



**CHRISANTHA  
CONSTRUCTION CORPORATION**

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YOUR NEEDS.

OUR PROCESS.

BETTER VALUE.

# Safety Program

**Revised**

**January 2010**



# Policy & Commitment to Safety

January 8, 2008

To our Employees, Customers, and Vendors:

Our company, CHRISANNTHA CONSTRUCTION CORPORATION, is guided by our safety and health policy. This policy is based upon the necessity to eliminate injuries, occupational illnesses and property damage, as well as to protect the public whenever and wherever the public comes into contact with the company's work.

All management and supervisory personnel are charged with the responsibility for planning safety into each work task and for preventing the occurrence of incidents and/or controlling conditions/actions that could lead to occupational injuries or illnesses. The ultimate success of a safety and health program depends upon the full cooperation of each individual employee. Management at CHRISANNTHA CONSTRUCTION CORPORATION is prepared to take the necessary actions to see that safety and health rules and practices are enforced, and to ensure that effective training programs are employed to the best advantage.

Safety will never be sacrificed for production. Safety is an integral part of quality control, cost reduction and job efficiency. All supervisors will be held accountable for the safety performance of the employees under their supervision.

Our goal is the total elimination of accidents from our operations, allowing each employee to return home safely to his or her family.

Sincerely,

Kevin Bragg

President

CHRISANNTHA CONSTRUCTION CORPORATION

**Section 1. Policy**

- A. Company Safety Policy
- B. Management Commitment to Safety
- C. Assignment of Responsibilities
- D. Accountability for Safety
- E. Opinion Survey
- F. Employee Suggestions

**Section 2. General Safety**

- A. Emergencies, Evacuation
- B. Safe Operating Procedures
  - 1. Rules
  - 2. Housekeeping
  - 3. Tools & Machinery
  - 4. Machine Guarding
  - 5. Materials Handling & Back Safety
  - 6. Forklift Safety
  - 7. Ladders
  - 8. Office Safety
  - 9. Clothing

**Section 3. Continual Monitoring & Improvement**

- A. Committees
- B. Meetings/Training
- C. Inspections

**Section 4. Accident Management**

- A. Accident & Near Misses Reporting Procedures
- B. Accident Investigation
- C. Accident Report

**Section 5. Special Emphasis Program**

- A. Drug- & Alcohol-Free Workplace
- B. Lock-Out/Tag-Out
- C. Confined Space Entry
- D. Hot Works
- E. Hazard Communications
- F. Personal Protective Equipment
- G. Hearing Conservation
- H. Smoking Policy
- I. Violence Prevention Program

**Section 6. New Employee Safety**

**Section 7. Safety Violation**

**Section 8. DEC Compliance**



## Company Policy

Chrisantha Construction Corporation is dedicated to providing a safe and healthy work environment for all of our employees and customers. The Company shall follow operating practices that will safeguard employees, the public and Company operations. **We believe all accidents are preventable.** Therefore, we will make every effort to prevent accidents and comply with all established safety and health laws and regulations.

### **Management Commitment to Safety**

Management is concerned about employee safety. Accidents, unsafe working conditions, and unsafe acts jeopardize both employees and Company resources. Injuries and illnesses result in discomfort, inconvenience and possibly reduced income for the employee. Costs to the Company include direct expenses (workers' compensation premiums, damaged equipment or materials, and medical care) and indirect expenses (loss of production, reduced efficiency, employee morale problems, etc.).

### **Assignment of Responsibilities**

Safety is everyone's responsibility. Everyone should have a safe attitude and practice safe behavior at all times. To best administer and monitor our safety policies, the following responsibilities are delegated. This list should not be construed as all-inclusive and is subject to change as needed.

#### Management (will)

- a. Provide sufficient staffing, funds, time, and equipment so that employees can work safely and efficiently
- b. Demand safe performance from each employee and express this demand periodically and whenever the opportunity presents itself.
- c. Delegate the responsibility for a safe performance to the Safety Director, Supervisors, and Employees, as appropriate.
- d. Hold every employee accountable for safety and evaluate performance accordingly.
- e. Periodically review the Safety Program effectiveness and results.

#### Safety Director (will)

- a. Provide the resources, direction, and audits to integrate safety into the management system.
- b. Establish and maintain a safety education and training program.
- c. Periodically conduct safety surveys, meetings, and inspections.
- d. Advise supervisors, employees, and the safety committee on safety policies and procedures.
- e. Assure that all newly hired employees have been given a thorough orientation concerning the Company's Safety Program.
- f. Coordinate with Human Resources pre-employment physicals and maintain the company's drug-testing program.
- g. Prepare and maintain safety records, analysis, evaluations, and reports to improve the Company's safety performance and comply with all government agencies, insurance carriers, and internal procedures.

- h. Work with management, supervisors, safety committees and employees to maintain & implement new and ongoing safety programs and comply with recommendations provided by outside consultants, OSHA inspectors, and insurance companies.
- i. Make available all necessary personal protective equipment, job safety material, and first-aid equipment.
- j. Review all accidents with management, supervisors, the safety committee and/or employees and ensure that corrective action is taken immediately.
- k. File all workers' compensation claims immediately and work with the workers' compensation carrier to ensure proper medical treatment is provided to injured workers and they are returned to work as quickly as medically possible.

### **Supervisors**

Each employee who is in charge of a specific work area supervises the work of others, or to whom an employee is assigned for a specific task or project, is responsible and accountable for their safety.

#### **Supervisors (will):**

Establish and maintain safe working conditions, practices, and processes through Job Safety Analysis

#### **Job Inspections**

- a. Safety Meetings
- b. Safety Training
- a. Observe work activities to detect and correct unsafe actions.
- b. Ensure that all injuries are reported promptly and cared for properly. Make available first aid treatment.
- c. Investigate all accidents promptly. Complete an accident report and provide it to the Safety Director the same day the accident occurs. Review all accidents with the Safety Director and employees and correct the causes immediately.
- d. Assist Human Resources in the review of employment applications, pre-employment physical reports, and personnel files to determine physical qualifications for specified job classifications.
- e. Seek out alternative work so those injured employees can return to work in a modified duty job.
- f. Consistently enforce safety rules/regulations, programs, and protective measures (i.e. use of personal protective equipment, machine guarding, proper clothing, etc.)
- g. Post signs, notices, and instructions as needed or required.
- h. Brief your employees of any new hazards before they start work and weekly host brief safety meetings to discuss safety practices related to job hazards and general safe work behavior.
- i. Work with management, the Safety Director, safety committees and employees to maintain & implement new and ongoing safety programs and comply with recommendations provided by outside consultants, OSHA inspectors, and insurance companies.

### **Employees**

Each employee is responsible for his/her own safety. No task should be completed unless it can be completed safely.

### Employees (will):

- a. Comply with all company safety programs, rules, regulations, procedures, and instructions that are applicable to his/her own actions and conduct.
- b. Refrain from any unsafe act that might endanger him/her or fellow workers.
- c. Use all safety devices and personal protective equipment provided for his/her protection.
- d. Report all hazards, incidents, and near-miss occurrences to their immediate supervisor or Safety Director, regardless of whether or not injury or property damaged was involved.
- e. Promptly report all injuries and suspected work related illnesses, however slight, to his/her immediate supervisor or Safety Director.
- f. Participate in safety committee meetings, training sessions, and surveys as requested and provide input into how to improve safety.
- g. Notify the Safety Director immediately of any change in physical or mental condition or use of prescription drugs that would affect the employees' job performance or the safety of him/herself or others.
- h. Notify the Human Resources Manager within five days of any serious driving, drug/alcohol, or criminal convictions.
- i. Be a safe worker on (and off) the job. Help coworkers do their job safely. Come to work everyday with a safe attitude.

### **Accountability for Safety**

Everyone is accountable for safety. Management, the Safety Director, and/or the Safety Committee will establish safety objectives and develop and direct accident prevention activities. All employees should strive to reach those objectives and will be evaluated accordingly. All managers' and supervisors' annual appraisals will include safety (results to objectives in their area and company wide) as well as an audit of their performance of their safety responsibilities. All employees' salary reviews will be affected by the company's safety performance record. Appraisals, which include safety records, will also be performed on all employees seeking a promotion.

### **Opinion Survey**

The Company requests ongoing comments and feedback from all employees. In addition, annually the company will request all employees' opinions and input on the Company's safety program through an opinion survey. Be honest. You know your job better than anyone else does. Therefore you can provide valuable input into performing the job safely. Changes to existing safety programs, rules, procedures, etc. may be influenced by your responses. Full cooperation of all employees is expected.

### **Employee Suggestions**

Safety suggestions from employees are welcomed and encouraged. To make a safety suggestion, complete the following form and provide it to the Safety Director



## Employee's Safety Suggestion

Employee's Name (optional): \_\_\_\_\_

Date:

Supervisor's Name: \_\_\_\_\_

**CURRENT PRACTICE OR CONDITION**

**SUGGESTION**

**BENEFITS EXPECTED FROM CHANGE**

## Section 2: Standards

### A. Emergencies & Evacuation

#### 1. Emergency Procedures

Our goal is to provide prompt and immediate action in any emergency to protect life, property, and equipment. In case of an emergency, the employee nearest the stricken person should call 911 (or the emergency phone number posted in your area) and direct a fellow employee to:

- a. Notify the nearest supervisor to come to the scene
- b. Simultaneously dispatch available employees to quickly retrieve the first aid kit.
- c. An individual trained in first aid should apply emergency rescue procedures until medical assistance arrives.

The Safety Director should be notified. The Project Manager or Safety Director (in that order) or their designees will decide whether or not to evacuate, inspect or shut down a facility.

#### 2. Evacuation Procedures

a. The Safety Director will assign each area a primary and alternate evacuation coordinator. They will be responsible for the effective evacuation of all persons. If neither is available, the supervisor is then responsible for evacuation.

b. When alerted by alarm or by the Evacuation Coordinator(s) to evacuate, employees should:

1. Properly secure all classified materials in your possession and assures all classified containers and areas are properly locked.
2. Proceed to the nearest exit and assemble in the designated area. See the attached building layout with exit routes clearly marked. These are also posted throughout the building.
3. Remain in the designated area until instructions are provided.

### B. Safe Operating Procedures

All employees are responsible for safety. The following applies to all employees:

#### 1. Rules

- a. Comply with all established safety rules, regulations, procedures, and instructions that are applicable to your own actions and conduct.
- b. Promptly report all accidents, hazards, incidents, and near-miss occurrences to your immediate supervisor, regardless of whether or not injury or property damage was involved.
- c. Do not visit, talk to, or distract another employee who is operating a machine, or who is engaged in a work activity where the possibility of injury exists.
- d. Do not participate in horseplay, scuffling, pushing, fighting, throwing things, or practical jokes.
- e. Observe all no-smoking signs and regulations.
- f. Do not run on Company premises.
- g. Use handrails on steps, elevated platforms, scaffolds, or other elevations.
- h. Assist others and ask for assistance in lifting and carrying heavy or awkward objects.
- i. Firearms, ammunition, and explosives are prohibited on Company premises.

- j. Personal stereos with headphones, i.e. Walkman, are not permitted to be worn in the workplace
- k. Alcohol and drug use and possession on Company property are prohibited.

## **2. Housekeeping**

- a. Practice good housekeeping by keeping the work area, aisles, walkways, stairways, roads, or other points of egress clean and clear of all hazards.
- b. Store and/or return parts, materials, tools, and equipment so as not to create a tripping hazard.
- c. Clean-up scrap, nails, and other excess materials. Place trash and scrap in proper waste containers.
- d. Keep work area floors clean, dry, and free of oils, grease and liquids. Remove all spills immediately.
- e. Remove or bend down nails or sharp protrusions. Store parts, materials, or equipment with protruding sharp ends or edges where personnel cannot accidentally bump into them.
- f. Materials and equipment are not to be stored in the aisles or near exits. Permission from the Safety Director must be obtained for temporary or permanent storage of any materials or equipment in aisles or near exits.

## **3. Tools, Machinery, & Equipment**

- a. Inspect tools daily to ensure that they are in proper working order. Damaged or defective tools must be taken out of service and replaced immediately.
- b. Power saws, grinders, and other power tools must have proper guards in place at all times.
- c. Cords and hoses must be kept out of the walkways and off stairs and ladders. They must be placed so as not to create a tripping hazard or damaged from equipment or materials.
- d. Electrically powered tools and equipment should be double insulated or grounded at all times when in use.
- e. Hand tools should be used for their intended purposes only. The design capacity of hand tools should not be exceeded by the use of unauthorized attachments.
- f. All fuel-powered tools must be shut down while being refueled or serviced. Smoking, welding, and other burning is prohibited during refueling.
- g. No one shall ride in or on any equipment not specifically designed or adapted for the transportation of employees.
- h. Do not operate or attempt to operate machines, tools, or equipment for which you are not authorized or trained.
- i. Do not stand, walk, or work under suspended loads or loads being moved by overhead equipment.

## **4. Machine Guarding**

- a. It is the responsibility of the Supervisor to see that guards are installed on machines where needed.
- b. Employees should report any malfunctions of the guards to the Safety Director.
- c. The Safety Director should determine if the machine should be locked and tagged-out until the guard can be fixed or replaced.

d. The guards increase safety on the machine. Any employee shall not use machinery with the guards removed without permission from the Safety Director.

## **5. Material Handling & Back Safety**

- a. Know the approximate weight of your load and make certain your equipment is rated to handle it. (All powered equipment and rigging is rated as to safe working load. This rating is posted on the equipment. Never exceed the manufacturer's recommended safe working load).
- b. Lift heavy objects as instructed, with the leg muscles and not with the back. On average, do not manually lift over 50 pounds.
- c. Call for assistance as needed for handling heavy or bulky objects or materials.
- d. Use an appropriate, approved lifting device (i.e. special trucks, racks, hoists, and other devices) for lifting very heavy, bulky, large or unyielding objects.
- e. All ropes, chains, cables, sling's, etc., and other hoisting equipment must be inspected each time before use.
- f. A load should never be lifted and left unattended.
- g. Wear safety gloves when handling materials.
- h. Properly stack and secure all materials prior to lifting or moving to prevent sliding, falling, or collapse.
- i. Protruding nails or staples must be bent or pulled away whenever stripping forms or opening materials.
- j. Avoid moving or lifting loads by hand whenever possible.

### Tips for manual lifting:

- a. Get a good footing.
- b. Place feet about shoulder width apart.
- c. Bend at the knees to grasp the weight.
- d. Keep back as straight as possible.
- e. Get a firm hold.
- f. Lift gradually by straightening the legs.
- g. Don't twist your back to turn. Move your feet.
- h. When the weight is too heavy or bulky for you to comfortably lift - GET HELP.
- i. When putting the load down, reverse the above steps.

Note: If lifting stacked materials, materials should be carefully piled and stable. Piles should not be stacked as to impair your vision or unbalance the load. Materials should not be stacked on any object (i.e. floor, scaffold) until the strength of the supporting members has been checked.

## **6. Forklift & Heavy Equipment Safety**

The following are the minimum safety practices for the operation of fork lifts and heavy equipment (cranes, bulldozers, backhoes, etc.):

- a. Only trained and authorized operators are permitted to operate forklift or heavy equipment. Their Supervisors or the Safety Director will train all operators. Every operator must participate in, at minimum, annual forklift training.

- b. Prior to operating the forklift or equipment, the operator must test: the brakes, steering controls, warning light, clutch, horn, fluid levels, and other devices for safe and proper operation.
- c. Never check the engine while it is running.
- d. Document your inspection results and equipment defects using the attached Inspection Report Form. Report defects to your supervisor immediately. No defective equipment shall be used. Authorized personnel should make adjustments and repairs only.
- e. Wash the equipment whenever necessary. The equipment must be kept clean and free of oil and grease.
- f. Employees should operate the equipment/forklift with safe speed and within rated load capacity. Drive to the right. Do not exceed 10 miles per hour, or posted authorized speeds, on plant roads.
- g. Passengers are not permitted on forklifts or heavy equipment except for training purposes.
- h. Mobile equipment should never be left unattended without first shutting off power, neutralizing controls, setting brakes, and lowering forks or bucket. Do not park on an incline.
- i. All mobile equipment must have a functional fire extinguisher on board.
- j. Sound horn at exits, corners, cross aisles, intersections, and when approaching pedestrians. Do not use horn needlessly or at undue length.
- k. Always look in the direction equipment is traveling, looking backward when backing up, even for a short distance. Keep a clear view of the path. When forward vision is obstructed, drive in reverse.
- l. When traveling, with or without a load, keep forks or bucket as low as possible.
- m. Avoid following pedestrians or other vehicles too closely, especially when operating on inclines or in noisy areas.
- n. Ascend/descend all ramps and inclines slowly. Wait for passengers to exit the ramp before attempting to ascend/descend. When descending, always use low gear and the slowest speed control. Do not descend ramps with the load at the front of the forklift. Never ascend in reverse. When ascending, loaded forklifts should be driven with the load upgrade.
- o. A man cage must be used when elevating personnel with a forklift. Attach the cage prior to use. Do not travel with passengers in the man cage. Personal protective equipment should be used as instructed. Hard hats should be worn where danger of falling objects exists.
- q. If the forklift is equipped with a seatbelt, the belt must be worn at all times.

## **7. Ladders**

- a. Inspect all ladders before use. Do not use any ladders with missing safety feet, missing or broken rungs, etc. Tag defective ladders with a “DO NOT USE” sign and report the defects immediately.
- b. Portable ladders should be placed so that the base is away from the horizontal plane by one-fourth the ladder length (i.e. 12’ ladder would be 3’ from the wall).
- c. Never climb a ladder that is unstable.
- d. Never place a ladder in front of a door, unless the door is locked, guarded or otherwise blocked.
- e. All ladders placed up against a stationary object must be tied off at the top to a secure point.

- f. Ladders must extend at least three feet beyond the step off point.
- g. Do not place a ladder close to live electrical wiring or against piping. Beware of overhead wires when moving an extended ladder. Do not use metal ladders near electrical power lines.
- h. Portable ladders must be equipped with non-slip bases.
- i. Face the ladder when ascending or descending.
- j. Never stand at the top rung of a stepladder.

## **8. Office Safety**

- a. Practice good housekeeping throughout the office area. Do not leave materials or position telephone or electrical cords in the aisles.
- b. Report or correct any obvious hazards as soon as they are discovered.
- c. Install pencil sharpeners so as not to protrude beyond the ends of desks or tables.
- d. Do not carry articles weighing more than 20 pounds when ascending or descending stairs that rise more than 5 feet.
- e. Close files and desk drawers. Arrange contents in file cabinets prevent tipping when draws are open. Store heavier materials in the lower drawers. Do not open more than one drawer at a time when tipping may occur. Secure cabinets to each other as necessary.
- f. Report damaged furniture and broken veneer surfaces immediately.
- g. Do not carry pointed or sharp objects in hand, pockets, or attached to clothing with points or blades exposed.
- h. Do not leave paper cutters with the blade in the open or upright position.
- i. Take precautions to prevent materials from falling from the top of file cabinets or desks.
- j. Do not stand on chairs, desks, boxes, wastebaskets, or any other substitutes for an approved step-stand or stepladder.
- k. Report slippery floor surfaces to your supervisor immediately.
- l. Clean up spills on floors immediately.
- m. Position desks and files so that drawers do not extend into the aisle way when open.

## **9. Clothing**

- a. Clothing: Wear safe and practical working apparel. Be sure that any clothing you wear is not highly flammable. Neckties and loose, torn or ragged clothing should not be worn while operating lathes, drill presses, reamers and other machines with revolving spindles or cutting tools.
- b. Shoes: Low-heeled, closed-toe shoes (or proper work boots) made of substantial leather or equivalent material with sufficient heavy soles must be worn in designated areas.
- c. Jewelry: Do not wear rings or any form of jewelry or ornamentation when working around machinery or exposed electrical equipment.

## **Section 3: Continual Monitoring & Improvement**

### **A. Safety Committees**

Managers, supervisors, union representatives, and employees will all be represented on the committee. The purpose is to bring workers and management together on a regular basis in a non-adversarial, cooperative effort to promote workplace safety.

The Safety Committee will not have more than 10 people on it at any one time. Members should remain on the Committee for a minimum of one year. Membership on the Committee includes:

**Management:** A Management representative with authority to act on all but major expenditures or procedural matters. The management representative will be familiar with corporate objectives and be aware of insurance costs and the need to control losses.

**Safety Director:** The Safety Director does not run the Safety Committee. He/she should attend all safety meetings and be an advisor to the Committee. The Safety Director shall select 3-4 supervisors to participate in the Safety Committee.

**Supervisors:** One supervisor shall chair all meetings. This is an elected position by the safety committee. The chairman should work with the Safety Director and other committee members to plan meeting agendas. One supervisor will be responsible for taking all minutes at the meetings. Minutes of the meetings should be provided to all committee members and field supervisory personnel within a reasonable time following meetings. Supervisors should solicit employees to volunteer to participate in the safety committee. Only employees working at least 1 year at the company may volunteer. 4-5 employees should be selected among the volunteers to participate on the committee.

**Employees:** Should solicit suggestions and concerns from coworkers and participate at the committee meetings. Employees must attend all committee meetings, unless a medical reason prohibits their attendance.

## **Safety Committee**

The Safety Committee has many functions. Here is a list of responsibilities often assigned to the Safety Committee. Managers and supervisors also perform some responsibilities. In this case, the Safety Committee may audit the supervisor or simply assist:

- A. Planning, direction, and control of corporate loss control activities
- B. Create, review, update, and implement areas of the safety manual and other safety programs
- C. Review losses
- D. Follow-up on employee suggestions
- E. Conduct inspections and monitor safe behavior.
- G. Conduct Training Sessions
- H. Complete Job Analyses (JSA) on safety-sensitive and non-routine tasks
- I. Non-safety issues can be addressed: production, process, quality, etc.

### **B. Safety Meetings/Training**

Supervisors should hold a (minimum) 10-minute toolbox safety talk every Monday at the beginning of the shift. All employees are required to attend. Supervisors should update employees on any changes in procedures, new equipment, and general safety issues. Emergency procedures should be periodically reviewed. Employees should be reminded to put safety first and look out for your fellow coworker. Employees and supervisors should offer comments and safety suggestions at this time and regularly throughout the day as needed.

Monthly safety training and/or meetings will be held to keep employees abreast of safety procedures and issues. Updates on the safety committee meetings will be provided at this time. Employees with outstanding safety records will be recognized during these meetings. All employees must attend. Quizzes and surveys may be administered after safety training or meetings.

### **C. Inspections**

Periodic inspections will be conducted to identify hazardous conditions and unsafe behavior. The Safety Director or Safety Committee will conduct inspections, along with insurance companies and OSHA, and may request employees or supervisors to participate. The inspector should look for unsafe practices and conditions that can cause an accident and take corrective action immediately.

Every month, the following inspection form should be completed and provided to the Safety Director. The Safety Director will review the report, take any corrective action needed, and maintain a file of inspections.

Periodically, supervisors, the Safety Director, Safety Committee, or designated employees will complete inspections on a safety-sensitive or non-routine job to ensure compliance with safety procedures. The Job Safety Analysis (JSA) worksheet will be completed and reviewed by the supervisor and/or Safety Director. Results of the JSA inspections will be charted to determine trends, along with production and quality. Additional training may be provided, as needed.

## **Section 4: Accident Management**

### **j. Accident & Near Miss Reporting Procedures**

If you have a near-miss situation while working, notify your supervisor immediately. The situation will be investigated and corrective action implemented to prevent future injury. Employees and witnesses must fully cooperate in the investigation.

If you are injured on the job:

- a. Contact your supervisor, or the nearest coworker (who should notify a supervisor) if you are unable to contact your supervisor due to the severity of your injury.
- b. The designated employee who is trained in first aid and/or CPR should be immediately notified to assist in the situation.
- c. First aid kits, which are prominently displayed throughout the workplace, should be made available and medical supplies promptly refilled (by the Safety Director).
- d. If needed, the supervisor or his designee should transport the injured worker to the company's designated medical facility to receive appropriate medical attention. A post-accident drug and/or alcohol test will be conducted in accordance with the company's Drug-Free Workplace Policy.
- e. If rescue personnel are summoned, the supervisor should delegate an individual to wait for the rescue team and escort them to the injured employee.



- f. All witnesses to the accident should be available to speak with the Safety Director and/or supervisor and cooperate in all accident investigations.
- g. The Safety Director should immediately notify the insurance company of the accident and file workers' compensation claim.

Every accident or near-miss situation should be reported immediately. Injured employees and witnesses to the accident will assist the supervisor in completing an accident investigation. Injured employees must comply with the medical treatment provided by the treating physician, cooperate with the insurance company and its designees, and abide by the company's return-to-work policy.

### **B. Accident Investigation**

When an accident occurs, it is an indication that something has gone wrong. Accidents don't just happen, they are caused. The basic cause(s) of accidents are unsafe acts and/or conditions. The supervisor must investigate every accident to determine the cause and to initiate corrective action to assure that similar type accidents will not recur from the same causes.

Supervisors should complete the following accident investigation form and submit a copy to the Safety Director and Safety Committee for review. The Committee and/or Safety Director should evaluate the corrective action taken or suggested by the supervisor and instruct if additional changes should be made.

Tips on accident investigations:

1. Every accident is caused. Carelessness is not a cause, but the result of some deficiency. Telling employees to be more careful will not eliminate the real accident cause.
2. An accident investigation is not a trial to find fault or to place blame. Its purpose is to find accident causes so that corrective measures may be taken to prevent future accidents.
3. Most accidents result from a combination of human error (unsafe behavior) and a physical hazard (unsafe condition). Do not overlook the possibility of multiple errors and hazards.
4. Don't stop at the obvious answer. For instance, a missing machine guard does not cause an accident. The accident happened because the operator entered the point of operation. Determine why the operator did this and why the guard was off the machine. Only by correcting both problems can you prevent future accidents.
5. The accident investigation should be conducted as soon after the accident as possible. Facts should be gathered while the accident is fresh in the minds of those involved. If possible, question every employee who was involved, or witnessed, the incident. Delay interviewing injured employees until after medical treatment has been received.
6. Other employees who did not witness the accident but work in the area may contribute information regarding the injured workers' activities prior to the accident and conditions a time of the accident.
7. The accuracy and completeness of the information received from the injured worker(s) and witnesses depend on how well the interview is conducted. Supervisors should:
  - a. Put employees at ease.
  - b. Ask what happened and how it happened.
  - c. Permit employees to answer without interruptions.

- d. Show concern.
- e. Remember, nothing is gained with criticism or ridicule.
- f. Ask why questions only to clarify the story.
- g. Repeat the story, as you understand it.
- h. Give the employee the chance to correct any misunderstandings that you have.
- i. Photographs of the conditions as they exist immediately following the accident, including photos of the damaged equipment, are very helpful.
- j. Damaged equipment should be removed or secured for future testing and used as evidence.
- k. Take immediate action to correct any obvious unsafe conditions. Determine the basic accident causes and correct or recommend action to prevent reoccurrence.

### **C. Supervisor's Accident Investigation Report**

The following Accident should be completed by the Supervisor in charge. One copy should be given to the Chrisanntha Construction Safety Coordinator. Copies shall then be distributed to the Insurance Companies and the Project owner or manager.



**ACCIDENT REPORT**

Date: \_\_\_\_\_

Time: \_\_\_\_\_ AM/PM

Employee Full Name: \_\_\_\_\_

DOB: \_\_\_\_\_

Job Classification \_\_\_\_\_

Job # **C** \_\_\_\_\_

Project Name \_\_\_\_\_

Project Location (Address, City, County) \_\_\_\_\_

How long has the injured employee been on this project \_\_\_\_\_ Day(s)/ Week(s)/ Month(s)

Nature of injury - BE SPECIFIC (left hand ring finger/right knee/lower back)

What was the employee doing when the injury was sustained? BE SPECIFIC

What conditions or circumstances allowed this injury to occur? DESCRIBE IN DETAIL

Were mechanical guards or other safeguards (goggles, hardhats, etc.) provided?  Yes  No

Were they in use at time of injury?  Yes  No

Was First Aid given?  Yes  No If so when? \_\_\_\_\_

by whom? \_\_\_\_\_

What First Aid treatment was given? \_\_\_\_\_

Did the injury require medical care?  Yes  No

Name/Location and Address of Doctor or Hospital \_\_\_\_\_

Were there any witnesses/contractors on site? (include addresses if not employees)  Yes  No

Knowing that it is your responsibility to provide a safe work place and promote safe work habits, what action have you taken? \_\_\_\_\_

Signature of Supervisor \_\_\_\_\_ Date of Report \_\_\_\_\_

Safety Coordinator Signature \_\_\_\_\_ Dated \_\_\_\_\_

## Section 5. Special Emphasis Programs

### A. Drug-Free Workplace Policy

#### Purpose

Chrisanntha Construction Corporation values its employees and recognizes their need for a safe and healthy work environment. Furthermore, employees abusing drugs and alcohol are less productive and are often a risk to the safety, security and productivity of our Company. The establishment of a Substance-Abuse Policy is consistent with the Company's desired culture and is in the best interest of the Company.

#### Policy

It is the policy of The Chrisanntha Construction Corporation to maintain a workplace free from the use and abuse of drugs and alcohol. Compliance with this policy is a condition of continued employment. It supersedes any other Company policy or practice on this subject. At any time, The Company may unilaterally, at its discretion, amend, supplement, modify, or change any part of this policy. The policy does not represent an expressed or implied contract, and it does not affect your status as an at-will employee. If you have any questions about this policy, please direct them to (designated person).

To maintain a Drug and Alcohol-Free Workplace, The Company has established the following policy with regard to the use, possession, and sale of drugs and alcohol. Drug and alcohol testing practices will be adopted to identify employees or applicants using drugs and/or alcohol.

#### Drug and Alcohol Prohibitions

“Illegal Drug” means: any drug (1), which is not legally obtainable, or (2), which is legally obtainable but has not been legally obtained, or (3), which is a controlled substance. The term includes prescribed drugs not legally obtained and prescribed drugs not being used for prescribed purposes.

1. Any employee involved in any of the following activities at any time during the hours between the beginning and end of the employee's work day, whether or not on Company business, premises or property, is in violation of Company policy and subject to disciplinary action:
  - a) Bringing illegal drugs onto Company premises or property, including Company owned or leased vehicles, or customer premises;
  - b) Having possession of or being under the influence of illegal drugs; or
  - c) Using, consuming, transforming, distributing or attempting to distribute, manufacturing or dispensing illegal drugs.
2. In addition, the Company strictly prohibits the abuse of alcohol or prescription drugs.
3. Any employee refusing to cooperate with or submit to questioning, medical or physical tests or examinations, when requested or conducted by the Company or its designee, is in violation of Company policy and subject to disciplinary action.

## **Disciplinary Actions**

The Company reserves the right to use disciplinary actions, up to and including termination of employment, depending upon the seriousness of the violation, the employee's present job assignment, the employee's record with the Company, and other factors, including the impact of the violation upon the conduct of Company business.

### **B. Lock-Out/Tag-Out**

#### **Purpose**

To establish a procedure to protect and prevent personnel from injury by 1) accidental activation of any powered or damaged equipment, and 2) the uncontrolled release of electrical energy. A secondary purpose is to remain in compliance with OSHA regulations, 29 CFR 1910.147.

#### **Responsibility**

The Safety Director is responsible for compliance. The Safety Director shall train supervisors on proper lockout/tagout procedures, audit and/or oversee the application of the procedures, ensure corrective actions are taken when problems arise, and conduct an annual inspection/evaluation. Supervisors are responsible for training effected and authorized employees on the purpose and use of these procedures. The Safety Director should periodically monitor training activities and assist as required to ensure compliance with OSHA regulations and company goals. All effected and authorized employees involved in lockout/tagout procedures must receive annual training. A list of authorized, trained individuals will be maintained by the Safety Director (see the attached log).

#### **Scope**

This procedure applies to all Company personnel and contract employees. It will be enforced during installation, cleaning, servicing, maintenance, or inspection work is performed on any powered equipment and/or processes in which the activation of such could injure employee or cause property damage. This procedure does not apply to adjustment or other activities, which require the equipment be operating at the time of service, provided other protective measures are employed.

#### **Definitions**

##### **Lockout:**

The application of a lock, chains, or other appropriate apparatus, and a danger identification tag to de-energize electrical equipment and/or process system to ensure that the equipment or system cannot be activated. Note: OSHA regulations require that locks be used to secure equipment whenever possible. Chains can be wrapped around valve handles and then locked in such a way that the valve cannot be operated. Tags alone can be used when it is not possible to use a lock.

##### **Tagout:**

The application of a danger identification tag when a physical lockout or de-energizing is not feasible or a lock has already been applied. Tags should bear the name of the employee applying the tag, the date of application, and a brief description of the work needed.

**Energy Source:**

The switch or valve through which energy is controlled to the unit (e.g. motor control center (disconnect) switches, (circuit) breaker panel switches, valves, locking pins, etc.). This energy may be: 1) electric power, 2) mechanical power, 3) hydraulic power, 4) pneumatic energy, 5) chemical system, or 6) thermal energy.

**Authorized Employees:**

A person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment.

**Effected Employees:**

An employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed. An effected employee becomes an authorized employee when the effected employees' duties include servicing or maintenance.

**Lockout/Tagout Procedures**

1. Each piece of equipment or system must be evaluated to identify all energy sources to be locked or tagged out. A supervisor or an authorized employee with familiarity with the equipment/system, using the attached energy source determination checklist, should do the evaluation periodically.
2. If the machine is determined by OSHA that formal lockout/tagout procedures are required, this should be done by an authorized employee and logged on the attached form titled "List of Lockout & Tagout Procedures." These procedures should then be followed. If no specific procedures are required, or provided by the equipment manufacturer, complete the following tasks.
3. Deactivate (turn off) and secure the equipment/system at the energy source. Relieve pressure, release stored energy from all systems, and restrain or block them. (Operators must tag the appropriate switches or controls inside the control room as part of this step).
4. Attach a lock to each isolation device and a tag to the lock. Sign and date the tag, along with providing pertinent information.
5. Check to ensure that no personnel are exposed to the equipment/system, and then attempt to activate the normal operating controls to ensure proper lockout/tagout. (A voltmeter can check the switch)

**CAUTION: Always return the operating control to the "neutral" or "off" position after completing this test.**

6. The equipment/system is now locked and tagged out.

**Lockout/Tagout Removal Procedures**

1. After installation, servicing, maintenance, inspection, or cleaning is complete, verify that all tools have been removed, all guards have been reinstalled, the area is clean and orderly, and the equipment is safe to operate.
2. Ensure that employees are not exposed to the equipment and all employees are aware of the removal of the lock and tag.

3. The locks and tags should be removed only by the employee who applied them, the supervisor or the Safety Director. The supervisor or Safety Director should only remove the locks and tags after a reasonable effort is made to contact the employee and notify him of the removal. The tags should be signed and dated and submitted to the Safety Director.
4. Activate energy source as required.

**Procedures involving more than one person**

If more than one individual is required to lockout or tagout equipment, each shall use his/her own assigned lockout/tagout device on the energy source. When the energy source cannot accept multiple locks or tags, a multiple lockout/tagout device (hasp) should be used. A single key should be used to lockout the equipment/system, with the key being placed in a lockout box or cabinet. This cabinet or lockout box must allow multiple locks to secure it. Each employee will then use his/her own lock to secure the box or cabinet. As each person no longer needs to maintain the lockout protection, that person will remove his/her lock from the cabinet. Proper removal procedures should be followed.

**List of Authorized Lockout/Tagout Individuals**

<b>Work Center</b>	<b>Lock Number</b>	<b>Name</b>	<b>Mechanical (yes/no)</b>	<b>Electrical (yes/no)</b>

**C. Confined Space Entry**

**Purpose**

To establish a procedure to protect personnel and prevent injury when entering and working in confined spaces. A secondary purpose is to remain in compliance with OSHA regulations, 1910.146.

**Responsibility**

Safety Director: The Safety Director is responsible for identifying all confined spaces and compliance with the procedures for space entry. The Safety Director shall 1) train supervisors & employees (entrants, attendants, and rescue personnel) annually on identifying existing & potential hazards, confined

space procedures, the use of permits, and equipment, 2) audit and/or oversee the confined space entry, and 3) ensure corrective actions are taken when problems arise. The Safety Director should periodically monitor training activities of the supervisors and assist as required to ensure compliance with OSHA regulations and safe confined space entry.

Supervisors are responsible for training employees on the purpose and use of these procedures. (All employees involved in confined space entry must receive annual training.) Supervisors shall verify that all preparations have been completed to allow for safe entry. The supervisor shall sign and post the permit. They will confirm the availability of all rescue service and terminate entry & cancel the permit when the job is completed, there is a change of work crews, or an emergency occurs. The supervisor ensures acceptable entry conditions are maintained during the operation and that all unauthorized entrants are removed.

Entrants: Entrants are the individuals who enter the confined space to work. They must know the hazards associated with the space and properly use all required safety and work equipment. The entrant must communicate with the attendant throughout entry by any effective means. They must immediately exit the space whenever they discover a problem, an emergency occurs, or there are instructed to exit by the attendant, supervisor, or Safety Director.

Attendant: The attendant monitors the space and surrounding areas for any problems that might affect the safety of the entrant. They will remain in continuous contact with entrant. The attendant will not enter the confined space. They will be trained in the confined space procedures and aware of the behavioral effects of exposures on the entrants. They will monitor oxygen, toxics, and flammables/explosive levels every 15 minutes. The attendant will summon emergency assistance when needed and may perform non-entry rescue (if properly trained). The attendant will have rescue equipment and a first-aid kit available. They shall prevent unauthorized personnel from entering the confined space. Attendants may not be assigned any duties, which could conflict with their primary responsibility of monitoring entrant safety.

## **Definitions**

Confined Space:

A confined space isn't necessarily a small, crowded area. A confined space has 1) limited or restricted means of entry or exit, 2) unfavorable natural ventilation, 3) not been designed for continuous human occupancy. Examples include: storage tanks, silos, kettles, vault, hopper, pit, trench, boilers, sewers, degreasers, vessels, sumps, diked areas, process tanks & equipment, and pipelines.

### **Permit Required:**

A permit is required if one of the following hazards is present: 1) hazardous atmosphere, 2) potential for engulfment, 3) internal configuration hazard, or 4) other recognized serious safety or health hazards.

## **Hazards**

Conditions in a confined space can change over time; therefore so can the hazards. Hazards include:

- 1) Oxygen-deficient atmosphere. Oxygen content of less than 19.5% is considered hazardous.
- 2) Oxygen-enriched atmosphere. Oxygen content of more than 23.5% is considered hazardous.
- 3) Flammable or combustible atmosphere. A concentration of a chemical in excess of 10% of its lower explosive, flammable, or combustible limit (LEL) is considered hazardous.



- 4) Toxic atmosphere. Any chemical exposure in excess of its permissible exposure limit (PEL) is considered hazardous.
- 5) Engulfment or structural entrapment. Employees can become trapped in liquid or granular material. Inwardly converging walls or floors that taper to a smaller cross-section can trap or asphyxiate an entrant.
- 6) Energy sources. These include electrical, mechanical, hydraulic, or compressed air. Uncontrolled sources are hazardous.
- 7) Other hazards. I.e. Slips & Falls, Radiation, Heat Stress, Internal configuration, Combustible dust, etc. decontaminated to the extent consistent with the hazard. The Safety Director must approve any cleaning or ventilating procedures.
7. The confined space shall be thoroughly ventilated. This should be done mechanically by blowing air into the space or by draft fan venting. Ventilation shall continue until work is complete in the confined space.
8. If an assessment (testing) of the atmosphere indicates contamination is present, the cause/source of the contamination must be determined. Furthermore, it must be determined if contamination will increase during entry. Testing should include:
  - a) Oxygen Atmosphere Testing. Testing should be done with a calibrated direct-reading oxygen indicator. The oxygen shall contain 19.5-21% oxygen by volume. Measurements should be taken at the top and bottom of the space. The attendant will take measurements every 15 minutes. Tests must be repeated after a stoppage exceeding 30 minutes. Results should be documented in the permit. Entry is not permitted if the oxygen level is less than 19.5% or greater than 21%
  - b) Toxic Atmosphere Testing. If it is determined that any of the following toxins (Toluene, Solvent, Isopropyl Alcohol, H<sub>2</sub>S or any material that is capable of generating H<sub>2</sub>S, or any material that has a ceiling PEL (permissible exposure limit) or LEL (lower exposure limit)) were previously contained in the space, testing with color detection tubes (i.e. Drager tubes), chlorine detector, or the biosystems H<sub>2</sub>S Detector should be conducted. If atmospheric contamination exceeds 10% of the PEL, the space should be ventilated until the level is below 10%. Safety Director should be contacted if the contamination is immediately dangerous to life of health (IDLH). Entry is not permitted, except for emergency procedures approved by the Safety Director, if toxic gases at an IDLH level exist. The attendant will take measurements every 15 minutes.
  - c) Flammable Atmosphere Testing. If the space previously contained or may contain flammable vapors, testing with a combustible gas indicator to determine the concentration of flammable gases and vapors must be conducted. If the concentration of flammable gas or vapors exceeds 5% of the lower flammability limit, the space should be ventilated until the concentration is below 5%. Entry is not permitted if the concentration exceeds 5%. The attendant will take measurements every 15 minutes.
9. Employees shall wear personal protective equipment such as respiratory protection (i.e. SCBA), gloves, boots, rubber suits, goggles, and harnesses as determined by the Safety Director. Respiratory protection must be worn if 1) there are unknown contaminants in the space, 2) the level of contaminants cannot be determined, 3) the potential for IDLH exists, 4) an emergency rescue is being performed, or 5) the potential exists to contaminate the atmosphere while in the space.

10. Portable power tools must be inspected and grounded. Cylinders for cutting and welding torches **shall not** be taken into the confined space. Ladders must be secured at the top.
11. All personnel shall conduct additional responsibilities as documented under Responsibilities above.

## **Rescue Equipment & Procedures**

### **Equipment**

The Safety Director will require the following equipment to be on hand prior to confined space entry:

1. Self-contained breathing apparatus or air-line respirator
2. Harness and lifeline
3. Mechanical retrieval equipment
4. Alarm horn
5. Oxygen/Explosive Meter
6. 12" wide confined space or rope ladder
7. Protective Clothing & equipment
8. Chain/Sling
9. Mechanical Ventilation

### **Rescue Procedures**

1. Procedures outlined above are followed. (I.e. atmospheric tests shall be performed prior to and during entry and documented on the permit, etc.)
2. The attendant is equipped with an alarm horn prior to entry.
3. Any entrant into a vertical exit confined space must wear a parachute type harness. Horizontal exit confined space requires a lifeline be worn in addition to the harness.
4. Lifelines must be attached to a fixed object outside of the confined space.
5. All confined spaces with vertical exits will be equipped with means to attach a lifting winch (i.e. crank with handle, hoist, hauling apparatus with a rope, etc.) for victim rescues (where tripod use is impossible).

### **Training**

Employees who perform tasks covered by the confined space entry policy (e.g. enter into confined spaces, measure atmospheric conditions in confined spaces, or perform rescue in a confined space) will be trained annually on site procedures and the use of permits and equipment.

## **D. Hot Works Program**

### **Purpose:**

To establish a procedure for the control of hazards associated with welding, cutting or the use of spark producing tools for the prevention of fire or subsequent injury to personnel.

### **Responsibility:**

It is the responsibility of all employees/supervisors/managers who will either perform or oversee the operation or employee, to adhere to the requirements of the Hot Works Permit Program. The Safety Director should designate a Hot Works Coordinator. It will be the responsibility of the Coordinator to evaluate all jobs prior to the work beginning to assess hazards and necessary controls required **before** any work will begin.

## Scope:

This procedure applies to any hot work performed by any employee or contractor. This procedure does not apply to hot work performed in designated Safe Work areas.

## Definitions:

### Hot work

Work involving the use of open flame or spark producing tools such as, but not limited to, welding, cutting, burning, grinding, and heat related producing jobs that could ignite combustibles.

### Safe Work Areas

These areas that have been designated-designed specifically for cutting, welding, grinding activities. The Hot Work Coordinator is responsible for designating all Safe Work Areas once he is assured of proper protection against combustibles.

## Procedures:

1. A Hot Work Permit must be issued prior to initiating any hot work outside of a designated Hot Work Area. The Coordinator prior to starting the job will evaluate this site for potential fire and safety hazards. The Coordinator should carefully review activities to determine if a less hazardous mechanical method such as cutting with a hacksaw can be used instead of more heat and spark producing methods.
2. Safe work permits are issued by the Safety Director. The permit remains active for the duration of the work shift.
3. Where practical, all-flammable and combustible materials shall be relocated at least 35 feet from the work area. Where relocation is impractical, combustibles and flammables shall be protected with flameproof covering or otherwise shielded with metal or flameproof curtains.
4. The person conducting the hot work will have a readily available fire extinguisher rated at a minimum of 2A:40BC.
5. Where potential for flammable or combustible vapors or gases might be present in the area, these concentrations must be determined before work begins. The Hot Works Coordinator will determine the concentration of the vapors or gases, and this measurement recorded.
6. Hot works **shall not** be permitted if the concentration reaches 5% of the lower explosive limit (LEL). If combustibles gas meter indicates any concentration of flammable vapor, the hot works permit shall not be approved until the person approving the permit:
  - a. Understands the source of the flammable-combustible vapors.
  - b. Can assure that concentration will not increase to a dangerous level while work is underway.
7. When performing hot work overhead, if combustibles could inadvertently be moved into the area, or people enter the area, the area below must be roped off and posted.
8. Where possible, noncombustible barriers should be placed around and under hot works area to confine sparks.
9. A fire watch is a necessary step to implement whenever work is conducted, such as:

- a. All work in buildings and storage sheds;
    - b. An appreciable amount of combustible material in building construction, contents or insulation is closer than 35 feet to the point of operation;
  - c. An appreciable amount of combustible materials are more than 35 feet away from work but can easily be reached by sparks, embers, etc.;
  - d. Wall or floor openings are within 35 feet of work, including concealed spaces in walls or floors; and/or
  - e. Combustible materials are adjacent to the opposite side of metal partitions, walls, ceilings or roofs and are likely to be ignited by conduction or radiation of heat.
10. Open drains which lead to underground drainage systems, which could contain flammable or combustible vapors, should:
- a. Have testing for the presence of any flammable or combustible vapors done before starting work;
  - b. Have drains covered with fire blanket or similar protection to prevent access to sparks even if the atmosphere is safe; and/or
  - c. If determined to contain flammable or combustible vapors, the system must be purged with nitrogen to below 5% lower explosive limit (LEL).
11. In areas immediately hazardous to life, hose masks, hose masks with blowers, or a self-contained breathing apparatus should be used in addition to suitable rescue equipment for confined space entry situations. US Bureau of Mines, NIOSH, or similar approval authority should approve all breathing equipment.
12. Employees are required to wear the proper personal protective equipment, such as coveralls, safety goggles, faceshield, welding hood, welding jacket, etc., as demanded by the type of work completed and required by the Hot Work Coordinator and/or Safety Director.

### **Fire watch:**

Having the appropriate extinguishing equipment ready and available and having the individual trained in its use are very important. As a minimum, an extinguisher with a rating of 2A:40BC should be provided. For those jobs where a significant amount of combustibles are present within the 35-foot area, a hose stream up to 1" should be considered by the Safety Director. The fire watch shall be familiar with all equipment for sounding an alarm in event to a fire, and any additional procedures necessary to summon aid.

They should watch for fires in all exposed areas, and try to extinguish them only when within the capacity of the equipment available. If the fire is of such magnitude that it is beyond the capacity of the fire watch to extinguish, the fire watch should summon aid (911).

The watch should be maintained until after the risk of fire has passed. This period should be at least 30 minutes after the completion of the job.

### **Contractors:**

Contractors are required to follow plant hot works procedures as outlined. The Safety Director is responsible for ensuring that all procedures are followed.

Contractual language between the Company and contractors can also help transfer exposures generated by having contractors work on premises. A hold harmless agreement signed by the contractor in our favor and being named as additional named insured within the contractors insurance policy helps maintain a degree of protection should an incident occur. The contractors' policy limits should be at least equal to your total exposure to economic loss from a disastrous fire, at a minimum; this would include the full replacement cost of all your property plus your business interruption costs.

## **E. Hazard Communications**

### **Purpose:**

To ensure that information about the dangers of all hazardous materials used by the Company are known to all affected employees and contractors. A secondary purpose is to comply with the requirements of the OSHA Hazard Communication Standard and corresponding state laws.

### **Responsibility:**

All employees of the company will participate in the hazard communication program and comply with all provisions of this policy. The Safety Director is responsible for maintaining this program and ensuring compliance with all local state, and federal laws.

### **Scope:**

This policy covers container labeling, material safety data sheets, employee training and information, hazardous non-routine tasks, contractors, list of hazardous chemicals, chemicals in unlabeled pipes and safety procedures.

### **Policy:**

#### **Container Labeling**

1. The Safety Director will verify that all containers received for use will be clearly labeled with the following: 1) contents, 2) the appropriate hazard warning (i.e. flammable), and 3) the name and address of the manufacturer. Existing labels will not be removed or defaced on incoming containers unless containers are to be immediately marked with required information.
2. All materials on site are to be stored in their original container with the label attached.
3. Any material with a label missing or illegible should be reported to the supervisor immediately for proper labeling.
4. Stationary, secondary, or portable containers should be clearly labeled with either an extra copy of the original manufacturer's label or with tile "central stores" generic labels that have a block for identification and blocks for the hazard warning.
5. Signs, placards, or other written materials that convey specific hazard information may be used in place of individual container labels if there are a number of stationary process containers within a work area which store similar contents.

6. Portable containers do not need to be labeled if the chemicals are transferred to labeled containers and used by the employee making the transfer during that shift. No unmarked containers of any size shall be left unattended in the work area.

### **Material Safety Data Sheets (MSDS)**

1. Any product having a hazardous warning on its label requires a MSDS.
2. The manufacturer, distributor, or vendor shall provide the MSDS for the hazardous product.
3. All MSDS's shall be forwarded to the Safety Director and reviewed by the Safety Director and employee using the product to determine safe work practices and personal protection, as needed. The MSDS's will be maintained and kept at the Onsite Construction Office.
4. The MSDS provides 1) chemical information, 2) hazardous ingredients, 3) physical data, such as the potential for fire, explosion, and reactivity, 4) health hazards, 5) spill or leak procedures, 6) special protection and precautions, 7) personal protective equipment needed, and 8) name, address, and phone of MSDS preparer or distributor

### **Employee Training and Information**

1. The Safety Director will provide training to employees when hired and routinely thereafter on the hazardous nature of chemical products. Training will include:
  - The Hazard Communication Policy
  - Chemicals present in their workplace operations
  - Physical and health effects of the hazardous chemicals
  - Appropriate work practices and controls when using chemicals.
  - Emergency and first-aid procedures
  - How to read labels and review an MSDS to obtain appropriate hazard information
  - Location of the MSDS file and written hazard communications program
2. After attending the training class, each employee will sign a form to verify that they attended the training, received the written materials, and understand the company's policies on Hazard Communication.

### **Hazardous Non-Routine Tasks**

1. Periodically, employees are required to perform hazardous non-routine tasks. Examples of non-routine tasks performed by employees of this company are as follows: Confined space entry, tank cleaning, and painting reactor vessels.
2. Prior to starting work on such projects, each affected employee will be given information by the Safety Director about the hazardous chemical he/she may encounter during such an activity. This information will include specific chemical hazards, protective safety measures the employee can use, and measures the company has taken to lessen the hazards including ventilation, respirators, presence of other employees, and emergency procedures.

### **Informing Contractors and Others**

1. The Safety Director shall advise contractors and other clients of our Hazard Communication Program.
2. Copies of the MSDS's for all materials brought onto the site will be made available upon request to each contractor from the Safety Director.
3. The Safety Director will also obtain chemical information from contractors that may expose our employees to hazardous chemicals, which they bring into our workplace.

## **List of Hazardous Chemicals**

Attached is a list of all known hazardous substances presently being used? Listed chemicals are denoted as EX for explosive, HT for highly toxic, C-R for corrosive or irritant, and CAR for proven or suspected carcinogen-mutagen in humans or animals. Further information on each chemical can be found by reviewing the MSDS's.

## **Chemicals in Unlabeled Pipes**

1. Work activities are often performed by employees in areas where chemicals are transferred through unlabeled pipes.
2. Prior to starting work in these areas, the employee shall contact the Safety Director for information regarding:
  - The chemical in the pipes.
  - Potential hazards.
  - Safety precautions that should be taken.

## **F. Personal Protective Equipment (PPE)**

### **Purpose**

To provide guidelines concerning the proper use of Personal Protective Equipment and to comply with OSHA standards outlined in Title 29, Code of Federal Regulations (CFR), and parts 1900-1999.

### **Definition**

PPE includes clothing and other accessories designed to create a barrier between the user and workplace hazards. It should be used in conjunction with engineering, work practice and/or administrative controls to provide maximum employee safety and health in the workplace.

### **Responsibility**

The Safety Director is responsible for complying with all OSHA requirements, including maintenance of all equipment. The Safety Director is also responsible for training both current and new employees on the proper usage of such equipment, or designating the appropriate supervisors to conduct training. The Safety Director, or his/her delegate, must also perform a hazard assessment whenever conditions change to determine if hazards exist that require the use of PPE. If hazards are found, the Safety Director, or his/her delegate, must either eliminate them or provide employees with proper protection from them. The Safety Director must document in writing that a workplace hazard assessment has been performed

### **Training**

Proper employee training on the correct usage of PPE will likely eliminate many accidents and injuries from occurring. Before performing any work that requires the use of PPE, the Safety Director, or his/her delegate, must train employees on the following:

- When and what types of PPE are necessary;
- How the PPE is to be used;
- What the PPE's limitations are.

In many cases, more than one type of PPE will provide adequate protection. In such cases, employees should have their choice of which type of protection they would like to use.

The company is required to document in writing that training has been performed and that employees understand all trained materials. Written certifications should contain the names of all employees trained, the date(s) of training, and the PPE requirements.

## **G. Hearing Protection**

Exposure to high noise levels can cause hearing loss or impairment and can create physical and psychological stress. There is no cure for noise-induced hearing loss, so the prevention of excessive noise exposure is the only way to avoid hearing damage. Specifically designed protection is required, depending on the type of noise encountered and the auditory condition of each employee.

The Safety Director, or his/her delegate, is responsible for providing appropriate hearing protection to employees. Pre-formed or molded earplugs are the best forms of hearing protection. A professional should individually fit them. Waxed cotton, foam, or fiberglass wool earplugs can also be used as hearing protection. When used properly, they work as well as most molded earplugs. Disposable earplugs should be discarded after usage. For proper protection, non-disposable earplugs should be cleaned after each use. Plain cotton should not be used, as it does not effectively protect against hazardous noises.

## **H. Smoking Policy**

### **Purpose**

To establish guidelines whereby the Company provides a smoke-free work environment for our employees and is in compliance with all federal and state Indoor Clean Air Acts.

### **Scope**

This policy applies to all employees, vendors, visitors, and contractors.

### **Policy**

1. Smoking is **prohibited throughout the buildings** unless clearly posted as “Smoking Permitted” area.
2. Employees will refrain from smoking in any company vehicles with non-smokers in the vehicle.

### **Discipline**

All employees share in the responsibility for adhering to and enforcing the policy. In all cases, the right of the non-smoker to protect his/her health and comfort will take precedence over an employees desire to



smoke. Employees who violate this policy may receive a written safety violation notice and may be disciplined, up to and including termination of employee, based on the severity of the violation.

## **I. Violence Prevention Program**

### **Purpose**

To establish guidelines to protect employees against workplace violence.

### **Policy**

Nothing is more important to the Company than the safety and well being of its employees. Threats, threatening behavior, or acts of violence against employees, visitors, guests, or other individuals by anyone on Company property will not be tolerated. Violations of this policy will lead to disciplinary action that may include dismissal, arrest, and prosecution.

Any person who makes substantial threats, exhibits threatening behavior, or engages in violent acts on Company property shall be removed from the premises as quickly as safety permits and shall remain off premises pending the outcome of an investigation. The Company will initiate an appropriate response, including but not limited to suspension, reassignment of duties, termination of employment and/or business relationship, and/or criminal prosecution of the person(s) involved.

No existing policy, practice, or procedure should be interpreted to prohibit decisions designed to prevent a threat from being carried out, a violent act from occurring, or a life-threatening situation from developing.

All Company personnel are responsible for notifying their supervisor or the management representative(s) designated below of any threats that they have witnessed, received, or has been told that another person has witnessed or received. Even without an actual threat, personnel should also report any behavior they have witnessed which they regard as threatening or violent, when that behavior is job related or might be carried out on at a Company site. Employees are responsible for making this report regardless of the relationship between the individual initiating the threat or threatening behavior and the person(s) receiving the threat, including domestic problems which they fear may result in violent acts against them or a coworker.

All individuals who apply for or obtain a protective or restraining order which lists the Company locations as protected areas must provide a copy of the petition used to obtain the order, as well as a copy of the protective or restraining order which was granted, to their immediate supervisor or the designated representative(s) listed below.

The Company understands the sensitivity of the information requested and has developed confidentiality procedures that recognize and respect the privacy of the reporting employee (

## **Section 6. New Employee Safety**

### **New Employee Safety**

The Safety Director should provide safety training to all newly hired employees. Each new employee will be given a copy of the safety manual.

**General safety orientation** containing information common to all employees should be reviewed, *before beginning their regular job duties*. Recommendations include (at a minimum):

Review the Safety Manual, with extra time spent on: Accident & hazard reporting procedures, emergency procedures, first aid, personal protective equipment, and special emphasis programs (Drug-Free Workplace Policy, Return-to-Work Policy, Incentive Programs, etc.)

Encourage & motivate employee involvement in safety. Make each accountable for their safety and the safety of their coworkers.

Explain the workers' compensation system and fraud prevention

Review any known workplace hazards.

Conduct training on any topics that are not scheduled to be addressed within a reasonable timeframe and are relevant to the employee's job.

**Job-specific training provided before performing the task** should include:

Review completed JSA's (Job Safety Analysis - see Level 2)

Specific safety rules, procedures, hazards, and special emphasis programs (Machine Guarding, Welding, Lockout/Tagout, etc.) to complete their job

### **Identify employee's or employer's responsibilities**

Continual training should be provided to new hires. Each new hire should be assigned to work with an experienced worker for at least 6 months. The senior employee should act as a mentor and ensure that the employee is working safely and exhibits a positive safe attitude.

## **Section 7. Safety Violation**

Should any employee commit an unsafe act, intentional or not, this action should be addressed by the immediate supervisor and reviewed by the Safety Director. The Company reserves the right to use disciplinary actions, depending upon the seriousness of the violation and the impact of the violation upon the conduct of Company business. It is not required to complete all steps of the disciplinary procedure in every case. Discipline may begin at any step appropriate to the situation. Discipline includes, but is not limited to:

- **Verbal Reprimand**
- **Written Reprimand**
- **Suspension**
- **Termination of Employment**

A copy of any written reprimands should be maintained in the employee's personnel file.

## **Section 8. DEC Compliance Statement**

During Construction, all DEC Rules and Regulations shall be followed as designated on the site specific Storm Water Protection Prevention Plan (SWPPP).

- Perimeter Sediment Controls shall be installed as directed, all required silt fence, sediment ponds and basins shall be maintained throughout the duration of the Project or until vegetation has been established.
- A stabilized Construction Entrance shall be installed and maintained.
- Soil stockpiles and exposed soil areas shall be stabilized by seed, mulch or other appropriate measures as soon as possible. In no case longer than 14 days after all activities have ended.
- Sediment shall be contained onsite. Straw bales, silt fence and temporary stone check dams shall be installed in proposed drainage swales.
- Any changes shall be noted in the Construction Office and all breeches shall be repaired to insure the integrity of the barriers.
- Contractors responsible to install and maintain these barriers shall be inspected on a weekly basis.
- Upon project completion all temporary structures shall be removed.

These are not all requirements of a Project Specific SWPPP. When required, a copy of the Site Specific shall be maintained in the job trailer on site.