxygen level inside a confined space may be decreased as the result of either consumption or displacement.

There are a number of processes that consume oxygen in a confined space. Oxygen is consumed during combustion of flammable materials, as in welding, cutting, or brazing. A more subtle consumption of oxygen occurs during bacterial action, as in the fermentation process. Oxygen can also be consumed during chemical reactions such as in the formation of rust on the exposed surfaces of a confined space. The number of people working in a confined space and the amount of physical activity can also influence oxygen consumption. Oxygen levels can also be reduced as the result of oxygen displacement by other gases.

2. Flammable Atmospheres

Flammable atmospheres are generally the result of flammable gases, vapors, dust mixed in certain concentrations with air, or an oxygen-enriched atmosphere.

Oxygen-enriched atmospheres are those atmospheres that contain an oxygen concentration greater than 22%. An oxygen-enriched atmosphere will cause flammable materials such as clothing and hair to burn violently when ignited.

Combustible gases or vapors can accumulate within a confined space when there is inadequate ventilation. Gases that are heavier than air will accumulate in the lower levels of a confined space. Therefore, it is especially important that atmospheric tests be conducted near the bottom of all confined spaces.

The work being conducted in a confined space can generate a flammable atmosphere. Work such as spray-painting, coating, or the use of flammable solvents for cleaning can result in the formation of an explosive atmosphere. Welding or cutting with oxyacetylene equipment can also be the cause of *an explosion in a confined space and shall not be* allowed without a hot work permit. Oxygen and acetylene hoses may have small leaks in them that could generate an explosive atmosphere and, therefore, should be removed when not in use. The atmosphere shall be tested continuously while **any** hot work is being conducted within the confined space.

3. Toxic atmospheres may be present within a confined space as the result of one or more of the following:
 - A. The Product Stored in the Confined Space
When a product is stored in a confined space, the product can be absorbed by the walls and give off toxic vapors when removed or when cleaning the residual material. The product can also produce toxic vapors that will remain in the atmosphere due to poor ventilation.
 - B. The Work Being Conducted in the Confined Space
Toxic atmosphere can be generated as the result of work being conducted inside the confined space. Examples of such work include: Welding or brazing with metals capable of producing toxic vapors, painting, scraping, sanding, etc. Many of the solvents used for cleaning and/or degreasing produce highly toxic vapors.
 - C. Areas Adjacent to the Confined Space
Toxic fumes produced by processes near the confined space may enter and accumulate in the confined space. For example, if the confined space is lower than the adjacent area and the toxic fume is heavier than air, the toxic fume may “settle” into the confined space.
4. Mechanical and Physical Hazards
Problems such as rotating or moving mechanical parts or energy sources can create hazards within a confined space. All rotating or moving equipment such as pumps, process lines, electrical sources, etc., within a confined space must be identified.

Physical factors such as heat, cold, noise, vibration, and fatigue can contribute to accidents. These factors must be evaluated for all confined spaces.

Excavations could present the possibility of engulfment. Employees shall be protected from cave-ins by sloping, benching, or shoring systems when the depth of the excavation is more than four (4) feet, in accordance with 29 CFR 1926.652. In some circumstances, air monitoring may also be required.

CONFINED SPACE ENTRY PROGRAM

1. Identifying All Confined Spaces

- A. All confined spaces located within a facility or under the facilities control should be identified. Once the space has been identified as Confined, whether a permit is required will be determined.
- B. All employees shall be made aware of these confined spaces through training or instruction provided by supervisors or their designated representatives. Assistance in this training shall be provided by safety.

2. Preventing Unauthorized Entry

- A. All employees shall be instructed by supervisors or their designated representatives that entry into a confined space is prohibited without an authorized permit.
- B. Supervisor or their designated representatives shall instruct all employees to list their names on the authorized permit before they will be allowed to enter a confined space.

3. The Permit System

- A. When a confined space must be entered, a permit shall be completed and authorized by supervisors or their designated representatives prior to entry of the confined space. This permit shall serve as certification that the space is safe for entry. The permit shall contain the date, the location of the space, and the signature of the person providing the certification.
- B. A permit shall not be authorized until all conditions of the permit have been met. The permit to be used by DPC employees can be found following this procedure.

Planning the Entry

The first step towards conducting a safe confined-space entry is to plan the entry. This will allow for the identification of all hazards, and for the determination of all equipment necessary, to complete the project.

A. Gathering General Data

- 1. Identify the confined space. Give the name or location of the confined space.
- 2. Give the reason for entering the confined space. Be specific. Also, identify if hot work will be done.
- 3. Identify the contents of the confined space. This refers to any chemicals or other materials and energy that are usually present in the confined space.

NOTE: Atmospheric testing shall be conducted prior to entering permit-required confined spaces. It is recommended that the entry supervisor conduct these tests. However, any competent person certified in confined space entry may do so.

B. Identify the Hazards

1. The entry supervisor will determine the oxygen content and record this on the entry permit.
2. The entry supervisor will determine flammable gas content and record this on the entry permit.
3. The entry supervisor will determine level of H₂S and Carbon Monoxide and record this on the entry permit.
4. If a toxic substance is determined to be in the confined space during testing by the entry supervisor, Environmental Health & Safety shall be contacted to assist in obtaining a Material Safety Data Sheet or other chemical information to determine what type of personal protective equipment is required, the potential health effects, the Permissible Exposure Limits, and any other information needed to safely conduct the work.
5. Entry supervisors will determine mechanical and physical hazards. They should list all items and energy that will require lockout/tag out, blanking, and bleeding, disconnecting, or securing. Physical hazards should also be listed.

C. Ventilation of the Confined Space

1. Indicate whether mechanical or natural ventilation will be used. Describe the procedures to be used.

NOTE: If mechanical ventilation is to be used, the exhaust must be pointed away from personnel or ignition sources. Also, mechanical ventilators should be bonded to the confined space.

D. Isolating the Confined Space

1. Describe the procedures for disconnecting equipment or lockout and tag out. All mechanical, electrical, or heat-producing equipment should be disconnected or locked and tagged out. This would also include any pumps that pull fluid from, or pump fluid into, the confined space.

E. Purging/Cleaning the Confined Space

1. Indicate if the confined space will be purged. Purging with inert gas is not recommended. If the space must be purged, describe the procedures.

2. Indicate the type of cleaning methods to be used. If chemical cleaners are to be used, name the type and describe the procedures. The MSDS for the chemical should be consulted prior to use.

NOTE: When introducing a chemical into a confined space, the compatibility of that chemical with the contents of the confined space must be checked. If in doubt, consult Environmental Health & Safety

NOTE: If steam is to be used, the hose should be bonded to the confined space.

F. Placement of Warning Signs'

1. Indicate if warning signs or barriers will be needed to prevent unauthorized entry or to protect workers from external hazards. If the confined space will be left open and unattended for any length of time, warning signs and barriers such as barricades and/or caution tape will be required.

G. Identifying All Personnel

1. List all employees that will be required to prepare the confined space and complete the work inside the space.

H. Identifying Necessary Equipment

1. List all equipment that will be necessary to complete the project.

CONDUCTING PRE-ENTRY TRAINING

Once the entry has been planned, department heads or their designated representatives must train all employees who will be involved in the entry. The training should be conducted no earlier than one day before entry is to be made. The following outline should be used for the training.

- A. Identify the confined space and the reason(s) for entry.
- B. Identify work detail
 1. Assign each employee the job(s) he/she is to perform in the entry project (entrant, standby person, etc.)
 2. If an employee is required to use a piece of equipment, be sure that he/she is capable of using the equipment properly.
 3. Inform all personnel that no one is to enter the confined space unless the attendant is present at the work site.
- C. Inform entrants of all known or suspected hazards
 1. Inform personnel of any access or exit problems
 2. Inform personnel of all equipment that must be locked out or tagged out
 3. Inform personnel of the contents of the confined space
 4. Inform personnel of all atmospheric levels that must be maintained before entering and while working in the confined space

If a toxic atmosphere or substance is present or could become present, the following additional training must be completed:

5. If respiratory protection is not going to be used, inform personnel of the maximum permissible exposure level (PEL) that can exist within the confined space, and the method used to monitor PEL.
6. Inform personnel of the potential health effects of exposure to the toxic atmosphere or substance
7. Inform personnel of the signs and symptoms of exposure to the toxic fume
8. Inform personnel of the personal protective equipment (PPE) that they will be required to wear
9. If entrants are unaware of the proper use of the PPE, they must be trained in the proper use of this equipment.

NOTE: Supervisors may request assistance from Safety in providing the above-mentioned training.

10. Persons should not be assigned to tasks requiring use of respirators unless it has been determined that they are physically able to perform the work and use the equipment. A local physician shall determine what health and physical conditions are pertinent. The respirator user's medical status should be reviewed periodically (annually)
- D. Identify isolation procedures
1. Inform the personnel responsible for the lockout/tag out of all equipment that must be isolated
 2. Inform the personnel responsible for performing this function of the methods to be used.
- E. Identify purging and/or ventilation procedures
1. Inform all personnel responsible for performing this function of the methods to be used
- F. Identify all equipment needed
1. Inform personnel involved in the project of all equipment that will be necessary to complete the project.
 2. Make sure that all employees are capable of using their assigned equipment properly.
- G. Determine necessary personal protective equipment
1. Inform personnel of all PPE that must be used to ensure their safety
 2. Make sure that all personnel required to use PPE are trained in the proper use of the equipment
- H. Establish communication
1. Inform all entrants that they are required to maintain communication with the attendant
 2. Inform attendant that he/she must maintain constant contact with all entrants
 3. Inform personnel of the type of communication they are to use

- I. Protect from external hazards
 - 1. Inform personnel where signs and barriers will be placed to prevent unauthorized entry and protect entrants from external hazards.
- J. Pre-Plan rescue procedures
 - 1. The designated attendant(s) should be informed of the rescue procedures to be followed. Rescue procedures to be used are listed in Item 10 of this section.
 - 2. The attendant should be informed that he/she can have no other duty but to maintain contact with personnel inside the confined space.
 - 3. Inform the attendant(s) that they must not enter the confined space under any circumstances.
- K. Place the confined space back into service
 - 1. Inform personnel of the steps to be taken to place the confined space back into service.

Preparing the Confined Space for Entry

Once the entry has been planned and personnel have been trained, the next step is to prepare the confined space for entry.

The following steps are to be followed when preparing the confined space for entry:

- A. Place warning signs or barriers around the confined space to prevent unauthorized entry as necessary
- B. Place all tools, safety equipment, monitoring equipment, etc., near the confined space
- C. Isolate all mechanical and/or electrical hazards as necessary
- D. Purge/ventilate the confined space as necessary
- E. Test the atmosphere using an appropriate gas monitor
 - 1. If oxygen content is less than 19.5% or greater than 21.5%, perform additional ventilation. Then shut off ventilation equipment and re-test the oxygen content.
 - 2. If oxygen content is between 19.5% and 21.5%, continue entry preparation.
- F. Test for flammable gases
 - 1. If the meter reading is less than 10% of the lower explosive limit (LEL), continue entry preparation.
 - 2. If the meter reading is above 10% of the LEL, continue ventilation of the confined space. Then shut off the ventilation and have the atmosphere re-tested
 - 3. If the meter reading is still above 10% of the LEL, the confined space must be cleaned before entry is permitted. If the confined space must be entered for cleaning purposes, the procedures outlined in Item 9 of this section must be followed.
- G. Test for toxics (If a toxic atmosphere is present, no person should be permitted in enter the confined space at a level exceeding the Permissible Exposure Limit without proper Personal Protective Equipment. Environmental Health & Safety should be

called to assist in identifying proper precautions and the protective measures to be taken.

- H. Assemble all personnel involved and review rescue procedures. The entry supervisor will then add any needed information, then complete and sign the permit.
- I. Notify supervisor that entry is commencing.

Utilizing Safety Equipment

Where practical, all personnel entering a confined space should be equipped with a retrieval line secured at one end to the entrant by a full-body harness with its other end secured to a tripod lifting hoist.

Atmosphere Testing Procedures

- A. All of the manufacturer's operating instructions must be followed
- B. The test equipment should be tested in a known atmosphere to insure its accuracy
- C. Ventilation equipment must be shut off before conducting any atmospheric tests
- D. The atmosphere must be tested at the bottom, top, and middle of all confined spaces.
- E. The atmosphere must be continuously monitored while work is being conducted in the confined space.
- F. If the confined space is left for any reason; the atmosphere must be re-tested before re-entering the space.

Confined Space Cleaning Procedures

If cleaning must be conducted in a confined space to achieve acceptable atmospheric conditions, the following procedures must be followed:

- A. All entrants must be equipped with the safety equipment designated in Item 7
- B. All entrants must be equipped with an SCBA
- C. No spark-producing tools will be allowed for use

Rescue Procedures

In the event of an emergency, the attendant should:

- A. Immediately summon the Fire Department or other emergency services by radio or telephone
- B. Attempt to remove the victim by use of the retrieval line from outside the confined space if this can be accomplished without creating further hazard for the entrant or the attendant.

- C. If the attendant is able to remove the victim with the retrieval line, he/she should administer aid within the limits of his/her training until emergency services (EMS) arrive.
- D. If the attendant is unable to remove the victim by using the retrieval line, he or she must wait for help to arrive. *The attendant(s) is not to enter the confined space for any reason.*
- E. Give EMS personnel any information they request.

PERSONNEL RESPONSIBILITIES/DUTIES & TRAINING

Everyone involved in a confined-space entry project has certain responsibilities and requires a certain amount of training. It is very important that every individual is familiar with her/his responsibilities. This section outlines the responsibilities and training requirements of each individual involved in a project.

1. Responsibilities and Training Requirements of Supervisors or Their Designated Representatives.

Supervisors or their designated representative shall be responsible for the following:

- A. Identifying confined spaces within facilities or areas under their control
- B. Identifying hazards within a confined space under their control
- C. Documenting that all training requirements for a specific confined space entry have been met by signing the pre-entry authorization space on the entry permit.

2. Responsibilities and Training Requirements of Entry Supervisors

Entry Supervisors shall be responsible for the following:

- A. Ensuring that the required atmospheric tests are performed at the confined space and results recorded on the permit prior to entry authorization
- B. Obtaining and maintaining all equipment necessary to complete the confined-space entry project
- C. Authorize entries by signing the Entry Authorization space on the entry permit after all conditions for a safe entry have been met
- D. Terminating the entry and canceling the permit when:
 - 1. Entry operations covered by the entry permit have been completed.
 - 2. A condition that is not allowed under the entry permit arises in or near the permit space
- E. Determining, whenever responsibility for a permit space entry operation is transferred, and at intervals dictated by the hazards and operations performed within the space, that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.

3. Responsibilities and Training Requirements of Authorized Entrants

The person(s) authorized to enter a confined space shall be responsible for and receive training in the following:

- A. The knowledge of hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure
- B. Proper use of equipment, which includes:
 - 1. Atmospheric testing and monitoring equipment
 - 2. Ventilating equipment needed to obtain acceptable entry conditions
 - 3. Communication equipment necessary to maintain contact with the attendant
 - 4. Personal protective equipment as needed
 - 5. Lighting equipment as needed
 - 6. Barriers and shield as needed
 - 7. Equipment, such as ladders, needed for safe ingress and egress
 - 8. Rescue and emergency equipment as needed
 - 9. Any other equipment necessary for safe entry into and rescue from permit spaces
- C. Communications with the attendant as necessary to enable the attendant to monitor entrant status and to enable the attendant to alert entrants of the need to evacuate the space if required.
- D. Alert the attendant (standby person) whenever:
 - 1. The entrant recognizes any warning sign or symptom of exposure to a dangerous situation, or
 - 2. The entrant detects a prohibited condition
- E. Exiting the permit space as quickly as possible whenever:
 - 1. An order to evacuate has been given by the attendant or the entry supervisor
 - 2. The entrant recognizes any warning sign or symptoms of exposure to a dangerous situation.
 - 3. The entrant detects a prohibited condition or
 - 4. An evacuation alarm is activated

4. Responsibilities and Training Required of Attendants

Persons authorized to perform duties as attendant shall be responsible for and receive training in the following:

- A. Knowing the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure
- B. Awareness of possible behavioral effects of hazard exposure in authorized entrants.
- C. Continuously maintaining an accurate count of authorized entrants in the permit space and ensuring that the means used to identify authorized entrants accurately identifies who is in the permit space

- D. Remains outside the permit space during entry operations until relieved by another attendant.
- E. Attempting non-entry rescue if proper equipment is in place and the rescue attempt will not present further hazards to the entrant or attendant
- F. Communicating with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space when conditions warrant
- G. Monitoring activities inside and outside the space to determine if it is safe for entrants to remain in the space and ordering the authorized entrants to evacuate the permit space immediately under any of the following conditions:
 - 1. If the attendant detects a prohibited condition
 - 2. If the attendant detects the behavioral effects of hazard exposure in an authorized entrant
 - 3. If the attendant detects a situation outside the space that could endanger the authorized entrants
 - 4. If the attendant cannot effectively and safely perform all the duties required by this program
- H. Summoning rescue and other emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards.
- I. Taking the following actions when unauthorized persons approach or enter a permit space while entry is underway
 - 1. Warning the unauthorized persons that they must stay away from the permit space.
 - 2. Advising the unauthorized persons that they must exit immediately if they have entered the permit space
 - 3. Informing the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space
- J. Performing no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.

CONTRACTORS TO PERFORM WORK IN PERMIT-REQUIRED CONFINED SPACES ON ANOTHER EMPLOYERS PROPERTY

- A. When an employer (Host Employer) has employees of another employer (Contractor) to perform permit-required confined space work, the Host employer shall:
 - 1. Inform the contractor of the permit spaces. Entry is only allowed through compliance of the 1910.146 Standard
 - 2. Inform contractor of hazards and elements involved with the space(s)
 - 3. Inform the contractor of any precautions or procedures the host employer has implemented including reclassification of permit space(s) to non-permit confined space(s)
 - 4. Coordinate entry operations when both contractor employees and host employees will enter together or will be working near the space.

5. Debrief contactor at conclusion of entry, regarding the space program and any hazards confronted

Note: Contractor must follow a permit space program equal to or greater than the Host Employer's

- B. The contractor shall:
1. Obtain information regarding the permit space hazards and entry operations from the Host employer
 2. Coordinate with the host employer when both sets of employees are working in or near space(s)
 3. Inform Host employer of the permit space program that the contractor will follow and of any hazards confronted or created in the space during entry operations or in the conclusion debriefing
 4. Train employees specifically for site specific space entry.

Confined Space means a space that:

Is large enough and so configured that an employee can bodily enter and perform assigned work; and

Has limited or restricted means for entry or exit (i.e., tanks, vessels, silos, storage bins, hoppers, vaults and pits are spaced that may have limited means of entry): and is *not designed for continuous employee occupancy*.

Engulfment means the surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respirator system or that can exert enough force on the body to cause death by strangulation, or crushing

Entry Permit means the written or printed document that is provided by the employer to allow and control entry into a permit space and that contains the information: permit space to be entered, purpose of the entry, the date and the authorized duration of the entry permit, authorized entrants (by name or other means) as will enable the attendant to determine quickly and accurately, for the duration of the permit, which authorized entrants are inside the permit space, the personnel, by name, currently serving as attendants, the individual, by name, currently serving as entry supervisor, - with a space for the signature or initials of the entry supervisor who originally authorized entry, hazards of permit space to be entered, acceptable entry conditions, results of initial and periodic tests performed along with names or initials of the testers and an indication of when the tests were performed, the rescue and emergency services that can be summoned as the means (i.e., - equipment and phone numbers) for summoning those services, the communication procedures used by authorized entrants and attendants to maintain contact during entry, equipment, (i.e., PPE, testing equipment, communications equipment, alarm systems, rescue equipment, etc.), and any other information whose inclusion is necessary, given the circumstances of the particular confined

space, in order to ensure employee safety and any additional permits, such as for hot work, that have been issued to authorize work in the permit space.

Hazardous Atmosphere means an atmosphere that may expose employees to the risk of death, incapacitation, and impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness from one or more of the following causes:

1. Flammable gas, vapor, or mist in excess of 10% of its lower flammable limit (LEL)
2. Airborne combustible dust at a concentration that meets or exceeds its LEL

NOTE: This concentration may be approximated as a condition in which the dust obscures vision at a distance of five (5) feet.

3. Atmospheric oxygen concentration below 19.5% or above 23.5%
4. Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in Subpart G, Occupations Health and Environmental Control, or in Subpart Z, Toxic and Hazardous substances, of this Part and which could result in employees exposure in excess of its dose or permissible exposure limit
5. Any other atmospheric condition that is immediately dangerous to life or health

NOTE: Air contaminants for which OSHA has not determined a dose or permissible exposure unit other sources of information, such as Material Safety Data Sheets that comply with the Hazard Communication Standard, section 1910.1200 of this Part.

Hot Work Permit means the employer's written authorization to perform operations (i.e., riveting, welding, cutting, burning, and heating) capable of providing a source of ignition

IDLE "Immediately Dangerous to Life or Health" means any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects

Isolation means the process by which a permit space is removed from service and completely protected against the release of energy and material into the space by such means as: blanking or blinding; misaligning or removing sections of lines, pipes, or ducts, a double block and bleed system; lockout or tag out of all sources of energy; or blocking or disconnecting all mechanical linkages.

Line Breaking means the intentional opening of a pipe

Rescue Service means the personnel designated to rescue employees from permit spaces

Retrieval System means the equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor)

TRENCHING AND SHORING PROCEDURES

PURPOSE: To ensure that a safe working environment is maintained for DPC's employees during all trenching and excavation projects.

SCOPE: This policy applies to all DPC's employees that are involved in trenching and excavation work, as well as any sub-contractor.

RESPONSIBILITY: It is the responsibility of all supervisor, foremen, and employees to adhere to these policy and procedures for trenching and excavation work.

General requirements:

Soil Types

Testing Methods

Spoil

Surface Crossings

Ingress & Egress

Exposure to Vehicles

Falling Loads

Warning Systems

Hazardous Atmospheres

Confined Spaces

Test for Contaminants

Standing Water

Benching, Sloping

Shoring, Shielding

As updated by Safety in March, 2006

Scope & Application

Definitions:

Aluminum hydraulic shoring – An engineered shoring systems comprised of aluminum hydraulic cylinders (cross-braces), used in conjunction with vertical rails (uprights) or horizontal rails (walers). Such a system is designed specifically to support the sidewalls of an excavation and prevent cave-ins;

Benching – 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 – The separation of a mass of soil or rock material from the side of an Excavation or the loss of soil from under a trench shield or support. System and its sudden movement into the excavation, either by falling or sliding, in sufficient quantity so that it could entrap, bury, or otherwise injure and immobilize a person.

Competent person – One who is capable of identifying existing and predictable hazards in the surrounding or working conditions that are unsanitary, hazardous, or dangerous to employees and who has authorization to take prompt corrective measures to eliminate them. All competent persons must complete the 4-hour Physical Plant trenching and shoring class. Successfully pass the exam, and be certified for successful completion of the class. A competent person should have and be able to demonstrate the following:

Training, experience, and knowledge of:

Soil Analysis, use of protective systems; and

Requirement of 29 CFR 1926 Subpart P.

Ability to detect:

Conditions that could result in cave-inc,

Failure in protective systems,

Hazardous atmospheres, and

Other hazards including those associated with confined spaces. Authority to take prompt corrective measures to eliminate existing and predictable hazards and to stop work when required.

Evacuation – Any man-made cut, cavity, trench, or depression in an earth surface, formed by earth removal

Registered professional engineer – A person who is registered as a professional engineer

Shield (shield system) – A structure that is able to withstand the forces imposed on it by a cave-in and thereby protects employees with the structure. Shields can be permanent structure or can be designed to be portable and moved along as work progress. Also known as trench box or trench shield.

Shoring (shoring system) – A structure such as a metal hydraulic, mechanical or timber shoring system that supports the sides of an excavation and which is designed to prevent cave-ins.

Sloping (sloping system) – 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 varies with differences in such factors as the soil type, environmental conditions of exposure, and application of surcharge loads.

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

Definitions:

Soil Types	Testing Methods	Spoil
Surface Crossings	Ingress & Egress	Exposure to Vehicles
Falling Loads	Warning Systems	Hazardous Atmospheres
Confined Spaces	Test for Contaminants	Standing Water
Benching, Sloping	Shoring, Shielding	

General Requirement:

All excavations shall be made in accordance with the rules, regulations, requirements and guidelines set form in 29 CFR 1926.650, 651, and 652. The Occupational Safety and Health Administration’s standard on excavations, except where otherwise noted below.

Procedures:

A competent person shall be placed in charge of all excavations. Underground utilities must be located and marked before excavation begins.

Employees are not allowed in the excavation while heavy equipment is digging.

INSPECTIONS:

The competent person shall conduct inspections:

Daily and before the start of each shift

As dictated by the work being done in the trench

After every rain storm

After other events that could increase hazards, such as snowstorm, windstorm, thaw, earthquake, dramatic change in weather, etc.

When fissures, tension cracks, sloughing, undercutting, water seepage, bulging at the bottom, or other similar conditions occur.

When there is a change in the size, location, or placement of the spoil pile

When there is any indication of change or movement in adjacent structures.

(For excavations 4 feet or greater in depth, a trench inspection form shall be filled out for each inspection.)

DEFINITIONS

Testing Methods	Spoil	Surface Crossings
Ingress & Egress	Exposure to Vehicles	Falling Loads
Warning Systems	Hazardous Atmospheres	Confined Spaces
Test for Contaminants	Standing Water	Benching, Sloping
Shoring, Shielding		

SOIL TYPES:

Type A – Most stable: clay, silt clay, and hardpan (resists penetration). No soil is Type A if it is fissured, is subject to vibration of any type, has previously been disturbed, or has seeping water.

Type B – Medium stability: silt, sandy loam, medium clay and unstable dry rock; previously disturbed soils unless otherwise classified as Type C; soils that meet the requirements of Type A soil but are fissured or subject to vibration.

Type C – Least stable: gravel, loamy sand, soft clay, submerged soil or dense, heavy unstable rock, and soil from which water is freely seeping.

Layered geological strata (where soils are configured in layers) – the soil must be classified on the basis of the soil classification of the weakest soil layer. Each layer may be classified individually if a more stable layer lies below a less stable layer, i.e. where a Type C soil rests on top of stable rock.

NOTE: It is the policy of DPC to classify all soil types, when possible, to Class C soil type. The ratio is 1 ½ to ` or 34 degrees.

DEFINITIONS:

Spoil	Surface Crossing	Ingress & Egress
Exposure to Vehicles	Falling Loads	Warning Systems
Hazardous, Atmospheres	Confined Spaces	Test for Contaminants
Standing Water	Benching, Sloping	Shoring, Shielding

Testing Methods:

The competent person in charge of the excavation shall be responsible for determining whether the soil is Type B or C. If the competent person wants to classify the soil as Type C, they do not need to day any tests. However, tests must be conducted to determine if the soil can be classified as Type B. To do this, the competent person shall use a visual test coupled with one or more manual tests.

VISUAL TEST

In addition to checking the items on the trench inspection form, the competent person should perform a visual test to evaluate the conditions around the site. In a visual test, the entire excavation site is observed, including the soil adjacent to the site and the soil being excavated. The competent person also checks for any signs of vibration. During the visual test, the competent person should check for crack-line openings along the failure zone that would indicate tension cracks, look for existing utilities that indicate that the soil has been previously disturbed, and if so, what sort of backfill was used, and observe the open side of the excavation for indications of layered geologic structuring.

This person should also look for signs of bulging, boiling, or sloughing, as well as for signs of surface water seeping, from the sides of the excavation or from the water table.

In addition, the area adjacent to the excavation should be checked for signs of foundations or other intrusions into the failure zone, and the evaluator should check for surcharging and the spoil distance from the edge of the excavation.

DEFINITIONS:

Spoil	Surface Crossings	Ingress & Egress
Exposure to Vehicles	Falling Loads	Warning Systems
Hazardous, Atmospheres	Confined Spaces	Test for Contaminants
Standing Water	Benching, Sloping	Shoring, Shielding

MANUAL TESTS:

Thumb penetration test attempt to press the thumb firmly into the soil in question. If the thumb penetrates no further than the length of the nail, it is probably Type B soil. If the thumb penetrates the full length of the nail, it is probably Type B soil. If the thumb penetrates the full length of the thumb, it is Type C. It should be noted that the thumb penetration test is the least accurate testing method.

DRY STRENGTH TEST:

Take a sample of dry soil. If it crumbles freely or with moderate pressure into individual grains it is considered granular (Type C). Dry soil that falls into clumps that subsequently break into smaller clumps as the smaller clumps can only be broken with difficulty it is probably clay in combination with gravel, sand, or silt (Type B).

Plasticity or Wet Thread Test

Take a moist sample of the soil. Mold it into a ball and then attempt to roll it into a thin thread approximately 1/8 inch in diameter by two inches in length. If the soil sample does not break when held by one end, it may be considered Type B.

A pocket penetrometer, shear vane, or to vane may also be used to determine the unconfined compression strength of soils.

DEFINITIONS:

Surface Crossings	Ingress & Egress	Exposure to Vehicles
Exposure to Vehicles	Falling Loads	Warning Systems
Hazardous, Atmospheres	Confined Spaces	Test for Contaminants
Standing Water	Benching, Sloping	Shoring, Shielding

SPOIL:

Temporary spoil shall be placed no closer than 2 feet from the surface edge of the excavation, measured from the nearest base of the spoil to the cut. This distance should not be measured from the crown of the spoil deposit. This distance requirement ensures that loose rock or soil from the temporary spoil will not fall on employees in the trench. Spoil should be placed so that it cannot accidentally run, slide, or fall back into the excavation.

Walkways or bridge must:

Benching, Sloping

Shoring, Shielding

INGRESS AND EGRESS:

Trenches 4 feet or more in depth shall be provided with a fixed means of egress. Pacing between ladders or other means of egress must be 25 feet or less permanent spoil should be placed some distance from the excavation.

DEFINITIONS:

Ingress & Egress

Exposure to Vehicles

Falling Loads

Warning Systems

Hazardous Atmospheres

Confined Spaces

Test for Contaminants

Standing Water

Benching, Sloping

Shoring, Shielding

SURFACE CROSSING OF TRENCHES:

Surface crossing of trenches should not be made unless absolutely necessary. However, if necessary, they are only permitted under the following conditions.

Vehicle crossing must be designed by and installed under the supervision of a registered professional engineer. Ensure that a worker will not have to travel more than 25 feet laterally to the nearest means of egress.

Ladders must be secured and extend a minimum of 36 inches about the landing.

Metal ladders should not be used when electric utilities are present.

DEFINITIONS:

Falling Loads

Warning Systems

Hazardous Atmospheres

Confined Spaces

Test for Contaminants

Standing Water

Benching, Sloping

Shoring, Shielding

EXPOSURE TO VEHICLES:

Employees exposed to vehicular traffic shall be provided with and required to wear reflective vests or other suitable garments marked with or made of reflective material of high-visibility materials.

Trained flag persons, signs, signals, and barricades shall be used when necessary.

Warning Systems DEFINITIONS:

Hazardous Atmospheres	Confined Spaces	
Test for Contaminants	Standing Water	Benching, Sloping
Shoring, Shielding		

EXPOSURE TO FALLING LOADS:

All employees on an excavation site must wear hard hats.

Employees are not allowed to work under raised loads.

Employees are not allowed to work under loads being lifted or moved by heavy equipment used for digging or lifting.

Employees are required to stand away from equipment that is being loaded or unloaded to avoid being struck by falling materials or spillage.

Equipment operators or truck drivers may remain in their equipment during loading and unloading if the equipment is properly equipped with a cab shield or adequate canopy.

DEFINITIONS:

Hazardous Atmospheres	Confined Spaces	Test for Contaminants
Standing Water	Benching, Sloping	Shoring, Shielding

WARNING SYSTEMS FOR MOBILE EQUIPMENT:

The following steps should be taken to prevent vehicles from accidentally falling into the trench:

Barricades must be installed where necessary

Hand or mechanical signals must be used as required

Trenches left open overnight shall be fenced and barricaded

DEFINITIONS:

Tests for Contaminants	Standing Water	Benching, Sloping
Shoring, Shielding		

HAZARDOUS ATMOSPHERES AND CONFINED SPACES:

Employees shall not be permitted to work in hazardous and/or toxic atmospheres. Such atmospheres include those with:

Less than 19.5% oxygen, a combustible gas concentration greater than 20% of the lower flammable limit, and, concentrations of hazardous substance that exceed those specified in the Threshold Limit Values for airborne contaminants established by the ACGIH.

All operations involving such atmospheres must be conducted in accordance with OSHA requirements for occupational health and environmental controls for personal protective equipment and for lifesaving equipment. Engineering controls (such as ventilation) and respiratory equipment may be required.

DEFINITIONS:

Standing Water

Benching, Sloping

Shoring, Shielding

TESTING FOR ATMOSPHERIC CONTAMINANTS:

If there is any possibility that the trench or excavation could contain a hazardous atmosphere, atmospheric testing must be conducted prior to entry. Conditions that might warrant atmospheric testing would be if the excavation was made in a landfill area or if the excavation was crossed by, was adjacent to, or contained pipelines containing a hazardous material (for example, natural gas lines).

Testing should be conducted before employees enter the trench and should be done regularly to ensure that the trench remains safe. The frequency of testing should be increased if equipment is operating in the trench. Testing frequency should also be increased if welding, cutting, or burning is done in the trench.

Employees required to wear respiratory protection must be trained, fit-tested, and enrolled in a respiratory protection program. Some trenches qualify as confined spaces. When this occurs, compliance with DPC's Confined Space Program is also required.

DEFINITIONS:

Benching, Sloping

Shoring, Shielding

STANDING WATER AND WATER ACCUMULATION:

Methods for controlling standing water and water accumulation must be provided and should consist of the following if employees must work in the Excavation:

Use of special support or shield systems approved by a registered professional engineer.

Water removal equipment, such as pumps, used and monitored by a competent person.

Employees removed from the trench during rainstorms.

Trenches carefully inspected by a competent person after each rain and before employees are permitted to re-enter the trench.

DEFINITIONS:

General Requirements:

Benching, Sloping

Shoring, Shielding

BENCHING, SLOPING, SHORING, AND SHIELDING REQUIREMENTS:

All excavations or trenches 4 feet or greater in depth shall be appropriately benched, shored, or sloped according to the procedures and requirements set forth in OSHA's Excavation standard, 29CFR 1926.650, 651, and 652.

Excavations or trenches 20 feet deep or greater must have a protective system designed by a registered professional engineer.

Excavations under the base of footing of a foundation or wall required a support system designed by a registered professional engineer.

Sidewalks and pavement shall not be undermined unless a support system or another method of protection is provided to protect employees from their possible collapse.

BENCHING

There are two basic types of benching, single and multiple, which can be used in conjunction with sloping.

In Type B soil, the vertical height of the benches must not exceed 4 feet. Benches must be below the maximum allowable slope for that soil type. In other words, a 10-foot deep trench in Type B soil must be benched back 10 feet in each direction, with the maximum of a 45-degree angle. **Benching is not allowed in Type C soil.**

DEFINITIONS:

General Requirements:

Benching, Sloping

Shoring, Shielding

SLOPING:

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

Soil Type Height/depth ration Slope angle

Type B 1:1 45 degrees

Type C 1 ½: 1 34 degrees

A 10 foot deep trench in Type B soil would have to be sloped to a 45 – degree angle, or sloped 10 feet back in both directions. Total distance across a 10-foot-deep trench would be 20 feet, plus the width of the bottom of the trench itself. In Type C soil, the trench would be sloped at a 34 – degree angle, or 15 feet back in both directions for at least 30 feet across, plus the width of the bottom of the trench itself.

Illustration of simple slope trenching in B and C type soils.

DEFINITIONS:

General Requirements

Benching, Sloping

Shoring, Shielding

SHORING:

Shoring or shielding is used when the location or depth of the cut makes sloping back to the maximum allowable slope impractical. There are two basic types of shoring, timber and aluminum hydraulic.

Because the Physical Plant has aluminum hydraulic shores, they will be the focus of this section. Hydraulic shoring provides a critical safety advantage over timber shoring because workers do not have to enter the trench to install them. They are also light enough to be installed by one worker; they are gauge-regulated to ensure even distribution of pressure along the trench line; and they can be adapted easily to various trench depths and widths. However, if timber shoring is used, it must meet the requirements of 29 CFR 1926.650, 651 and 652.

All shoring shall be installed from the top down and removed from the bottom up. Hydraulic shoring shall be checked at least once per shift for leaking hoses and/or cylinders, broken connections, cracked nipples, bent bases, and any other damaged or defective parts.

The top cylinder of hydraulic shoring shall be no more than 18 inches before the top of the excavation. The bottom of the cylinder shall be no higher than four (4) feet from the bottom of the excavation. (Two ((2)) feet of trench wall may be exposed beneath the bottom of the rail or

plywood sheeting, if used.) Three vertical shores, evenly spaced, must be used to form a system.

Wales are installed no more than two (2) feet from the top, no more than four (4) feet from the bottom, and no more than four (4) feet apart, vertically. Hydraulic shores must be installed in accordance with Table D-1.2 and Table D-1.3 in soil Type B. Hydraulic shores must be installed with sheeting in accordance with Table D-1.4 in soil Type C.

Here are some typical installations of aluminum hydraulic shoring:

Vertical aluminum hydraulic shoring (spot bracing)

Vertical aluminum hydraulic shoring (with plywood)

Vertical aluminum hydraulic shoring (stacked)

Aluminum hydraulic shoring waler system (typical)

DEFINITIONS:

General Requirements

Benching, Sloping

Shoring, Shielding

SHIELDING:

Trench boxes are different from shoring because, instead of shoring up or otherwise supporting the trench face, they are intended primarily to protect workers from cave-ins and similar incidents.

The excavated area between the outside of the trench box and the face of the trench should be as small as possible. The space between the trench box and the excavation side must be backfilled to prevent lateral movement of the box. Shields may not be subjected to loads exceeding those which the system was designed to withstand. Trench boxes are generally used in open areas, but they also may be used in combination with sloping and benching.

The box must extend at least 18 inches about the surrounding area if there is sloping toward the excavation. This can be accomplished by providing a benched area adjacent to the box. Any modifications to the shields must be approved by the manufacturer.

Shields may ride two (2) feet above the bottom of an excavation, provided they are calculated to support the full depth of the excavation and there is no caving under or behind the shield. Workers must enter and leave the shield in a protected manner, such as by a ladder or ramp. Workers may not remain in the shield while it is being moved. Illustration of shielding systems in B and C type soils.

HAZMAT - HAZWOPER – CHEMICAL EXPOSURES – SPILLS

Purpose: To ensure DPC employees are not exposed to any known or unknown hazardous substances. To put in place a system to ensure no employee exposures occur, and in many cases prevented. To outline procedures for dealing with Hazardous Materials (HAZMAT). To ensure any and all monitoring, air or blood in the case of lead, is completed by DPC if needed. (See respirator policy).

Policy: The page following this page refers to contact number at 3E Company. This number is a contracted service with the 3E Company. This number is available to all foremen, project managers, safety or employee by request. If you are ever on an industrial work-site and an exposure environment exists follow the host's employer's emergency action plan if directed to do so by alarm, personnel, or emergency services. This might include a going to "safe area: or evacuation. Plant orientation typically covers the site specific Emergency Action Plan (EAP) or alarm system.

Supervisors also need to ensure that if any exposure situation has occurred to any DPC employee notify the safety department and project manager within 8 hours or by the end of shift whichever is first. This is DPC policy as well as workers compensation law, and under certain circumstances OSHA. Also, ensure proper first aid and/or medical treatment is rendered to employees. Call for ambulance or transport by foreman or their designate to local emergency room if needed. Notify supervisor and safety department. You as electricians are not involved with not trained for any hazardous clean-ups, emergency response, disposal or even handling of unknown hazardous chemicals unless it is needed to perform your duties. If a new chemical or substance is introduced into the environment at your jobsite a hazard assessment will need to be done. Also an MSDS needs to be added to the hardcopies located on each jobsite. If and when an abatement situation is agreed upon by contractor and host employer, a certification company offering abatement, testing, or sampling services will be contacted. For any abatement we would be responsible for, DPC would be contracting these services to a qualified company. DPC uses certified contract service companies and laboratories. If the presence of lead, possibly containing asbestos material (PCAM's) silica, PCB's cadmium, or any other hazardous substance is suspected or known to exist possibly causing an employee exposure contact your supervisor, safety and project manager for further action and implementation of required program elements related to this hazard.

There are monitoring programs for employees working around many hazardous chemicals or substances. Air sampling, respirator usage medical evaluations, fit testing, and or medical monitoring aspects that might need action.

Hazardous Communication Manual which also contains our hardcopy MSDS's

SCOPE: This policy applies to all DPC personnel that are no construction or maintenance projects or where any hazardous presents an employee exposure possibility.

Responsibility: This policy is the responsibility of project supervisors in unison with the safety department. Hazardous substance presence is usually communicated to DPC through the contract process. Actions needed on the part of DPC is dictated by the substance itself and applicable OSHA permissible exposure limits (PEL's), "action levels" time weighted averages (TWA), short term exposure levels (STEL's), threshold limit values (TLV's) by the American National Conference of Industrial Hygienist. Any and all testing of materials will be performed by a certified lab. Through agreement with the Parkersburg Marietta Contractor's Association (PMCA), the Parkersburg/Marietta Occupational Health Partners performs our fit testing and medical evaluations for respirator usage by and employee. They also participate in our medical monitoring program, needed radiological tests as well as drug testing.

Some sampling or testing may be performed by your trained and professional safety department. All noise monitoring is conducted by DPC as well as most air sampling. Always contact your supervisor, project manager or safety department with any questions or concerns concerning this policy.

DAVIS,PICKERING AND COMPANY INC.

POLICY FOR ASBESTOS EXPOSURE

The purpose of this policy is to comply with CFR 29, Part 1926.1101 which requires full compliance by July 10th, 1995 and which regulates employee exposure to asbestos containing material (ACM) and presumed asbestos containing material (PACM) in the workplace.

Their policy covers all work including, but not limited to the following:

- Demolition or salvage of structures where asbestos is present
- Removal or encapsulation of materials containing asbestos
- Construction, alteration, repair, maintenance or renovation of structures, substrates or portions thereof, that contain asbestos
- Installation of products containing asbestos
- Asbestos spill/emergency cleanup and
- Transportation, disposal, storage, containment of and housekeeping, activities involving asbestos or products containing asbestos, on the site or location where construction activities are performed

“Asbestos: includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos and any of these minerals that have been chemically treated and/or altered. “Asbestos” includes presumed asbestos-containing materials (PACM) and asbestos-containing materials (ACM) as defined by OSHA.

“Asbestos containing materials” means any material containing more than one percent asbestos. “Presumed asbestos-containing material (PACM)” means thermal system insulation and surfacing material found in buildings constructed no later than 1980 and presumed to be asbestos-containing material until rebutted.

“Surfacing material” means material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing or other purposes).

“Thermal system insulation (TSI)” means ACM applied to pipes, fittings, boilers, breeching, tanks, ducts, or other structural components to prevent heat loss or gain. “Thermal system insulation ACM” is thermal system insulation which contains more than one percent asbestos.

“Class I asbestos work” means activities involving the removal of TSI and surfacing ACP and PACM.

“Class II asbestos work” means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of

asbestos-containing wall board, floor tile and sheeting, roofing and siding shingles, and construction mastics.

“Class III asbestos work” means repair and maintenance operations, where ACM, including thermal system insulation and surfacing material, is likely to be disturbed.

“Class IV asbestos work” means maintenance and custodial activities during which employees contact ACM and PACM and, activities to clean up waste and debris containing ACM and PACM.

Davis, Pickering and Company, Inc. management shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter of air (0.1 f/cc) as an eight (8) hour time-weighted average (TWA), or to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) as averaged over a sampling period of 30 minutes, as determined by the OSHA reference method prescribed in Appendix A to CFR 29, Part 1926.1101.

Davis, Pickering and Company Inc. recognizes that all general contractors on a construction project which includes work covered by this standard are deemed to exercise general supervisory authority over the work covered by this standard, even though, Davis Pickering and Company, Inc. is not qualified to serve as the “competent person” as defined by the standard. As supervisor of any entire project: Davis Pickering and Company, Inc. shall ascertain whether any asbestos contractor is in compliance with the standard, and shall require such contractor to come into compliance as necessary.

As a matter of policy, Davis, Pickering Company, Inc. shall not engage employees to work in an atmosphere which contains or may contain asbestos fibers. There Davis Pickering and Company, Inc. is notified by an owner or another contractor, or has any other reason to suspect the presence of ACM or PACM, Davis Pickering and Company Inc. shall ensure that a “competent person” conducts an exposure assessment immediately before or at the initiation of the work operation to identify and ACM or PACM and to ascertain any expected exposures during that operation or at that workplace. The assessment shall include consideration of all observations, information or calculations which indicate employee exposure to asbestos, including any previous investigation or monitoring conducted I that workplace.

To accomplish the above assessment, Davis Pickering and Company, Inc. shall engage the services of a qualified, licensed and properly insured environmental consulting firm which has the capabilities and qualified personnel to determine the presence of ACM or PACM. If ACM is discovered, Davis Pickering and Company, Inc. management personnel shall immediately notify the owner and any other contractors of the presence of ACM and take steps to abate, or wait until the owner abates the ACM, when required to ensure that employees of David Pickering and Company, Inc. or any other contractor or owner are not exposed about the permissible exposure limits (PELS).

If Davis Pickering and Company, Inc. is not notified by an owner or other contractor of the presence of ACM or PACM, but in the course of our operations discovers ACM or PACM, Davis Pickering and Company, Inc. shall immediately convey information concerning the presence,

location and quantity of such newly discovered ACM and/or PACM to the owner and to other employers of employees on the site, and ensure that it is properly labeled and not disturbed.

Where ACM or PACM is present on a job site but will not be disturbed, Davis Pickering and Company, Inc. shall inform all of its employees of the presence of ACM or PACM as part of hazard communication training and ensure that the location of the material is well communicated to all employees. Further, management shall ensure that any ACM or PACM is properly labeled before allowing our employees to work in the vicinity to ensure that it is not unintentionally disturbed.

When ACM or PACM is encountered on the job and must be removed by a properly licensed abatement company in order for Davis Pickering and Company, Inc. to accomplish its contracted work, the atmosphere shall be monitored and declared free of asbestos fibers prior to any Davis Pickering and Company, Inc. employees being permitted to work in the area.

When small amounts of ACM or PACM are removed to access a building component in order to perform certain contract work, Davis Pickering and Company, Inc. is aware that the activity of removal constitutes "disturbance" and therefore triggers the need for monitoring to determine that the area is free of asbestos fibers prior to allowing our employees to work in the area. Further, Davis Pickering and Company, Inc. will ensure that in no event shall the amount so disturbed exceed that which can be contained in one glove bag or waste bad which amount shall not exceed to inches in length and width.

DAVIS, PICKERING AND COMPANY, INC.

POLICY FOR LEAD EXPOSURE

The purpose of this policy is to ensure that no employee performing his/her job duties is exposed to concentrations of lead which exceed the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limits (PEL).

Operations that may generate lead dust and fume and other exposure include:

- Flame-torch cutting, welding and grinding of lead painted surfaces in repair, reconstruction, dismantling and demolition work;
- Maintaining process equipment;
- Using solder in electrical work.

Lead is an accumulative poison; it accumulates in the blood, bones and organs, including the kidneys, brain and liver. It stays in the bones for decades. It may be slowly released over time to cause toxic effects. The early effects of lead poisoning are not specific and resemble “flu-like” illnesses. Lead can be absorbed into the body by inhalation (breathing) and ingestion (eating).

Cumulative exposure to lead, which is typical in construction settings, may result in damage to the blood, nervous system, kidneys, bones, heart and reproductive system and contributes to high blood pressure.

Worker awareness and training are important so that employees can recognize the symptoms of exposure and get prompt medical attention.

General Policy Statement

Davis Pickering and Company, Inc. as a matter of policy, will attempt to eliminate any lead hazard in the workplace as the first choice of exposure control for its employees. When total elimination is not a workable solution, the following shall be carefully followed:

- A. Due to the seriousness of this issue and in compliance with 29 CFR 1926.21 and 1926.62 David Pickering and Company, Inc. required that all potentially exposed employees be informed of the hazard of lead and be trained in the precautions to take when working around it. The employee shall also be instructed in proper work practices, personal hygiene procedures, and the use and limitations of protective equipment, such as eye and face protection, head protection, overalls and respirators.

- B. In all work conditions where, because of physical or atmospheric conditions, and unsafe accumulation of contaminant exists, suitable mechanical ventilation or respiratory protective equipment shall be provided.
- C. If , for any reason, the possibility of exposure to lead is suspected after the work has stated, all employees shall stop work and the suspected source shall be sampled, if possible (in all cases the owner shall be notified of the need for sampling). If source sampling confirms the existence of lead, then representative sampling shall be done of selected, protected employees and under conditions that represent each employer's regular daily exposure to lead. The samples should be taken in accordance with the National Institute of Occupational Safety and Health (NIOSH) method 7082 or equivalent.

The purpose of the sampling is to:

- Identify the extent of exposure
 - Determine the need for engineering controls
 - Determine the effectiveness of work practices in controlling exposures
 - Determine any need for medical monitoring
 - Select the appropriate respiratory device, if needed, and monitor its effectiveness
- D. When evidence shows that any worker is exposed to lead in excess of the OSPA PRL, immediate steps are to be taken to minimize the hazards of lead and protect all affected employees. Engineering and work practice controls may include:
- The immediate notification of a specialized lead abatement team for proper containment.
 - Furthermore, employees shall not be allowed to eat, drink or smoke in areas where lead contamination exists. All lunch boxes and coffee cups must be kept away from the work area.

DAVIS PICKERING AND COMPANY, INC.

CHROMIUM (VI) EXPOSURE

PURPOSE:

It is the policy of Davis Pickering and Company, Inc. (DPC) to adhere to all OSHA standards concerning employee exposure to hexavalent chromium (Cr VI). Occupational exposures mainly occur among workers who handle pigments containing dry chromate, spray paints and coatings containing chromium. In the electrical industry the main hazard or emphasis concerning Chromium VI exposure would be when stainless steel pipe or other stainless steel materials are used. Strict adherence to the following policy/procedure and standard is necessary to ensure that no occupational exposures occur with Davis Pickering employees. It might be noted in some circumstances other crafts or employees in close proximity to DPC employees might be exposing our employees. These instances will be addressed on a case by case scenario..

SCOPE

This policy applies to all DPC employees, supervisors, and management personnel that may be welding or thermal cutting stainless steel pipe or other materials that may contain chromium.

POLICY

Whenever welding or thermal cutting operations are to occur, the material safety data sheet (MSDS) will be consulted to ensure that no chromium is present in materials to be welded or cut. If stainless steel is the material to be welded or cut it will be assumed that chromium is present. Alternative materials that do not contain chromium will be substituted whenever feasible. The primary concern in the electrical industry is stainless steel, however, chromium plated materials would also be of concern. Whether chromium is present will be indicated on the MSDS. The OSHA standard allows respirator usage during work operations where employees are exposed about the PEL for fewer than 30 days per year, and the employer has elected not to implement engineering and work practice controls to achieve the PEL; or in emergency situations. It would be on the rare occasion that any stainless steel would be welded or thermal cut by Davis Pickering employees and when this would occur it would be for short periods of time, well below the 30 days a year time. With this in mind, whenever stainless steel is to be welded or thermal cut, all employees are required to wear a respirator. Pulmonary function testing, fit testing, as well as all other aspects of our respiratory policy would apply. If and when welding or thermal cutting of stainless steel or other chromium plated material is to occur, contact the safety department so that the appropriate appointments' with Parkersburg Marietta Occupational Health Partners can be scheduled to

have employees fit tested and medically cleared to utilize the appropriate respirator and cartridge medium.

PROCEDURES

1. Consult MSDS to ascertain whether chromium is present in the material to be welded or thermal cut. If the material is stainless proceed as if chromium is present.
2. If welding or thermal cutting stainless steel or any other chromium containing materials contact the safety department so provisions of our respirator policy can be initiated.
3. Fit testing and pulmonary function testing will be arranged per respirator policy. Appropriate PPE will also be provided. Tyvek coveralls will be used and properly disposed of to eliminate clothing contamination. All other PPE worn while welding or thermal cutting stainless steel or other chromium containing material such as gloves, coveralls, etc. will be disposed of in accordance with Hazard Communication standard 29 CFR 1910.1200. Operations are taking place on jobsites that require flame resistant coveralls, DPC will ensure launderer is aware that the clothing is contaminated with chromium and that clothing should be laundered where no skin or eye contact occurs. Coveralls will be bagged and sealed in impermeable bags or containers. These containers will be labeled in accordance with the Hazard Communication standard 29 CFR 1910.1200.
4. No eating, drinking, smoking or similar activities will take place where chromium contamination is present.
5. PPE will be changed in change room separate from where employees that breaks or eat lunch.
6. If any questions arise concerning this policy contact your supervisor or the safety department for further guidance.

SEXUAL HARASSMENT POLICY

Davis, Pickering & Company, Inc. strongly disapproves of and does not tolerate sexual harassment of any kind. All employees must avoid offensive or inappropriate sexual behavior at work and are responsible for assuring that the workplace is free from sexual harassment at all times. SEE COMPANY HANDBOOK

Davis, Pickering & Company, Inc. policy prohibits sexual harassment.

1. Unwelcome sexual advances; (2) requests for sexual acts or favors, with or without accompanying promises, threats, or reciprocal favors or actions, and (3) other verbal or physical conduct of a sexual nature constitute harassment when:
2. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
3. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
4. Such conduct has the purpose of or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples of prohibited conduct include, but are not limited to, lewd or sexually suggestive comments, off-color language or jokes of a sexual nature; slurs and other verbal, graphic or physical conduct relating to an individual's gender; or any display or sexually explicit pictures, greeting cards, articles, books, magazines, photos or cartoons.

Any employee who has a complaint of sexual harassment at work by anyone, including supervisors, co-workers, or visitors shall bring the matter to the attention of Company officials in the manner prescribed in the previous section (Harassment.)

The Company will investigate and respond to complaints as outlined in the "Harassment" section. Violation of this policy is grounds for discipline, including discharge.

SEE DPC HANDBOOK PAGE 10

WORK PLACE VIOLENCE

Threatening employees, customers, visitors, or vendors or engaging in threatening or violent behavior in our workplace (or at customer sites) is a serious matter. Such conduct places the safety and health of our employees and customers in jeopardy, and will not be tolerated. Employees engaging in such activities will be subject to appropriate corrective action up to and including termination of employment, and perhaps legal action from the victim(s) of their conduct. Violent or inappropriate behavior includes, but is not limited to:

1. Threats of any kind
2. Threatening, physically aggressive or violent behavior, such as intimidation or attempts to instill fear in others
3. Other behavior including belligerent speech, excessive arguing, or sabotage of company property
4. Defacing company property or causing physical damage to company facilities
5. Bringing weapons or firearms (including hunting rifles of any kind on company premises, in company parking lots, in personal or company vehicles, or while conducting company business; and/or
6. Using any object in a threatening or weapon-like manner

What to Do If You Are Threatened, or Are a Victim of Workplace Violence

If you are threatened, or the victim of a violent act in the workplace, or if you observe behavior that is violent, or potentially violent (as described above), immediately report it to your supervisor or any other member of management and the Vice President. This includes threats or violent acts by co-workers, customers, visitors, or others who have come onto our premises.

All reports of workplace violence will be taken seriously and will be investigated promptly and thoroughly. We will maintain confidentiality when possible (i.e., release information only to those with a business need-to-know). We will not tolerate retaliation against any employee who reports workplace violence.

Threats of Violence by Outside Third Parties

Unfortunately, sometimes non-employees may try to bring their personal disputes into our workplace. To protect your safety and the safety of your co-workers, please ***immediately*** report to your supervisor or Vice President any personal situations which may bring violence to our workplace. By being forewarned we can take appropriate measures to try and protect you and/or your co-workers. Employees who report potential workplace violence from a domestic or personal dispute do not need to fear corrective action or retaliation.

Inspection of Employees and Personal Property For Possession of Weapons

In order to promote a safe and violence-free workplace, we reserve the right to inspect employee clothing, personal vehicles on company property, packages, lunch boxes, containers, articles in such areas, and other objects brought onto company property that might conceal weapons. Any employee who does not consent to and fully cooperate with such inspections is subject to corrective action up to and including termination of employment.

DAVIS PICKERING & COMPANY, INC.

STATEMENT OF FLEET SAFETY POLICY

All accidents, whether they occur on public streets or on our property, are costly to our company and to the public. They damage the goods that we transport and contribute to delays in the service that we provide to our customers. When accidents result in injuries, they cause unnecessary misery to employees and to the public. These motor vehicles accidents can be prevented. Our efforts to reduce accidents can reduce the cost of our company and improve our well-being.

It is the policy of this company to provide service with safety. Our company will do everything in its power to prevent motor accidents and operate our vehicles in a safe and courteous manner. It will be the responsibility of all employees to see that this policy is adhered to in all aspects of our vehicle operations. A Fleet Safety Program has been developed to assist us in this effort. This program is being integrated into our daily operation and is a part of our overall operational philosophy.

Jeff Williamson, President

Purpose of Fleet Safety Program

Most of this country's goods move via ground transportation. Nearly every company has operations involving ground transportation with the exposure varying from significant for motor transportation companies to minor for companies who use their vehicles for a trip to the post office or bank. The size and scope of the fleet operation will determine the extent of the Fleet Safety Program that is recommended. The material provided in this manual is intended to provide the basic guidelines to establish a successful Fleet Safety Program for a variety of different types and sizes of fleet operations.

In order to understand the benefit of a Fleet Safety Program it is necessary to understand the cost of not having a Fleet Safety Program. Motor vehicle accidents are the leading cause of occupational death. Aside from the devastating personal tragedies associated with vehicle accidents, companies also suffer losses in the form of increased insurance costs, costs associated with down time and costs of retraining replacement drivers. The additional cost of the loss of a company's reputation can also be a factor. An effective Fleet Safety Program will help to reduce these costs through the reduction in the frequency and severity of vehicle accidents.

MANAGEMENT RESPONSIBILITY

For a Fleet Safety Program to be effective, management must provide the support and funding for its implementation and continued operation. In addition, management must remain committed and interested in the program in order to convey the proper attitude to employees. If top management is not interested in preventing vehicle accidents, it is unlikely that others in the organization will retain their interest.

The first role of management in a Fleet Safety Program is the assignment of responsibility of the Fleet Safety Program to the Fleet Administrator. This person should be a willing participant in the program and one who is enthusiastic about the job. This person should be knowledgeable of company operations which will enable him or her to recognize and evaluate potential vehicle-related exposures. The Administrator should be able to communicate effectively with both the drivers and upper management. The drivers should have the confidence to discuss problems and offer suggestions to the Administrator in an open environment.

The Fleet Administrator will probably have other duties in addition to the administration of the Fleet Safety Program. These duties could include hiring, training, accident investigation, vehicle maintenance, maintenance of drivers' records, conducting safety meetings and scheduling deliveries. Fleet Safety should be emphasized as the most important duty of the Fleet Administrator.

Davis Pickering & Company, Inc.

Fleet Safety Program

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1.0 Scope and Application

This program is applicable to all employees of DPC, who operate any over-the-road motor vehicle in the course of conducting business. The program covers the use of personal, rental, leased or DPC owned motor vehicle.

2.0 Responsibilities

Program responsibilities are defined below for the individuals designated to ensure the proper implementation of this program.

2.1 Health and Safety Manager

- A. Ensure all management and affected employees are aware of the Fleet Safety Program and ensure the same.
- B. Provide all materials and hardware for effective implementation of this program and ensure they are properly utilized and maintained.
- C. Periodically review worksites for compliance with this program.

2.2 Supervisor and Crew Leaders

- A. Be knowledgeable of Fleet Safety Program requirements.
- B. Make routine surveys of work areas to ensure compliance with the Fleet Safety Program equipment.
- C. Ensure fleet equipment is maintained properly.
- D. Ensure all affected employees attend scheduled training and operator physicals.

2.3 Employees

- A. Actively participate in the assigned fleet safety training sessions and adhere to the safe operating guidelines contained within this program.
- B. Inspect fleet vehicles prior to use.
- C. Report any defects or deficiencies noted during weekly inspections to their immediate Supervisor.

3.0 General Requirements

- A. When driving for DPC business, employees are required to wear seat belts at all times. No DPC personnel are to ride unprotected (e.g. in the bed of pickup trucks or deck of trailers).
- B. Drivers must report the following as soon as possible, but no later than the end of the next business day:
 - Any change in driver's license status including suspension, restriction, or revocation.
 - Accidents in accordance with the "Accident Reporting Procedures".
 - Potential unsafe vehicle conditions of DPC owned vehicles.
- C. All vehicles will be operated in compliance with all federal, state, or local limits regarding the weight of the load. If for any reason, compliance with weight limits is in question, the operator will not move the vehicle until the General Manager has been contacted and makes a determination on how to proceed.
- D. Drivers are responsible for any and all traffic violations or fines associated with vehicle use on company time, including parking violations.
- E. When entering or exiting vehicles with cabs that are significantly elevated (>3ft) the driver shall follow the 3 Point Contact rule.
- F. The use of alcohol and illegal drugs, and possession of the same in any company vehicle is strictly prohibited at all times. Prescription medications that may impair the vehicle operator's reaction time, judgment, or alertness are prohibited. Allowable prescription medication must be in the original containers.
- G. The possession of firearms is strictly prohibited in any company vehicle at all times.
- H. Rental or DPC owned vehicles may not be used or operated by anyone other than the assigned driver.
- I. Transport of hazardous materials in any vehicle used for company business will be conducted in accordance with DOT requirements stipulated in 49 CFR 171-177.

4.0 Accidents Reporting Procedures

All accidents are to be reported to the Safety Department, regardless of severity. All traffic accidents are to be reported to the local police or highway patrol. The driver should cooperate with police but not assume responsibility for the accident.

In the event you are involved in an accident while operating a vehicle on behalf of the following guidelines shall be followed:

- A. Immediately STOP!
- B. Obtain packet in glove compartment that was issued to you. Follow the instructions on the envelope.
- C. Assist any injured persons to the degree that your medical training allows (e.g., first aid, CPR, etc.). Never move an accident victim before medical help arrives unless not moving the victim poses a more immediate danger.
- D. Notify the authorities. Do not leave the scene, except in an extreme emergency. Call the police.
- E. Gather preliminary information. This includes gathering names and information from others involved in the accident, witnesses to the accident, or first persons arriving on the scene are no witnesses.
- F. Notify the Company as soon as reasonably possible, but no later than the end of the next business day. Notify the company with the location, nature, and severity of the accident. Individuals that should be notified are:
 - ✓ Immediate supervisor
 - ✓ Safety Department
 - ✓ Claims/Insurance Administrator
- G. Remain at the scene until instructed otherwise by the officer on the scene, a company representative, or insurance company official.

5.0 Driver Qualifications

To be eligible to drive a vehicle for company business, an employee must meet the following qualifications:

- ✓ Hold a current, valid driver's license for the class of vehicle that will be operated, issued by the state of employee's residence.
- ✓ Not have had driving privileges currently suspended or revoked by the authorizing government agency.
- ✓ Pass a pre-employment physical and drug test, or hold a current DOT medical card, where applicable (CDL).
- ✓ Obey driving restrictions as established by the authorizing government agency.
- ✓ Where privacy laws prevent access, grant permission to DPC or its designated representative to obtain, at DPC option, a Motor Vehicle Report or similar driving record.
- ✓ Not be denied coverage by DPC auto insurance carrier or broker.

Reserve the right to prohibit an employees from driving for company business, depending on the nature, severity, or frequency of vehicle safety violations.

6.0 Drug Testing Requirements

It is DPC policy that the use of illegal drugs by drivers is prohibited.

- A. Pursuant to DOT regulations, DPC may require four types of drug tests:
 - Pre-employment
 - Random
 - Reasonable cause
 - Post accident
- B. When judicially permissible, it is the intention of DPC to implement random and post accident drug testing pursuant to the regulations. The overall goal of drug testing is to ensure a drug-free transportation environment and to reduce accidents, injuries, and fatalities.
- C. Refusal to submit to the type of drug testing used by DPC will be grounds for termination of existing drivers. Any driver who has been disqualified on the basis of violation of this policy may be subject to termination of employment.
- D. Existing Drivers are subject to the DPC drug and alcohol program outlined in the employee handbook. If a driver manifests physical or physiological symptoms commonly attributed to the use of controlled substances, reasonable cause for requiring the driver to submit to a urine test may be deemed to exist by law enforcement or company personnel.
- E. Individual test results that are released to DPC will be maintained in strict confidence unless the individual has given consent to release the results. Any individual who has submitted to testing in compliance with this policy is entitled to receive the results of the testing in a timely manner, when requested.
- F. Any driver that tests positive for the presence of illegal drugs in his or her system will immediately be deemed medically disqualified from driving and removed from service.
- G. DPC, at its discretion, when requested by the driver, may keep the driver's position open while the driver attempts to obtain medically qualified status.
- H. Any driver that has been medically disqualified due to the results of a drug test, and who subsequently becomes medically re-qualified, shall be subject to random drug testing. The follow-up drug testing re-qualified drivers is in addition to and separate from the periodic and reasonable cause drug testing procedures and is a condition of employment.

7.0 Inspections and Maintenance

- A. All DPC owned or leased vehicles are to be maintained to reduce the potential for unsafe mechanical conditions. DPC employees must report potentially unsafe conditions to the Supervisor as soon as possible.

Personal vehicles used for company business must be maintained in a roadworthy condition and pass state vehicle inspections where required.

- B. DPC employees should evaluate any vehicle prior to use to identify potential safety, mechanical, or other maintenance problems.

8.0 Disciplinary Policy

All employees are expected to adhere to the procedures given in this written program. Failure to comply may result in disciplinary action.

The following are some of the items that may subject the operator to disciplinary actions or termination:

- Operation of a company while under the influence of drugs or alcohol
- Deliberately falsifying or use of falsified records
- Possession of firearms
- Carrying any unauthorized passenger in a company owned or operated vehicle
- Failure to immediately report an injury or accident
- Tampering with the engine of any company vehicle, including governor and injector pump
- Operating a company vehicle with a suspended driver's license
- Unauthorized use of a company vehicle

9.0 Program Review and Revision

The Safety Department shall perform an annual assessment of this program. The assessment will address the degree and consistency of program element implementation in the workplace. The Safety Department may select a committee to perform such assessment.

10.0 Recordkeeping

DPC shall maintain the following information:

- All employee training records will be maintained for at least two years from the last training date
- All employee medical records obtained pursuant to this program will be maintained by DPC for the duration of the effected employee's employment, plus thirty years
- Vehicle repair and prevention maintenance records will be maintained by the service life of the vehicle.
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▪ **Attachment A**

**Driving Record Release
Authorization Form**

Attachment A

Driving Record Release Authorization Form

I, _____ hereby authorize Davis Pickering & Company, Inc. to obtain my personal driving record as issued by the Department of Motor Vehicles State of _____. This for the purpose of ensuring that I have a current and valid driver's license, my driving privileges are not restricted by the state or other governing agency and I meet other qualifications for DPC vehicle operator.

Signature

Date

EMPLOYEE PRIVACY POLICY

PURPOSE: All DPC employees have a reasonable expectation that any and all confidential information retained or released by DPC will be handled and stored in a safe and reliable manner. Any private information given to such entities as host employer's, regulatory agencies i.e., insurance agencies, OSHA DOT, Law Enforcement, or others requesting such information will be done so within the scope of this policy and regulatory obligations. This policy covers all Davis Pickering & Company, Inc. confidential employer records as well as such information requests from others.

SCOPE: This policy applies to all DPC employees, owners, officers, or managers that might be in a position to release confidential information or retain such information.

Procedures: DPC office and management personnel will establish a "need to know" before any information is given out. Check with project managers, customer representatives or safety. Find out if the information request is a legitimate request. Legitimacy of the requestor should also be determined. Many examples of information being given occur. Such requests come from but are not limited to: state agencies, law enforcement, OSHA, DOT, etc., these entities have reporting laws that require us to provide such information when requested. Building trades (PMCA) local union halls and DPC also exchange non-confidential and confidential information on an ongoing basis.

Employment references may still be given if non-confidential information only is exchanged between outside party and DPC employee.

Financial information is also communicated routinely during transactions between such entities as banks, retirement account institutions, local unions, regulatory agencies for fourth ordered wage garnishment etc.

Responsibility: ALL DPC employees, managers, owners, consultants, sub-contractors or others retaining or releasing such employee confidential information. If an employee requests in writing to be told of all confidential information requests from outside parties that are not of a routine fashion and legitimate fashion they will be notified of the request and DPC actions. In some instances employee permission may be required. When in doubt ask officer manager, or supervisor.

APPENDIX

