National Safety CONSULTING

IMPACT STRATEGIES

Safety Manual

Safety Policy Statement

IMPACT Strategies, Inc. is concerned about the safety and well-being of all employees while on the jobsite. This program has been designed so that each employee is an integral part of the company safety program. The program is put into practice by the goals as outlined below:

- To maintain a safe, accident-free work place for all employees
- For all employees on the jobsite to return to their families at the end of each work day
- To attract good employees to return to our jobsites because it is a safe and rewarding place to work
- To get all employees totally involved with safety
- To reduce our annual company insurance premiums because of a reduction in the number of accident

Mike Christ
Executive Vice President

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Safety Manual Table of Contents

Chapter 1 SAFETY POLICY

A. Company Policy

IMPACT Strategies is dedicated to providing a safe and healthy work environment for all of our employees. The company shall follow operating practices that will safeguard employees, the public and company operations. Furthermore, compliance with all Federal, State, and local safety and health regulations is mandatory.

"**We believe all incidents are preventable and want everybody to go home safely every night."**

B. Management Commitment to Safety

Management is committed to the safety of its employees. Incidents, 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.

C. Assignment of Responsibilities

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

1. Management Responsibilities
    a. Management has the responsibility for incident prevention in the performance of all company activities.
    b. Management is responsible for assuring that all operations comply with applicable government regulations and company policies.
    c. Management displays its concern for the well-being of its employees through its active participation and support of the incident prevention program.
    d. Management has an obligation to support and when necessary to direct all supervisory personnel and the company's safety coordinator in the execution of their duties.
2. Superintendent Responsibilities
    a. The superintendent must consider both existing and anticipated safety hazards associated with the work place.
    b. The superintendent must make provisions for employee safeguarding, by allowing for the procurement of personal protective equipment, safe tools and equipment.
    c. The superintendent must take into consideration the protection of the public and the protection of the owner's private property.
    d. It is the superintendent's responsibility to plan and conduct all operations with full regard to safety and shall insure compliance with all federal, state, and local safety regulations, all jobsite rules and operating procedures. The superintendent shall implement additional rules and procedures as required to further incident prevention at the worksite and hold the responsibility for incident prevention within their crew.
    e. The superintendent shall participate in incident investigations, safety meetings, site inspections and general safety awareness.
3. Employee Responsibilities
    a. Employees are responsible for complying with all job safety rules and regulations.
    b. Employees are responsible for reporting all incidents and for correcting and/or reporting any unsafe acts or conditions to their superintendent.

c. Employees are encouraged to participate fully in the incident prevention program.

d. Employees have an obligation to question management and superintendents concerning any direction(s) or safety precaution(s) they do not understand.

e. Employees must attend all training sessions to reinforce the skills needed to perform their jobs in a safe manner in and around their work area.

4. Safety Coordinator Responsibilities

a. The Safety Coordinator will provide safety meeting topics (tool box talks) to the superintendent to be read and signed at the safety meetings.

b. The Safety Coordinator is responsible to consult on matters in developing the objectives for jobsite incident prevention programs and their implementation.

c. The Safety Coordinator shall consult with the company and superintendents on safety-related matters, keeping both groups current with inspection results, incident reports, corrective actions, general incident statistics, trends, changes in government safety regulations (OSHA), and other pertinent information.

d. The Safety Coordinator will help monitor the completion of the OSHA 300 Injury Log.

D. Accountability for Safety

Everyone is accountable for safety. Management will establish safety objectives and develop and direct incident prevention activities. All employees shall strive to reach those objectives and will be evaluated accordingly.

Chapter 2 GENERAL SAFETY

A. Emergencies & Evacuation (29 CFR 1926.35)

1. Emergency Procedures

   a. 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 shall call 911 (or the emergency phone number posted in your area) and direct a fellow employee to:

   b. Notify the nearest Supervisor to come to the scene; and simultaneously dispatch available employees to quickly retrieve the first aid kit. The Supervisor or Management will decide whether or not to evacuate, inspect or shut down the work site.

   c. After an ambulance has been dispatched, all major injuries that must be reported to OSHA will be reported within 24 hours.

   d. Contact the office once emergency actions have been taken.

2. Evacuation Procedures

   a. When alerted by alarm or by the Supervisor to evacuate, employees shall:

      i. Properly secure all materials/tools/equipment in their possession and assure all hazardous containers and areas are properly locked.
      ii. Proceed to the nearest exit and wait in a safe location at the designated meeting location away from the danger.
      iii. Remain in the designated meeting location until role call is complete and instructions are provided.

B. Safe Operating Procedures (29 CFR 1926.20)

All employees are responsible for safety. The following applies to all activities on the work site:

1. Rules

   a. Comply with all established safety rules, regulations, procedures, and instructions which are applicable to your own actions and conduct

   b. Promptly report all incidents, hazards, incidents, and near-miss occurrences to the Lead 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 work site premises except during emergencies.

   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 work site premises.

   j. Personal stereos with headphones, e.g. Walkman/IPods, are not permitted to be worn in the work site.

   k. Alcohol and drug use and possession at work site are prohibited.

2. Hazard & Risk Assessment
    a. A hazard and risk assessment is used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable to:
        i. Provide guidelines for identifying, assessing and controlling workplace hazards;
        ii. Ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace;
        iii. Identify the jobs/tasks which require risk assessment.
    b. The Company shall conduct a baseline worksite hazard assessment which is a formal process in place to identify the various tasks that are to be performed and the accompanying identified potential hazards.
3. First Aid (29 CFR 1926.23)

    A person properly trained in CPR/First Aid shall be present at each jobsite any time work is being performed in order to render prompt medical attention. A first aid kit of adequate size shall be kept on the job site with Emergency Contact information posted. Kit shall contain the following supplies:

    a. Adhesive Bandages
    b. Adhesive Tape
    c. Antibiotic Application
    d. Antiseptic
    e. Breathing Barrier
    f. Burn Dressing (Gel Soaked)
    g. Burn Treatment
    h. Cold Pack
    i. Eye Covering w/means of attachment
    j. Eye / Skin Wash
    k. Hand Sanitizer
    l. Medical Examination Gloves
    m. Roller Bandage – 2”
    n. Roller Bandage – 4”
    o. Scissors
    p. Splint
    q. Sterile Pads
    r. Tourniquet
    s. Trauma Pad
    t. Triangular Bandage
    u. First Aid Guide
4. Housekeeping (29 CFR 1926.25)
    a. Unless otherwise specified, waste material and scrap must be put in the proper containers and/or central location to be removed from the work site.
    b. Materials shall be stored in an orderly manner. Work site storage areas and walkways must be maintained reasonably free of dangerous depressions, obstructions, and debris.
    c. The entire work site shall be orderly and debris must be disposed of in dumpsters, or off site, in accordance with all EPA regulations.
5. Machine Guarding (29 CFR 1926.300)
    a. It is the responsibility of the operators to see that guards are on machines where needed.
    b. Employees shall report any malfunctions of the guards to the Supervisor.
        i. Machines with guard malfunctions will not be used.
    c. The Supervisor shall determine if the machine shall be locked and tagged-out until the guard can be fixed or replaced.
    d. The guards increase safety on the machine. Machinery with the guards removed shall not be used.

6. Material Handling & Back Safety (29 CFR 1926.250)
    a. Know the approximate weight of your load and make certain your equipment is rated to handle it. (Never exceed the manufacturer's recommended safe working load).
    b. Back Safety Policy
        i. Get help when lifting loads to heavy or bulky for one person
        ii. When lifting:
            (1.) Place your feet close to the load ... shoulder width apart for good balance.
            (2.) Bend knees to the degree comfortable and get a good hand hold.
            (3.) Then, using both leg and arm muscles, lift the load
            (4.) Lift the load smoothly and evenly while pushing with your legs and keeping the load close to your body
        iii. The effectiveness of the back safety plan depends upon the active support and involvement of all affected employees.
    c. Use an appropriate, approved lifting device (i.e. special trucks, racks, hoists, and other devices) for lifting very heavy, bulky, large or unyielding objects.
    d. All ropes, chains, cables, slings, etc., and other hoisting equipment must be inspected each time before use.
    e. A load shall never be lifted and left unattended.
    f. Wear safety gloves when handling materials.
    g. Properly stack and secure all materials prior to lifting or moving to prevent sliding, falling, or collapse.

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

7. Powered Industrial Truck Safety (29 CFR 1926.602)
    a. The following are the minimum safety practices for the operation of powered industrial trucks:
    b. Only trained and authorized operators are permitted to operate a powered industrial truck.
    c. Passengers are not permitted on powered industrial trucks.
    d. Powered industrial trucks shall never be left unattended without first shutting off power, neutralizing controls, setting brakes, and lowering forks. Do not park on an incline.
    e. 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.
    f. Follow posted speed limit.
    g. When traveling, with or without a load, keep forks as low as possible.
    h. Avoid following pedestrians or other vehicles too closely, especially when operating on inclines or in noisy areas.
    i. 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 lift. Never ascend in reverse. When ascending, loaded powered industrial trucks shall be driven with the load upgrade.

8. Electrical (29 CFR 1926.400)
    a. All electrical work shall comply with NFPA 70E Standard for Electrical Safety and all Federal, State, and local codes. Any electrical work not in compliance shall be brought to the Supervisor's attention immediately.
    b. Only knowledgeable, certified electricians are to perform electrical work.
    c. Proper high energy PPE shall be worn when working with live electrical circuits.
    d. Employees shall not work close to any unprotected electrical power circuit unless that circuit is de-energized and grounded.
    e. All switches must be enclosed and grounded. Panel boards must have provisions for closing and locking the main switch and fuse box compartment. Access to electrical panels must be kept clear from obstructions.
    f. Extension cords used with portable electric tools and appliances must be heavy duty (no less than 12 gauge conductors) of the three wire grounding type, and must conform to OSHA standards. NO FLAT ELECTRICAL CORDS ARE ALLOWED ON WORK SITE.
    g. All electrical tools and cords must be protected by a ground fault circuit interrupter (GFCI), when applicable.
    h. Voltages must be clearly labeled on all electrical equipment and circuits. Circuits must also be clearly marked for the areas of service they provide per NFPA 70E regulations.
    i. Prior to performing any work, an authorized employee must "lockout and tag-out" the equipment or machinery. The only exception is when power is required for "megging" circuits.
    j. Electrical cords and trailing cables shall be covered, elevated or otherwise protected from damage. Any exposed wiring and cords with frayed or deteriorated insulation must be reported immediately and taken out of service, if possible.
    k. Extension cords shall be used for temporary use only and all plugs must be the dead front type.
    l. Working spaces, walkways, and similar locations must be kept clear of cords.
    m. Electrical tools and equipment must be appropriately protected when used in wet or damp areas.
    n. To avoid contacting overhead power lines, obtain prior approval from the Site Superintendent before bringing any equipment over 18 feet high on site. Any wide load over ten feet requires an escort. A power outage approval must also be obtained from the site superintendent.
9. Small Tools (29 CFR 1926.301)
    a. Provide proper storage for all tools.
    b. Repair all damaged or worn tools promptly. Temporary and makeshift repairs are prohibited. Tools that can't be properly repaired shall be discarded immediately.
    c. All equipment must conform to OSHA Safety and Health Regulations for General Industry Part 1910.
    d. Power tools shall not be used if safety equipment has been removed.
    e. Employees using tools that cause objects to be thrown will wear personal protective gear, including proper eye and hearing protection.
    f. Gas powered tools shall not be used in unventilated areas and gas shall be dispensed from U.L. approved cans only. All gas-powered tools must be turned off before being refueled.

g. Portable grinders must have hood-type guards and side enclosures that cover the spindle and at least 50% of the wheel. All wheels shall be inspected regularly for fractures, etc. Defects shall be promptly reported to the Job Site Lead / Supervisor.

h. Bench grinders shall have deflector shields and side cover guards. The maximum clearance for the tool rest is 1/8" from the wheel and for the tongue guard is ¼".

i. Air-supply lines shall be inspected regularly and maintained in good condition.

j. To prevent "whipping" in the event of hose separation or failure, air sources supplying hoses shall be protected with an excess flow valve. Completely bleed all air from tools before disconnecting them.

k. Only trained employees are to use powder-actuated tools, and all spent shells will be removed by the end of the shift.

l. Do not raise or lower power tools by their electrical cord or pneumatic line.

10. Fire Prevention (29 CFR 1926.150)

a. Good housekeeping is the first rule of fire prevention. Oily rags, paper shavings, trim, etc. shall be cleaned up and placed in proper trash receptacles.

b. Welding or cutting shall not take place near locations where flammables or combustibles are present. When welding or cutting occurs, the area shall be protected with fire resistant blankets. An approved fire extinguisher shall also be located at each welding or cutting facility.

c. All flammable liquids shall be stored in an approved manner and dispensed in approved safety containers. Store welding gas cylinders in an isolated area.

d. Open fires of any kind are not permitted, unless specifically permitted by the local AHJ.

e. Combustible materials or equipment in combustible containers will be stored properly. Fire extinguishers shall be kept within close proximity to any combustible container.

f. Fire extinguishers shall be recharged and inspected regularly as well as receive annual maintenance. A tag indicating the date of recharging shall be affixed to each extinguisher.

g. Access to fire hydrants shall be maintained at all times. Fire hydrants shall never be blocked or obstructed in any way.

h. This is a non-smoking work site; Smoking is prohibited in the building and around hazardous equipment and materials. A smoking area may be provided as designated by the Management.

i. No material shall be stored within three feet of an electrical panel, outlet, or fire suppression equipment.

11. Material Use and Waste Management (29 CFR 1926.65)

a. Receptacles must be placed around the work area for collection of waste materials.

b. All hazardous waste must be stored and collected in special areas.

c. No hazardous material is to be abandoned in the work area.

d. No waste haulers, disposers, recyclers, or scavengers are allowed on the work site without approval.

e. All hazardous waste removed from the work site must have authorization. No outside waste is to be disposed of using the company's facilities. Dumpsters are to be inspected frequently and any potentially hazardous material is to be placed in the appropriate storage area.

f. No used oil or paint is to accumulate on the work site. All spills are to be cleaned up and disposed of immediately. The Supervisor must be notified of the situation immediately.

12. Employee & Public Protection (29 CFR 1926.20)
    a. Work is not to be performed in any area unless specifically permitted.
    b. Sidewalks, entrances to buildings, lobbies, corridors, aisles, doors or exits must be kept clear of obstructions at all times.
    c. Appropriate warnings and instructional safety signs must be posted.
13. Lockout/Tagout (29 CFR 1926.417) (29 CFR 1910.147)
    a. The lockout procedure shall be followed to protect workers from injury due to inadvertent startup of power driven equipment. The lockout procedure is to render inoperative electrical systems, pumps, pipelines, valves and all such energy systems that may incidentally be energized or started up while employees are working on them or before they are mechanically ready and released for service. All energy sources shall be locked out and a “DANGER” tag affixed to the equipment or system indicating who installed the lock and the reason the system was locked out.
    b. In most cases, lockout procedures apply to the control of machinery hazards which require complex shutdown procedures. Yet “locked out” machines can still injure or kill anyone working in, on, or around them.
    c. Consider more than electrical energy sources to achieve maximum protection for operating, maintenance or service personnel. Depending on the equipment involved examine other energy sources of:
        i. Hydraulic power
        ii. Compressed air or trapped pressure
        iii. Energy stored in springs, counterweights, etc.
        iv. Potential energy from suspended parts
        v. Any other sources that might cause unexpected mechanical movement or sudden release.
14. Ladders (29 CFR 1926.1053)
    a. Manufactured ladders must comply with OSHA, ANSI, manufacturer and job specifications.
    b. Ladders with broken or missing rungs and/or broken or split side rails shall not be used.
    c. All portable ladders shall be equipped with non-skid safety feet and shall be placed on a stable base. All access areas shall be kept clear.
    d. Wood ladders shall not be painted except for an identification mark.
    e. Fixed ladders shall have cages or wells provided.
    f. Ladders shall be maintained free of lines, ropes, hoses, wires, cables, oil, grease, and debris. No objects shall be left on ladders.
    g. Single portable ladders over 30 feet in length shall not be used.
    h. Side rails shall extend 3 feet above the landings. All ladders in use shall be tied, blocked, or otherwise secured to prevent incidental displacement.
    i. Always climb and descend facing the ladder (use 3 points-of-contact rule: 2 hands and one foot or 2 feet and one hand).
    j. Never stand or sit on the top rung of a step ladder.
    k. Never work with another person on the same ladder.

15. Personal Protective Equipment (PPE) (29 CFR 1926.95)
    a. An assessment of the workplace shall be made to determine the hazards requiring PPE. This assessment shall be reviewed and revised annually, as necessary.
    b. Employees working in areas where there is a possible danger of head injury from impact, or from falling or flying objects, or from electrical shock and burns, shall be protected by protective helmets.
    c. Protective eyewear shall be worn when working with tools and equipment which present a hazard to the eye.
    d. Hard toed work shoes shall be worn at all times on the job site. Tennis shoes, hush puppies, canvas/soft leather hiking boots, and sandals are not permitted.
    e. Approved hearing protection shall be worn in areas with high noise levels. If you cannot carry on a normal conversation with someone within 3 feet of you, hearing protection is needed.
    f. Face shields shall be worn when performing any grinding, chipping, drilling or cutting, and welding.
    g. Protection for the hands and other parts of the body is required when exposed to cuts, burns electricity, or harmful chemicals/substances.
    h. Reflective vests or High Visibility clothing shall be worn by all employees when on an active jobsite.
    i. When airborne contaminants exceed permissible limits, appropriate respiratory protection shall be required. This may necessitate a medical evaluation, fit tests, and proper respirator training.
16. Cranes & Riggers (29 CFR 1926.1400)
    a. Only trained, qualified employees are permitted to operate any crane or rigging equipment. Training includes an in-depth review of the operating characteristics and limitations of the equipment.
    b. All equipment shall be inspected daily. This includes inspecting all cables, sheaves and pulleys, booms and boom angles. Report any defects immediately to the supervisor.
    c. Equipment shall be shut off before any repairs are made or lubricants are applied.
    d. Any removed guards must be properly put back into place before the machine is used.
    e. Loads shall not exceed equipment rated capacities.
    f. Standard signals shall be used to direct any moving crane. Employees must have their signal training card in their possession at all times. Only one person can be designated to signal a crane.
    g. Cranes and rigging equipment are not permitted to work closer than 20 feet to any power line.
    h. Employees are to stay clear of the cranes swing radius at all times. Never turn your back on any load. Cab portion of the crane shall be properly blocked off.
    i. Loads shall never be swung over any person.
    j. A fire extinguisher is to be kept in the crane’s cab at all times and must have a current inspection tag.
    k. All rigging devices shall have permanently affixed identification stating size, grade, rated capacity, and manufacturer.
    l. Any rigging not being used shall be removed from the area.

m. “Shop-made” grabs, hooks, clamps, or other lifting devices are prohibited.

n. A licensed engineer must inspect all lifting beams and spreader bars to make sure that they are the proper size for the capacity.

o. Slings shall not be shortened by using knots, bolts, or other makeshift designs.

p. Wire rope slings shall be padded to protect against damage from sharp corners.

q. Inspection records must be kept with all equipment.

r. Hard hats and proper personal protective equipment shall be worn while operating or working close to a crane.

17. Welding & Cutting (29 CFR 1926.350)

a. Welders must be protected from toxic fumes, burns, fires, explosions, electric shock, radiation, noise, and heat stress. Only those trained to operate an electric arc welder shall use it.

b. Always check the cables, ground clamp, electrode holder, gauges, and switches to make sure they are all working properly.

c. Report any faulty or defective equipment to designated person.

d. Make sure the welder is properly installed and grounded.

e. You must assess the work area before you start. Work in well ventilated areas and use an exhaust system if you weld in a confined space.

f. Use a respirator when welding or cutting hazardous metals or metals with hazardous coatings.

g. Wear all necessary PPE when welding including welding helmets, masks, fire retardant gloves, aprons, and safety footwear.

h. Make sure the work area is fire safe by using fire resistant materials as barriers and removing nearby combustible materials.

i. If a fire watch is required, maintain a fire extinguisher during operations and 30 minutes after welding ceases.

j. Compressed gas cylinders shall be secured in an upright position at all times during storage, use and transportation.

    i. Maintain a distance of at least 20 feet or provide a non-combustible barrier at least five feet high in separating fuel gas cylinders from oxygen cylinders. This applies to indoor and outdoor storage.

k. Valve protection caps shall be in place at all times when a cylinder is not in use, to include while transporting, moving and storing cylinders.

l. Inspect valves, regulators, hoses, torches and cables prior to use.

m. If hot work permit procedures are in effect, follow precautions as listed on permit.

18. Fall Protection (29 CFR 1926.500)

a. A competent person shall conduct an assessment of the type of fall protection to be provided if a fall hazard of 6 feet or greater exists; e.g. guardrails, personal fall arrest system (PFAS), safety net, controlled access zone, safety monitor, or other.

b. Procedures must provide for a prompt rescue within 20 minutes in the event of a fall.

c. When receiving materials at elevation from a crane, the landing zone shall be protected by a guardrail system, if possible, or use of a PFAS is required.

d. Holes and wall openings shall be properly covered or guarded to prevent falls.

e. Steel erection (see under Special Emphasis Program section of this manual)

19. Aerial Lifts & Work Platforms (29 CFR 1926.453)

a. Only trained, qualified employees are permitted to operate aerial lifts.

b. Inspect equipment per manufacturer's handbook prior to use.

c. Fall protection in the form of full body harness shall be utilized during platform use.

d. Barricade area below to protect workers from falling objects.

20. Temporary Heating Devices (29 CFR 1926.154)

a. Ventilation
   i. Fresh air shall be supplied in sufficient quantities to maintain the health and safety of the workmen. If no fresh air is available, mechanical ventilation shall be provided.
   ii. When heaters are used in confined spaces, sufficient ventilation must be used to insure proper combustion to maintain the health and safety of the workmen.

b. Clearance and Mounting
   i. Temporary heating devices shall be installed to provide clearance to combustible material not less than the amount shown below:

Heating Appliances	Minimum Clearance (inches)		
	Sides	Rear	Chimney Connection
Room heater, circulating type	12	12	18
Room heater ,radiant type	36	36	18

21. Asbestos Awareness (29 CFR 1926.1101)

a. Asbestos is a naturally occurring fibrous silicate mineral known for its strength and durability and for its fireproof and insulation properties. It was used widely in construction and other products until 1978. During the twentieth century, some 30 million tons of asbestos have been used in industrial sites, homes, schools, shipyards, and commercial buildings in the United States. Exposure is possible when handling some of the more common Presumed Asbestos-Containing products and Materials (PACM) such as:

   i. Floor tiles
   ii. Vinyl sheet flooring
   iii. Ceiling tiles
   iv. Siding shingles
   v. Pipe & boiler insulation
   vi. Sprayed-on building insulation
   vii. Automotive brake linings
   viii. Laboratory counter tops
   ix. Laboratory ventilation hoods

22. Bloodborne Pathogen (BBP) Awareness (29 CFR 1910.1030)

a. Bloodborne pathogens are infectious microorganisms present in blood that can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV), hepatitis C virus (HCV), and human immunodeficiency virus (HIV), the virus that causes AIDS. Workers exposed to BBP are at risk for serious or life-threatening illnesses.

b. "Universal precautions" is an approach to infection control to treat all human blood and certain human body fluids as if they were known to be infectious for HIV, HBV and other BBP.

c. An exposure control plan should be established in order to protect workers who can reasonably be anticipated to come into contact with blood or OPIM as a result of doing their job duties.

   i. Even in a non-medical environment, it is possible to be exposed to bloodborne pathogens, so employees should be aware of where to look for proper procedures to deal with BBP exposure and/or clean up

23. Lead Awareness (29 CFR 1926.62)

a. Lead is an ingredient in thousands of products widely used throughout industry, including lead-based paints, lead solder, electrical fittings and conduits, tank linings, plumbing fixtures, and many metal alloys. Although many uses of lead have been banned, lead based paints continue to be used on bridges, railways, ships, and other steel structures because of its rust- and corrosion-inhibiting properties. Also, many homes were painted with lead-containing paints. Significant lead exposures can also occur when paint is removed from surfaces previously covered with lead-based paint.

b. Lead paint can be found:

i. Constructed before 1950

(1.) Everywhere – inside and outside (all coatings)

ii. Constructed between 1950-1960

(1.) Probably outside, may be inside

(2.) Trims, doors, windows, kitchens, bathrooms, etc.

iii. Constructed between 1960-1978

(1.) May be outside, less likely inside

iv. Constructed before 1978 - we assume lead!

24. Silica Awareness (29 CFR 1926.1153)

OSHA's Silica Standard 1926.1153 applies to all occupational exposures to respirable crystalline silica in construction work, except where employee exposure will remain below 25 micrograms per cubic meter of air (25 µg/m3) as an 8-hour time-weighted average (TWA) under any foreseeable conditions. The standard outlines engineering controls, work practices, and respiratory protection specified for specific tasks outlined on "Table 1 – Silica 1926.1153" which is included in the forms section of this manual. IMPACT Strategies will follow exposure control methods outlined on this table.

a. Crystalline Silica is a primary component of many common construction materials, and silica-containing dust can be generated during many construction activities. Unprotected workers performing these activities, or working in the vicinity, can be exposed to harmful levels of airborne silica:

i. Abrasive blasting (e.g., of concrete structures)

ii. Jackhammering, chipping, or drilling rock or concrete

iii. Rock/well drilling

iv. Concrete mixing

v. Concrete drilling

vi. Brick and concrete block cutting and sawing,

vii. Tuck pointing

viii. Tunneling operations

b. Exposure to crystalline silica has been shown to cause silicosis, lung cancer, pulmonary tuberculosis and other airway diseases. Crystalline silica dust can cause a disabling, sometimes fatal disease called silicosis. A worker may develop any of three types of silicosis, depending on the concentrations of silica dust and the duration of exposure:

i. Chronic silicosis—develops after 10 or more years of exposure to crystalline silica at relatively low concentrations

ii. Accelerated silicosis—develops 5 to 10 years after initial exposure to crystalline silica at high concentrations

iii. Acute silicosis—develops within a few weeks, or 4 to 5 years, after exposure to very high concentrations of crystalline silica.

25. Motor Vehicle Operator Safety Program

At IMPACT Strategies, an important aspect of our Safety and Loss Prevention Program involves motor vehicle accident prevention and safety. The operation of motor vehicles is essential in conducting company business. Motor vehicles use exposes each of us to accident, injury, and life-threatening hazards. Vehicular collisions are potentially the costliest losses we can incur when the summation of property damage, bodily injury, fatalities, and liability suits is considered. This program is designed to reduce our potential for motor vehicle accidents as much as possible.

The purpose of this program is to define responsibilities and procedures to be followed in order to establish and administer an effective Motor Vehicle Operator Safety Program and, subsequently, effectively reduce the risk of motor vehicle accidents. Our objectives are:

- To establish firm internal requirements for personnel who operate motor vehicles.
- To enforce compliance through progressive disciplinary action and ensure that employees show a continuing regard for safe driving practices.
- To insist that assigned vehicles are maintained adequately for safe operation.
- To establish and implement a vehicle inspection program to check for safety discrepancies, malfunctions, signs of abuse, and unreported damage, as well as to have repairs made as soon as possible.
- To fully support driver training programs and promote defensive driving.
- To review each vehicle collision and unsafe driving report with the employee and direct supervisor to determine means of preventing a recurrence.
- To establish an aggressive campaign to enforce the wearing of seatbelts.
- To establish a cell phone policy while driving company vehicles.

It is the responsibility of the motor vehicle operator to follow defensive driving practices to help protect the driver, other employees, and the public from accident/injury.

a. **Vehicle Inspections**

Vehicles must be inspected on a regular basis. The inspection shall include but not be limited to the following:

i. **Lights** - Clean and operating front/rear lights, brake lights, and turn signals.
ii. **Essential Fluids** - Crankcase oil, transmission fluid, coolant, battery level, windshield washer fluid, and brake fluid.
iii. **Windshield Wipers** - Worn out wipers must be replaced before the next rainy day to ensure the driver can see the road.
iv. **Tires** - Tires must be properly inflated with no obvious defects.

v. **Brakes** - Brakes must be working at all times. Vehicles with defective brakes must not be driven.
vi. **Mirrors** - Mirrors must be clean and properly adjusted.
vii. **Vehicle Loading** - Tools, equipment and materials must be properly secured for safe hauling.
viii. **General Vehicle Condition** – Dents, scrapes or any other damage must be reported immediately
ix. **Emergency Equipment** – Vehicle must contain a fully charged fire extinguisher with current inspection tag and first aid kit

b. The operator must immediately report any evidence of accident damage to his/her manager/supervisor. It is the responsibility of the operator to immediately report any unsafe conditions to his/her manager/supervisor and request another vehicle or schedule repairs to be made immediately. Vehicles with steering or braking defects shall not be driven and must be towed to an authorized garage for repairs. The operator must call appropriate law enforcement agencies to report any and all collisions and provide information for management as soon as possible. If involved in an accident, the operator must complete the accident report contained in the Safety Manual within 24 hours. The operator must never allow an unauthorized passenger or driver to ride in or operate a company vehicle.

c. The operator must possess a valid operator's license and adhere to all applicable state and local motor vehicle laws. Operators must never allow passengers to ride other than in the passenger compartment. It is strictly forbidden to operate a vehicle while under the influence of prescription or "over the counter" drugs that may impair driving skills. Use of alcohol and/or illegal drugs while operating a vehicle on company business will result in the immediate termination of the operator.

d. The operator must always secure the vehicle and its equipment when unable to provide direct supervision of the same. An operator must exercise good judgment and extreme caution when eating, drinking, smoking or using a phone while operating a motor vehicle. Such activities should be avoided whenever they may increase risk of an accident.

e. Maintain a safe distance behind another moving vehicle, the two second rule should be followed. As the vehicle in front of you passes a landmark, count two seconds. If you don’t pass the landmark before the two-second count, you can assume that you are traveling at a safe distance behind the other vehicle.

f. Vehicles must never be overloaded. It is imperative to stay within the recommended weight limit of a vehicle.

g. **Selection Drivers**

Special care must be taken when employing operators of motor vehicles. The employment application form is the first source of information regarding prospective employees. It includes the following:

i. Personal data (name, address, social security number, etc.)
ii. Education (academic or special training courses)
iii. Work (type of work sought and previous experience)

h. **Hiring**

All applicants for the driver position must meet the minimum qualifications as set forth below:

i. High school diploma or GED equivalent;
ii. US Citizen or permanent Visa;
iii. Must be at least 21 years of age;
iv. Must have a vehicle driver's license for at least 3 years;
v. Must have acceptable driving record (MVR).
vi. Must be physically capable to perform the essential job functions;
vii. Must have no conviction of a felony;
viii. Must comply with all other applicable qualifications for employment established by regulation and by the company

i. **License classification required by IMPACT Strategies is "Non-Classified Driver"**

These drivers operate automobiles or pickup trucks primarily local but could be inter or intra state.

i. Driver File Maintained including:
   - Annual check of MVR
   - Copy of Driver's License or Certificate

j. Accident Reporting and Investigating

All drivers must be aware of the procedures to follow if they should be involved in an accident in a company vehicle. As operators, they have the important role of making the initial accident report. The way one handles the accident scene can have a direct impact on any alleged liability for the company. The following is a general sequence of procedures for drivers at the scene of an accident in which operators are involved. Refer to the Vehicle & Driving Accident Check List contained in this Safety Manual.

i. Stop the vehicle immediately and shut off the engine. Turn on the four-way flashers. Extinguish fires and do not smoke near the scene.

ii. See that any injured people are cared for and summon police and ambulance to the scene if necessary.

iii. Protect the accident scene with warning reflectors. Direct traffic around the accident scene, if necessary.

iv. Make sure police inspect the damage and notations are made of any bodily injury.

v. Request statements from witnesses. Be alert to comments made by occupants of other vehicles, and take down remarks concerning admissions of guilt, defective condition of the other vehicle, extent of injured and property damage.

vi. Collect information -- be specific!

vii. Make a diagram of the accident scene showing location of vehicles after the collision. Use lines to show paths that vehicles traveled. Do not rely on the police diagram, as they will sometimes have errors, particularly in multi-vehicle accidents. (Use diagram found in section 10-27 of the safety manual and submit to the office)

viii. Report the accident to your manager/supervisor immediately and get further instructions. The manager/supervisor will report the accident and any potential claims to the appropriate parties.

The manager/supervisor shall investigate and evaluate all motor vehicle accidents. An accident review shall be conducted in a manner consistent with the severity of the accident. If appropriate, progressive disciplinary action shall be taken.

k. **Periodic Monitoring**

Periodic check rides, conducted for the purpose of monitoring the driver's safe driving habits, as well as the safety of the vehicle, may take place periodically. This procedure shall consist of the operator being accompanied by his manager/supervisor or the safety liaison while he/she performs typical driving duties.

l. **Disciplinary actions for specific unacceptable behaviors shall be as follows:**

Length of Time	Unacceptable Behaviors	Action to Be Taken Time
0 - 12 months	1 - Preventable Accident 1 - Moving Violation in any vehicle 1 - Unacceptable Road/Ride Observation Report 2 - Verified Complaints	Warning and Remedial Training
0 - 12 months	2 - Preventable Accidents 2 - Moving Violations in any vehicle 2 - Unacceptable Road/Ride Observation Reports 4 - Verified Complaints	Up to and including Termination
12 - 24 months	2 - Preventable Accidents 2 - Moving Violations in any vehicle 2 - Unacceptable Road/Ride Observation Reports 4 - Verified Complaints	Suspension and Remedial Training
24 - 36 months	3 - Preventable accidents 3 - Moving Violations in any vehicle 3 - Unacceptable Road/Ride Observation Reports 6 - Verified Complaints	Up to and including Termination
N/A	Any unreported violations or accidents	Up to and including Termination
N/A	DUI/DWI Conviction	Up to and including Termination

Length of Time	Unacceptable Behaviors	Action to Be Taken Time
N/A	Any confirmed positive or any refusal to have a test administered when directed by management	Up to and including Termination
N/A	Falsification of record-of- duty status records (logs)	Up to and including Termination
N/A	Tampering with pre-set safety devices on vehicles	Up to and including Termination
N/A	Violations involving excessive speeding (15 mph or more above speed limit), reckless driving, disobeying stop signs or traffic signals, or other serious traffic offense defined in the Federal Motor Carrier Safety Regulations, or a preventable accident involving excessive speed, reckless driving, or other irresponsible behaviors as determined by Management.	Up to and including Termination
N/A	Any violation of safety rules, performance evaluation criteria or other policies in effect.	Disciplinary Action as Determined by Management

Chapter 3 CONTINUAL MONITORING & IMPROVEMENT

A. Safety Meetings/Training

Supervisors shall hold a tool box/huddle talk on a weekly basis for their employees at the work site. All Foremen / Supervisors are required to attend. Emergency procedures shall be periodically reviewed. Employees shall be reminded to put safety first and look out for their fellow workers. Employees shall be encouraged to offer comments and safety suggestions at this time and regularly throughout the day as needed.

B. Inspections

Periodic inspections will be conducted to identify hazardous conditions and unsafe behaviors. The Supervisor will conduct inspections, as well as insurance company Loss Prevention personnel and/or the company assigned safety coordinator. The inspection shall look for unsafe practices and conditions that can cause an incident and take corrective action immediately.

Chapter 4 INCIDENT MANAGEMENT (29 CFR 1904)

A. Incident & Near Miss Reporting Procedures

If there is an incident or a near-miss while working, it is mandatory to notify the superintendent immediately but especially prior to the end of the shift. The situation will be investigated and corrective action implemented to prevent future injury. Employees and witnesses must fully cooperate in the investigation.

If there is an injury on the job:

1. In case of an emergency, the employee nearest the stricken person shall call 911 (or the emergency phone number posted in your area).
2. Care for the injured worker immediately, if possible.
3. Contact the designated employee who is trained in first-aid and/or CPR to assist in the situation (IMPACT superintendent).
4. Contact and report to the superintendent.
5. If needed, the Supervisor or other designee shall transport the injured worker to the company's designated medical facility to receive appropriate medical attention. A post-incident drug and/or alcohol test will be conducted in accordance with the General Contractor's Drug-Free Workplace Policy. Additional details can be found in the IMPACT Safety Manual section 7-1 "Substance Abuse Policy".
    - Employee will receive substance abuse testing notification form from IMPACT Safety Coordinator. Form must be completed and returned to Safety Coordinator within 24 hours of receipt of form.
6. If rescue personnel are summoned via a 9-1-1 call, the Supervisor shall delegate an individual to wait for the rescue team and escort them to the injured employee.
7. All witnesses to the incident shall be available to speak with the Safety Coordinator or the Supervisor and cooperate in all incident investigations. All witnesses are required to complete a witness statement and submit to IMPACT Strategies (copies available in the IMPACT Safety Manual).
8. The Supervisor shall immediately notify the Safety Coordinator of the incident so a workers' compensation claim or a report only claim can be filed.
9. 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.
10. Superintendent shall complete an accident investigation report and submit to the IMPACT Strategies office within 24 hours.

B. Incident Investigation

1. When an incident occurs, it is an indication that something has gone wrong. Incident don't just happen they are caused. The basic cause(s) of incidents are unsafe acts and/or conditions. Every incident must be investigated to determine the root cause and to initiate corrective action to prevent recurrence from the same causes.
2. Once completed, the incident investigation form shall be submitted to the Safety Director for review. The management and Safety Director shall evaluate the corrective action taken/suggested and instruct if additional changes shall be made.

C. Return to Work Policy

1. Should an associate incur an injury/illness, the injured associate may need to be placed in a modified job rather than be subjected to the stressors involved in his/her regular assignment. Medical restrictions may also require work restrictions. This program is designed to allow the injured associate to return to active work as quickly as possible while providing for the necessary recovery period from the injury by:
    - Assuring that an injured associate gets prompt and appropriate medical treatment.
    - Demonstrating genuine concern for the well-being of all associates.
    - Making every reasonable effort to help an injured associate return to the workplace as quickly as possible.
2. The purpose of this program is to define responsibilities and procedures to be followed in order to establish and administer an effective return to work program. Our goal is to decrease the chance of re-injury upon returning to normal duties, maintain an experienced work force, minimize employee turnover, and reduce costs associated with injuries/illnesses.
3. Management shall be responsible for coordinating all aspects of this program. Management will assist the Department Managers and Supervisors in program implementation and provide information and informational resources as needed.
4. Administration of this program shall be in strict accordance with all applicable state and federal laws, and coordinated with the involvement of all applicable associates, including but not limited to the injured employee, the Worker's Comp. Administrator, the department manager, the Human Resources Department, the injured associate's immediate supervisor, attending physicians and therapists, and insurance claims adjusters and case managers.
5. A return to work form must be completed by the attending physician and returned to the Safety Manager, the Human Resources Department or the injured employee's immediate supervisor. The Safety Manager shall review all Return to Work Forms completed by attending physicians.
6. All restrictions related to work must be specific. If questionable or unclear, the medical provider will be contacted for clarification. Each situation shall be discussed with applicable associates and arrangements shall be made for the injured employee to return to work, as soon as possible, under one of the following plans:

    Modified Work - The injured associate is brought back to work and temporarily placed within an existing job that is not as physically taxing or demanding as their normal job. This temporary job placement must meet the physical restrictions that a physician has assigned to the injured employee.

    Restricted Work - The injured associate is brought back to their normal job with restrictions assigned by the doctor. For example, this may involve placing 10 lb. lifting restrictions on the injured worker. It is important to impress that the restrictions are mandatory to everyone, including the injured worker, their supervisors, crew, etc.

    Transitional Duty or Total Accommodation - For light duty or total accommodation, positions are specifically created which will accommodate the restriction(s) of any injured associate within a company. These positions may have been previously established or are created as injuries dictate.

    Gradual Reclamation - The injured employee is gradually, over time, brought back to their full working capacity. Over a several weeks period, the injured worker may work several hours for a reduced number of days per week or a few hours each scheduled day. This process begins with limited work hours and gradually increases as time passes.

Chapter 5 TRAINING (29 CFR 1926.21)

IMPACT Strategies will provide training to assure the requirements of OSHA standards are met and continuously evaluate employee training needs to keep workers safe and healthy on the job.

A. New Employee Orientation

1. New employees will receive training on the company safety and health management policies, safe work practices and expectations, and specific safety and health training for the tasks that they will perform.
2. New employees will be issued an IMPACT Safety Manual and will be responsible for safe keeping and maintaining of the binder.
3. New employees will be asked to sign the “Safety Manual Acknowledgement Form” which will be placed in the employee’s personnel file.

B. Safety Training

The Safety Coordinator or other designated person will appraise the skill and knowledge level of exposed workers, and provide any additional training, as required.

1. Where safety and health training is needed, appropriate training will be provided to include:
    a. Hazard recognition
    b. Best work practices and PPE
    c. Training length and level of detail will be determined by the severity of the hazards and the requirements of OSHA
2. Records will be maintained for all training sessions with descriptions of topics covered and names of workers trained.

C. Tool Box Talks

Weekly Tool Box Talks will be conducted as part of training on a full range of safety topics. The Safety Coordinator will distribute topics on a weekly basis for Superintendent use.

Chapter 6 OSHA RECORDKEEPING (29 CFR 1904)

A. Reporting Criteria

1. Report to OSHA within eight (8) hours, if a result of a work-related incident:
    a. The death of any employee
        i. If the fatality does not occur during or right after the work-related incident, you still report to OSHA if the fatality occurs within thirty (30) days of the work-related incident
2. Report to OSHA within twenty-four (24) hours, if a result of a work-related incident:
    a. The in-patient hospitalization of one or more employees
        i. OSHA defines inpatient hospitalization as a formal admission to the in-patient service of a hospital or clinic for care or treatment (not for observation or diagnostic testing)
    b. An employee's amputation
        i. Amputations include a part, such as a limb or appendage that has been severed, cut off, amputated (either completely or partially); fingertip amputations with or without bone loss; medical amputations resulting from irreparable damage; amputations of body parts that have since been reattached.
        ii. Amputations do not include avulsions, enucleations, de-gloving, scalping, severed ears, or broken/chipped teeth
    c. An employee's loss of an eye

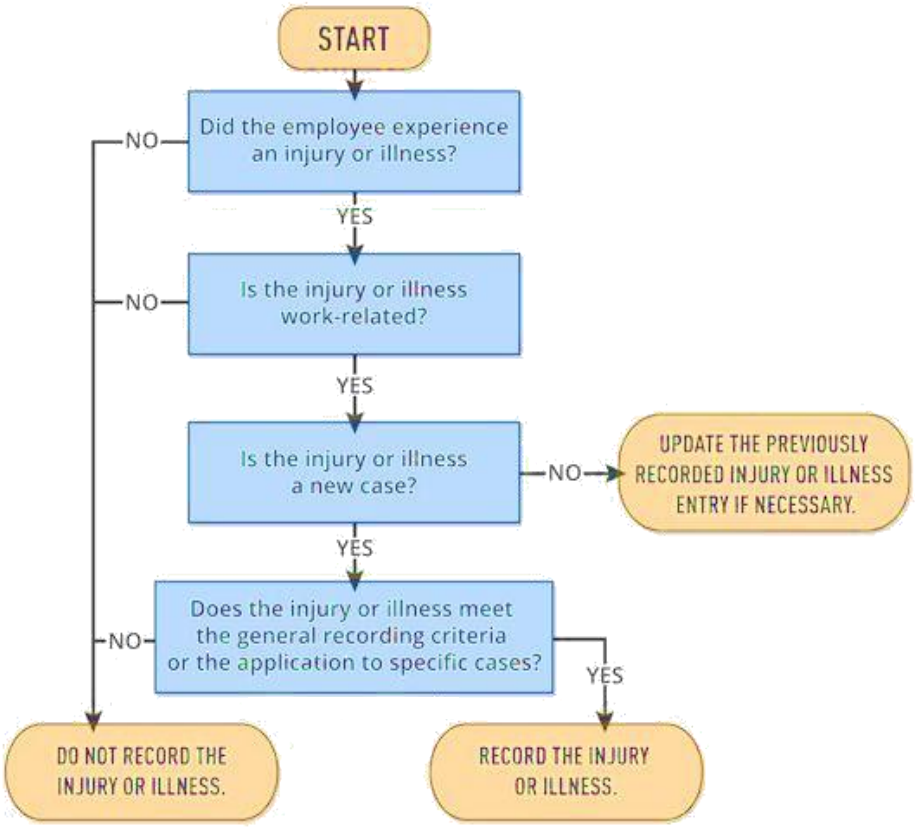
How do I report?
1. Call 1-800-321-OSHA (6742) or
2. Call your nearest area office during normal business hours or

3. Reporting Methods
    a. By telephone or in person to the local OSHA Area Office that is nearest to the site of the incident
        i. Leaving a message is not considered reporting
    b. By telephone to the OSHA toll-free central telephone number, 1-800-321-OSHA (1-800-321-6742)
        i. Leaving a message is not considered reporting
4. Information needed to report
    a. The establishment name

b. The location of the work-related incident
c. The time of the work-related incident
d. The type of reportable event (i.e., fatality, in-patient hospitalization, amputation, or loss of an eye)
e. The number of employees affected by the reportable event
f. The names of the employees affected by the reportable event
g. Your contact person and his or her phone number
h. A brief description of the work related incident

B. Recording Criteria

1. Each employer required by this part to keep records of fatalities, injuries, and illnesses must, in accordance with the requirements of this part, make and maintain an accurate record of each and every fatality, injury, and illness that:
   a. Is work-related; and
   b. Is a new case; and
   c. Meets one or more of the general recording criteria.
2. Decision tree to determine if an injury or illness is recordable



3. Determination of work-relatedness
   a. You must consider an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness.

b. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment, unless an exception specifically applies

c. Exceptions

i. At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.

ii. The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.

iii. The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball.

iv. The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work-related. (***Note:*** *If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.(*

v. The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.

vi. The injury or illness is solely the result of personal grooming, self-medication for a non-work-related condition, or is intentionally self-inflicted.

vii. The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.

viii. The illness is the common cold or flu *(**Note:** contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work)*.

ix. The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience stating that the employee has a mental illness that is work-related.

4. Determination of new cases

You must consider an injury or illness to be a "new case" if:

a. The employee has not previously experienced a recorded injury or illness of the same type that affects the same part of the body, or

b. The employee previously experienced a recorded injury or illness of the same type that affected the same part of the body but had recovered completely (all signs and symptoms had disappeared) from the previous injury or illness and an event or exposure in the work environment caused the signs or symptoms to reappear.

5. Recording criteria

You must consider an injury or illness to meet the general recording criteria, and therefore to be recordable, if it results in any of the following:

a. Death

b. Days away from work

c. Restricted work or transfer to another job

d. Medical treatment beyond first aid

    i. Refer to 29 CFR 1904.7(b)(5)(ii) for a complete list of what is considered by OSHA as First Aid for recordkeeping purposes.

e. Loss of consciousness

f. A significant injury or illness diagnosed by a physician or other licensed health care professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

    i. Cancer, chronic irreversible diseases, fractured or cracked bones, and punctured eardrums are generally considered significant injuries and illnesses, and must be recorded at the initial diagnosis even if medical treatment or work restrictions are not recommended, or are postponed.

C. OSHA Forms

1. All record keeping documents, are maintained at the company office.
2. Every recordable occupational injury or illness shall be logged on the appropriate OSHA forms within seven (7) working days from the time the employer learns of the injury.
    a. OSHA 300 form - Log of Work-Related Injuries and Illnesses
    b. OSHA300-A form - Summary of Work-Related Injuries and Illnesses
    c. OSHA 301 form - Injury and Illness Incident Report.
3. Additional log forms are available at www.osha.gov.

D. Recordkeeping Requirements

1. Covered Employees
    a. You must record on the OSHA 300 Log the recordable injuries and illnesses of all employees on your payroll, whether they are labor, executive, hourly, salary, part-time, seasonal, or migrant workers.
    b. You also must record the recordable injuries and illnesses that occur to employees who are not on your payroll if you supervise these employees on a day-to-day basis.
    c. If your business is organized as a sole proprietorship or partnership, the owner or partners are not considered employees for recordkeeping purposes.
2. Annual Summary

    At the end of each calendar year, you must:

    a. Review that year's OSHA 300 Log to verify that it contains accurate entries for all recordable injuries and illnesses that occurred during the year, and make any additions or corrections necessary to ensure its accuracy.
    b. Verify that each injury and illness recorded on the 300 Log, including any injuries and illnesses added to the Log following your year-end review is accurately recorded on a corresponding 301 Incident Report form.
    c. After you have verified the accuracy of the Log
        i. Complete the OSHA 300A form, with the summary of injuries and illnesses recorded on the Log
        ii. Certify the summary

(1.) A company executive must certify that he or she has examined the OSHA 300 Log and that he or she reasonably believes that the annual summary is correct and complete.

iii. Post the summary

(1.) Must be posted from February 1 to April 30 of the year following the year covered on the form.

(2.) Must be posted in each establishment in a conspicuous place or places where notices to employees are customarily posted.

(3.) Must not be altered, defaced or covered by other material.

3. Retention & Updating

a. You must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary, and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover.

b. You must make the following additions and corrections to the OSHA Log and Incident Reports during the five-year retention period:

i. The OSHA Logs must contain entries for all recordable injuries and illnesses that occurred during the calendar year to which each Log relates.

(1.) This means that if a recordable case occurred and you failed to record it on the Log for the year in which the injury or illness occurred, you are under a continuing obligation to record the case during the five-year retention period for that Log.

ii. You must make any additions and corrections to the OSHA Log that are necessary to accurately reflect any changes that have occurred with respect to previously recorded injuries and illnesses.

(1.) If the classification, description, or outcome of a previously recorded case changes, you must remove or line out the original entry and enter the new information.

c. You must have an OSHA 301 Incident Report for each and every recordable injury and illness.

i. You are not required to make additions or corrections to Incident Reports during the five-year retention period, but you may do so if you wish.

d. You are not required to make additions or corrections to the OSHA 300A Annual Summaries during the five-year retention period.

Chapter 7 SUBSTANCE ABUSE POLICY

A. Substance Abuse Policy

It is recognized that if IMPACT Strategies employees use, store, possess, manufacture, or distribute illegal substances in the work place, it is a violation of this policy and it poses serious risks to the safety and health of the entire work force, as well as to the future well-being of each and every employee. Prescription drugs may only be used as directed by the individual for which that prescription is issued by a licensed physician.

No employee may use, possess, distribute, deliver, or be under the influence of drugs, or alcohol, while performing work. An employee is considered to be under the influence of alcohol for the purposes of this policy if the alcohol concentration in his/her blood or breath at the time alleged (as shown by analysis) is at or above 0.02.

If this problem exists, it could damage the quality of services the company renders to its customers, cause damage to persons and property due to accidents and carelessness, lower morale within the work place, threaten the ability of the company to compete in the market place, and ultimately threaten the financial security of both the company and the work force alike.

Subject to the following conditions, the Employer shall have the right to require an Employee to submit to urinalysis for illegal substances prior to assignment to projects where customer specifications or governmental regulations mandate such testing. In addition, the Employer shall have the right to implement Random Testing, “For Cause” testing and Post Accident testing as outlined below:

1. It is the responsibility of the employee to submit in writing any synthetic or prescription drugs that are either prescribed or being used to immediate supervisor.

B. Testing

Any employee being notified to submit to a drug and/or alcohol test will receive a Substance Abuse Testing Notification Form from the IMPACT Safety Coordinator regardless of the category in which the testing falls. Employee must sign and return within 24 hours of receipt of form.

1. Pre-employment Testing

   Offers of employment with IMPACT Strategies may be conditioned on proper cooperation with and participation in a drug and controlled substance screening test. Following a conditional employment offer, applicants will be asked to sign a form consenting to a screening test as part of the application process. Failure to sign the consent form may be considered a withdrawal of the application.

2. Random Testing

   Random drug and alcohol testing may be conducted as needed at the discretion of the management. Employees selected for random testing shall report to the drug testing laboratory the same day that they are notified that they have been selected so long as proper laboratory facilities are provided during working hours. The testing and selection shall be conducted by a third party. Random testing will be based on an agreement between IMPACT Strategies and customer or union contract.

3. “Reasonable Suspicion” Testing

   An employee whose supervisor has reasonable suspicion to believe the employee is under the influence of alcohol or a drug is subject to discipline up to and including termination, and is required to undergo an alcohol or drug test.

a. "Reasonable suspicion" means a belief, based on behavioral observations or other evidence, sufficient to lead a prudent or reasonable person to suspect an employee is under the influence and exhibits slurred speech, erratic behavior, decreased motor skills, or other such traits. Circumstances, both physical and psychological, shall be given consideration.

b. Whenever possible before an employee is required to submit to testing based on reasonable suspicion, more than one supervisory/managerial employee shall observe the employee.

c. The employer who is requiring an employee to be tested based upon reasonable suspicion shall provide transportation for the employee to the testing facility and may send a representative to accompany the employee to the testing facility. Under no circumstances may an employee thought to be under the influence of alcohol or a drug be allowed to operate a vehicle or other equipment for any purpose.

d. The employee shall be removed from the job site and placed on inactive status pending the employer's receipt of notice of the test results. The employee shall have the right to request a representative or designee to be present at the time he or she is directed to provide a specimen for testing based upon reasonable suspicion.

e. If the test result is positive for drugs or alcohol, the employee shall be subject to termination. The employee shall pay all costs related to this testing.

f. If the test result is negative, the employee shall be returned to active status and shall be put back to work by the employer. The employee shall be paid for all lost time to include all time needed to complete the drug or alcohol test and any and all overtime according to the employee's contract. The employer shall pay all costs related to testing.

4. Post-Accident Testing

If substance-abuse is likely to have been a contributing factor to the cause of an accident, the program requires that an employee submit to testing for drugs and alcohol.

a. Employees will be subject to testing after a work related accident involving medical treatment (other than first aid), or which results in a lost work day to the individual or which involves significant property damage.

b. Employee injuries that are considered to have occurred through no fault of the employee shall be excluded from testing.

C. Testing Guidelines

All Substance Abuse testing under this “Memorandum of Understanding” shall be carried out under the following conditions:

1. The Employer shall be responsible for all expenses incurred in carrying out drug testing, including, but not limited to lost time, travel time, travel expense and all costs of testing, except under item 6.

2. Only employees who are in the Random Testing Selection Pool or who agree to be tested and be placed in the Random Testing Selection Pool will be employed on projects covered by this agreement.

3. All testing shall become under the control and supervision of a physician with confidentiality protected in accordance with the “American Occupational Medical Association’s Code of Ethical Conduct for Physicians Providing Occupational Medical Services” (adopted by the Board of Directors of AOMA’s July 23, 1976) and “Drug Screening in the Work Place Ethical Guidelines” (adopted July 26, 1986), and the “Medical Review Officer Manual”, as developed by the National Institute on Drug Abuse (published September 1988).

4. Urine testing shall be performed only by laboratories listed by current federal standards.

5. A “positive” drug test result shall mean test levels on both the screening test and the

confirmatory test that are recognized as positive by current federal standards.

6. An employee testing “positive” shall have the right to have the second portion of his/her urine sample independently retested by an HHS-certified laboratory of his/her choice and at his/her expense. If the independent retest is “negative,” the employee shall be allowed to resume work and be reimbursed for the cost of such independent test.
7. Substance to be tested, (confirmatory test levels which are recognized as positive by current federal standards):

SUBSTANCE	THRESHOLD LIMIT
Alcohol	0.02%
Amphetamines	300 ng/ml
Cocaine metabolites	300 ng/ml
Marijuana metabolites	20 ng/ml
Opiate metabolites	300ng/ml
Phencyclidine	25 ng/ml
Barbiturates	300 ng/ml
Benzodiazepines	300 ng/ml
Methadone	300ng/ml
Methaqualone	300ng/ml
Propoxyphene	300 ng/ml

8. The Employer shall treat employee records including positive test results with the highest degree of confidentiality. Such records shall not be distributed to other parties. If a grievance is brought before the Joint Labor Management Committee as a result of a positive test, the Employer shall have the right to present, as evidence, any and all employee records including positive test results.
9. It is understood that the Employer shall have the right to document negative or “drug free” results for individual employees, customers, government agencies or the Union. In the case of alcohol testing verification, the Employer will document to the customer, government agency or the Union that all employees currently employed on the job site are in compliance with the alcohol section of the policy.

D. Alcohol Statement

1. The parties recognize that alcohol abuse differs from abuse of illegal drugs in that alcohol may be legally obtained and used, and each employee has the right to decide whether or not to drink on his own time so long as job safety and job performance are not impaired; however, improper use of alcohol affecting job safety or efficiency is unacceptable.
2. Unauthorized consumption of alcohol or alcohol impairment on any given job or project during working hours or in an Employer vehicle at any time, will be cause for termination.

E. Reassignment Upon Positive Substance Abuse Test

1. Employees who have tested “positive” for substance abuse may be eligible for reassignment under the following conditions:
    a. In the case of a first violation of this substance abuse policy, the employee may be reassigned to the project or other projects at the Employer’s option. First-time violators shall be subject to random testing for use at any time without prior notice up to six months following the violation.
    b. The employee shall be immediately placed in an approved rehabilitation program directed by the Medical Review Officer.
    c. Employees who test “positive” for substance abuse for the second time shall be subject to

disciplinary action up to and including immediate termination.

d. Upon successful completion of an approved rehabilitation program, any employee who is certified as fit for duty shall have the right to return to the same Employer provided that the Employer has not made a layoff that would have included said employee.

2. The Employer shall have the right to verify that the employee has completed an approved rehabilitation program and is fit for duty.

F. Joint Labor Management Committee Involvement

In the interest of securing a drug-free work-place, protecting employee rights and securing employment opportunities, suggestions and issues of concern/compliance shall be communicated in writing to the Joint Labor Management Committee for review.

G. Substance Abuse Procedures

1. FIRST OFFENSE
   In the event that an employee takes and fails a substance abuse test, the employee must wait a minimum of 30 days before taking a second test, at his/her expense and from the same testing office and then be considered for re-employment. The re-employment is a discretionary decision made by the management.
2. SECOND OFFENSE
   Second offense for failure of a substance abuse test is grounds for automatic termination without recourse.

H. Substance Abuse Policy Acknowledgment Forms

All IMPACT Strategies employees are required to sign a Substance Abuse Policy Acknowledgment Form confirming that they have received and read the Substance Abuse Policy as outlined in this section.

Chapter 8 REQUESTED PROGRAMS

Requested Program – **Fall Protection for Construction (29 CFR 1926.500)**

A. Introduction

OSHA currently regulates fall protection for construction under Part 1926, Subpart M. The standards for regulating fall protection systems and procedures are intended to prevent employees from falling off, onto or through working levels and to protect employees from falling objects. Fall protection requirements under the OSHA Construction regulations require considerable planning and preparation.

Written fall protection procedures establish guidelines to be followed whenever an employee works above dangerous equipment on ramps or runways, or at heights with fall protection at the job site. The regulations:

a. Are designed to provide a safe working environment, and

b. Govern use of fall protection procedures and equipment.

Written procedures for fall protection establish uniform requirements for fall protection training, operation, and practices. The effectiveness of the written fall protection procedures depends on the active support and involvement of all employees who perform the jobs requiring it. This plan is intended to document procedures that ensure all work requiring fall protection is carried out safely

B. Purpose

IMPACT Strategies is dedicated to the protection of its employees from on-the-job injuries. All of our employees have the responsibility to work safely on the job. The purpose of this plan is to:

a. Supplement our standard safety policy by providing safety standards specifically designed to cover fall protection on the job.

b. Ensure that each employee is trained and made aware of the safety provisions which are to be implemented by this plan prior to the start of erection/construction.

This program informs interested persons, including employees that we are complying with OSHA's Fall Protection requirements, (29 CFR 1926.500 to.503).

This program applies to all employees who might be exposed to fall hazards, except when designated employees are inspecting, investigating, or assessing workplace conditions before the actual start of construction work or after all construction work has been completed.

The Project Superintendent is responsible for its implementation and is the competent person for our company. Copies of the written program may be obtained from our written Safety and Health plan. Certain employees are authorized to inspect, investigate, or assess workplace conditions before construction work begins or after all construction work has been completed. These employees are exempt from the fall protection rule during the performance of these duties.

These authorized employees determine if all walking/working surfaces on which our employees work have the strength and structural integrity to support the employees. Our employees will not be allowed to work on these surfaces until they have the requisite strength and structural integrity.

All employees, or their designated representatives, can obtain further information about this written program, and/or the fall protection standard from the Project Superintendent/Competent Person..

C. Fall Protection

To prevent falls, our company has a duty to anticipate the need to work at heights and to plan our work activities accordingly. Careful planning and preparation lay the necessary groundwork for an accident-free jobsite.

1. Worksite Assessment and Fall Protection System Selection

   This written plan is for all our various construction sites. However, at those worksites which require a site-specific fall protection plan, it shall be prepared by a qualified person.

   a. All fall protection systems selected for each application will be installed before an employee is allowed to go to work in an area that necessitates the protection. When selecting and purchasing fall protection equipment and supplies, they shall be approved for the purpose for which they are intended. Such fall protection equipment shall bear appropriate labels clearly indicating that the equipment meets or exceeds applicable ANSI and ASTM requirements.

   b. This fall protection plan is intended to anticipate the particular fall hazards to which our employees may be exposed. Specifically, we:

      i. Inspect the area to determine what hazards exist or may arise during the work.

      ii. Identify the hazards and select the appropriate measures and equipment.

      iii. Give specific and appropriate instructions to workers to prevent exposure to unsafe conditions.

      iv. Ensure employees follow procedures given and understand training provided.

      v. Apprise ourselves of the steps our specialty subcontractors have taken to meet their fall protection requirements.

   c. Providing fall protection requires an assessment of each fall situation at a given jobsite. Our criteria for selecting a given fall protection system follow those established at 29 CFR 1926.502, fall protection systems criteria and practices. Each employee exposed to these situations must be trained as outlined later in this plan.

2. Unprotected Sides and Edges

   a. Our employees must be protected when they are exposed to falls from unprotected sides and edges of walking/working surfaces (horizontal and vertical surfaces) which are 6 feet or more above lower levels.

   b. We know that OSHA has determined that there is no "safe" distance from an unprotected side or edge that would render fall protection unnecessary.

   c. We utilize and require the use of covers, standard guardrails, or personal fall arrest systems (PFAS) to protect our employees from fall hazards.

   d. We maintain the system(s) chosen until all work has been completed or until the permanent elements of the structure which will eliminate the exposure to falling hazards are in place.

3. Leading Edge Work

   a. Some construction sites require leading edge work. Leading edges are defined as the edge of a floor, roof, or formwork that changes location as additional floor, roof, or formwork sections are placed, formed, or constructed. If work stops on a leading edge it will be considered to be an "unprotected side or edge" and will be covered by the section of this plan on unprotected sides and edges.

   b. We presume that it is feasible and will not create a greater hazard to implement at least one of the conventional fall protection systems for our leading edge work.

   c. We utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees from fall hazards.

   d. Employees who are not constructing the leading edge, but who are on walking/working surfaces where leading edges are under construction, will also protected from falls by the use of standard guardrails, safety nets, or personal fall arrest systems (PFAS).

4. Hoist Areas
    a. In all situations where equipment and material hoisting operations take place, we protect our employees from fall hazards. When we are involved in hoisting operations we utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees from fall hazards.
    b. When operations require the materials to be lifted by crane to a landing zone (and do not require an employee to lean through the access opening or out over the edge to receive or guide materials), we can select either personal fall arrest equipment or a guardrail system.
    c. When guardrails (or chains or gates) are removed to facilitate hoisting operations and one of our employees must lean through the access opening or out over the edge to receive or guide materials they will be protected by a personal fall arrest system.
5. Holes
    a. Our company protects employees from:
    b. Tripping in or stepping into or through holes (including skylights).
    c. Objects falling through holes (including skylights).
    d. We utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees from fall hazards.
    e. At our worksites employees can trip or step into or through a hole (including skylights) or an object could fall through a hole and strike a worker. In these instances we use covers to prevent accidents.
    f. We understand that OSHA does not intend that a guardrail be erected around holes while employees are working at the hole, passing materials, and so on. Therefore, if the cover is removed while work is in progress, guardrails are not required because they would interfere with the performance of work. When the work has been completed, we will be required to either replace the cover or erect guardrails around the hole.
6. Formwork and Reinforcing Steel
    a. We are involved in work where different systems fit different applications. If our jobsites requires formwork or reinforcing steel work 6 feet or more above lower levels, we will chose a fall protection systems at each location to protect our employees:
    b. We utilize and require the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees from fall hazards.
7. Ramps, Runways, and Other Walkways
    a. We equip all ramps, runways, and other walkways with guardrails when employees are subject to falling 6 feet or more to lower levels.
8. Excavations
    a. At our jobsites we may have excavation edges that will not be readily seen (i. e., concealed from view by plant growth, etc.). In addition, walls, pits, shafts, and similar excavations 6 feet or more deep will be guarded to prevent employees from falling into them. When it is necessary, and when the excavation is 6 feet or more deep we will protect our employees.
    b. We utilize and require the use of standard guardrails, fences, barricades, or personal fall arrest systems (PFAS) to protect our employees from fall hazards.
9. Dangerous Equipment
    a. We are committed to protecting our employees from falling onto dangerous equipment. Because of the inherent danger an employee will be exposed to, we will utilize and require

the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS) to protect our employees from these fall hazards.

10. Roofing Work on Low-Slope Roofs
    a. Each of our employees engaged in roofing activities on low-slope roofs (4 in 12 or less, vertical to horizontal pitch) with unprotected sides and edges six-feet or more above lower levels will be protected from falling by requiring the use of covers, standard guardrails, safety nets, safety monitoring systems, or personal fall arrest systems (PFAS).
    b. We follow the guidelines in Appendix A of Subpart M to determine how to correctly measure a roof that is not a rectangle.
11. Steep Roofs
    a. We will protect our workers on roofs with slopes greater than 4 in 12 vertical to horizontal pitch (steep roofs) from falling when the roof has unprotected sides or edges more than 6 feet above lower levels by the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS).
12. Precast Concrete Erection
    a. Our company may be involved with precast concrete erection work.
    b. We presume that it is feasible and will not create a greater hazard to implement at least one of the conventional fall protection systems for any precast concrete erection work. When our employees are erecting precast concrete members 6 feet or more above a lower level they must be protected from falling by the use of standard guardrail, or personal fall arrest systems (PFAS).
13. Wall Openings
    a. Employees who are exposed to the hazard of falling out or through wall openings (including those with chutes attached) where the outside bottom edge of the wall opening is 6 feet or more above lower levels and the inside bottom edge of the wall opening is less than 39 inches above the walking/working surface must be protected from falling.
    b. We protect our employees from falls out or through wall openings by the use of covers, standard guardrails, safety nets, or personal fall arrest systems (PFAS).
14. Walking/Working Surfaces Not Otherwise Addressed
    a. We realize there will be situations that are not covered by our written safety plan, for which we have the duty to provide fall protection. All employees exposed to falls of 6 feet or more to lower levels must be protected by a guardrail system, safety net system, or personal fall arrest system except where specified otherwise in Part 1926. In addition to these measures, Safety Monitoring systems and controlled access zones may be utilized as alternative protection in accordance with the requirements of 29 CFR 1926.502(g) & (h).
    b. When Safety Monitoring Systems are utilized, the Project Superintendent will serve as the safety monitor or he shall designate an individual adequately trained under this program to serve as the safety monitor. The safety monitor is designated the competent person and has the authority to take prompt corrective action shall he/she identify or predict any fall hazards that our employees may be exposed to.
    c. Duties of the safety monitor shall be:
        i. To recognize fall hazards.
        ii. Warn employees if they are unaware of a fall hazard or acting in an unsafe manner.
        iii. Be on the same working surface and in visual sight of employees.
        iv. Stay within a distance that verbal communication can be heard and understood.

v. Shall not assume any other duties or assignments which may interfere with performing the duties of the safety monitor.

D. Protection from Falling Objects

When employees are exposed to falling objects, we ensure they wear hard hats and also implement one of the following measures:

1. Erect toeboards, screens, or guardrail systems to prevent objects from falling from higher levels.
2. Erect a canopy structure and keep potential fall objects far enough from the edge of the higher level so that those objects would not go over the edge if they were accidentally moved.
3. Barricade the area to which objects could fall, prohibit employees from entering the barricaded area, and keep objects that may fall far enough away from the edge of a higher level so that those objects would not go over the edge if they were accidentally moved.
4. Cover or guard holes 6 feet or more above a lower level.

E. General Worksite

1. If any one of the conditions described in the Workplace Assessment is not met for the area or piece of equipment posing a potential fall hazard, then do not perform that work until the condition is met. If you cannot remedy the condition immediately, notify a supervisor of the problem and utilize a different piece of equipment or work in a different area, according to the situation.
2. If the situation calls for use of fall protection devices such as harnesses or lanyards and belts because the fall hazard cannot be reduced to a safe level, then the employee must don such protective equipment before beginning the work and use it as intended throughout the duration of the work.
3. Only employees trained in such work are expected to perform it.
4. All places of employment, job sites shall be kept clean and orderly and in a sanitary condition.
5. Prompt rescue of employees shall be provided in the event of a fall or assurance the employees are able to rescue themselves. Each job will be assessed based on its unique environment by a competent person.
6. All walking/working surfaces must be kept in a clean and, so far as possible, dry condition. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats, or other dry standing places shall be provided where practicable.

F. Training

1. Guidelines

   Under no circumstances shall employees work in areas where they might be exposed to fall hazards, do work requiring fall protection devices, or use fall protection devices until they have successfully completed an approved fall protection training program.

2. Program

   The training program may include classroom instruction and operational training on recognition and avoidance of unsafe conditions and the regulations applicable to their work environment for each specific fall hazard the employee may encounter. The training program is given by a "competent person" qualified in each aspect of the program, and must cover the following areas:

a. The nature of fall hazards in the work area.

b. The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used.

c. The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used.

d. The role of each employee in the safety monitoring system when this is used.

e. The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs.

f. The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection.

g. The role of employees in fall protection plans.

h. The standards contained in Subpart M of the construction regulations.

3. Project Superintendent Responsibilities

   a. The Project Superintendent will identify all current and new employees who require training and schedule the classroom instruction for those employees. Training on the above components will occur both in the classroom and on the job site, as appropriate. Classroom training will cover written policy/procedures on fall protection and include a training video on the subject. Job site instruction will include demonstration of and practice in wearing fall protection equipment and any instruction necessary for a specific job.

   b. The Project Superintendent has overall responsibility for the safety of employees and will verify compliance with 1926.503(a), training program, for each employee required to be trained.

   c. The Project Superintendent has the responsibility of determining when an employee who has already been trained, does not have the understanding and skill required by the training program (1926.503(a)).

4. Retraining

   a. Required when an employee cannot demonstrate the ability to recognize the hazards of falling and the procedures to be followed to minimize fall hazards.

5. Enforcement

   a. Constant awareness of and respect for fall hazards, and compliance with all safety rules are considered conditions of employment. The Project Superintendent reserves the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.

6. Incident Investigation

   a. All accidents that result in injury to workers, regardless of their nature, are investigated and reported. It is an integral part of any safety program that documentation takes place as soon as possible so that the cause and means of prevention can be identified to prevent a reoccurrence.

   b. In the event that an employee falls or there is some other related, serious incident (e.g., a near miss) occurs, this plan will be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar types of falls or incidents from occurring.

7. Changes to Plan

    a. Any changes to the plan must be approved by the Safety Director. This plan is reviewed by a qualified person as the job progresses to determine if additional practices, procedures or training needs to be implemented by the competent person to improve or provide additional fall protection. Workers are notified and trained, if necessary, in the new procedures. A copy of this plan and all approved changes is maintained at the jobsite.

Requested Program – **Ground Fault Protection (29 CFR 1926.404)**

A. Ground Fault Protection

The company will use ground fault circuit interrupters or assured equipment grounding conductor program to protect employees on the job site. These requirements are in addition to any other requirements for equipment grounding conductors.

B. Ground-fault circuit interrupters (GFCI)

All 120 volt, single phase, 15 and 20 ampere Receptacle outlets on the job site, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection. Receptacles on a two wire, single phase portable or vehicle mounted generator rated not more than 5kw, where the circuit conductors of the generator frame and all other grounded surfaces, need not be protected with ground fault circuit interrupters.

C. Assured equipment grounding conductor program

Covers all cord sets, receptacles which are not part of the building or structure, and equipment connected by cord and plug which are available for use or used by employees on the jobsite. This program will comply with the following minimum requirements:

1. A written description of the program, including the specific procedures adopted by the employer, shall be available at the job site for inspection and copying.
2. The manager and/or designated employee have been designate to implement the program as defined by OSHA 1926.304(f).
3. Each cord set, attachment cap, plug and receptacle of cord sets, and any equipment connected by cord and plug, except cord sets and receptacles which are fixed and not exposed to damage, shall be visually inspected before each day's use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal damage.
    a. Equipment found damaged or defective shall not be used until repaired, but shall be tagged "DO NOT USE" and removed from service until repaired and tested.
4. The following tests shall be performed on all cord sets, receptacles which are not part of the permanent wiring of the building or structure, and cord and plug connected required to be grounded:
    a. All equipment grounding conductors shall be tested for continuity and shall be electrically continuous.
    b. 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.
5. All required test shall be performed:
    a. Before first use;
    b. Before equipment is returned to service following any repairs;
    c. Before equipment is used after any incident which can be reasonably suspected to cause damage (for example, when the cord set has been run over; and
    d. At intervals not to exceed 3 months, except that cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months.
6. The company will not make available or permit the use by employees on any equipment which has not met the above requirements.

Requested Program – **Hand & Power Tools (29 CFR 1926.301)**

A. Policy

The employer is responsible for the safe condition of tools and equipment used by employees. Employers shall not issue or permit the use of unsafe hand tools. Employees should be trained in the proper use and handling of tools and equipment.

B. Hand Tools & Equipment

1. Any tool or piece of equipment that is identified as unsafe will be tagged/locked to prevent use, will be rendered inoperable, or shall be physically removed from its place of operation.
2. All tools and equipment (both, company and employee-owned) used by employees in workplace will be in good condition.
3. Hand tools such as chisels, punches, etc., which develop mushroomed heads during use will be reconditioned or replaced as necessary.
4. Broken or fractured handles on hammers, axes and similar equipment shall be replaced immediately.
5. Worn or bent wrenches will be replaced.
6. Handles used on files and similar tools will be appropriate and in good condition.
7. Employees will be trained regarding the hazards caused by faulty or improper use of hand tools.
8. Safety glasses, face shields, etc., will be used while using hand tools or equipment that might produce flying materials or be subject to breakage.
9. Jacks will be checked periodically to assure they are in good operating condition.
10. Tool cutting edges will be kept sharp so the tool will move smoothly without binding or skipping.
11. Eye and face protection will be used when driving hardened or tempered nails.

C. Portable (Power Operated) Tools and Equipment

1. Any power operated tool or piece of equipment that is identified as unsafe will be tagged/locked to prevent use, will be rendered inoperable, or shall be physically removed from its place of operation.
2. Grinders, saws, and similar equipment will be provided with appropriate safety guards.
3. Power tools will be used with the correct shield, guard, or attachment, recommended by the manufacturer.
4. Portable circular saws will be equipped with guards above and below the base shoe.
5. Rotating or moving parts of equipment will be guarded to prevent physical contact.
6. Cord-connected, electronically operated tools and equipment will be effectively grounded or of the approved double insulated type.
7. Effective guards shall be in place over belts, pulleys, chains, sprockets, on equipment such as concrete mixers, air compressors, etc.
8. Portable fans will be provided with full guards or screens.
9. Ground-fault circuit interrupters shall be provided on all temporary electrical 15 and 20- ampere circuits, used during periods of construction.

10. Pneumatic and hydraulic hoses on power-operated tools will be checked regularly for deterioration or damage.
11. Power cords will not be used to lie or lower portable electric tools.
12. All electrical cords will be kept clear from where vehicles might drive over them.
13. Table saws will be equipped with hood guards over the blade above the table, which will automatically adjust to the thickness and remain in contact with the material being cut.

D. Abrasive Wheel Equipment – Grinders

1. Any grinder that is identified as unsafe will be tagged/locked to prevent use, will be rendered inoperable, or shall be physically removed from its place of operation.
2. The work rest used will be kept adjusted to within 1/8 inch of the wheel.
3. The adjustable tongue on the topside of the grinder will be used and kept adjusted to within ¼ inch of the wheel.
4. Side guards will cover the spindle, nut and flange and 75 percent of the wheel diameter.
5. Bench and pedestal grinders will be permanently mounted.
6. Goggles or face shields will always be worn when grinding.
7. The maximum RPM rating of each abrasive wheel will be compatible with the RPM rating of the grinder motor.
8. Fixed or permanently mounted grinders will be connected to their electrical supply system with metallic conduit or other permanent wiring method.
9. Each grinder will have an individual on and off control switch.
10. Each electrically operated grinder will be effectively grounded.
11. When abrasive wheels are mounted, they will be visually inspected and ring tested.
12. Dust collectors and powered exhausts will be provided on grinders used in operations that produce large amounts of dust.
13. Splashguards will be mounted on grinders that use coolant to prevent the coolant from reaching employees.

E. Powder-Actuated Tools

1. Only employees who have been trained in the operation of the particular tool in use shall be allowed to operate a powder-actuated tool.
2. The tool shall be tested each day before loading to see that safety devices are in proper working condition. The method of testing shall be in accordance with the manufacturer's recommended procedure.
3. Any tool found not in proper working order, or that develops a defect during use, shall be immediately removed from service and not used until properly repaired.
4. Personal protective equipment shall be in accordance with Subpart E of this part.
5. Tools shall not be loaded until just prior to the intended firing time. Neither loaded nor empty tools are to be pointed at any employees. Hands shall be kept clear of the open barrel end.
6. Loaded tools shall not be left unattended.
7. Fasteners shall not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface-hardened steel, glass block, live rock, face brick, or hollow tile.

8. Driving into materials easily penetrated shall be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.
9. No fastener shall be driven into a spalled area caused by an unsatisfactory fastening.
10. Tools shall not be used in an explosive or flammable atmosphere.
11. All tools shall be used with the correct shield, guard, or attachment recommended by the manufacturer.
12. Powder-actuated tools used by employees shall meet all other applicable requirements of American National Standards Institute, A10.3-1970, Safety Requirements for Explosive-Actuated Fastening Tools.

Requested Program – **Hazard Communications & Identification (29 CFR 1926.59)**

A. Purpose

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

B. Policy:

1. Container Labeling

a. The Subcontractors will verify that all containers received for use will be clearly labeled by the manufacturer with the following:

- Name, address and telephone number of the manufacturer
- Product identifier
- Signal word
- Hazard statement(s)
- Precautionary Statement(s)
- Pictogram(s)

b. Existing labels will not be removed or defaced on incoming containers unless containers are to be immediately marked with required information.

c. All materials on site are to be stored in their original container with the label attached.

d. Any material with a label missing or illegible shall be reported to the supervisor immediately for proper labeling.

e. All labels **must** include pictograms included in the Global Harmonization system. The pictograms found on all labeling must be according to the following list:

Health Hazard 	**Flame** 	**Exclamation Mark** 
• Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity	• Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides	• Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non Mandatory)
Gas Cylinder 	**Corrosion** 	**Exploding Bomb** 
• Gases under Pressure	• Skin Corrosion/ burns • Eye Damage • Corrosive to Metals	• Explosives • Self-Reactives • Organic Peroxides
Flame over Circle 	**Environment *(Non Mandatory)** 	**Skull and Crossbones** 
• Oxidizers	• Aquatic Toxicity	• Acute Toxicity (fatal or toxic)

f. Workplace Labels

i. Workplace labels must be in English. Other languages may be added to the label if applicable.

ii. Employers may use additional instructional symbols that are not included in OSHA's HCS pictograms on the workplace labels.

(1.) An example of an instructional pictogram is a person with goggles, denoting that goggles must be worn while handling the given chemical. Including both types of pictograms on workplace labels is acceptable.

iii. Employers may continue to use rating systems such as National Fire Protection Association (NFPA) diamonds or HMIS requirements for workplace labels as long as they are consistent with the requirements of the Hazard Communication Standard and the employees have immediate access to the specific hazard information as discussed above.

(1.) An employer using NFPA or HMIS labeling must, through training, ensure that its employees are fully aware of the hazards of the chemicals used.

iv. If an employer transfers hazardous chemicals from a labeled container to a portable container that is only intended for immediate use by the employee who performs the transfer, no labels are required for the portable container.

2. Safety Data Sheets (SDS)

a. Any product having a hazardous warning on its label requires a SDS.

b. The manufacturer, distributor, or vendor shall provide the SDS for the hazardous product.

c. All SDS shall be reviewed by the Job Superintendent or Subcontractor's Foreman using the product to determine safe work practices and personal protection, as needed. The SDS will be maintained and keep accessible by the subcontractor on site. IMPACT Strategies shall have SDS for any hazardous products they have on site.

d. The SDS must provide the 16 sections listed:

(1) Identification

(2) Hazard(s) identification

(3) Composition/information on ingredients

(4) First-aid measures

(5) Fire-fighting measures

(6) Accidental release measures

(7) Handling and storage

(8) Exposure control/personal protection

(9) Physical and chemical properties

(10) Stability and reactivity

(11) Toxicology information

(12) Ecological information *

(13) Disposal Consideration *

(14) Transport information *

(15) Regulatory information *

(16) Other information

* Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 - 15

3. Employee Training and Information

The Subcontractors will provide training to their employees when hired and routinely thereafter on the hazardous nature of chemical products. Training will include:

a. The Hazard Communication Policy

b. Chemicals present in their workplace operations

c. Physical and health effects of the hazardous chemicals

d. Appropriate work practices and controls when using chemicals.

e. Emergency and first-aid procedures

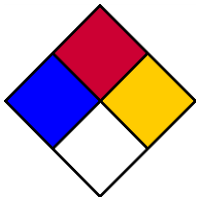
f. How to read labels and review an SDS to obtain appropriate hazard information

g. Location of the SDS file and written hazard communications program

C. Hazardous Material Identification System (HMIS)

HMIS is a **voluntary** hazard rating scheme developed to help employers comply with workplace labeling requirements of the OSHA Hazard Communication Standard. The meaning of the numbers in each color field are outlined below

1. **FLAMMABILITY HAZARD (RED)**



4 Materials that rapidly or completely vaporize at atmospheric pressure and normal ambient temperatures and burn rapidly or are readily dispersed in the air and burn readily. (Below 73°F)

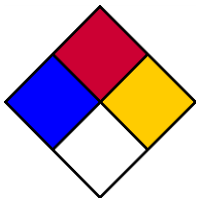
3 Liquids and solids that can be ignited under almost all ambient temperature conditions. (Below 100°F)

2 Materials that must be moderately heated or exposed to relatively high ambient temperatures before ignition can occur. (Below 200°F)

1 Materials that must be preheated before ignition occurs (Above 200°F)

0 Materials that will not burn

2. **HEALTH HAZARD (BLUE)**



4 Materials that on very short exposure could cause death or major residual injury even though prompt medical treatment was given. (Deadly)

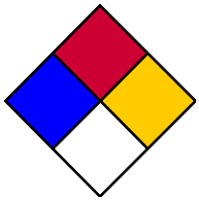
3 Materials that on very short exposure could cause serious temporary or residual injury even though prompt medical treatment was given. (Extreme Danger)

2 Materials that on intense or continued exposure could cause temporary incapacitation or possible residual injury unless prompt medical treatment was given. (Hazardous)

1 Materials that on exposure would cause irritation but only minor injury even if no hazard beyond that of ordinary combustible material. (Slightly Hazardous)

0 Materials that on exposure under fire conditions would offer no hazard beyond that ordinary combustible material. (Normal Material)

3. **REACTIVITY HAZARD (YELLOW)**



4 Materials that in themselves are readily capable of detonation or of explosive decomposition or reaction at normal temperatures and pressures. (May Detonate)

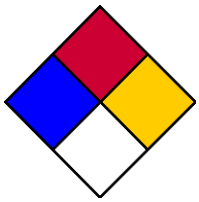
3 Materials that in themselves are capable of detonation or explosive reaction but require a strong initiating source, or must be heated under confinement before initiation, react explosively with water. (Shock & Heat May Detonate)

2 Materials that in themselves are normally unstable and readily undergo violent chemical change but do not detonate, or may react violently with water, or may form potentially explosive mixtures with water. (Violent Chemical Change)

1 Materials that in themselves are normally stable but which can become unstable at elevated temperatures or react with water with some release of energy but not violently. (Unstable if Heated)

0 Materials that in themselves are normally stable; even when exposed to fire, and do not react with water. (Stable)

4. **SPECIAL INFORMATION (WHITE)**



The white block is designated for special information about the chemical. For example, it may indicate that the material is radioactive by displaying the standard radioactive symbol, or unusually water-reactive by displaying a large W with a line through it (~~W~~). Typical symbols include:

~~W~~	Water Reactive
OXY	Oxidizer or Oxidizing Properties
TOX	Toxic
COR	Corrosive
IGN	Ignitable
	Radioactive
EXP	Explosive

Requested Program – **Heat & Cold Stress**

A. Introduction

Working in extreme temperatures (hot or cold) can overwhelm the body's internal temperature control system. When the body is unable to warm or cool itself, heat or cold related stress can result. Heat and cold stress can contribute to adverse health effects which range in severity from discomfort to death.

IMPACT Strategies has developed this Heat and Cold Stress Program to minimize the effects of heat and cold stress for our employees. This program contains the procedures and practices for safely working in temperature extremes.

The Occupational Safety and Health Administration (OSHA) does not currently have specific standards for heat or cold stress. However, the Occupational Safety and Health Act of 1970 General Duty Clause (Section 5(a)(1)) states that "Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees." In addition, 29 CFR Subpart I relating to personal protective equipment requires employers to provide protection to employees exposed to hazards in the workplace. The OSHA website contains Fact Sheets and Guidance Documents that relate to heat and cold stress that have been incorporated into this program.

B. Assignment of Responsibilities

1. Management Responsibilities
    a. Maintain, review and update the Heat and Cold Stress Program as needed.
    b. Provide monitoring (upon request) and assist employees with the development of procedures to minimize the adverse effects of heat and cold stress in the workplace.
    c. Provide training to employees affected by heat and cold.
    d. Train employees to administer proper first aid on heat- and cold-induced injuries or illnesses.
    e. Ensure all employees are trained in the employer's heat and cold injury or illness, emergency response procedures.
2. Supervisor Responsibilities
    a. Review and comply with the provisions outlined in this program.
    b. Ensure all employees are properly trained before working in extreme temperature conditions.
    c. Assess the day-to-day heat or cold stresses on employees.
    d. Assess employees work load and assigning work and rest schedules as needed.
    e. Take personal factors into consideration before assigning a task where there is a possibility of a heat related illness occurring.
    f. Ensure all employees have the appropriate personal protective equipment (PPE) prior to working in extreme temperature conditions.
    g. Ensure employees are familiar with the company's safety program.
3. Employee Responsibilities
    a. Review and comply with the provisions outlined in this program.
    b. Complete training before working in extreme temperature conditions and be familiar with the signs and symptoms of heat and cold weather hazards.

c. Wear the appropriate PPE.

d. Report heat and cold stress concerns to their supervisor.

C. Heat Related Illnesses: Signs, Prevention & Treatment

While working in hot weather conditions, the human body may not be able to maintain a normal temperature just by sweating. If this happens, heat-related illnesses may occur. The physical factors which contribute to this condition shall be considered prior to performing any tasks in hot weather.

1. Common Health Problems - Heat

   a. Heat stroke – This is the most serious heat related effect. Heat stroke occurs when the body temperature increases above 104 - 106 F. Signs and symptoms of heat stroke are confusion, loss of consciousness and lack of perspiration. This condition must be treated as a medical emergency and the employee must receive immediate medical attention.

   b. Heat exhaustion – Signs and symptoms of heat exhaustion include headache, nausea, dizziness, weakness, irritability, confusion, thirst, heavy perspiration and a body temperature 104 or greater. Employees experiencing heat exhaustion shall be moved to a cool area, given fluids to drink and given cold compresses for their head, face and neck. Employees shall also be taken to a clinic or emergency room to be monitored by medical personnel.

   c. Heat cramps – Signs and symptoms of heat cramps include muscle pains usually caused by the loss of body salts/fluids. Employees shall replace fluid loss by drinking water and/or carbohydrate-electrolyte replacement liquids (e.g. Gatorade) every 15 to 20 minutes.

   d. Heat rash – Heat rash is caused by excessive perspiration and looks like a red cluster of pimples or small blisters. Heat rash usually appears on the neck, upper chest, in the groin, under the breasts and in elbow creases. Treatment for heat rash is to provide a cooler, less humid environment.

   e. Dehydration – Dehydration is a major factor in most heat disorders. Signs and symptoms of dehydration include increasing thirst, dry mouth, weakness or light-headedness (particularly if worse upon standing), and a darkening of the urine or a decrease in urination. Dehydration can be reversed or put back in balance by drinking fluids that contain electrolytes (i.e. Gatorade) that are lost during work related activities. Avoid caffeinated drinks.

2. Prevention methods - Heat

   a. Acclimation – Acclimation is a process by which the physical processes of an employee's body adjusts to the environment over a period of time. Based on data obtained from OSHA, this process usually takes five to seven days. This process could take up to three weeks depending on the individual and their work environment. According to the American Industrial Hygiene Association, the process requires a consistent work level for at least two hours each day during the acclimation period in order for an employee to become acclimatized. Mere exposure to heat does not confer acclimatization, nor does acclimatization at one heat stress level confer resistance to heat stress at a higher temperature or more vigorous workload.

      Employees who are not adequately acclimatized to the heat may experience temporary heat fatigue resulting in a decline in performance, coordination or alertness. They may also become irritable or depressed. This can be prevented through gradual adjustment to the hot environment. People in good physical condition tend to acclimatize better because their cardiovascular systems respond better.

   b. Engineering Controls – For employees working indoors, the best way to prevent heat-related illness is to make the work environment cooler. Where and if possible, use air

conditioning to cool the work area. Alternatively, increase the general ventilation as much as possible by opening windows or doors. When available, use cooling fans to aid in increasing ventilation.

c. Safe Work Practices – For employees working outdoors or working indoors without air conditioning or ventilation, take scheduled breaks in cool areas. Ensure there is plenty of cool, potable drinking water and take water breaks as needed. Employees shall always be provided with access to shaded area. Immediately report any problems to a supervisor. Supervisors shall consider scheduling the hottest work for the coolest part of day, assigning extra employees to high demand tasks, and using work-saving devices (e.g. power tools, hoists or lifting aids) to reduce the body's work load. All employees shall watch out for the safety of their coworkers.

d. Heat Index – The Heat Index is a single numeric value that uses both temperature and humidity to inform the public on how the weather outdoors "feels". The higher the Heat Index, the hotter the weather feels. OSHA has used the Heat Index to assign protective measures for workers as the Heat Index increases. These protective measures may reduce the likelihood of heat related illnesses.

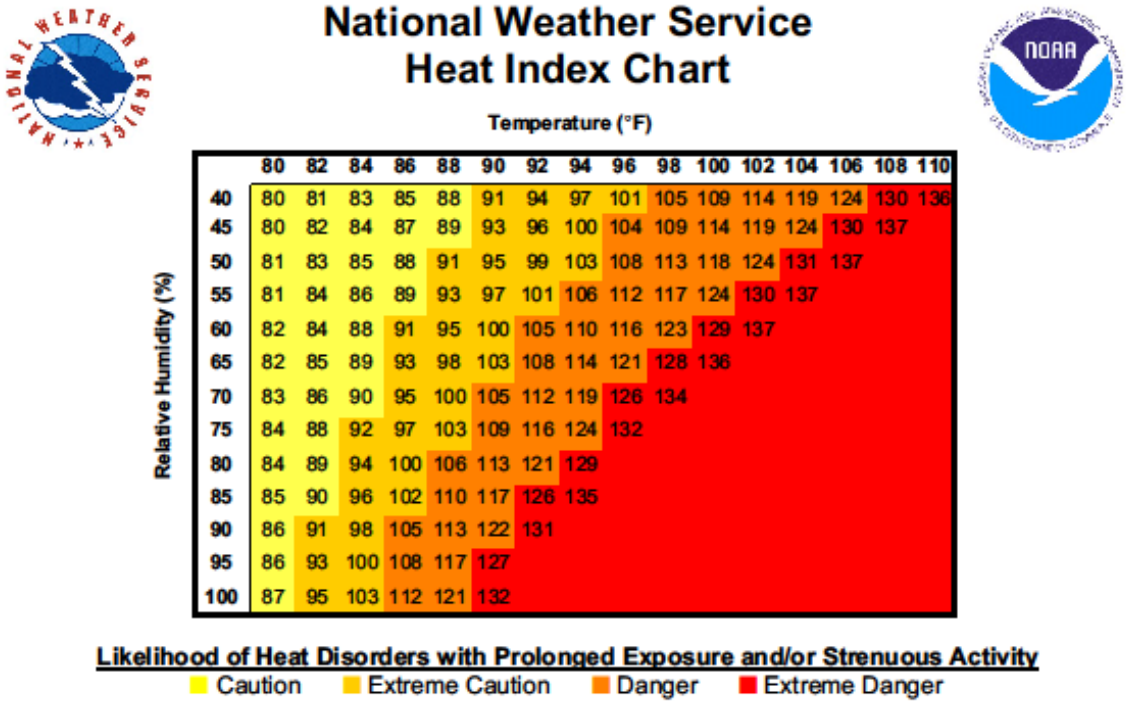
   i. Heat Index

   ii. The heat index is a simple tool and a useful guide for employers/employees making decisions about protecting employees in hot weather. It does not account for certain conditions that contribute additional risk, such as physical exertion. Consider taking the steps at the next highest risk level to protect employees from the added risks posed by:

      (1.) Working in the direct sun (can add up to 15°F to the heat index value)

      (2.) Wearing heavy clothing or protective gear

   iii. Under most circumstances, fluid intake shall not exceed 6 cups per hour or 12 quarts per day. This makes it particularly important to reduce work rates, reschedule work, or enforce work/rest schedules.



D. Cold Related Illnesses: Signs, Prevention & Treatment

During cold weather, an employee's body will use energy to maintain a normal internal body temperature. This will result in a shift of blood flow from employee's extremities (hands, feet and legs) and outer skin to the employee's core (chest and abdomen). If this happens, cold-related illnesses and injuries may occur if exposed to cold conditions for an extended period of time.

1. Common health problems - Cold

   a. Hypothermia – Hypothermia is a potentially serious health condition. Hypothermia occurs when body heat is lost faster than it can be replaced. When the core body temperature drops to approximately 95°F, the onset of symptoms normally begins. The employee may begin to shiver, lose coordination, have slurred speech, and fumble with items in the hand. The employee's skin will likely be pale and cold. As the body temperature continues to fall these symptoms will worsen and shivering will stop. Once the body temperature falls to around 85°F severe hypothermia will develop and the person may become unconscious, and at 78°F, vital organs may begin to fail. Treatment depends on the severity of the hypothermia. For cases of mild hypothermia move to warm area and stay active. Remove wet clothes and replace with dry clothes or blankets, cover the head. To promote metabolism and assist in raising internal core temperature drink a warm (not hot) sugary drink. Avoid drinks with caffeine. For more severe cases do all the above, plus contact emergency medical personnel (Call 911 for an ambulance), cover all extremities completely, place very warm objects, such as hot packs or water bottles on the victim's head, neck, chest and groin. Arms and legs shall be warmed last. In cases of severe hypothermia, treat the employee very gently and do not apply external heat to re-warm. Hospital treatment is required.

   b. Frostbite – Frostbite occurs when the skin actually freezes and loses water. In severe cases, amputation of the frostbitten area may be required. While frostbite usually occurs when the temperatures are 30° F or lower, wind chill factors can allow frostbite to occur in above freezing temperatures. Frostbite typically affects the extremities, particularly the feet and hands. The affected body part will be cold, tingling, stinging or aching followed by numbness. Skin color turns red, then purple, then white, and is cold to the touch. There may be blisters in severe cases. Do not rub the area to warm it. Wrap the area in a soft cloth, move the employee to a warm area, and contact medical personnel. Do not leave the employee alone. If help is delayed, immerse in warm (maximum 105 °F), not hot, water. Do not pour water directly on affected part. If there is a chance that the affected part will get cold again do not warm. Repeated heating and cooling of the skin may cause severe tissue damage.

   c. Trench Foot – Trench Foot is caused by having feet exposed to damp, unsanitary and cold conditions including water at temperatures above freezing for long periods of time. It is similar to frostbite, but considered less severe. Symptoms usually consist of tingling, itching or burning sensation. Blisters may be present. For treatment, soak feet in warm water, then wrap with dry cloth bandages. Drink a warm, sugary drink. Seek medical attention if necessary.

   d. Dehydration – It is easy to become dehydrated during cold weather. Signs of dehydration include increasing thirst, dry mouth, weakness or light-headedness (particularly if worse upon standing), and a darkening of the urine or a decrease in urination. Dehydration can be reversed or put back in balance by drinking fluids that contain electrolytes (i.e. Gatorade) that are lost during work related activities. Avoid caffeinated drinks

2. Prevention method - Cold

   a. Acclimation – Employees exposed to the cold shall be physically fit, without any circulatory, metabolic, or neurologic diseases that may place them at increased risk for hypothermia. A new employee shall not be required to work in the cold full time during the first days of employment until they become adjusted to the working conditions and

required protective clothing. New employees shall be introduced to the work schedule slowly and be trained accordingly.

b. Engineering Controls – For employees working indoors, the best way to prevent cold-related illness is to make the work environment warmer. Where and if possible, use heaters to warm the work area. Alternatively, decrease the general ventilation as much as possible by closing windows or doors.

c. Safe Work Practices – For employees working outdoors or working indoors without heat, take scheduled breaks in warm areas. If available, use wind barricades to block the wind from the employees. Ensure there is plenty of water to drink and take water breaks as needed. Immediately report any problems to a supervisor. Supervisors shall consider scheduling the most work for the warmest part of day, assigning extra employees to high demand tasks that will require longer periods in cold areas. All employees shall watch out for the safety of their coworkers. All employees will be informed of dangers associated with working around unstable snow and ice build-ups. All regularly used walkways and travelways shall be sanded, salted, or cleared of snow and ice as soon as practicable.

d. Personal Protective Equipment (PPE) – PPE is an important factor in preventing cold stress related illnesses and injuries. Cold weather supplies will be regularly inspected and restocked when necessary. Employees shall adhere to the following recommendations when dressing for work in a cold environment:

   i. Wear at least three layers of clothing; an inner layer of wool, silk or synthetic to wick moisture away from the body; a middle layer of wool or synthetic to provide insulation even when wet; an outer wind and rain protection layer that allows some ventilation to prevent overheating.

   ii. Wear a hat or hood; up to 40% of body heat can be lost when the head is left exposed.

   iii. Wear insulated boots or other footwear.

   iv. Do not wear tight clothing; loose clothing provides better ventilation.

   v. Keep a change of clothing available in case work clothes become wet.

e. All employees shall be under constant protective observation by a co-worker or supervisor for cold weather symptoms.

E. Training

1. Supervisors shall be trained in prevention measures for heat and cold related illnesses and well as emergency response procedures.
2. The company can provide heat or cold stress training upon request.

Requested Program – **Ladders & Stairways (29 CFR 1926.1050)**

A. Purpose

This written Stairway and Ladder Safety Plan describes methods and practices for care and use of stairways and ladders that can be read and understood by all managers, supervisors, and employees at IMPACT Strategies. The procedures establish guidelines to be followed whenever an employee works with ladders or stairways at our company. This written plan is intended to be used to:

1. Create awareness of the hazards among our workforce,
2. Standardize procedures for use and care of the equipment,
3. Provide a consistent format for training employees on the proper procedures to be used,
4. Minimize the possibility of injury or harm to our employees, and
5. Demonstrate compliance with stairway and ladder requirements in Subpart D of 29 CFR 1910.

B. Administrative Duties

1. The Safety Director is responsible for developing and maintaining this written Stairway and Ladder Safety Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan.
2. This written Stairway and Ladder Safety Plan is kept in our written Safety and Health manual and at our corporate offices.
3. If, after reading this plan, you find that improvements can be made, please contact the Safety Director. We encourage all suggestions because we are committed to creating a safe workplace for all our employees and a safe and effective stairway and ladder safety program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

C. Fixed Industrial Stairs

Fixed industrial stairs are provided in our facility or on job sits in the following circumstances:

1. For access from one structure level to another where operations necessitate regular travel between levels
2. All fixed industrial stairs are provided according to OSHA specifications for stair strength, stair width, angle of stairway rise, stair treads, stairway platforms, railings and handrails, and vertical clearance

D. Portable Ladders

1. All portable ladders, including job built ladders, provided by the company under normal conditions of usage.
    a. When positioned for use, all ladder rungs, cleats, and steps shall be parallel to the ground and uniformly spaced.
    b. Ladders shall not be loaded beyond the maximum intended load for which they were built, or beyond the manufacturer's capacity.
2. For portable wood ladders, all wood parts shall be visually inspected before use and be:
    a. Free from sharp edges and splinters.
    b. Sound and free from shake, wane, compression failures, decay, or other irregularities.

3. Portable metal ladders chose for use by the company are:
    a. Designed without structural defects or accident hazards such as sharp edges, burrs, etc.
    b. Of sufficient strength to meet the test requirements.
    c. Protected against corrosion unless inherently corrosion-resistant.

E. Work Practices

1. When ascending or descending, the climber must face the ladder.
2. Ladders are only used for the purpose they were intended and designed for.
3. Portable ladders are designed as a one-man working ladder and will be used accordingly. Ladders shall not be loaded beyond the manufacturer's maximum intended load.
4. Portable rung and cleat ladders will be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder (the length along the ladder between the foot and the top support – 4:1 ratio).
5. The ladder will be so placed as to prevent slipping, or it will be lashed, or held in position. The ladder base section must be placed on a stable level surface with a secure footing.
6. Employees must not carry anything in hands that could cause injury in fall.
7. Employees will only use portable rung ladders with non-slip bases when there is a hazard of slipping. However, nonslip bases are not intended as a substitute for care in safely placing, lashing, or holding a ladder that is being used on oily, metal, concrete, or slippery surfaces.
8. The top of the ladder must extend 3 feet above the upper landing and placed with the two rails supported, unless equipped with single support attachment.
9. On two-section extension ladders, the minimum overlap for the two sections in use will be according to OSHA specifications.
10. Portable rung ladders with reinforced rails will be used only with the metal reinforcement on the underside.
11. The bracing on the back legs of stepladders is designed solely for increasing stability and not for climbing.
12. Ladders will not be:
    a. Used in a horizontal position as platforms, runways, or scaffolds.
    b. Placed in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded.
    c. Placed on boxes, barrels, or other unstable bases to obtain additional height.
    d. Tied or fastened together to provide longer sections. They must be equipped with the hardware fittings necessary if the manufacturer endorses extended uses.
    e. Use to gain access to a roof unless the top of the ladder extends at least 3 feet above the point of support, at eave, gutter, or roofline.
    f. Used as a brace, skid, guy or gin pole, gangway, or for other uses than that for which they were intended, unless specifically recommended for use by the manufacturer.
13. More than one employee shall not use ladders at a time for which dimensions are specified or with ladder jacks and scaffold planks where use by more than one employee is anticipated.
14. Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment must not be used. Employees finding ladders with any of these conditions must report them to the Project Superintendent. Improvised repairs may not be made.

15. Ladders made by fastening cleats across a single rail will not be used.
16. Tops of the ordinary types of stepladders will not be used as steps.
17. Middle and top sections of sectional or window cleaner's ladders will not be used for bottom section unless the user equips them with safety shoes.

F. Inspections and Maintenance

1. Ladders will be inspected regularly and frequently to insure safety and serviceability.
2. Ladders will be maintained in good usable condition at all times.
3. The joint between the steps and side rails is kept tight, all hardware and fitting are securely attached, and the movable parts operate freely without binding or undue play.
4. Metal bearings of lock, wheels, pulleys, etc. will be frequently lubricated.
5. Frayed or badly worn rope will be replaced.
6. Safety feet and other auxiliary equipment will be kept in good condition to insure proper performance.
7. Ladders with defects will be withdrawn from service for repair or destruction and tagged or marked as Dangerous, Do Not Use.
8. If ladders tip over, our employee will:
    a. Inspect the ladder for side rail dents or bends, or excessively dented rungs;
    b. Check all rung-to-side-rail connections;
    c. Check hardware connections; and
    d. Check rivets for shear.
9. If ladders are exposed to oil and grease, equipment will be cleaned and kept free of oil, grease, or slippery materials.

G. Fixed Ladders

1. Fixed ladders are provided according to OSHA specifications for design, clearance, and pitch.
2. All fixed ladders are maintained in a safe condition.
3. Fixed ladders are inspected regularly and frequently to insure safety and serviceability.

H. Training

For all employees who work on ladders and stairways, training is provided to enable each employee to recognize hazards associated with ladders and stairways and to use proper procedures to minimize the hazards.

I. Disciplinary Procedures

Constant awareness of and respect for stairway and ladder safety procedures and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety and Personnel Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this stairway and ladder safety program.

J. Program Evaluation

Although we may not be able to eliminate all problems, we try to eliminate as many as possible to improve employee protection and encourage employee safety practices. Therefore, the Safety Director is responsible for evaluating and updating this written plan as necessary.

1. The evaluation will include a review of reported accidents, as well as near misses, to identify areas where additional safety measures need to be taken. A periodic review to determine the effectiveness of the program will also take place. This may include:
    a. A walk-through of the jobsite, and
    b. Interviews with employees to determine whether they are familiar with the requirements of this program and if safety measures are being practiced.

Requested Program – **Lockout/Tagout (29 CFR 1926.417)**

A. Purpose

IMPACT Strategies has developed this program in order to provide our employees with information on OSHA's Control of Hazardous Energy Standard, 29 CFR 1910.147, which we normally call Lockout/Tagout. This program will inform when Lockout/Tagout procedures are required, different employees involved in the procedure, the Lockout/Tagout procedures to be used, electrical safety related work practices, and employee's responsibilities under company policy. The Project Superintendent has overall responsibility for the administration and enforcement of this Program.

B. Responsibility & Procedures

The energy that runs equipment can be hazardous if it is not carefully controlled during servicing or maintenance. The Lockout/Tagout standard covers procedures for shutting down, releasing energy types (including stored energy in capacitors or elevated machine parts), the actual Lockout/Tagout procedures, verifying lockout, release of locks and tags, and re-energizing equipment.

The standard requires that each affected, authorized, and qualified employee be trained in specific requirements under the standard.

This program has been developed to meet OSHA's training requirements under Lockout/Tagout.

1. Energy Familiarity
    a. When an employee locks or tags equipment, that employee must be familiar with the types of energy the equipment uses (electrical; hydraulic; mechanical; pneumatic; air, steam, or water pressure; thermal; spring loaded; gravity; chemical; or nuclear) including types of stored energy that the machine uses. Each energy source must be isolated by closing valves, relieving trapped pressure, disconnecting circuits, or blocking/bleeding down lines
2. Use Lockout/Tagout when:
    a. Performing maintenance or servicing equipment
    b. An employee is required to remove or bypass a guard
    c. An employee is required to place any part of his/her body into an area of a machine or equipment where work is performed upon the material being processed (point of operation) or where a danger zone exists during the machine's operating cycle.
3. Lockout/Tagout Exceptions:
    a. When making minor tool changes and adjustments, and other minor servicing activities, which take place during normal operations.
        i. These activities must be routine, repetitive, and integral to the use of the equipment. However, this work must be performed using alternate measures to provide effective employee protection such as machine guarding.
    b. When working on cord and plug connected electrical equipment, which the exposure to a hazard is the unexpected startup of the equipment.
        i. That hazard will be controlled by unplugging the equipment from its energy source.
        ii. The plug must be under the control of the employee performing the maintenance on the machine.

C. Terminology

Lockout

Lockout is placing a lockout device on an energy-isolating device according to an established procedure after an energy source has been relieved. The lockout device insures accidental re-energizing does not occur.

Lockout Device

Lockout device is a device that utilizes a lock, either key or combination, to hold an energy isolating device in a safe position. If an energy source cannot be locked out, a Tagout system shall be utilized.

Tagout

Tagout is placing a tag on an energy source according to an established procedure. The tag is only a warning device indicating that the equipment must not be operated until the tags have been removed by the authorized employee. Tags do not provide the same level of protection that locks do. When only Tagout procedure is used, additional safety precautions must be taken — removing of a fuse or a valve control handle.

Tagout Device

A Tagout device is a weather and chemical resistant warning tag standardized in size and color with wording warning of hazardous energy. Examples would be “Do Not Start”, Do Not Open”, Do Not Close”, “Do Not Energize”, and “Do Not Operate”.

Qualified Employee

A Qualified [Electrical] employee is defined by 29 CFR 1910.399 as An employee “who has received training in and has demonstrated skills and knowledge in the construction and operation of electric equipment and installations and the hazards involved.” Qualified Employees will be trained in the following:

i. The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment.

ii. The skills and techniques necessary to determine the nominal voltage of exposed live parts.

iii. The clearance distances specified in 29 CFR 1910.333(c) and the corresponding voltages to which the qualified person will be exposed.

Affected Employee

An Affected employee is defined by 29 CFR 1910.1747 as-”An employee who is required to use machines or equipment on which servicing is performed under the Lockout/Tagout standard or who performs other job responsibilities in an area where such servicing is performed.” Affected Employees will be trained in the following:

i. The purpose of Lockout/Tagout procedures

ii. The use of Lockout/Tagout procedures

Authorized Employee

An Authorized employee is defined by 29 CFR 1910.1747 as-”An employee who locks or tags machines or equipment in order to perform servicing or maintenance.” Authorized Employees will be trained in the above Affected Employee training program along with the following:

i. Recognition of applicable hazardous energy sources

ii. Type and magnitude of the energy available in the workplace

iii. Methods and means necessary for energy isolation and control

D. Rules for Lockout/Tagout

1. General

   a. A machine shut down for repair, cleaning, or inspection must have all power switched and locked in the “OFF” position by each employee working on that equipment.

   b. If the equipment cannot be locked out, utilize a tagout system.

      Note: After January 1990, whenever replacement or major repair, renovation or modification of a machine or equipment is performed, and whenever new machines or equipment are installed, energy isolating devices for such machine or equipment shall be designed to accept a lockout device.

   c. If an employee will be exposed to the servicing or maintenance activities of an outside contractor/repair personnel, the employee must be informed of and comply with the contractor’s/repair personnel’s energy control procedures. The outside personnel must also be informed and given a copy of our Lockout/Tagout program and will use these procedures if they do not have their own.

2. Locks and Tags

   a. Lockout devices and tagout devices shall be singularly identified; shall be the only devices(s) used for controlling energy, and shall not be used for other purposes.

   b. Lockout and tagout devices shall be capable of withstanding the environment to which they are exposed for the maximum period of time that exposure is expected.

   c. Tagout devices shall be constructed and printed so that exposure to weather conditions or wet and damp locations will not cause the tag to deteriorate or the message on the tag to become illegible.

   d. Tags shall not deteriorate when used in corrosive environments such as areas where acid and alkali chemicals are handled and stored.

   e. Lockout and tagout devices shall be standardized within the facility in at least one of the following criteria: Color; shape; or size; and additionally, in the case of tagout devices, print and format shall be standardized.

   f. Lockout devices shall be substantial enough to prevent removal without the use of excessive force or unusual techniques, such as with the use of bolt cutters or other metal cutting tools.

   g. Tagout devices, including their means of attachment, shall be substantial enough to prevent inadvertent or accidental removal. Tagout device attachment means shall be of a non-reusable type, attachable by hand, self-locking, and non-releasable with a minimum unlocking strength of no less than 50 pounds and having the general design and basic characteristics of being at least equivalent to a one-piece, all environment-tolerant nylon cable tie.

   h. Lockout devices and tagout devices shall indicate the identity of the employee applying the device(s).

   i. Tagout devices shall warn against hazardous conditions if the machine or equipment is energized and shall include a legend such as the following: Do Not Start. Do Not Open. Do Not Close. Do Not Energize. Do Not Operate.

E. Mechanical Lockout/Tagout Procedure

Before servicing or performing maintenance on machinery or equipment, the authorized employee must follow this written procedure.

1. Preparation for Shutdown

a. Notify affected employee that Lockout/Tagout procedures are going to be used and the reason for procedure use.

b. The authorized employee will know the type(s) and magnitude(s) of energy; the hazards of the energy; and the method(s) to control the energy. If the authorized employee is uncertain of any of this information, the employee must review the energy control procedure for that piece of machinery or equipment.

c. Shut down the machine or equipment by normal stopping procedures (depress stop button, open toggle switch, etc.).

d. Tagout cannot be used if the machine or equipment is capable of being locked out. If the lockout is not possible, a tag must be securely fastened to each energy-isolating device to indicate that the machine or equipment may not be operated until the tag is removed. The employee who attaches the tag must verify that the machine or equipment has been turned off before starting work.

e. If Tagout is used, additional methods of preventing accidental energizing must be used if feasible (removal of an isolating circuit element, blocking of a controlling switch, opening of an extra disconnecting device, removal of valve handle).

2. Applying Lockout/Tagout

a. Apply locks and tags to each energy-isolating device, isolating energy sources. Tags must note the employee's name and the service date. Each employee must install a lock and tag on the equipment to be serviced.

b. All stored and residual energy must be relieved, disconnected, restrained, and otherwise rendered safe.

c. Verify that the main disconnect or circuit breaker cannot be moved. Press all start buttons and activating controls on equipment to make sure all power is disconnected.

d. If it is possible that stored energy will re-accumulate to a hazardous level, the authorized employee will repeat the certification process until servicing or maintenance is completed.

3. Perform Work

a. Avoid tasks that could reactivate the equipment.

b. Do not bypass locks or tags when putting in new piping or wiring.

4. Removing Lockout/Tagout

a. Remove all tools from the work area, reattach guards taken off, and make sure the machine or equipment is safe to operate.

b. Inform all affected employees that lock(s) and tag(s) are being removed. Check to ensure all Employees are safely positioned or removed from the area.

c. Verify controls are in neutral.

d. Remove lock(s) and tag(s) and re-energize equipment.

e. Notify affected employees that the servicing is completed and the machine or equipment is ready for use.

F. Electrical Lockout/Tagout Procedures

All mechanical Lockout/Tagout procedures still apply plus the following

1. Preparation for Shutdown

a. Notify affected employee that Lockout/Tagout procedures are going to be used and the reason for procedure use.

b. The authorized employee will know the type(s) and magnitude(s) of energy; the hazards of the energy; and the method(s) to control the energy. If the authorized employee is uncertain of any of this information, the employee must review the energy control procedure for that piece of machinery or equipment.

c. Shut down the machine or equipment by normal stopping procedures (depress stop button, open toggle switch, etc.).

d. Tagout cannot be used if the machine or equipment is capable of being locked out. If the lockout is not possible, a tag must be securely fastened to each energy-isolating device to indicate that the machine or equipment may not be operated until the tag is removed. The employee who attaches the tag must verify that the machine or equipment has been turned off before starting work.

e. If Tagout is used, additional methods of preventing accidental energizing must be used if feasible (removal of an isolating circuit element, blocking of a controlling switch, opening of an extra disconnecting device, removal of valve handle).

2. Shutdown of Machines or Equipment

   a. All sources of energy must be completely disconnected, including auxiliary power supplies (batteries, generators, etc.). Also dissipate any stored energy present (capacitors).

   b. Push button selector switches, interlocks, and other control devices may not be used as the sole means for isolating energy.

   c. Clear the work area of all unqualified personnel.

3. Applying Lockout/Tagout

   a. Lockout/Tagout every point where the equipment could be re-energized.

   b. If a lock cannot be used, use a tag, providing at least one safety precaution equivalent to a lock (removal of fuses, blocking switches, and removal of circuit breakers.)

   c. A qualified employee must verify that equipment is inoperable by attempting to restart it using equipment's on/off controls or by using test equipment (voltmeters, circuit testers, etc.).

4. Perform Work

   a. Avoid tasks that could reactivate the equipment.

   b. Do not bypass locks or tags when putting in new piping or wiring.

5. Removing Lockout/Tagout

   a. After electrical work is completed and before re-energizing equipment, a qualified employee must conduct tests, using test equipment, and make visual inspection to verify the following:

      i. That work is completed properly

      ii. That there are no shorts or grounds

      iii. That all tools, electrical jumpers and other such devices have been removed, so that the equipment may safely re-energized.

   b. Only the worker who applies the lock/tag is permitted to remove it. In an emergency, locks may be removed with the consent of a supervisor. The Supervisor must then inform the worker that the lock was removed before the worker comes back to work.

   c. After Lockout/Tagout is removed a qualified employee must conduct a thorough safety inspection of the work area, warn others to stay clear, and then energize the machine according to the prescribed sequence under the proper Lockout/Tagout procedures.

G. Special Situations

1. Temporarily reactivating machinery/equipment

   When reactivating equipment, you must remove unnecessary tools from the work area, make sure personnel is clear of equipment, remove lock(s)/tag(s), and energize & proceed with testing. As soon as energy is not needed, isolate equipment and reapply lock(s)/tag(s) following Applying Lockout/Tagout sequence (step 6-9).

2. Servicing by outside contractors/repair personnel

   If an employee will be exposed to the servicing or maintenance activities of an outside contractor or repair personnel, the employee must be informed of and comply with the outside contractor's/repair personnel's energy control procedures. The outside personnel must also be informed and given a copy of the company's Lockout/Tagout Program and will use these procedures if they do not have their own.

3. Group Lockout/Tagout Procedures

   If more than one person is servicing or maintaining a piece of equipment, each authorized employee will place a lock and tag on each energy-isolating device.

   a. A hasp will be used if the energy-isolating device cannot accept multiple locks and tags.

   b. The department supervisor will be responsible for ensuring compliance.

H. Shift Changes/Servicing lasting more than one shift

1. During shift or personnel changes, the departing employee servicing the equipment must notify the supervisor of such change.

   a. Only the person who applies the lock tag is permitted to remove it. In emergencies, locks may be removed with the consent of a Supervisor. The supervisor must then inform the worker that the lock/tag was removed and the reason for removal before that worker goes back to work.

2. The incoming employee will follow steps for Preparation for Shutdown and Applying Lockout/Tagout of the Lockout/Tagout procedure as outlined in sections E. 1-2 and/or F. 1-3 of this Special Emphasis Program.

   a. This must be done BEFORE the departing employee removes their lock and BEFORE incoming employee performs any work.

3. The departing employee will follow the Removing Lockout/Tagout sequence of the Lockout/Tagout procedure as outlined in sections E. 4 and/or F. 5 of this Special Emphasis Program.

   a. This must be done only AFTER the incoming employee has applied their lock

I. Compliance

1. Regulations

   a. All Employees are required to comply with the restrictions and limitations imposed upon them during the use of Lockout/Tagout. Non-compliance would be considered a serious violation in the discipline system.

   b. The authorized employees are required to perform the Lockout/Tagout in accordance with this procedure.

   c. In no case shall any employee remove another employee's Lockout/Tagout device.

d. All employees, upon observing a machine or piece of equipment which is locked out or tagged out to perform servicing or maintenance shall not attempt to start, energize, or use that machine or equipment.

2. Verification/Inspection

a. We shall conduct a periodic inspection of this energy control procedure at least annually to ensure that the procedure and the requirements of the Standard are being followed.

b. An authorized employee other than the one(s) utilizing the energy control procedure being inspected shall perform the periodic inspection.

c. The periodic inspection shall be conducted to correct any deviations or inadequacies identified.

d. Where Lockout is used for energy control, the periodic inspection shall include a review between the inspector and each authorized employee of that employee's responsibilities under the energy control procedure being inspected.

e. Where Tagout is used for energy control, the periodic inspection shall include a review between the inspector and each authorized and affected employee of that employee's responsibilities under the energy control procedure being inspected and the elements set forth in Section "Training and Communication" of this Plan.

J. Training & Communication

1. Training

We shall provide training to ensure that the purpose and function of the energy control program are understood by all Employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The training shall include the following:

2. Each authorized employee shall receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.

3. Each affected employee shall be instructed in the purpose and use of the energy control procedure.

4. All other Employees whose work operations are or may be in an area where energy control procedures may be utilized, shall be instructed about the procedure and about the prohibition relating to attempts to restart or re-energize machines or equipment which are locked out or tagged out.

5. Where Tagout systems are used, employees shall be trained in the following limitations of tags:

a. Tags are essentially warning devices affixed to energy isolating devices and do not provide the physical restraint on those devices that is provided by lock.

b. When a tag is attached to an energy isolating means, it is not to be removed without authorization of the authorized person responsible for it, and it is never to be bypassed, ignored, or otherwise defeated.

c. Tags must be legible and understandable by all authorized employees, affected employees, and all other employees whose work operations are or may be in the area in order to be effective.

d. Tags and their means of attachment must be made of materials, which will withstand the environmental conditions encountered in the workplace.

e. Tags may evoke a false sense of security and their meaning needs to be understood as part of the overall energy control program.

f. Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.

6. Retraining

a. Retraining shall be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard, or when there is a change in the energy control procedure.

b. Additional retraining shall be conducted whenever a periodic inspection under Section “Compliance with Program” of this Plan reveals, or whenever our company has reason to believe, that there are deviations from, or inadequacies in the employee’s knowledge, or use of the energy control procedures.

c. The training shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary.

Requested Program – **Personal Protective Equipment (PPE) (29 CFR 1926.28)**

A. Introduction

This written program documents steps IMPACT Strategies has taken to minimize injury resulting from various occupational hazards present at our construction sites by protecting workers through the use of PPE when the hazards cannot be eliminated.

The Project Superintendent is the program coordinator, acting as the representative of IMPACT Strategies, who has overall responsibility for the program and will monitor employee use of PPE.

B. Purpose

The basic element of any PPE program is an in depth evaluation of the equipment needed to protect against the hazards at the workplace. Two basic objectives of any PPE program shall be to protect the wearer from incorrect use and/or malfunction of PPE. The purpose of this Personal Protective Equipment (PPE) Program is hazard assessment, to put protective measures in place, and to establish PPE use at this company. PPE devices are not to be relied on as the only means to provide protection against hazards, but are used in conjunction with guards, engineering controls, and sound manufacturing practices. If possible, hazards will be abated first through engineering controls, with PPE to provide protection against hazards which cannot reasonably be abated otherwise.

C. Hazard Assessment

In order to assess the need for PPE the following steps are taken:

1. Project Superintendent, with other appropriate employees identifies job classifications where exposures occur or could occur.
2. The Project Superintendent surveys the workplace areas where hazards exist or may exist to identify sources of hazards to employees. They consider these basic hazard categories:
    - Impact
    - Heat
    - Penetration
    - Harmful dust
    - Compression (roll over)
    - Light (optical) radiation
    - Chemical

    a. During the survey the Project Superintendent observes and records the following hazards along with PPE currently in use.
        i. Sources of motion; i.e., machinery or processes where any movement of tools, machine elements or particles could exist, or movement of personnel that could result in collision with stationary objects.
        ii. Sources of high temperatures that could result in burns, eye injury or ignition of protective equipment, etc.
        iii. Chemical exposures
        iv. Sources of harmful dust.
        v. Sources of light radiation, i.e., welding, brazing, cutting, furnaces, heat treating, high intensity lights, etc.
        vi. Sources of falling objects or potential for dropping objects.
        vii. Sources of sharp objects which might pierce the feet or cut the hands.
        viii. Sources of rolling or pinching objects which could crush the feet.

ix. Layout of workplace and location of coworkers.

x. Electrical hazards.

b. Following the survey, the Project Superintendent organizes the data and information for use in the assessment of hazards to analyze the hazards and enable proper selection of protective equipment.

D. Selection Guidelines

Once any hazards have been identified and evaluated through hazard assessment, the general procedure for selecting protective equipment is to:

1. Become familiar with the potential hazards and the type of protective equipment (PPE) that are available, and what they can do.
2. Compare types of equipment to the hazards associated with the environment.
3. Select the PPE which ensures a level of protection greater than the minimum required to protect employees from the hazards.
4. Fit the user with proper, comfortable, well-fitting protection and instruct employees on care and use of the PPE. It is very important that the users are aware of all warning labels for and limitations of their PPE. (See the Employee Training guidelines outlined in the next section of this program for a more detailed description of training procedures.)
5. It is the responsibility of the Project Superintendent to reassess the workplace hazard situation as necessary, to identify and evaluate new equipment and processes, to review accident records, and reevaluate the suitability of previously selected PPE. This reassessment will take place as needed. Elements which shall be considered in the reassessment include:
   a. Adequacy of PPE program
   b. Accidents and illness experience
   c. Levels of exposure (this implies appropriate exposure monitoring)
   d. Adequacy of equipment selection
   e. Number of person hours that workers wear various protective ensembles
   f. Adequacy of training/fitting of PPE
   g. The adequacy of program records
   h. Recommendation for program improvement and modification
   i. Coordination with overall safety and health program

E. Employee Training

1. The Project Superintendent or designee provides training for each employee who is required to use personal protective equipment, to include:
   a. When PPE is necessary
   b. What PPE is necessary
   c. How to wear assigned PPE
   d. Limitations of PPE
   e. The proper care, maintenance, useful life, and disposal of assigned PPE
2. Employees must demonstrate an understanding of the training and the ability to use the PPE properly before they are allowed to perform work requiring the use of the equipment.

3. Employees are prohibited from performing work without donning appropriate PPE to protect them from the hazards they will encounter in the course of that work.
4. If the Project Superintendent has reason to believe an employee does not have the understanding or skill required, the employer must retrain the employee.
5. Because failure to comply with company policy concerning PPE can result in OSHA citations and fines as well as employee injury, an employee who does not comply with this program will be disciplined for noncompliance according to the following schedule:
    a. Verbal warning for the first offense accompanied by retraining
    b. Written reprimand for the second offense which goes in the employee's permanent record
    c. Suspension without pay for a third offense and documentation in the permanent record
    d. Dismissal as a last resort.

F. Cleaning and Maintenance

It is important that all PPE provided be kept clean, properly used and maintained in a sanitary and reliable condition by the employee to whom it is assigned. Cleaning is particularly important for eye and face protection where dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned, and maintained by employees at regular intervals as part of their normal job duties so that the PPE provides the requisite protection. Supervisors are responsible for ensuring compliance with cleaning responsibilities by employees. If PPE is for general use, the employee has responsibility for cleaning and maintenance. If a piece of PPE is in need of repair or replacement it is the responsibility of the employee to bring it to the immediate attention of his or her supervisor or the Project Superintendent. It is against work rules to use PPE that is in disrepair or not able to perform its intended function. Contaminated PPE which cannot be decontaminated is disposed of in a manner that protects employees from exposure to hazards.

G. PPE Specific Information

1. Eye and face protection -- Goggles and face shields
    a. It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved goggles/face shields to help prevent eye and face injuries, including those resulting from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or light radiation, for example.
    b. Employees from temporary work agencies and contractors/subcontractors are required to wear goggles/face shields if assigned to work in the designated work areas requiring PPE.
    c. All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.
    d. All employees who work in designated work areas and/or job assignments are responsible for wearing company provided goggles/face shields to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.
    e. All employees required to wear goggles/face shields must routinely inspect and properly care for their goggles/face shields.
2. Foot Protection-Safety Shoes
    a. It is the policy of the company that as a condition of employment all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or

job assignments are required to wear safety shoes to help prevent foot injuries, ankle injuries, slips, and falls.

b. Employees from temporary work agencies and contractors/subcontractors are required to wear safety shoes if assigned to work in the designated work areas. It is the responsibility of the agency and/or contractor to ensure the employee reports to his/her temporary assignment at this company wearing approved safety shoes.

c. All employees who work in designated work areas and/or job assignments are responsible for purchasing and wearing safety shoes to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

d. Personnel are responsible for informing new employees who are assigned to the designated work areas of the safety shoe policy and the procedures for obtaining them. The new employee is responsible for reporting to his/her first day of work wearing approved safety shoes.

3. Hand Protection -- Gloves

a. It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear gloves to help prevent hand injuries, including cuts, burns, chemical exposure, for example.

b. Employees from temporary work agencies and contractors are required to wear protective gloves if assigned to work in the designated work areas.

c. All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

d. All employees who work in designated work areas and/or job assignments are responsible for wearing company provided gloves to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

e. All employees required to wear protective gloves must routinely inspect and properly care for their assigned gloves (if the gloves are not disposable).

4. Head protection -- Hard hats

a. It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear ANSI approved hard hats to help prevent head injuries, including those resulting from falling objects, bumping the head against a fixed object, or electrical shock.

b. Employees from temporary work agencies and contractors are required to wear hard hats if assigned to work in the designated work areas.

c. All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

d. All employees who work in designated work areas and/or job assignments are responsible for wearing hard hats to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

e. All employees required to wear hard hats must routinely inspect and properly care for their hard hats.

5. High Visibility Clothing

Appropriate warning vests or other suitable garments marked with or made of reflectorized or high-visibility material

a. It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or

job assignments are required to wear high visibility clothing to help prevent injuries due to being struck by equipment.

b. Employees from temporary work agencies and contractors are required to wear high visibility clothing if assigned to work in the designated work areas.

c. All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

d. All employees who work in designated work areas and/or job assignments are responsible for wearing high visibility clothing to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

e. All employees required to wear high visibility clothing must routinely inspect and properly care for their high visibility clothing.

6. Ear protection

a. It is the policy of the company that as a condition of employment, all regular full time, part time, subcontractors, and temporary employees working in designated work areas and/or job assignments are required to wear hearing protection when required.

b. Employees from temporary work agencies and contractors are required to wear hearing protection if assigned to work in the designated work areas.

c. All supervisors and managers are responsible for ensuring employees under their charge are in compliance with this policy.

d. All employees who work in designated work areas and/or job assignments are responsible for wearing hearing protection to comply with this policy. Failure to comply will result in disciplinary action up to and including discharge.

e. All employees required to wear hearing protection must routinely inspect and properly care for their hearing protection.

H. Employee Owned Equipment

When applicable, the Project Superintendent will be responsible for the assurance of PPE adequacy, maintenance, and sanitation.

Requested Program – **Scaffolding & Aerial Lifts (29 CFR 1926.450)**

A. Introduction

The purpose in IMPACT Strategies issuing these procedures is to further ensure a safe workplace based on the following formal, written procedures for scaffold work. These procedures will be reviewed and updated as needed to comply with new OSHA regulations, new best practices in scaffolding, and as business practices demand. The Project Superintendent is the plan coordinator/manager and is responsible for its implementation.

Copies of the written program may be obtained from the written Safety and Health manual or at our corporate offices. This written plan covers our various construction sites.

B. Scaffolding

The following general procedures apply to all scaffold and aerial lift operations for our company.

1. Capacity

   Taking into account the OSHA rules we must apply and the engineering/manufacturing requirements of our scaffolds, the following rules apply.

   a. Each scaffold and scaffold component we use will support, without failure, its own weight and at least four times the maximum intended load applied or transmitted to it.

2. Platform Construction

   This section documents the procedures and safety requirements we use to construct our scaffold platforms.

   a. Each scaffold plank will be installed so that the space between adjacent planks and the space between the platform and uprights is no more than one inch wide. If, in certain situations, we need to make this space wider, we will attach our demonstration in the appendix to this plan.

   b. Except for outrigger scaffolds (3 inches) and plastering and lathing operations (18 inches), the front edge of all platforms will not be more than 14 inches from the face of the work, unless we have a guardrail or personal fall arrest system in place that meets regulations.

   c. The following additional construction and safety information is included depending on the type of scaffold being erected.

      i. Supported Scaffolds

         (1.) Supported scaffolds with a height to base width ratio of more than four to one (4:1) must be restrained from tipping by guying, tying, bracing, or equivalent means.

         (2.) Supported scaffold poles, legs, posts, frames, and uprights will always bear on base plates and mud sills or other adequate firm foundations.

3. Gaining Access to Scaffolds

   We know that getting to the working platform is critical to the safety of our employees. This section outlines the mechanical requirements for gaining access to scaffold platforms such as:

   - Ladders,
   - Ramps and walkways,
   - Stair rails, and
   - Direct access from another scaffold.

   a. Portable, hook-on, and attachable ladders will be positioned so as not to tip the scaffold.

b. All stair rail systems and handrails will be surfaced to prevent injury to our employees from punctures or lacerations, and to prevent snagging of their clothes.

4. Fall Protection Plan

   Fall protection planning is critical to the safety and well-being of our employees. Our fall protection plan follows the OSHA requirements which are different depending on the type of scaffold we are using.

   Fall protection will be provided for any employee on a scaffold more than 10 feet above a lower level.

   This fall protection plan for our working employees is for the various types of scaffolds that we may encounter in the workplace: Self-contained adjustable scaffold supported by the frame structure-We will protect each employee on our self-contained, frame structure supported, adjustable scaffolds by a guardrail system or a Personal Fall Arrest System (PFAS).

   a. The guardrail system:

      i. Has a minimum 200 pound toprail capacity.

      ii. Will be installed before being released for use by our employees.

   b. Personal Fall Arrest System

      i. Will be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.

5. Falling Object Protection

   All employees must wear hardhats when working on, assembling, or dismantling scaffolds. This is our primary protection from falling objects. Additionally, we will:

   a. Install all guardrail systems with openings small enough to prevent passage of potential falling objects.

   b. Prevent tools, materials, or equipment that inadvertently fell from our scaffolds from striking employees by barricading the area below the scaffold.

6. Using Scaffolds

   Site preparation, scaffold erection, fall protection, and gaining access to the working platform is only part of the requirements for scaffold work. While this all takes concentration and safe work practices, the most dangerous time can be when employees are concentrating on their work and not particularly aware of the hazards of working from scaffolds. It is critical that employees who use scaffolds be trained, among other things, in the recognition of the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. Our competent person will inspect all scaffolds and scaffold components for visible defects before each work shift, and after any occurrence which could affect a scaffold's structural integrity. However, in addition to that, all users of scaffolds in this company will know and understand the following safety rules:

   a. Scaffolds and scaffold components will never be loaded in excess of their maximum intended loads or rated capacities.

   b. Debris must not be allowed to accumulate on platforms.

7. Specific Procedures

   In addition to the general procedures in this written safety plan, there are procedures that apply to specific types of scaffolds. The safety rules for these specific types of scaffolds are found in1926.452.

   a. Prohibited Practices

      The following practices will never be tolerated in this company:

i. Scaffold components manufactured by different manufacturers will never be intermixed unless the components fit together without force and the scaffold's structural integrity is maintained.

ii. Unstable objects will never be used to support scaffolds or platform units. Footings must be level, sound, rigid, and capable of supporting the loaded scaffold without settling or displacement.

iii. Cross braces will never be used as a means of access.

iv. The use of shore or lean-to scaffolds is prohibited.

C. Aerial Lifts

1. Safety Rules

a. Anytime aerial lifts, including: (1) extensible boom platforms, (2) aerial ladders, (3) articulating boom platforms, (4) vertical towers, or (5) a combination of any such devices, are used to elevate employees to job-sites above ground, the following safety rules will apply:

i. Only authorized persons shall operate an aerial lift.

ii. Employees shall always stand firmly on the floor of the basket, and shall not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position.

iii. Approved fall protection shall be worn and a lanyard attached to a lanyard anchoring point when working from an aerial lift.

iv. Boom and basket load limits specified by the manufacturer shall not be exceeded.

v. For electrical lines rated 50 kV or below, a minimum clearance between the lines and any part of the aerial lift, employee, tools/equipment, or load shall be 10 feet. For lines greater than 50 kV, our competent person will determine clearance distances using the rule of 4” additional clearance or every 10 kV greater than 50 kV.

vi. Lift controls shall be tested each day prior to use to determine that such controls are in safe working condition. Tests shall be made at the beginning of each shift during which the equipment is to be used to determine that the brakes and operating systems are in proper working condition.

vii. All aerial lifts shall have a reverse signal alarm audible above the surrounding noise level or the vehicle is backed up only when an observer signals that it is safe to do so.

viii. No aerial lift this company owns or uses will be 'field modified' for uses other than those intended by the manufacturer unless:

(1.) The manufacturer certifies the modification in writing, or

(2.) Any other equivalent entity, such as a nationally recognized testing lab, certifies the aerial lift modification conforms to all applicable provisions of ANSI A92.2-1969, and the OSHA rules at 1926.453. The lift must be at least as safe as the equipment was before modification.

D. Extensible and articulating boom platforms:

1. Safety Rules

a. We will test lift controls each day prior to use to determine they are in safe working condition.

b. Only authorized employees can operate an aerial lift.

c. A full body harness must be worn and a lanyard attached to the boom or basket when working from an aerial lift.

E. Duties of Competent and Qualified Persons

When working with scaffolds in this company there are some tasks that must be done by our competent or a qualified person.

1. Definition

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

b. Qualified person-One who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, has successfully demonstrated his/her ability to solve or resolve problems related to the subject matter, the work, or the project.

2. Duties of a Competent Person:

a. We will not intermix scaffold components manufactured by different manufacturers unless the components fit together without force and the scaffold's structural integrity is maintained. Scaffold components manufactured by different manufacturers will not be modified in order to intermix them unless our competent person determines the resulting scaffold is structurally sound.

b. Scaffolds will be erected, moved, dismantled, or altered only under the supervision and direction of a competent person.

3. Duties of a Qualified Person:

a. The following tasks will only be done by the person we have deemed competent or qualified to perform

b. Scaffolds must be designed by a qualified person and shall be constructed and loaded in accordance with that design.

c. Swaged attachments or spliced eyes on wire suspension ropes of suspension scaffolds will not be used unless they are made by the wire rope manufacturer or a qualified person.

d. We will have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards.

e. If any unsafe condition is noted which might impact the ability of the scaffolding system to safely perform its intended functions and protect personnel, the scaffolding system will be immediately tagged at all access points, "Danger: Do Not Use" These tags shall be designed in accordance with specifications detailed in 29 CFR 1910.145 & 1926.200. These tags are commercially available through Labelmaster as Product number HT-117 by calling 1-800-621 -5808.

f. Implement the company’s disciplinary plan in accordance with our corporate policies and procedures program when requirements of this program are not met or unqualified individuals alter, dismantle, or erect our scaffolding systems.

F. Training

Recognizing the need for training, the following syllabus is a part of this written safety plan.

1. Employees Who Use Scaffolds.

   Our employees who perform work on scaffolds will be trained by a qualified person to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training will include the following areas as applicable:

   a. The nature of and the correct procedures for dealing with electrical hazards.
   b. The nature of and the correct procedures for erecting, maintaining, and disassembling the fall protection and falling object protection systems used.
   c. The proper use of the scaffold, and the proper handling of materials on the scaffold.
   d. The maximum intended load and the load-carrying capacities of the scaffolds used.
   e. Any other pertinent requirements of the OSHA rules.

2. Employees Who Erect, Disassemble, Move, Operate, Repair, Maintain, or Inspect Scaffolds:

   Our employees who erect, disassemble, move, operate, repair, maintain, or inspect scaffolds will be trained by our competent person to recognize the hazards associated with the work being done. The training will include the following topics as applicable:

   a. The nature of scaffold hazards.
   b. The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in question.
   c. The design criteria, maximum intended load-carrying capacity, and intended use of the scaffold.
   d. Any other pertinent requirements of this subpart.

3. Employees Who Need Retraining:

   When we have reason to believe that one of our employees lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, we will retrain the employee so that the requisite proficiency is regained. Retraining will be done in at least the following situations:

   a. Where changes at the worksite present a hazard about which the employee has not been previously trained.
   b. Where changes in the types of scaffolds, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been previously trained.
   c. Where inadequacies in an affected employee's work involving scaffolds indicate that the employee has not retained the requisite proficiency.

Requested Program – **Vehicle & Driving Safety**

A. Purpose

At IMPACT Strategies, an important aspect of our Safety and Loss Prevention Program involves motor vehicle accident prevention and safety. The operation of motor vehicles is essential in conducting company business. Motor vehicle use exposes each of us to accident, injury, and life-threatening hazards. Vehicular collisions are potentially the costliest losses we can incur when the summation of property damage, bodily injury, fatalities, and liability suits is considered. This program is designed to reduce our potential for motor vehicle accidents as much as possible.

The purpose of this program is to define responsibilities and procedures to be followed in order to establish and administer an effective Motor Vehicle Operator Safety Program and effectively reduce the risk of motor vehicle accidents.

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of the vehicle safety program with IMPACT Strategies.

B. Program Objectives

1. Establish firm internal requirements for personnel who operate motor vehicles.
2. Enforce compliance through progressive disciplinary action and ensure that employees show a continuing regard for safe driving practices.
3. Insist that assigned vehicles are maintained adequately for safe operation.
4. Establish and implement a vehicle inspection program to check for safety discrepancies, malfunctions, signs of abuse, and unreported damage; repairs/issues as soon as possible.
5. Fully support driver training programs and promote defensive driving.
6. Review each vehicle collision and unsafe driving report with the employee and direct supervisor to determine means of preventing a recurrence.
7. Require the use of seatbelts at all times, with no exceptions.
8. Enforce a cell phone policy while driving company vehicles.

C. Responsibilities

It is the responsibility of the motor vehicle operator to follow defensive driving practices to help protect the driver, other employees, and the public from accident/injury.

1. Safety Director
    a. The Safety Director is responsible for developing and maintaining the program and related procedures.
    b. These procedures are kept in the offices of IMPACT Strategies.
2. Superintendent

    Responsible for the implementation and maintenance of the program for their site and ensuring all assets are made available for compliance with the plan.
3. Employees
    a. All shall be familiar with this procedure and the local workplace vehicle safety program.
    b. Follow all requirements, report unsafe conditions, and follow all posted requirements.

D. Company Vehicle Limitations

1. Company vehicles may be used for company business only, unless prior permission is obtained.
2. Employees are not to perform repairs or maintenance on company vehicles, other than routine fluid additions.

E. Driving Safety

1. Operators of company on or off-road vehicles shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.
2. Only authorized employees will drive a motor vehicle in the course of work or operate a company owned vehicle.
3. Drivers shall have three (3) years of driving experience on the vehicle he/she is licensed to drive regularly.
4. No passengers shall be on trucks used to deliver goods.
5. Backing is prohibited whenever practicable. Where backing is required, drivers, when parking, shall make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.
6. Drivers must have either a reversing alarm, use a spotter or walk around the truck/trailer prior to backing.
7. Passenger compartments are to be free from loose objects that might endanger passengers in the event of an incident.
8. Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer and maintained in safe working order.
9. Signs, stickers or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

F. Safe Driving Practices

1. Obey all federal and local driving laws or regulations as well as requirements of customer.
2. Immediately report to Safety Director any citation, warning, traffic violation, collision, vehicle damage or near miss associated with company or customer vehicle operation or while driving on company time.
3. Immediately report any restriction or change to driving privileges to the Safety Director.
4. Seat belts shall always be worn by all occupants whenever the vehicle is in motion; only seats fitted with three-point inertia-reel type seatbelts shall be used.
5. Be a defensive driver, someone who continually assesses conditions and hazards and remains prepared for any challenge that may approach them.
6. When speaking with a passenger, always keep your eyes on the road.
7. Keep both hands on the wheel.
8. No use of cell phones or other electronic devices while driving any vehicle unless using a hands-free device. See Vehicle & Driving Safety Cell Phone Policy. New employees who are to operate company vehicles are required to read and sign this acknowledgement form, which will be kept in the employee's personnel file.

9. Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving.
10. All loads shall be secure and shall not exceed the manufacturer's specifications and legal limits for the vehicle.
11. Vehicles shall only be operated for their intended use.
12. Drive for conditions, not just the speed limit.
13. Alcohol or illegal drugs are not allowed in a company or leased vehicle at anytime.
14. Drivers shall not operate a motor vehicle while under the influence of alcohol, illegal drugs, prescription or over the counter medications that might impair driving skills.

G. Pre-Departure Safety Check

1. Perform 360 walk around – report new damage.
2. Check windshield for cracks that could interfere with vision.
3. Inspect for vehicle damage and immediately report any damage to the Safety Director if not previously observed.
4. Make sure dirt or snow is removed from lights on all sides of the vehicle.
5. Brush or clean off snow or ice on all windows to ensure complete vision.
6. Check fuel level to be certain the destination can be reached.
7. Check to ensure the license plates and inspection tag on vehicle are current.
8. Ensure that there is a first aid kit and inspected fire extinguisher in the company vehicle.
9. Ensure driver is rested and alert for driving.

H. Vehicle Inspection

Vehicles must be inspected on a regular basis. The inspection shall include but not limited to:

1. **Lights** – clean and operating (front and rear); includes brake lights and turn signals
2. **Essential Fluids** – crankcase oil, transmission fluid, coolant, battery level, windshield wiper fluid and brake fluid
3. **Windshield Wipers** – replace worn out wipers
4. **Windshield and Windows** – cracked and broken glass must be reported and replaced immediately. Defrosters must be working properly and glass must be clean, inside and out
5. **Tires** – must be properly inflated with no obvious defects
6. **Brakes** – must be working at all times – vehicles with defective brakes must not be driven
7. **Mirrors** – must be clean and properly adjusted
8. **Vehicle Loading** – tools, equipment and materials must be properly secured for safe hauling
9. **General Vehicle Condition** – dents, scrapes or any other damage must be reported immediately
10. **Emergency Equipment** – vehicle must contain a fully charged fire extinguisher with current inspection tag and first aid kit

I. Vehicle Damage

The operator must immediately report any evidence of accident damage to the Safety Director. It is the responsibility of the operator to immediately report any unsafe conditions to the Safety Director and request another vehicle or schedule repairs to be made immediately. Vehicles with steering or braking defects shall not be driven and must be towed to an authorized garage for repairs.

The operator must call appropriate law enforcement agencies to report all collisions and provide information to management as soon as possible. If involved in an accident, the operator must complete the vehicle accident report form contained in the Safety Manual within 24 hours of the accident and submit to the Safety Director. The operator must never allow an unauthorized passenger or drive to ride in or operate a company vehicle.

J. Vehicle Operation

1. The operator must possess a valid operator's license and adhere to all applicable state and local motor vehicle laws. Operators must never allow passengers to ride other than in the passenger compartment. It is strictly forbidden to operate a vehicle while under the influence of prescription or over-the-counter drugs that may impair driving skills. Use of alcohol and/or illegal drugs while operating a vehicle on company business will result in the immediate termination of the operator. See section 7-1 Substance Abuse Policy for more details.
2. The operator must always secure the vehicle and its equipment when unable to provide direct supervision. An operator must exercise good judgement and extreme caution when eating, drinking or smoking while operating a motor vehicle. Such activities should be avoided whenever they may increase risk of an accident. Use of cell phones while operating company vehicles is prohibited unless a hands-free device is used. See "Vehicle & Driving Safety Cell Phone Policy" for more details about this requirement.
3. Maintain a safe distance behind another moving vehicle, the two second rule should be followed. As the vehicle in front of you passes a landmark, count two seconds. If you don't pass the landmark before the two second count, you can assume that you are traveling at a safe distance behind the other vehicle.
4. Vehicles must never be overloaded. It is imperative to stay within the recommended weight limit of a vehicle. If you are unsure of the vehicle weight limit, reference vehicle manual.

K. Driver Requirements

1. All drivers must meet the minimum qualifications as set forth below:
    a. High school diploma or GED equivalent
    b. U.S. Citizen or permanent Visa
    c. Must be at least 21 years of age

d. Must have a vehicle driver's license for at least 3 years

e. Must have acceptable driving record (MVR)

f. Must be physically capable to perform the essential job functions

g. Must have no conviction of a felony

h. Must comply with all other applicable qualifications for employment established by regulation and by the company

2. License classification required by IMPACT Strategies in "Non-Classified Driver"

a. These drivers operate automobiles or pickup trucks primarily local but could be Inter or Intra State

- Personnel file must include:
  - Annual check of MVR
  - Copy of Driver's License or Certificate

L. Accident Reporting and Investigating

1. All drivers must be aware of the procedures to follow if they become involved in an accident in a company vehicle. As operators, they have the important role of making the initial accident report. The way one handles the accident scene can have a direct impact on any alleged liability for the company. The following is a general sequence of procedures for drivers at the scene of an accident in which operators are involved.

a. Stop the vehicle immediately and shut off the engine. Turn on the four-way flashers. Extinguish fires and do not smoke near the scene.

b. See that any injured people are cared for and call 9-1-1 to the scene if necessary

c. Protect the accident scene with warning reflectors; direct traffic around the accident scene, if necessary

d. Make sure police inspect the damage and notations are made of any bodily injury

e. Request statements from witnesses; be alert to comments made by occupants of other vehicles and take down remarks concerning admissions of guilt, defective condition of the other vehicle, extent of injuries and property damage

f. Collect information (in writing and photos) – be specific!

g. Make a diagram of the accident scene showing location of vehicles after the collision; use Accident Diagram in the Safety Manual section 10-27

h. Report the accident to the Safety Director immediately and get further instructions; the Safety Director will report the accident and any potential claims to the appropriate parties

2. Refer to the Vehicle & Driving Accident Check List (section 10-26) contained in the Safety Manual.

3. The Safety Director shall investigate and evaluate all motor vehicle accidents. An accident review shall be conducted in a manner consistent with the severity of the accident. If appropriate, progressive disciplinary action shall be taken.

Requested Program – **Voluntary Respirator Program (29 CFR 1910.134(c)(2))**

A. Purpose

This program is designed to protect employee health even though it has been determined that respirators are not required. This program is designed for compliance with OSHA Standard 29 CFR 1910.134(c)(2).

B. Policy

IMPACT Strategies encourages the use of respirators even when exposures are below the exposure limit, to provide an additional level of comfort and protection for our employees.

Respirators are an effective method of protection against designated hazards when properly selected and worn. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard. Respirators may be worn to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards.

C. Dust Masks

When worn voluntarily:

1. The company must:
    a. Determine that the masks themselves do not pose a hazard to workers
    b. Provide the information found in Appendix D to 1910.134 of OSHA's Respiratory Protection Standard ("Information for Employees Using Respirators When Not Required Under the Standard").
2. The company is not required to:
    a. Have a written respiratory protection program
    b. Determine medical clearance for the workers
    c. Provide training

D. Respirators **other than Dust Masks**

When worn voluntarily:

1. The company must:
    a. Determine that the masks themselves do not pose a hazard to workers
    b. Provide the information found in Appendix D to 1910.134 of OSHA's Respiratory Protection Standard ("Information for Employees Using Respirators When Not Required Under the Standard").
        i. Can be found in the Forms section of this manual
    c. Establish and implement those elements of a written respiratory protection program necessary to ensure that any employee using a respirator voluntarily is medically able to use that respirator.
    d. Ensure that the respirator is cleaned, stored, and maintained so that its use does not present a health hazard to the user.
2. Either the employer or the employee can provide the respirator for voluntary use. The employer doesn't have to pay for the voluntary-use respirators, but the employer does have to pay for

any expenses related to providing the Appendix D information, as well as any necessary medical evaluations and respirator cleaning equipment.

3. Facial Hair

   a. Unlike for required respirator use, OSHA does not prohibit employees from having facial hair when they use a tight-fitting respirator voluntarily -- because the air is safe to breathe. But, OSHA does discourage this and recommends following sound industrial hygiene practices, as well as the manufacturer's instructions, even for voluntary use.

4. Medical Evaluation

   a. All employees who wish to make use of voluntary respiratory protection other than a dust mask shall be evaluated and certified by a physician or a licensed health care professional (PLHCP) as being “medically fit” to wear a respirator. The medical evaluation consists of, at a minimum, the administration of a health questionnaire meeting federal guidelines or provisions for a physical examination by a PLHCP that elicits the same information as the questionnaire. The PLHCP shall be provided with supplemental information by the employer on the description of the possible work conditions and any additional PPE that may be required of the employee while using respiratory equipment.

   b. The administration of the health questionnaire will be done during work hours and at no cost to the employee. The information on the questionnaire shall remain confidential between the PLHCP and the employee. The employee must have access to the PLHCP for discussion and asking questions concerning their medical evaluation. The company will only receive a recommendation of the employee’s ability to wear respiratory equipment.

   c. If an employee is restricted by the PLHCP from wearing a negative pressure respirator, but otherwise physically able to perform duties with a powered air respirator, then reasonable accommodations will be made by the program administrator not to have this restriction limit the employee’s ability to perform his job.

5. Maintenance and Care

   The company will provide for the cleaning and disinfecting, storage, inspection and repair of respirators that are made available to their employees for voluntary use. There are specific guidelines to follow in Attachment 1 to ensure the respirators are clean and disinfected. Respirators designated for the exclusive use of an employee shall be the responsibility of that employee to maintain and keep in a sanitary condition. Respirators issued to more than one employee shall be cleaned and disinfected before being worn by different individuals. Respirators maintained for emergency, training, or fit testing use shall be cleaned and disinfected after every use.

   a. Storage

      Respirators shall be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture and damaging chemicals. They shall be packed or stored to prevent deformation of the face piece. Emergency respirators shall, in addition, be kept accessible to the work area and stored in easily identifiable coverings. Refer to manufacturer’s instructions for other recommendations.

   b. Inspection

      Respirators are inspected on a regular basis and employees are instructed on how to inspect their respirator. All respirators used on a routine basis shall be inspected before each use and during cleaning. All emergency respirators shall also be inspected at least on a monthly basis. Respirator inspection shall include the tightness of connections and the condition of various parts including, but not limited to, the face piece, head straps, valves, and gaskets, connecting tubes, cartridges, canisters and filters. Also, check all elastic parts for deterioration and pliability. Inspection of self-contained breathing apparatus shall be done only by trained technicians competent with that specific brand,

make and model of respiratory equipment. The technician conducting the inspection shall certify the inspection by attaching a signed and dated tag or label to the equipment.

c. Repairs

Equipment that is defective, broken or otherwise in need of repair shall be identified immediately by attaching a red tag and stating the reason it is out of service. Repairs to respirator equipment shall be made by competent employees and only with the manufacturers' recommended replacement parts. Absolutely no substitution of parts is allowed that is not authorized by the NIOSH approval.

6. Training

a. Employers who wish to participate in a voluntary respirator program are only required to provide the basic information on respirators in 29 CFR 1910.134 Appendix D to employees who wear respirators when not required.

7. Recordkeeping

a. The company will receive and keep on file the health care provider's written opinion on the employee's ability to use the respirator.

Attachment 1
Respirator Cleaning Procedures

These procedures are provided as a guideline when cleaning respirators. They are general in nature, and the administrator as an alternative may use the cleaning recommendations provided by the manufacturer of the respirators used by their employees, provided such procedures are as effective as those listed here. Equivalent effectiveness simply means that the procedures used must accomplish the objectives set forth (i.e., must ensure that the respirator is properly cleaned and disinfected in a manner that prevents damage to the respirator and does not cause harm to the user).

A. Remove filters, cartridges, or canisters. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.

B. Wash components in warm water (110° F maximum), with mild detergent or cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.

C. Rinse components thoroughly in clean, warm (110° F maximum), preferably running water. Drain.

D. When the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in one of the following:

   1. Hypochlorite solution (50 ppm of chlorine) made by adding approximately one milliliter of laundry bleach to one liter of water at 110° F, or,
   2. Aqueous solution of iodine (50 ppm iodine) made by adding approximately 0.8 milliliters of tincture of iodine (6-8 grams ammonium and/or potassium iodide/100cc of 45% alcohol) to one liter of water at 110°F, or,
   3. Other commercially available cleansers of equivalent disinfectant quality when used as directed, if their use is recommended or approved by the respirator manufacturer.

E. Rinse components thoroughly in clean, warm (110° F maximum), preferably running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on face pieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.

F. Components should be hand-dried with a clean lint-free cloth or air-dried.

G. Reassemble face piece, replacing filters, cartridges, and canisters where necessary.

H. Test the respirator to ensure that all components work properly.

Requested Program - **Musculoskeletal Disorders & Ergonomics**

A. Musculoskeletal Disorders (MSDs)

MSDs include cases where the nature of the injury or illness is pinched nerve; herniated disc; meniscus tear; sprains, strains, tears; hernia (traumatic and nontraumatic); pain, swelling, and numbness; carpal or tarsal tunnel syndrome; Raynaud's syndrome or phenomenon; musculoskeletal system and connective tissue diseases and disorders, when the event or exposure leading to the injury or illness is overexertion and bodily reaction, unspecified; overexertion involving outside sources; repetitive motion involving microtasks; other and multiple exertions or bodily reactions; and rubbed, abraded, or jarred by vibration.

B. Risk Factors

1. The risk of MSD injury depends on work positions and postures, how often the task is performed, the level of required effort and how long the task lasts.
2. Risk factors that may lead to the development of MSDs include:
    a. Exerting excessive force Examples include lifting heavy objects or people, pushing or pulling heavy loads, manually pouring materials, or maintaining control of equipment or tools.
    b. Performing the same or similar tasks repetitively. Performing the same motion or series of motions continually or frequently for an extended period of time.
    c. Working in awkward postures or being in the same posture for long periods of time. Using positions that place stress on the body, such as prolonged or repetitive reaching above shoulder height, kneeling, squatting, leaning over a counter, using a knife with wrists bent, or twisting the torso while lifting.
    d. Localized pressure into the body part. Pressing the body or part of the body (such as the hand) against hard or sharp edges, or using the hand as a hammer.
    e. Cold temperatures. In combination with any one of the above risk factors may also increase the potential for MSDs to develop. For example, many of the operations in meatpacking and poultry processing occur with a chilled product or in a cold environment.
    f. Vibration. Both whole body and hand-arm, can cause a number of health effects. Hand-arm vibration can damage small capillaries that supply nutrients and can make hand tools more difficult to control. Hand-arm vibration may cause a worker to lose feeling in the hands and arms resulting in increased force exertion to control hand-powered tools (e.g. hammer drills, portable grinders, chainsaws) in much the same way gloves limit feeling in the hands. The effects of vibration can damage the body and greatly increase the force which must be exerted for a task.
    g. Combined exposure to several risk factors. May place workers at a higher risk for MSDs than does exposure to any one risk factor.

C. Health Hazards

1. Strains and sprains from lifting loads improperly or from carrying loads that are either too large or too heavy
2. Fractures and bruises caused by being struck by materials or by being caught in pinch points
3. Cuts and bruises caused by falling materials that have been improperly stored or by incorrectly cutting ties or other securing devices

D. Symptoms

1. Pain is the most common symptom associated with MSDs. There may be joint stiffness, muscle tightness, redness and swelling of the affected area. Some people may also experience sensations of "pins and needles," numbness, skin color changes, and decreased sweating of the hands.
2. MSDs may progress in stages from mild to severe.
    a. The first pain is a signal that the muscles and tendons should rest and recover. Otherwise, an injury can become longstanding, and sometimes, irreversible.
    b. Not everyone goes through these stages in the same way. The earlier people recognize symptoms, the quicker they should respond to them.
        i. Early stage
            (1.) Aching and tiredness of the affected limb occur during the work shift but disappear at night and during days off work.
            (2.) No reduction of work performance.
        ii. Intermediate stage
            (1.) Aching and tiredness occur early in the work shift and persist at night.
            (2.) Reduced capacity for repetitive work.
        iii. Late stage
            (1.) Aching, fatigue, and weakness persist at rest.
            (2.) Inability to sleep and to perform light duties.

E. Treatment

1. The treatment of MSDs should come only from a physician
2. Treatment may involve several approaches including the following:
    a. Restriction of movement
        i. The first approach to treatment of MSDs is to avoid the activities causing the injury
        ii. Often requires work restrictions. In some cases, transfer to a different job should be considered
    b. Application of heat or cold
        i. Heat
            (1.) Heat is recommended for muscle pain relief.
            (2.) Heat increases the flow of blood which facilitates the elimination of lactic acid build up.
            (3.) It is not recommended for injuries with significant inflammation and swelling.
        ii. Cold
            (1.) Cold reduces pain and swelling and is recommended for injuries and inflammations (tissues that are swollen, red, hot and inflamed).
            (2.) The use of ice it is not recommended in case of muscle pain (spasm) because cold temperature will contract the muscle even more.
            (3.) Application of ice on painful muscle is recommended only immediately after an injury occurred, and only for few days.

c. Exercise
    i. Stretching is beneficial because it promotes circulation and reduces muscle tension.
    ii. Consult a physical therapist before exercising as stretching or exercise programs can aggravate the existing condition if not properly designed
d. Medication and surgery
    i. Anti-inflammatory drugs can reduce pain and inflammation
    ii. The doctor may try more elaborate treatments or even surgery if all other approaches fail

F. Risk Reduction

Hazards are best eliminated at the source; this is a fundamental principle of occupational health and safety. In the case of MSDs, the prime source of hazard is the repetitiveness of work; therefore, the main effort to protect workers from MSDs should focus on avoiding repetitive patterns of work.

1. Where elimination of the repetitive patterns of work is not possible or practical, prevention strategies involving workplace layout, tool and equipment design, and work practices should be considered.
2. Job Design
    a. One way to eliminate repetitive tasks is to mechanize the job. Where mechanization is not feasible or appropriate, other alternatives are available.
    b. Job rotation
        i. Requires workers to move between different tasks, at fixed or irregular periods of time. But it must be a rotation where workers do something completely different.
        ii. Different tasks must engage different muscle groups in order to allow recovery for those already strained.
        iii. Job rotation alone will not be effective in reducing WMSDs if not combined with the proper design of workstations. And it will not be effective while the high pace of work persists.
    c. Job Enlargement increases the variety of tasks built into the job. It breaks the monotony of the job and avoids overloading one part of the body.
    d. Team Work
        i. Team work can provide greater variety and more evenly distributed muscular work.
        ii. The whole team is involved in the planning and allocation of the work and carries out a set of operations to complete the whole product.
        iii. Allows the worker to alternate between tasks, hence, reducing the risk of MSDs.
3. Workplace Design
    a. The guiding principle in workplace design is to fit the workplace to the worker.
    b. Evaluation of the workplace can identify the source or sources of MSDs.
    c. Proper design of the workstation decreases the effort required of the worker to maintain a working position.
    d. Ideally, the workstation should be fully adjustable, providing a worker with the options to work in standing, sitting or sitting-standing positions, as well as fitting the worker's body size and shape.

4. Tools and Equipment Design
    a. Proper design of tools and equipment significantly decreases the force needed to complete the task.
    b. Providing the worker with the proper jigs or fixtures for tasks that require holding elements saves a lot of muscular effort in awkward positions.
    c. Good tools, maintained carefully and where necessary frequently changed, can also save a lot of muscle strain. More information about hand tools and preventing WMSD resulting from their use can be found in the OSH Answers document Hand Tool Ergonomics.

G. Ergonomics Program

Implementing an ergonomic process is effective in reducing the risks of developing MSDs. An ergonomic process uses the principles of a safety and health program to address MSD hazards. Such a process should be viewed as an ongoing function that is incorporated into the daily operations, rather than as an individual project.

Considerations for a program include:

1. Provide Management Support
    a. A strong commitment by management is critical to the overall success of an ergonomic process.
    b. Management should define clear goals and objectives for the ergonomic process, discuss them with their workers, assign responsibilities to designated staff members, and communicate clearly with the workforce.
2. Involve Workers
    a. A participatory ergonomic approach, where workers are directly involved in worksite assessments, solution development and implementation is the essence of a successful ergonomic process.
    b. Workers can:
        i. Identify and provide important information about hazards in their workplaces.
        ii. Assist in the ergonomic process by voicing their concerns and suggestions for reducing exposure to risk factors and by evaluating the changes made as a result of an ergonomic assessment.
3. Provide Training
    a. Training is an important element in the ergonomic process.
    b. Training should be conducted in a language and vocabulary that all workers understand.
    c. Training is best provided by individuals who have experience with ergonomic issues in the particular industry.
    d. When training is effective workers will:
        i. Learn the principles of ergonomics and their applications.
        ii. Learn about the proper use of equipment, tools, and machine controls.
        iii. Use good work practices, including proper lifting techniques.
        iv. Become more aware of work tasks that may lead to pain or injury.
        v. Recognize early symptoms of MSDs.
        vi. Understand the importance of reporting and addressing early indications of MSDs before serious injuries develop.

vii. Understand procedures for reporting work-related injuries and illnesses, as required by OSHA's injury and illness recording and reporting regulation

4. Identify Problems - An important step in the ergonomic process is to identify and assess ergonomic problems in the workplace before they result in MSDs.
   a. An important part of the ergonomic process is a periodic review of the facility, specific workstation designs and work practices, and the overall production process, from an ergonomics perspective.
   b. Identify existing problems by:
      i. Reviewing the company's OSHA 300 injury and illness logs & 301 reports
      ii. Reviewing workers' compensation records
      iii. Examining worker reports of problems
   c. Identifying potential ergonomic issues by:
      i. Observing workplace conditions and work processes
      ii. Conduct ergonomic job analyses
      iii. Conduct workplace survey and worker interviews
5. Implement Solutions to Control Hazards
   a. Interventions have included:
      i. Modifying existing equipment
      ii. Making changes in work practices
      iii. Purchasing new tools or other devices to assist in the production process
   b. To reduce the chance of injury, work tasks should be designed to limit exposure to ergonomic risk factors.
      i. Engineering controls are the most desirable, where possible.
      ii. Administrative or work practice controls may be appropriate in some cases where engineering controls cannot be implemented or when different procedures are needed after implementation of the new engineering controls.
      iii. Personal protection solutions have only limited effectiveness when dealing with ergonomic hazards.
   c. Sample Overview for controls:

Type of Control	Program Policy Examples
Engineering Controls *(implement physical change to the workplace, which eliminates/reduces the hazard on the job/task)*	▪ Use a device to lift and reposition heavy objects to limit force exertion ▪ Reduce the weight of a load to limit force exertion ▪ Reposition a work table to eliminate a long/excessive reach and enable working in neutral postures ▪ Use diverging conveyors off a main line so that tasks are less repetitive ▪ Install diverters on conveyors to direct materials toward the worker to eliminate excessive leaning or reaching ▪ Redesign tools to enable neutral postures
Administrative and Work Practice Controls *(establish efficient processes or procedures)*	▪ Require that heavy loads are only lifted by two people to limit force exertion ▪ Establish systems so workers are rotated away from tasks to minimize the duration of continual exertion, repetitive motions, and awkward postures. Design a job rotation system in which employees rotate between jobs that use different muscle groups ▪ Staff "floaters" to provide periodic breaks between scheduled breaks ▪ Properly use and maintain pneumatic and power tools
Personal Protective Equipment *(use protection to reduce exposure to ergonomics-related risk factors)*	▪ Use padding to reduce direct contact with hard, sharp, or vibrating surfaces ▪ Wear good fitting thermal gloves to help with cold conditions while maintaining the ability to grasp items easily

6. Encourage Early Reporting of MSD Symptoms
    a. Early reporting can accelerate the job assessment and improvement process, helping to prevent or reduce the progression of symptoms, the development of serious injuries, and subsequent lost-time claims.
    b. Procedures for reporting work-related injuries and illnesses must be reasonable and not deter or discourage employees from reporting.
    c. Retaliating against employees for reporting work-related injuries or illnesses is not permitted.
7. Evaluate Progress
    a. Established evaluation and corrective action procedures are required to periodically assess the effectiveness of the ergonomic process and to ensure its continuous improvement and long-term success.
    b. As an ergonomic process is first developing, assessments should include determining whether goals set for the ergonomic process have been met and determining the success of the implemented ergonomic solutions.

Chapter 9 SAFETY VIOLATION POLICY

Should any IMPACT Strategies employee commit an unsafe act, intentional or not, this action shall be addressed by the immediate supervisor and reviewed by the Safety Director and Management. 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 from Job Site
- Termination of Employment Contract

Willful Safety Violation

Employees committing a willful behaving in a manner that results in a Life Threatening safety violation will be terminated immediately.

Paperwork

- A Safety Violation Notice shall be completed for all written reprimands.
- A copy shall be maintained in the employee's file and provided to the employee, if corrective action(s) is required.

These forms are provided as additional resources, templates, and/or tools that can be used with your safety program.

SAMPLE

IMPACT Strategies

Emergency Action Plan Guide

Note: *The following emergency action plan is provided only as a guide to assist employers and employees in complying with the requirements of 29 CFR 1910.38, as well as to provide other helpful information. It is not intended to supersede the requirements of the standard. An employer shall review the standard for particular requirements which are applicable to their individual* situation *and make adjustments to this program that are specific to their company. An employer will need to add information relevant to their particular facility in order to develop an effective, comprehensive program.*

Emergency Action Plan Date XX / XX / XX

Project Name: IMPACT Job # & Name

POLICY

It is the policy of this company to take every possible action to comply with all emergency regulations and protect employees in emergency situations.

EMERGENCY PLAN COORDINATOR

SUPERINTENDENT NAME *(name of person or title)* is responsible for making sure this emergency action plan is kept up to date, practices, and reviewed periodically. The Emergency Plan Coordinator can be reached at *(location and phone number)*: IMPACT OFFICE TRAILER OR XXX-XXX-XXXX

REPORTING PROCEDURES

(List the types of emergencies that could occur at your workplace and how employees shall report them. Options include internal telephone numbers, intercom, public address systems, etc. Employees must also notify external emergency responders if the company uses them for assistance in emergencies.)

Type of Emergency	How to Report (Phone Numbers)
Fire	911 / PROJECT SUPERINTENDENT
Explosion	911 / PROJECT SUPERINTENDENT
Weather	911 / PROJECT SUPERINTENDENT
Bomb threat	911 / PROJECT SUPERINTENDENT
Chemical Spill/Leak	911 / PROJECT SUPERINTENDENT
Violence	911 / PROJECT SUPERINTENDENT
Medical	911 / PROJECT SUPERINTENDENT
Other (list)	FILL IN IF APPLICABLE

Reporting procedures are posted *(locations)*: IMPACT OFFICE TRAILER

Emergency Designated Meeting Place: TO BE IDENTIFIED – JOB SPECIFIC

EVACUATION PROCEDURES

Emergency Escape Procedures and Meeting Location

Emergency escape procedures and meeting location shall be assigned to each person by their supervisor. Subcontractor supervisors are to insure all employees within their company are familiar with this plan.

Employee Accountability Procedures after Evacuations

When an evacuation signal is given, each supervisor involved will proceed to the vicinity of the designated meeting place. The supervisor will insure all personnel are evacuated and will provide assistance to employees requiring same.

All employees will then be accounted for by their supervisor. Supervisors will then report their company's status to the superintendent or individual in charge. No one is to re-enter the building for any reason until the Fire Department or other responsible agency has notified us the building is safe for re-entry.

Severe Weather/Tornado

When a hazardous weather alert is announced, all employees shall immediately go to their designated tornado refuge area. All employees shall stay in the tornado refuge area until given the all clear sign and then proceed to their designated meeting place.

Tornado refuge areas are located *(locations)*: TO BE IDENTIFIED – JOB SPECIFIC

Training

The following personnel have been trained to assist in the safe and orderly emergency evacuation of other employees.

Name	Title
XYZ	IMPACT JOBSITE SUPERINTENDENT
XYZ	IMPACT JOBSITE P.E.

FIRE EXTINGUISHERS

Fire extinguishers are located at the IMPACT Strategies office trailer and throughout the project jobsite where appropriate

CHAIN OF COMMAND AND EMERGENCY PHONE NUMBERS

For more information about this plan, contact the Project Superintendent. The following people shall be contacted during off-hours emergencies:

Name	Telephone Number
PROJECT SUPERINTENDENT	XXX-XXX-XXXX
PROJECT MANAGER	XXX-XXX-XXXX
Mike Christ	618-531-9406

IMPACT STRATEGIES

IMPACT Strategies

National Safety CONSULTING

Emergency Action Plan Guide

Note: *The following emergency action plan is provided only as a guide to assist employers and employees in complying with the requirements of 29 CFR 1910.38, as well as to provide other helpful information. It is not intended to supersede the requirements of the standard. An employer shall review the standard for particular requirements which are applicable to their individual situation and make adjustments to this program that are specific to their company. An employer will need to add information relevant to their particular facility in order to develop an effective, comprehensive program.*

Emergency Action Plan Date _____ / _____ / _____

Project Name:_____

POLICY

It is the policy of this company to take every possible action to comply with all emergency regulations and protect employees in emergency situations.

EMERGENCY PLAN COORDINATOR

_____ *(name of person or title)* is responsible for making sure this emergency action plan is kept up to date, practices, and reviewed periodically. The Emergency Plan Coordinator can be reached at *(location and phone number)*: _____

_____

REPORTING PROCEDURES

(List the types of emergencies that could occur at your workplace and how employees shall report them. Options include internal telephone numbers, intercom, public address systems, etc. Employees must also notify external emergency responders if the company uses them for assistance in emergencies.)

Type of Emergency	How to Report (Phone Numbers)
Fire	
Explosion	
Weather	
Bomb threat	
Chemical Spill/Leak	
Violence	
Medical	
Other (list)	

Reporting procedures are posted *(locations)*: _____

Emergency Designated Meeting Place:_____

EVACUATION PROCEDURES

Emergency Escape Procedures and Meeting Location

Emergency escape procedures and meeting location shall be assigned to each person by their supervisor. Subcontractor supervisors are to insure all employees within their company are familiar with this plan.

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_____

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Name	Telephone Number
Mike Christ	618-531-9406

SAMPLE

IMPACT Strategies

Hazard & Risk Assessment Form

Certificate of Hazard Assessment Statement for: IMPACT JOB # & NAME

Individual Hazard/Task	Risk Level	Hazards Associated with Task	Procedures & Administrative Controls	Appropriate PPE for Task
OVERHEAD POWER LINES	HIGH	ELECTROCUTION	SEE ATTACHED JOB SAFETY ANALYSIS #1	SEE ATTACHED
***LIST ALL IDENTIFIED HAZARDS AS PROJECT PROGRESSES. THIS IS AN ACTIVE DOCUMENT SPECIFIC TO EACH PROJECT**				

Hazard & Risk Assessment Form (cont'd)

												I certify that a worksite Hazard & Risk Assessment was performed for the Jobsite listed above PROJECT SUPERINTENDENT XX / XX / XXXX	Signature of on-site Safety Manager Printed name of on-site Safety Manager Date

IMPACT STRATEGIES

IMPACT Strategies

National Safety CONSULTING

Hazard & Risk Assessment Form

Certificate of Hazard Assessment Statement for: _____

Individual Tasks	Risk Level	Hazards Associated with Task	Procedures & Engineering and/or Administrative Controls	Appropriate PPE for Task											

Hazard & Risk Assessment Form (cont'd)

												I certify that a worksite Hazard & Risk Assessment was performed for the Jobsite listed above	Signature of on-site Safety Manager Printed name of on-site Safety Manager Date

Hazard & Risk Assessment - Job Safety Analysis Form

Location: IDENTIFY LOCATION ON JOB SITE | Date: XX/XX/XXXX | ☒ New ☐ Revision JSA NO: 01

Task: OVERHEAD POWER LINES | Analysis By: SUPERINTENDENT

Team Members: ALL SUBCONTRACTORS | Approved By: PROJECT MANAGER

Specific rules and procedures to be followed: EXISTING OVERHEAD POWER LINES EXISTS ALONG THE SOUTH PROPERTY LINE & REPRESENTS A HAZARD TO ALL CONSTRUCTION WORKERS. SEE BELOW FOR ACTION PLAN.

SEQUENCE OF SAFETY STEPS	POTENTIAL INJURY OF HAZARDS	RECOMMENDATIONS TO ELIMINATE OR REDUCE POTENTIAL HAZARDS
MEET W/UTILITY COMPANY TO UNDERSTAND SAFE WORKING DISTANCE.	ELECTROCUTION	*FILL IN A TION PLAN AS A RESULT OF RESEARCH/SAFETY CONSIDERATIONS.
CONSIDER COVERING LINES IF SAFE WORKING DISTANCE IS NOT POSSIBLE.	ELECTROCUTION	
DISCUSS THIS SAFETY CONCERN DURING SAFETY ORIENTATIONS.	ELECTROCUTION	
DISCUSS THIS SAFETY CONCERN AT TOOL BOX TALKS.	ELECTROCUTION	
INSTALL WARNING SIGNAGE TRAFFIC CONTROLS.	ELECTROCUTION	
CONSIDER FLAG MAN IF ACTIVITY WARRANTS.	ELECTROCUTION	

Check Items Required to do this Job

☐ Safety Glasses ☐ Leather Gloves ☐ Face Shield ☐ Fire Extinguisher ☐ Atmospheric Testing
☐ Hart Hats ☐ Work Vest ☐ Goggles (Type?) ☐ Lockout/Tagout ☒ Traffic Controls
☐ Safety Shoes ☐ Fall Harness ☐ Flame Resistant Clothing ☒ Warning Signs ☐ Other

Instructions for Completing the Hazard & Risk Assessment - Job Safety Analysis Form

Select an employee to help you with the JSA: someone who is experienced in the job, willing to help and a good communicator. The employees play an important role in helping you identify job steps and hazards. In summary, to complete this form you shall consider the purpose of the job, the activities it involves, and the hazards it presents. In addition, observing an employee performing the job, or "walking through" the operation step by step may give additional insight into potential hazards. Here's how to do each of the three parts of a Job Safety Analysis:

SEQUENCE OF SAFETY STEPS	POTENTIAL HAZARDS	RECOMMENDED ACTION OR PROCEDURE
Examining a specific job by breaking it down into a series of steps or tasks, will enable you to discover potential hazards employees may encounter. Each job or operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity, change in direction or movement. Picking up the box from the conveyor and placing it on a hand truck is one step. The next step might be to push the loaded hand truck to the storage area (a change in activity). Moving the boxes from the truck and placing them on the shelf is another step. The final step might be returning the hand truck to the receiving area. Be sure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the casters on the hand truck. However, if that step is generally part of the job it shall be listed.	A hazard is a potential danger. The purpose of the Job Safety Analysis is to identify ALL hazards – both those produced by the environment or conditions and those connected with the job procedure. To identify hazards, ask yourself these questions about each step: Is there a danger of the employee striking against, being struck by, or otherwise making injurious contact with an object? Can the employee be caught in, by or between objects? Is there a potential for slipping, tripping, or falling? Could the employee suffer strains from pushing, pulling, lifting, bending, or twisting? Is the environment hazardous to safety and/or health (toxic gas, vapour, mist, fumes, dust, heat, or radiation)? Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards – the actions, conditions, and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents.	Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury or occupational illness. Begin by trying to: (1) engineer the hazard out; (2) provide guards, safety devices, etc.; (3) provide personal protective equipment; (4) provide job instruction training; (5) maintain good housekeeping; (6) ensure good ergonomics (positioning the person in relation to the machine or other elements). List the required or recommended personal protective equipment necessary to perform each step of the job. Give a recommended action or procedure for each hazard. Serious hazards shall be corrected immediately. The JSA shall then be changed to reflect the new conditions. Finally, review your input on all three columns for accuracy and completeness with affected employees. Determine if the recommended actions or procedures have been put in place. Re-evaluate the job safety analysis as necessary.

IMPACT Strategies

Hazard & Risk Assessment - Job Safety Analysis Form

Location:	Date:	☐ New ☐ Revision JSA NO:
Task:		Supervisor:
		Analysis By:
Team Members:		Reviewed By:
		Approved By:
Specific rules and procedures to be followed:		

Sequence of Basic Job Steps	Potential Injury or Hazards	Recommendations to Eliminate or Reduce Potential Hazards

Check Items Required to do this Job

☐ Safety Glasses	☐ Leather Gloves	☐ Face Shield	☐ Fire Extinguisher	☐ Atmospheric Testing
☐ Hart Hats	☐ Work Vest	☐ Goggles (Type?)	☐ Lockout/Tagout	☐ Traffic Controls
☐ Safety Shoes	☐ Fall Harness	☐ Flame Resistant Clothing	☐ Warning Signs	☐ Other

Instructions for Completing the Hazard & Risk Assessment - Job Safety Analysis Form

Select an employee to help you with the JSA: someone who is experienced in the job, willing to help and a good communicator. The employees play an important role in helping you identify job steps and hazards. In summary, to complete this form you shall consider the purpose of the job, the activities it involves, and the hazards it presents. In addition, observing an employee performing the job, or "walking through" the operation step by step may give additional insight into potential hazards. Here's how to do each of the three parts of a Job Safety Analysis:

SEQUENCE OF BASIC JOB STEPS	POTENTIAL HAZARDS	RECOMMENDED ACTION OR PROCEDURE
Examining a specific job by breaking it down into a series of steps or tasks, will enable you to discover potential hazards employees may encounter. Each job or operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity, change in direction or movement. Picking up the box from the conveyor and placing it on a hand truck is one step. The next step might be to push the loaded hand truck to the storage area (a change in activity). Moving the boxes from the truck and placing them on the shelf is another step. The final step might be returning the hand truck to the receiving area. Be sure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the casters on the hand truck. However, if that step is generally part of the job it shall be listed.	A hazard is a potential danger. The purpose of the Job Safety Analysis is to identify ALL hazards – both those produced by the environment or conditions and those connected with the job procedure. To identify hazards, ask yourself these questions about each step: Is there a danger of the employee striking against, being struck by, or otherwise making injurious contact with an object? Can the employee be caught in, by or between objects? Is there a potential for slipping, tripping, or falling? Could the employee suffer strains from pushing, pulling, lifting, bending, or twisting? Is the environment hazardous to safety and/or health (toxic gas, vapour, mist, fumes, dust, heat, or radiation)? Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards – the actions, conditions, and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents.	Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury or occupational illness. Begin by trying to: (1) engineer the hazard out; (2) provide guards, safety devices, etc.; (3) provide personal protective equipment; (4) provide job instruction training; (5) maintain good housekeeping; (6) ensure good ergonomics (positioning the person in relation to the machine or other elements). List the required or recommended personal protective equipment necessary to perform each step of the job. Give a recommended action or procedure for each hazard. Serious hazards shall be corrected immediately. The JSA shall then be changed to reflect the new conditions. Finally, review your input on all three columns for accuracy and completeness with affected employees. Determine if the recommended actions or procedures have been put in place. Re-evaluate the job safety analysis as necessary.

Incident/Near Miss Investigation Report

Investigator: _____ Report Date: ____ /____ /____

Accident Classification:

☐ Medical Only ☐ Injury ☐ Equipment Damage ☐ Property Damage ☐ Incident Only ☐ Fatality

Date of Injury: _____ Time of Injury: _____ Working: ☐ Inside ☐ Outside

Weather conditions: ☐ Sunny ☐ Excessive Heat ☐ Dry ☐ Rainy ☐ Snowy ☐ Excessive Cold

Is the incident/injury reportable to OSHA? ☐ NO ☐ YES

Injured Employee's Information:

Name: _____ _____ _____
LAST FIRST MI

Address: _____ _____ ____ _____
STREET CITY STATE ZIP

Telephone: _____ D.O.B.: ____ / ____ / ____ Sex: _____

Occupation: _____ SSN #: _____-____-_____

Was the employee Drug Tested? ☐ NO ☐ YES Results: _____

Was the employee Alcohol Tested? ☐ NO ☐ YES Results: _____

Employer Information:

Company Name: _____

Supervisor's Name: _____ _____ _____
LAST FIRST MI

Telephone: _____ Fax Number: _____

Company Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Witness Information:

☐ No Witnesses

Name: _____ _____ _____
LAST FIRST MI

Statement Attached ☐ YES ☐ NO Explain: _____

Name: _____ _____ _____
LAST FIRST MI

Statement Attached ☐ YES ☐ NO Explain: _____

Name: _____ _____ _____
LAST FIRST MI

Statement Attached ☐ YES ☐ NO Explain: _____

Accident Information:

Job Site Address: _____ _____ _____ _____
STREET CITY STATE ZIP

When was the incident reported to supervisor? Date: ___ / ___ / ___ Time: ___:___ am/pm

Specific Location Where Injury/Illness Occurred: _____

Description of Accident: _____

_____

_____

What was the involved employee doing at the time of the incident?

Describe how the incident occurred:

Describe any property damage:

Describe any equipment damage:

What environmental factors (unsafe conditions) contributed to the incident?

What behavioral factors (unsafe acts) contributed to the incident?

What corrective actions have been taken to prevent incident recurrence?

Type of Injury/Illness: (check all applicable)

- ☐ Abrasion
- ☐ Allergic Reaction
- ☐ Animal Bite
- ☐ Asphyxiation
- ☐ Blister
- ☐ Burns
- ☐ Cardiovascular
- ☐ Concussion
- ☐ Contusion (bruise)
- ☐ Crushing Injury
- ☐ Dermatitis
- ☐ Dislocation
- ☐ Electrocution
- ☐ Exposure-Chemical
- ☐ Exposure-Radiation
- ☐ Eye Cases
- ☐ Fracture
- ☐ Hearing Loss-Temp.
- ☐ Hernia
- ☐ Laceration
- ☐ Poisoning
- ☐ Puncture
- ☐ Repetitive Motion
- ☐ Splinter
- ☐ Sprain (joint)
- ☐ Sting-Insect Bite
- ☐ Strain (muscle)
- ☐ Temperature Extreme Hot or Cold
- ☐ Unclassified

Body Part Injured: (check all applicable)

- ☐ Ankle ☐ R ☐ L
- ☐ Arm ☐ R ☐ L
- ☐ Back
- ☐ Buttock ☐ R ☐ L
- ☐ Ear ☐ R ☐ L
- ☐ Eye ☐ R ☐ L
- ☐ Face
- ☐ Foot ☐ R ☐ L
- ☐ Fingers ☐ R ☐ L *(circle)*
- ☐ Groin ☐ R ☐ L
- ☐ Hand ☐ R ☐ L
- ☐ Head
- ☐ Hip ☐ R ☐ L
- ☐ Kidney ☐ R ☐ L
- ☐ Knee ☐ R ☐ L
- ☐ Leg ☐ R ☐ L
- ☐ Neck
- ☐ Nose
- ☐ Shoulder ☐ R ☐ L
- ☐ Toes ☐ R ☐ L *(circle)*
- ☐ Torso
- ☐ Wrist ☐ R ☐ L

Injury Mechanism: (check all applicable)

☐ Burns	☐ Fall - Elevation	☐ Motor Vehicle
☐ Caught in/between	☐ Fall - Same Level	☐ Natural Disaster
☐ Climbing	☐ Fall – Climbing	☐ Reaching for
☐ Cut/Puncture	☐ Falling Object	☐ Struck against
☐ Electrical Shock	☐ Irritation	☐ Struck by
☐ Explosion	☐ Lifting/Handling	☐ Violence

Type of Medical Treatment administered (check all that apply):

☐ None ☐ Doctor/Clinic ☐ E.R. ☐ On-Site First Aid ☐ EMT/Paramedic ☐ Hospital Stay

Medical Treatment Information:

Hospital/Clinic Name: _____ Telephone: _____

Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Result of Injury:

Disposition: ☐ Regular Work ☐ Restricted Work ☐ Lost Time ☐ Hospital Stay ☐ Unknown

Number of Restricted Work Days: _____ Return to Regular Work on: _____

Number of Lost Time Work Days: _____ Return to Light Duty Date: _____

Hospital/Clinic Name: _____ Telephone: _____

Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Doctor Seen: _____

Supervisor Information:

I certify that I have reviewed all information contained on this accident report and am taking the appropriate actions to completely investigate the incident, as well as to report any required findings.

Reported to IMPACT Office: Date: ___ / ___ / ___ Time: ___:___ am/pm

Name of person to whom it was reported: _____

Reported to NSC: Date: ___ / ___ / ___ Time: ___:___ am/pm

Name of person to whom it was reported: _____

Reported to OSHA (if applicable) Date: ___ / ___ / ___ Time: ___:___ am/pm

Signature:

_____ _____ ___ / ___ / ___

PRINT SIGNED DATE

National Safety Consulting Information:

Safety Manager Completing Investigation: _____

☐ Photos attached to report

Incident Notes:

Recommended Action(s):

Nation Safety Consultant Signature:

_____ _____ ___ / ___ / ___

PRINT SIGNED DATE

IMPACT Strategies

Incident/Near Miss Witness Statement

Witness Information:

Name: _____ _____ _____
LAST FIRST MI

Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Home Phone: _____ Mobile Phone: _____

Name of Employer: _____

Supervisor's Name: _____ _____ _____
LAST FIRST MI

Telephone: _____ Fax Number: _____

Employer's Address: _____ _____ _____ _____
STREET CITY STATE ZIP

Incident Information:

When did the incident occur? Date: _____ / _____ / _____ Time: ____ : ____a.m./p.m.

The incident occurred while working: ☐ Inside ☐ Outside

Weather conditions: ☐ Sunny ☐ Excessive Heat ☐ Dry ☐ Rainy ☐ Snowy ☐ Excessive Cold

Please state your involvement in the incident: *(the more detail, the better – continue on back, if needed)*

Did you report the incident to anyone? ☐ Yes _____ ☐ No (If no, explain)

The events recounted on this Incident/Near Miss Report are true and complete to the best of my recollection.

_____ _____ _____ / _____ / _____
PRINT SIGNED DATE

IMPACT Strategies

Safety Inspection Check List

Inspector: _____ Title: _____ Date: ____ / ____ / ____

1 = Satisfactory 2 = Needs some attention 3 = Needs immediate action

Item	*Grade*	*Comments*
Housekeeping		
General neatness of work area, lunchrooms, restrooms. Housekeeping maintained		
Aisles are properly marked, clear & in good condition		
Aisle widths maintained		
Mats, gratings, etc. used when drainage is needed		
Floor openings & holes marked and protected		
Fire Prevention		
Fire extinguisher available & functional, where required		
No smoking signs posted & enforced		
Ventilation adequate		
Exposures from dust, fumes, vapors, etc. controlled		
Flammable Gases & Liquids, Batteries		
Proper storage, use & handling of flammable & combustible materials in approved cans and/or cabinets		
Proper handling of compressed gases & materials		
Storage drums for flammable liquids properly grounded & bonded		
Batteries are charged in a properly vented room		
No open flames exist in the battery charging room		
Fuel tanks are always filled when the equipment engine is turned off		
Tools, Machinery & Equipment		
Electrical & portable tools and outlets properly grounded		
Covers in place on all electrical fuse & outlet boxes		
Approved machines guards in place at points of operation & over foot treadles		
Only authorized tools are used to place & remove materials from machinery		
Proper guarding of gears, pulleys, conveyors, chains, etc.		
Machines firmly anchored to prevent moving		
Weight of load does not exceed equipment (i.e. scaffolding) rating to handle it		
Mobile equipment equipped with a horn, capacity sign & overhead guard		
Lockout/Tagout program in use for designated equipment		

Continued on back

Safety Inspection Check List (Page 2)

1 = Satisfactory 2 = Needs some attention 3 = Needs immediate action

Item	***Grade***	***Comments***
Ladders		
Ladders inspected, in good condition, and free from sharp edges & splinters		
Ladders have proper safety feet		
Cages & wells used as required (on fixed ladders only)		
Step ladders do not exceed 20 feet in length		
Stairs & Exits		
Stair handrails are 30-34 inches above surface		
A handrail is in place on every stairway with at least 4 risers (steps)		
Risers conform to proper height and are uniform		
Standard railings are in place on open sides of exposed stairs		
Building exits are marked & adequate		
Exit routes are not blocked and well illuminated		
Lighting on exit signs conform to government standards (5 foot candles)		
General Work Environment & Personal Protective Equipment		
Noise levels conform to government standards		
Compressed air for cleaning under 30 PSI		
Separate lunch rooms provided when toxic materials are present		
Number of restroom facilities available conforms to federal standards		
Separate restroom facilities provided for men & women		
Personnel trained in first aid & first aid kits are available		
Personal protective equipment provided & used		
Proper respirators & masks used when necessary		
OSHA Postings & Records		
OSHA poster is properly displayed		
Capacity signs posted through-out the building		

IMPACT Strategies

Safety Violation Notice

Employee Name: _____

Department: _____ Violation Date: ____ / ____ / ____

A safety and health survey of your operation has revealed non-compliance of certain safety rules, procedures, programs, and/or local, state, or federal regulations. As a condition of the company's safety policy, you are required to maintain a safe work environment and to prevent unsafe actions of yourself, co-workers, and/or your employees.

This warning is for your protection and safety. The violation(s) noted and corrective action(s) are indicated below.

Rule Violated	Violation Description	Corrective Action Required*
1)		
2)		
3)		

Corrective Action Required*

1 = Cease operation until corrective action is complete
2 = Warn personnel and instruct them on proper safety procedures
3 = Provide proper equipment necessary
4 = Change procedure/work method
5 = Initiate and complete corrective action (include date)
6 = Other (specify above)

Comments: _____

Disciplinary Action Imposed

- ☐ Verbal Reprimand along with this notice
- ☐ Written Reprimand with a last chance warning
- ☐ Suspension from Work Site (from _____ / _____ / _____ until _____ / _____ / _____)
- ☐ Termination of Employment Contract

Supervisor: _____ Date: ____ / ____ / ____

Employee: _____ Date: ____ / ____ / ____

Silica 1926.1153 – Table 1

Specified Exposure Control Methods when Working with Materials Containing Crystalline Silica

Equipment / Task	Engineering & Work Practice Control Methods	Required Respiratory Protection & Minimum Assigned Protection Factor (APF)	
		≤ 4 hrs/shift	> 4 hrs/shift
Stationary masonry saws	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	NONE	NONE
Handheld power saws (any blade diameter)	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. – When used outdoors. – When used indoors or in an enclosed area.	NONE APF 10	APF 10 APF 10
Handheld power saws for cutting fibercement board (with blade diameter of inches or less)	For tasks performed outdoors only: Use saw equipped with commercially available dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.	NONE	NONE
Walk-behind saws	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. – When used outdoors. – When used indoors or in an enclosed area.	NONE APF 10	NONE APF 10
Drivable saws	For tasks performed outdoors only: Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	NONE	NONE

Rig-mounted core saws or drills	Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.	NONE	NONE
Handheld and stand-mounted drills (including impact and rotary hammer drills)	Use drill equipped with commercially available shroud or cowling with dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes.	NONE	NONE
Dowel drilling rigs for concrete	For tasks performed outdoors only: Use shroud around drill bit with a dust collection system. Dust collector must have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes.	APF 10	APF 10
Vehicle-mounted drilling rigs for rock and concrete	Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector. OR Operate from within an enclosed cab and use water for dust suppression on drill bit.	NONE NONE	NONE NONE
Jackhammers and handheld powered chipping tools	Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact. – When used outdoors. – When used indoors or in an enclosed area. OR Use tool equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. – When used outdoors. – When used indoors or in an enclosed area.	NONE APF 10 NONE APF 10	APF 10 APF 10 APF 10 APF 10

Handheld grinders for mortar removal *(i.e., tuckpointing)*	Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.	APF 10	APF 25
Handheld grinders for uses other than mortar removal	For tasks performed outdoors only: Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. OR Use grinder equipped with commercially available shroud and dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism – When used outdoors. – When used indoors or in an enclosed area.	NONE NONE NONE	NONE NONE APF 10
Walk-behind milling machines and floor grinders	Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. OR Use machine equipped with dust collection system recommended by the manufacturer. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.	NONE NONE	NONE NONE
Small drivable milling machines (less than half-lane)	Use a machine equipped with supplemental water sprays designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions.	NONE	NONE

Large drivable milling machines (half-lane and larger)	For cuts of any depth on asphalt only: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions.	NONE	NONE
	For cuts of four inches in depth or less on any substrate: Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust. Operate and maintain machine to minimize dust emissions.	NONE	NONE
	OR Use a machine equipped with supplemental water spray designed to suppress dust. Water must be combined with a surfactant. Operate and maintain machine to minimize dust emissions.	NONE	NONE
Crushing machines	Use equipment designed to deliver water spray or mist for dust suppression at crusher and other points where dust is generated (e.g., hoppers, conveyers, sieves/sizing or vibrating components, and discharge points). Operate and maintain machine in accordance with manufacturer's instructions to minimize dust emissions. Use a ventilated booth that provides fresh, climate-controlled air to the operator, or a remote control station.	NONE	NONE
Heavy equipment and utility vehicles used to abrade or fracture silica containing materials *(e.g., hoe-ramming, rock ripping)* or used during demolition activities involving silica-containing materials	Operate equipment from within an enclosed cab	NONE	NONE
	When employees outside of the cab are engaged in the task, apply water and/or dust suppressants as necessary to minimize dust emissions.	NONE	NONE
Heavy equipment and utility vehicles for tasks such as grading and excavating but not including: demolishing, abrading, or fracturing silica containing materials	Apply water and/or dust suppressants as necessary to minimize dust emissions. OR	NONE	NONE
	When the equipment operator is the only employee engaged in the task, operate equipment from within an enclosed cab.	NONE	NONE

IMPACT Strategies

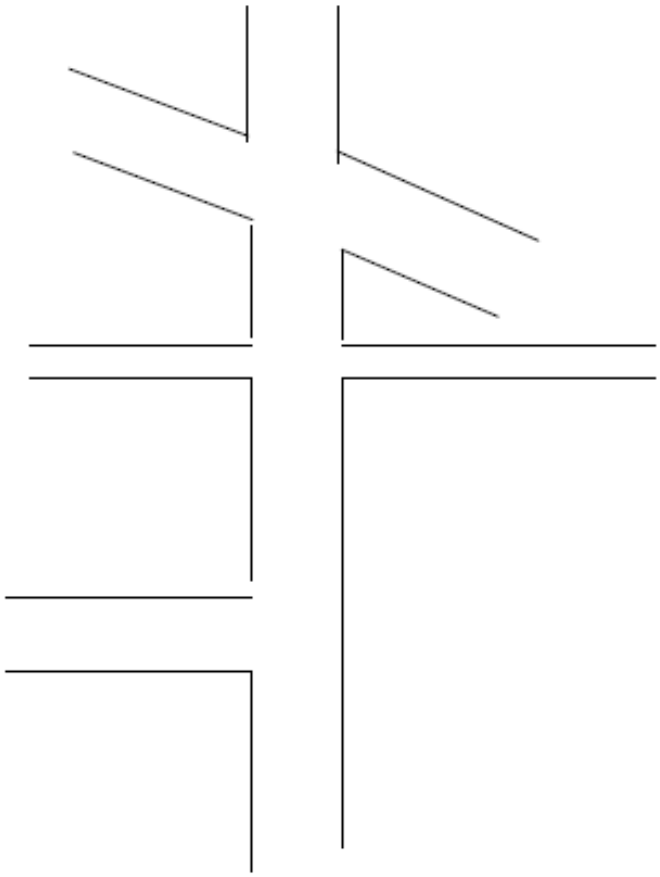
Vehicle & Driving Accident Check List

At the time of the accident

1. Stop immediately! Offer assistance. Give first aid to the injured.
2. Call ambulance if anyone appears to be injured.
3. Make no admission of fault.
4. Be courteous. Do not argue.
5. Telephone or radio your supervisor. If another employee is with you, ask them to do it.
6. Call police to investigate and advise them of facts only. Do not admit you were guilty of any law violation.
7. Do not move vehicle unless necessary.
8. If you feel all right, fill out Attachment 1 and give it to your supervisor as soon as he/she reaches the scene.
9. It is most important for you to immediately get the names of any witnesses on Attachment 2, as many people do not want to get involved and will leave the scene without leaving their names.
10. An employee of the company should take pictures of all vehicles involved and the accident scene.
11. Ask and responding officers where you can obtain a copy of the Accident Report.
12. As best you can, describe and diagram the accident on the back side of this form.

Use one of these outlines to sketch the scene of your accident, writing in street or highway names or numbers.

- *Mark your vehicle no.1— other no.2.*
- *Show positions prior to and after collision.*
- *Locate where witnesses were.*



Date of Accident _____ / _____ / _____ Time of Accident _____ : _____ am/pm

Road Conditions: Dry Wet Icy Snowy Construction Zone: Yes No

Describe what happened: _____

_____

_____

_____

_____

_____

_____

IMPACT STRATEGIES

IMPACT Strategies

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Vehicle & Driving Accident Check List
Attachment 1

Vehicle # in the Diagram: _____

Driver Information

Driver's License Number _____ State _____

Name _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Vehicle Information

Color _____ Year _____

Make _____ Model _____

VIN _____ License Plate _____

Insurance Information

Insurance Company _____

Policy Number _____

Telephone _____ Fax _____

Emergency Services Information

Police Officer Name _____ Badge Number _____

Report Number _____ Telephone _____

Location of Accident

_____

_____

_____

Continued on Back

Vehicle # in the Diagram: _____

Passenger Information

Name _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Passenger Information

Name _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Passenger Information

Name _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Passenger Information

Name _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

IMPACT STRATEGIES

IMPACT Strategies

National Safety CONSULTING

Vehicle & Driving Accident Check List
Attachment 2

Witness Information

Name _____ Age _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Location at the scene _____

Remarks _____

Witness Information

Name _____ Age _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Location at the scene _____

Remarks _____

Witness Information

Name _____ Age _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Location at the scene _____

Remarks _____

Witness Information

Name _____ Age _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Location at the scene _____

Remarks _____

_____

Witness Information

Name _____ Age _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Location at the scene _____

Remarks _____

_____

Witness Information

Name _____ Age _____

Address _____

_____

Telephone _____ Cell Phone _____

Email _____

Location at the scene _____

Remarks _____

_____

Voluntary Respirator Program – Appendix D

to Sec. 1910.134 (Mandatory)

Information for Employees Using Respirators When Not Required Under the Standard

To be given to Employees participating in the Voluntary Respiratory Program

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

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.

2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.

3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.

4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.
   [63 FR 1152, Jan. 8, 1998; 63 FR 20098, April 23, 1998]

End Safety Manual

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