



HEALTH AND SAFETY PROGRAM

FOR EMERGENCIES, DIAL 911

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1.0 SAFETY AND HEALTH POLICY

Stony Creek Services, Inc. believes that NO JOB OR NO TASK IS MORE IMPORTANT THAN WORKER HEALTH AND SAFETY.

The owners and managers of the company are committed to providing a safe work environment for our employees and those affected by our operations. It is the responsibility of all employees to comply with all safety and health rules, even when they may seem inappropriate and inconvenient. Failure to follow our safety policies and procedures exposes employees and others to injury and exposes the company to liability.

Every procedure must be a safe procedure. Shortcuts in safe procedures by either foremen or workers will not be tolerated. If an employee believes that a foreman or other manager is violating a safety or health rule, it is their responsibility to bring it to their attention, and it is their duty to comply with the rule even if this results in disobeying a work instruction.

If a worker observes any unprotected job, which may pose a potential threat to their health or safety, he or she must inform management and management must take adequate precautions.

**IF A JOB CANNOT BE DONE SAFELY IT WILL
NOT BE DONE AT ALL!**

2.0 SAFETY AND HEALTH OBJECTIVES

The objectives of the Stony Creek Services, Inc. Safety and Health Program are:

- To ensure the safety, health and well-being of all our employees;
- To comply with Federal, State and local laws and regulations; and
- To comply with the requirements of our clients.

3.0 SAFETY MANAGEMENT AND ADMINISTRATION

3.1 PURPOSE: The purpose of this section of the Safety and Health Program is to identify the responsibilities of key staff and to ensure that all employees are aware of how the company works to protect their safety and health.

3.2 GENERALLY: The owners of SCS are responsible for developing the overall safety and health program, and for ensuring compliance with all relevant laws and regulations. The owners will designate a Safety Officer or an Authorized Safety Representative to be responsible for the program. The SCS Director of Operations is responsible for implementing all programs and bringing existing and potential violations to the owners' attention. Foreman and lead employees are responsible for ensuring that all employees comply with all safety and health rules. Employees are responsible for knowing and understanding the safety rules, and for complying without continuous direction. Working safely is a requirement of employment and unsafe work behaviors will not be tolerated.

3.3 POLICY:

3.3(A) Periodic Audits: The Safety and Health Program will be audited annually, at the end of October, by the Safety Officer or an Authorized Safety Representative and a member of ownership. The purpose of the audit is to determine whether there is a need for change based on the company's experiences during the year or the introduction of new laws or new technology.

3.3(B) Legislative Monitoring: The Safety Officer or an Authorized Safety Representative will be responsible for monitoring Federal, State and local legislation and regulation to determine if any proposed or actual changes will impact the program. In the event that such a change is made, the Safety Officer or an Authorized Safety Representative will work to amend the program to bring the company in compliance.

3.3(C) Contract Compliance: The Director of Operations, Safety Officer or an Authorized Safety Representative will review customer contract requirements to ensure that the SCS Safety and Health Program meets the customer's standards and/or requirements. If it appears that additional policies or procedures are required to be in compliance, the Director of Operations will inform the Safety Officer or an Authorized Safety Representative and such changes will be made as are needed.

4.0 JOB SITE INSPECTIONS

4.1 PURPOSE: The purpose of the SCS Job Site Inspection program is to ensure that the company is aware of all the conditions present on a job site, and that the proper equipment and training is provided to SCS employees.

4.2 GENERALLY: The SCS Director of Operations, Safety Officer or an Authorized Safety Representative may be responsible for ensuring that each job site is inspected prior to the beginning of work. Based on the inspection results, a jobs site safety plan may be developed,

and all necessary information and training will be provided.

4.3 POLICY

4.3(A) Initial Safety Review: When SCS is informed it has been selected to perform work on a job site, the Safety Officer or an Authorized Safety Representative will review the project contracts to determine whether there are any special health and safety requirements, and what will be required for compliance. The owner/general contractor's safety contact will be identified.

4.3(B) Job Site Inspection. Prior to the beginning of the project, the Safety Officer or an Authorized Safety Representative may inspect the job site for hazards and working conditions. If time or distance conflicts do not allow for an on-site inspection, the Safety Officer or an Authorized Safety Representative will attempt to make a site review with the owner/general contractor's safety contact and/or site superintendent. Based on the inspection, review of contract documents and any other relevant information, the Director of Operations, Safety Officer or an Authorized Safety Representative will prepare a job site safety plan, to include:

- Identifying the SDS for any materials used by SCS on the job
- Identifying any other chemical hazards on the job site, and ensuring that the appropriate SDS is provided
- Identifying any job site hazards or conditions (e.g. low overhead power lines, muddy roads)
- Identify any measurements which must take place and be recorded in order to ensure safety.
- Locating all job-site safety facilities (e.g., eye wash stations)
- Preparing a list of all safety equipment to be used and policies to be followed.
- Reviewing all employees' records to ensure that all appropriate training has been completed and is current.

4.3(C) Job Preparation: Before the job is scheduled to begin, the Safety Officer or an Authorized Safety Representative will meet with the Project Superintendent/Foreman or electronically submit the job site safety report for review. Any unusual conditions will be discussed; the list of protective equipment will be reviewed and, if appropriate, all required equipment will then be loaded on the trailer/truck. It will be the Project Superintendent/Foreman's responsibility to familiarize employees with any unsafe conditions once the project team is on-site.

4.3(D) Recordkeeping. The Director of Operations, Safety Officer or an Authorized Safety Representative will ensure that a copy of the site safety plan is in the project file, and that a copy is available if needed for submission to the owner/general contractor. The Project Superintendent/Foreman will sign the site plan to verify that he has reviewed the plan with the Director of Operations, Safety Officer or an Authorized Safety Representative. In the event that there are any special or unusual conditions on the site which require that non-routine procedures are followed, the Project Superintendent/foreman will secure the signatures of all SCS employees working on the job to verify that the special conditions have been reviewed. A

record of all safety inspections and correctional steps will be kept.

5.0 PHYSICAL EXAMS AND FITNESS

5.1 PURPOSE: The purpose of the SCS Physical Exam and Fitness pre-employment Management and Unions Serving Together (MUST) policy is to ensure that employees are physically capable of performing their duties and assignments, and that the company is not exposed to liability for failure to identify situations where an employee's health, or that of other employees or customers, is at risk.

5.2 GENERALLY: The company will maintain a physical exam program designed to identify health risks associated with the work performed by company employees. Physical exams will be required on at least an annual basis. Employment decisions based on physical examination results will be made carefully in compliance with all Federal, State and local laws and regulation.

5.3 POLICY: The SCS Director of Operations, Safety Officer or an Authorized Safety Representative may be responsible for ensuring that team member has their physical exam prior to the beginning of work. Based on the exam results, a team member may be approved to begin work on a jobsite.

5.3(A) Policy Development: The Safety Officer or an Authorized Safety Representative will be responsible for designing an employee physical examination that will test for pre-existing conditions that could be exacerbated by work performed by employees in the normal course of their job, and for conditions that might make an employee more "at risk" of injury or health problems. The An Authorized Safety Representative will be responsible for ensuring that this policy is in compliance with relevant laws and regulations.

5.3(B) Pre-Employment Physical: Employees will be required to report for a pre-employment physical after they have been selected for employment, but before they perform services for the company. If a condition is discovered that prevents the employee from performing essential job functions, employment will not be tendered.

5.3(C) Annual Physical: Employees will be required to report for an annual physical examination scheduled by the company. If a condition is discovered that increases the risk of injury or addition to a degenerative disease or condition, the company will attempt to find a practical way to reduce the risk. If no such accommodation is reasonable, the employee will be terminated if no other work is available.

5.4(D) Employee Appeals: Employees who are reassigned or terminated under this policy may seek, at their own expense, a second opinion concerning their physical abilities to perform work. Any such examination must include the same tests as required by the policy. In the event that there is a conflicting report, the company will submit the new findings to the original physician in order to ensure that no errors or omissions have been made.

6.0 SUBSTANCE ABUSE TESTING POLICY

6.1 PURPOSE: The purpose of the Stony Creek Services, Inc. substance abuse testing policy is to comply with Federal and State laws and regulation, comply with industry and customer rules, reduce costs associated with substance abuse, and in general, to ensure the safety and health of all our employees.

6.2 GENERALLY: Stony Creek Services participates in the Management and Unions Serving Together (MUST) Drug and Alcohol Testing program. This program requires pre-employment, annual and random drug and alcohol screening, which must be completed under strict rules regarding collection, chain-of-custody, and testing.

6.3 POLICY:

6.3(A) Required Testing

6.3(A)(i) Pre-Employment Testing: All employees with “on-site” responsibilities are required to be tested for the presence of intoxicants and illegal drugs prior to performing any services.

6.3(A)(ii) Annual Testing: All employees that participate in the MUST Drug and Alcohol Testing program are required to be tested annually, either on their anniversary date of employment or their testing date.

6.3(B) Random Testing: Stony Creek Services, Inc. may request any employee, with or without cause, to be tested for banned substances. Additionally, any general contractor or the MUST administrator may require a random test for any employee working on the job site.

6.3(C) Testing For Cause: In the event that, in the opinion of SCS management, supervisors or work leaders, there is reasonable cause to believe that an employee may be working under the influence of alcohol or a banned substance, or such individual observes or is made aware of, the employee ingesting alcohol or a banned substance, said individual shall instruct the employee to immediately cease work and proceed to an approved medical facility for testing. An employee so suspected of working under the influence shall be considered suspended without pay until such time as the employee is found to not be under the influence.

6.3(D) Other Testing: In the event that MUST, any contractor or the union representing SCS employees shall require any additional testing, such testing shall be included in this policy by reference.

6.4 TESTING PROCEDURES

6.4(A) Testing Laboratory – All testing shall be done by facilities approved by MUST.

6.4(B) Sample Collection – All testing to be performed by a facility approved by MUST.

6.4(C) Reporting Results – All test results shall be input in the MUST internet reporting system.

6.5 DISCIPLINE

6.5(A) Suspension without Pay - Employees testing positive for banned substances shall be suspended without pay for the thirty (30) days until such time as they shall be able to provide a sample testing negative. The employee shall be responsible for the costs associated with the second test.

6.5(B) Termination - Employees testing positive for the first time may be terminated at the discretion of the company. Employees testing positive for the second time will be terminated immediately. To the extent that this policy conflicts with any grievance procedures required by the collective bargaining agreement (CBA), this policy shall control.

7.0 PERSONAL PROTECTIVE EQUIPMENT

7.1 PURPOSE: Stony Creek Services Inc. maintains a Personal Protective Equipment (PPE) program to ensure that the risk to employees from their work is minimized. The program is strictly enforced in order to ensure that optimum safety conditions are maintained.

7.2 GENERALLY: The company reviews all processes used in its work and ensures that all necessary personal protective equipment is provided, and that employees are trained in its use. Job site inspections ensure that employees are protected from any site-related hazards. Training is provided in the use of all personal protective equipment. The company is responsible for providing all PPE in a safe condition; employees are responsible for properly using the equipment assigned to them, and for maintaining the equipment during and after its use.

7.3 POLICY: The Director of Operations, Safety Officer or an Authorized Safety Representative are jointly responsible for maintaining and administering the personal protective equipment program.

7.3(A) Process Safety. The Director of Operations, Safety Officer or an Authorized Safety Representative will develop a list of appropriate protective equipment for each process. In developing this list, the varying conditions under which work will be performed will be considered (e.g., work in enclosed spaces rather than open air), so that employees will know what type of equipment should be used in which conditions.

7.3(A)(i) Equipment: Equipment will be purchased and maintained for all conditions under which it is reasonably likely that work will be performed. SCS will maintain an up-to-date list of suppliers of other equipment so that it can be acquired in a timely manner if needed.

7.3(A)(ii) Testing: Prior to using certain personal protective equipment, employees will receive appropriate medical testing to ensure that they can safely use the equipment.

7.3(A)(iii) Training: Prior to using personal protective equipment, employees will receive appropriate training to ensure they have the knowledge to use the equipment correctly.

7.3(A)(iv) Recordkeeping: Copies of all fitness tests will be kept in confidential files in the company's office. Copies of individual's tests can be made available in the event of an inspector's request.

7.3(B) On-The-Job Use of Equipment. All safety equipment to be used on the job will be identified prior to the start of work on the job. All employees must use all designated safety equipment at all time during which it is required.

7.3(B)(i) Normal Safety Equipment. The following are general safety equipment requirements:

- Head protection will be worn on job sites when there is potential of falling objects, hair entanglement, burning, electrical hazards, or as mandated by other jobsite requirements.
- Eye protection will be worn when there are potentials of hazards from flying objects or particles, chemicals, arcing, glare, dust, or as mandated by other jobsite requirements.
- Protective footwear shall be worn to protect from falling objects, chemicals, stepping on sharp objects, or as mandated by other jobsite requirements. Athletic or canvas-type shoes shall not be worn.
- Protective gloves or clothing shall be worn when required to protect against a hazard.
- Ear protection when utilizing equipment or in a noisy environment when the employee's exposure to noise equals or exceeds the action level of 85dBA or equivalent.
 - The competent person and/or the site foreman for SCS shall check noise levels as needed to check whether noise levels exceed the action level.
 - Ear plugs, earmuffs or other appropriate ear protection shall be provided by SCS to employees to mitigate noise exposure while on the job site. The net noise entering the ear, in combination with the ear protection, shall be less than the action level of 85dBA.

7.3(B)(i) Special Safety Equipment. The following are special safety equipment requirements, based on needs:

- Harnesses and lanyards shall be utilized for fall protection as required in MIOSHA Construction Safety Standards.

- Respirators are to be used in all enclosed areas, or whenever spraying is being done. The level of respirator protection required will be determined by the foreman onsite, after consultation with the Director of Operations, Safety Officer or an Authorized Safety Representative.

7.3(C) Use of All Types of Blade Razor Knives

Purpose: This policy is to be used by all Stony Creek Services, Inc. (SCS) employees when they are using any type of utility knives to reduce the risk of injury when completing the task of cutting, slicing, or stripping materials.

- This procedure applies to all SCS employees working in tenant areas involved in using an approved razor knife as a tool for cutting certain materials where approval has been granted. Approved materials include plastic bags and 1.5 mil plastic sheeting.
- Hazards of Knife: Cuts, punctures, lacerations, scrapes, and dropped tool to an employee or someone else.
- Types of Tools Covered: Retractable Utility Knives, 'Box Cutters', Self-Retracting Utility Knife
- Personal Protective Equipment: Follow the manufacture's safe-usage procedures, use the correct personal protective equipment for the job (ANSI Cut Level 4 Gloves, hard hat, safety glasses, safety toe boots), use the correct tool for the job, and keep your body out of the line of fire.
- Training Required: Prior to use, the employee must review Stony Creek Services' Safe Work Procedure for Use of Blade Razor Knives.
- Procedures and Hazard Controls:
 - General Cutting Procedure:
 - Knife use is the last resort. All other methods should be considered prior to using a self-retractable knife.
 - Notify the Safe Work Permit writer of the intention to use a self-retractable knife to ensure that it is covered on the safe work permit.
 - An approved self-retractable knife may only be used to cut the materials listed in this procedure when permission is granted: plastic bags and plastic sheeting.
 - Cut resistant gloves must be worn when using the self-retractable knife.
 - Review the knife procedure as a group and complete all JSAs and CHAT cards with specific attention to using the knives.
 - Ensure that the blade is retracted when not in use.
 - When changing blades wear cut-resistant gloves.
 - Discard used blades in a closed container and placed them in the dumpster.
 - If working overhead, barricade the area below where the cutting is taking place.
 - Cutting Plastic and Visqueen:
 - When cuts are needed, an approved self-retractable knife may be used
 - Follow the general cutting procedure requirements
 - Ensure that body parts are not in the line of fire and cut away from the body.

8.0 RESPIRATOR PROTECTION

8.1 PURPOSE: The purpose of the company Respirator Protection Program is to ensure that all employees have adequate and appropriate protection against airborne particulates and contaminants that may result in injury or health hazards. The program is designed to comply with OSHA and MIOSHA standards.

8.2 GENERALLY: Employees are encouraged to use respirators and required to do so where the company has identified a potential hazard. Employees may not elect to not wear respirators where it is so required.

8.3 POLICY: It is the policy of SCS to protect its employees from respiratory hazards. This is best accomplished with effective engineering controls, employee training, and administrative controls. In cases where these controls are not adequate, employees must be provided with respiratory protection to eliminate the potential exposure to respiratory hazards.

8.3(A) Employees Affected. The Director of Operations, Safety Officer or an Authorized Safety Representative will determine those company operations in which respirators will be required. In general, the following rules apply:

8.3(A)(i) Cellulose Applications. Employees involved in applying cellulose are encouraged to wear a filtering face piece (“dust-filtering” or “nuisance” mask). None of the materials used in cellulose applications contain any chemicals or materials found to be hazardous.

8.3(A)(ii) Foam Applications. Employees involved in foam applications are always required to wear a respirator during foam application and immediately afterward if the employee remains in the application area. Standard half-facepiece air purifying respirators (APR) with organic vapor cartridges are the normal level of protection required. In enclosed areas where particulate levels of methylene biphenyl isocyanate (MDI) will exceed the standard of 0.2 mg/m³, employee will be required to wear full-mask respirators with supplied air (SAR). If (SAR) is recommended the employee is required follow all necessary safety procedures for the type he is using.

8.3(A)(iii) Employees subject to this policy. Employees who work in situations where respirators are mandatory must comply with all of the provisions of this policy. Employees who are not required to use respirators other than dust masks are also required to comply with this policy. Employees who voluntarily wear only filtering facepieces are not subject to the medical, cleaning, storage, and maintenance provisions of this policy.

8.3(B) Responsibilities.

8.3(B)(i) Management. The Director of Operations, Safety Officer or an Authorized Safety Representative is jointly responsible for establishing, implementing, and administering the respirator protection program. This includes:

- Identifying work areas and processes that require employees to wear respirators

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- Selecting respiratory protection options
- Monitoring respirator use to ensure that respirators are used in accordance with their certifications
- Arranging for appropriate physical testing and training in respirator use
- Ensuring proper storage and maintenance of respiratory protection equipment
- Maintaining all records required by the program.

8.3(B)(ii) Foremen. Foremen are responsible for identifying specific site hazards requiring the use of various forms of various respiratory protections and ensuring that the respirators are used as required. This includes:

- Assessing the risk on job sites and identifying the appropriate protection method, including contacting management where necessary to resolve concerns
- Ensuring that all employees' respirators are properly worn and operating before work begins
- Monitoring respirator operation throughout the application process
- Ensuring that respirators and supplies are properly protected and maintained while on the job site but not in use

8.3(B)(iii) Employees. Each employee is required to wear his respirator when required, and to maintain his equipment while in use and away from the company office. Specifically, employees must:

- Properly put on and adjust respirators to fit, and check for correct operation, before entering any area where respiratory protection is required.
- Inform foremen if the respirator does not fit properly, needs new cartridges or hoses, or otherwise requires maintenance.
- Inform the foreman or company management if they feel that any respiratory hazards are not being adequately addressed in the workplace.

8.3(C) Respirator Selection. The company will establish the general rules under which respirators are to be worn, as described in paragraph 8.3(A) above. Whenever there is a change in the materials or products used in company processes, management will review the SDS provided by the manufacturers to determine whether changes to the program are needed. Specific respirators to be used on a job site will be determined based on the following hazard assessment:

- The Director of Operations, Safety Officer or an Authorized Safety Representative will review blueprints and descriptions of the conditions expected on the job site prior to the employees' departure to the site. The foreman will be instructed to identify any conditions not readily apparent from the specifications which might affect the choice of respirator used.
- The company has determined that only under unusual conditions, described below, will suggest the use of any respirator other than the half-facepiece APR in foam applications. The foreman will confirm that conditions are within standard for the company and inform employees that they will be using the standard APR or dust mask.

- It is possible that employees will be required to work in an enclosed space during a foam application where air circulation is inadequate to maintain reasonably low levels of isocyanates. If this situation arises, the foreman should report immediately to the Director of Operations to determine whether supplied air respirators may be obtained for use on the site. All equipment obtained will be used according to manufacturers' specifications. SAR is not mandatory or required to protect against isocyanates; however, the company may decide that this level of protection may be appropriate.

8.3(D) Respirator Use. All employees will use their respirators correctly, according to manufacturer's instructions and training.

8.3(D)(i) Training. Prior to wearing a respirator on the job site, employees will be trained in its use. This training will include supervised practice in putting on the respirator, changing cartridges, making minor adjustments for fit, and the proper care and maintenance of the respirator. Whenever there is a change in the make, model or size of the respirator, employees will be re-trained.

8.3(D)(ii) General Job Site Use. Employees will use their respirators under conditions specified by this program, in accordance with the training they receive on the use of the particular model. Respirators shall only be used in a manner for which they have been certified by NIOSH or the manufacturer.

- All employees shall conduct user seal checks each time they wear their respirator. Employees will use either the positive or negative pressure check specified by the Standards
- Employees will be permitted to leave the work area to maintain their respirator for the following reasons:
 - To clean the respirator if the respirator is impeding their ability to work
 - Change filters or cartridges
 - Replace parts, or
 - To inspect the respirator if it stops functioning as intended
- Employees are not permitted to wear tight fitting respirators if they have any physical conditions such as scars or facial hair that prevents them from achieving a good seal.
- Employees are not permitted to wear headphones, jewelry or other articles of clothing that may interfere with the facepiece-to-face seal.

8.3(D)(iii) Malfunctions. In the event of a malfunction of the respirator, the employee should inform his foreman/supervisor and proceed to the trailer or other site where repairs can be made. If the employee cannot repair or replace the respirator at the job site, he may not re-enter the work area. The employee or foreman should contact the Director of Operations, Safety Officer or an Authorized Safety Representative immediately to secure a replacement.

8.3(D)(iv) Maintaining adequate parts and supplies. The respirator storage box in every trailer will be inspected prior to departure for the job site to ensure that there are adequate supplies of cartridges and parts.

8.4 Medical Evaluation. All employees who are required to wear, or who voluntarily wear, any type of respirator other than a dust-mask will be required to comply with the medical evaluation and testing procedures. Employees are not permitted to wear respirators until a physician has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

8.4(A) Evaluation Questionnaire. All employees will be given a respiratory assessment questionnaire to complete as part of the employee orientation program. All current employees who have not completed the questionnaire at the beginning of their employment will be required to complete the questionnaire prior to receiving the fit-testing examination.

8.4(B) Medical Evaluation. The company has provided Concentra Medical Center (and any subsequent medical clinic/physician selected by the company), or the company has been informed that said facility already possesses, a copy of this program, the Respiratory Protection Standard, the list of hazardous substances in the work area, and information concerning the respirators to be used and the situations under which the respirators will be used.

8.4(B)(i) Initial Testing and Evaluation. All employees who will work in a situation in which respirators other than dust masks may be used will be sent to the company-approved physician for respirator fitness testing prior to being sent to such a job site. The testing method should include qualitative fit testing protocols using irritant smoke and proper HEPA filters. An employee must be certified by the physician as physically able to perform the job duties. Employees will be fit tested with the make, model, and size of respirator that they will wear.

8.4(B)(ii) Additional Testing and Evaluation. All employees who will continue to work in situations in which respirators other than dust masks will be used will be re-tested under the following conditions:

- Annually
- When there is a change in the make, model, or size of the respirator
- When there are changes in the employee's physical condition (e.g., weight, facial scarring) that could affect respiratory fit.

8.5 Respirator Care and Maintenance.

8.5(A) Job Site Storage. On the job site, respirators not in use shall be stored in the designated toolbox, which shall not be used for any other purpose. The foreman is responsible for informing the Director of Operations if the toolbox conditions deteriorate to the point at which the respirators, cartridges and parts cannot be adequately inspected.

8.5(B) Warehouse Storage. All respirators, cartridges and supplies will be kept in clean dry storage boxes on adequate shelving protected from damage by warehouse operations. The Director of Operations, Safety Officer or an Authorized Safety Representative shall be responsible for ensuring that adequate supplies are maintained.

8.5(C) Cleaning. Respirators issued for the exclusive use of an employee shall be cleaned as often as necessary, but not less than once per week. Respirators not assigned to a specific employee must be cleaned daily, or after a job is completed, so long as only one employee has worn the respirator. The following procedure is to be used when cleaning and disinfecting respirators:

- Disassemble the respirator, removing any filters, canisters, or cartridges
- Wash the facepiece and associated parts in a mild detergent with warm water. Do not use organic solvents.
- Rinse completely in clean warm water.
- Wipe the respirator with disinfectant wipes (70% isopropyl alcohol) to kill germs
- Air dry in a clean area.
- Reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other airtight container.

8.5(D) Maintenance. Respirators are always to be properly maintained in order to ensure that they function properly and adequately protect the employee. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use. No components will be replaced, or repairs made, beyond those recommended by the manufacturer. The following inspection (with appropriate repairs) will be conducted at least monthly:

- Facepiece:
 - Cracks, tears, or holes
 - Facemask distortion
 - Cracked or loose lenses/faceshield
- Head straps:
 - Breaks or tears
 - Broken buckles
- Valves:
 - Residue or dirt
 - Cracks or tears in valve material
- Filters/Cartridges
 - Approval designation
 - Gaskets
 - Cracks or dents in housing
 - Proper cartridge for hazard

8.5(E) Change Schedules. Employees wearing respirators with filters should replace the cartridges on their respirators when they first begin to have trouble breathing (i.e., resistance) while wearing their masks. Organic vapor cartridges must be changed for every 8 hours of service or more frequently if needed. Employees shall be required to maintain their respirator cartridge logs and include the following:

- Date of inspection and cleaning
- Date of each cartridge exchange

The respirator cartridge logs shall be submitted on a bi-weekly basis to the Foreman, Director of Operations, Safety Officer or an Authorized Safety Representative.

8.5(F) Defective Respirators. Respirators that are defective or have defective parts shall be taken out of service immediately. If, during an inspection, an employee discovers a defect in a respirator, he is to bring the defect to the attention of his foreman (if on a job site) or the Director of Operations (if in the warehouse). The foreman/Director of Operations will decide whether to:

- Temporarily take the respirator out of service until it can be repaired
- Perform a simple fix on the spot (e.g., replacing a head strap)
- Dispose of the respirator due to an irreparable problem or defect.

When a respirator is taken out of service for an extended period, the respirator will be tagged out of service and the employee will be given a replacement of similar make, model and size. All tagged out respirators will be kept in storage separate from usable respirators.

8.5(G) Recordkeeping. The Director of Operations, Safety Officer or an Authorized Safety Representative shall maintain a log for each respirator, initialed by the employee, to indicate when cleaning was done, inspections made, and describing any type of maintenance performed on the respirator. The log will be reviewed quarterly by the Director of Operations and President for accuracy.

9.0 FALL PROTECTION PROGRAM

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- 9.11. Glossary

9.1. OBJECTIVE

The objective of the Stony Creek Services, Inc (SCS) Fall Protection Program is to identify and evaluate fall hazards to which employees will be exposed, and to provide specific training as required by the Occupational Safety and Health Administration (OSHA) Fall Protection Standard, 29 CFR 1926, Subpart M.

9.2. POLICY

It is the policy of SCS to protect its employees from occupational injuries by implementing and enforcing safe work practices and appointing a competent person(s) to manage the Fall Protection Program. The SCS Fall Protection Program shall comply with the OSHA requirements. A copy of the OSHA Fall Protection Standard shall be made available to all employees and may be obtained from Responsible Person.

9.3. ASSIGNMENT OF RESPONSIBILITY

A. Employer

It is the responsibility of Stony Creek Services (SCS) to provide fall protection to affected employees, and to ensure that all employees understand and adhere to the procedures of this plan and follow the instructions of the Responsible Person.

B. Program Manager

It is the responsibility of Responsible Person as the Fall Protection Program Manager to implement this program by:

1. performing routine safety checks of work operations;
2. enforcing SCS safety policy and procedures;
3. correcting any unsafe practices or conditions immediately;
4. training employees and supervisors in recognizing fall hazards and the use of fall protection systems;
5. maintaining records of employee training, equipment issue, and fall protection systems used at SCS jobsites; and
6. investigating and documenting all incidents that result in employee injury.

C. Employees

It is the responsibility of all employees to:

1. understand and adhere to the procedures outlined in this Fall Protection Program.
2. follow the instructions of Responsible Person.
3. bring to management's attention any unsafe or hazardous conditions or practices that may cause injury to either themselves or any other employees; and
4. report any incident that causes injury to an employee, regardless of nature of the injury.

9.4. TRAINING

A. All employees who may be exposed to fall hazards are required to receive training on how to recognize such hazards, and how to minimize their exposure to them. Employees shall receive training as soon after employment as possible, and before they are required to work in areas where fall hazards exist.

B. A record of employees who have received training and training dates shall be maintained by Responsible Person. Training of employees by Responsible Person shall include:

1. Nature of the fall hazards employees may be exposed to.
2. Correct procedures for erecting, maintaining, disassembling, and inspecting fall protection systems.
3. Use and operation of controlled access zones, guardrails, personal fall arrest systems, safety nets, warning lines, and safety monitoring systems.
4. Role of each employee in the Safety Monitoring System (if one is used).
5. Limitations of the use of mechanical equipment during roofing work on low slope roofs (if applicable).
6. Correct procedures for equipment and materials handling, and storage and erection of overhead protection.
7. Role of each employee in alternative Fall Protection Plans (if used).

- 8. Requirements of the OSHA Fall Protection Standard, 29 CFR 1926, Subpart
- 9. SCS requirements for reporting incidents that cause injury to an employee.
- C. Additional training shall be provided on an annual basis, or as needed when changes are made to this Fall Protection Program, an alternative Fall Protection Plan, or the OSHA Fall Protection Standard.

9.5. BEING AWARE OF CONTROLLED ACCESS ZONES AND WHAT THEY ARE

A. Masons are the only authorized employees permitted to enter controlled access zones and areas from which guardrails have been removed. All other workers are prohibited from entering controlled access zones.

B. Controlled access zones shall be defined by control lines consisting of ropes, wires, tapes, or equivalent material, with supporting stanchions, and shall be:

- 1. Flagged with a high-visibility material at six (6) foot intervals.
- 2. Rugged and supported so that the line is between 30 and 50 inches (including sag) from the walking/working surface.
- 3. Strong enough to sustain stress of at least 200 pounds.
- 4. Extended along the entire length of an unprotected or leading edge.
- 5. Parallel to the unprotected or leading edge.
- 6. Connected on each side to a guardrail system or wall.
- 7. Erected between six (6) feet and 25 feet from an unprotected edge, except in the following cases:
 - a. when working with precast concrete members: between six (6) feet and 60 feet from the leading edge, or half the length of the member being erected, whichever is less; or
 - b. when performing overhand bricking or related work: between ten (10) feet and 15 feet from the working edge.

9.6. EXCAVATIONS

Fall protection will be provided to employees working at the edge of an excavation that is six (6)

feet or deeper. Employees in these areas are required to use the fall protection systems as designated in this program.

A. Excavations that are six (6) feet or deeper shall be protected by guardrail systems, fences, barricades, or covers.

B. Walkways that allow employees to cross over an excavation that is six (6) feet or deeper shall be equipped with guardrails.

9.7. FALL PROTECTION SYSTEMS

A. Covers

- 1. All covers shall be secured to prevent accidental displacement.
- 2. Covers shall be color-coded or bear the markings "HOLE" or "COVER".
- 3. Covers located in roadways shall be able to support twice the axle load of the largest vehicle that might cross them.
- 4. Covers shall be able to support twice the weight of employees, equipment, and materials that might cross them.

B. Guardrail Systems

Guardrail systems shall be erected at unprotected edges, ramps, runways, or holes where it is determined by Responsible Person that erecting such systems will not cause an increased hazard to employees. The following specifications will be followed in the erection of guardrail systems. Toprails shall be:

1. at least ¼ inch in diameter (steel or plastic banding is unacceptable);
2. flagged every six (6) feet or less with a high visibility material if wire rope is used
3. inspected by Responsible Person as frequently as necessary to ensure strength and stability;
4. forty-two (42) inches (plus or minus three (3) inches) above the walking/working level and
5. adjusted to accommodate the height of stilts, if they are in use.

Midrails, screens, mesh, intermediate vertical members, and solid panels shall be erected in accordance with the OSHA Fall Protection Standard.

Gates or removable guardrail sections shall be placed across openings of hoisting areas or holes when they are not in use to prevent access.

C. Personal Fall Arrest Systems

1. Personal fall arrest systems shall be issued to and used by employees as determined by Responsible Person and may consist of anchorage, connectors, body harness, deceleration device, lifeline, or suitable combinations. Personal fall arrest systems shall:
 - a. limit the maximum arresting force to 1800 pounds;
 - b. be rigged so an employee cannot free fall more than six (6) feet or contact any lower level;
 - c. bring an employee to a complete stop and limit the maximum deceleration distance traveled to three and a half (3 ½) feet;
 - d. be strong enough to withstand twice the potential impact energy of an employee free falling six (6) feet (or the free fall distance permitted by the system, whichever is less);
 - e. be inspected prior to each use for damage and deterioration; and
 - f. be removed from service if any damaged components are detected.

2. All components of a fall arrest system shall meet the specifications of the OSHA Fall Protection Standard, and shall be used in accordance with the manufacturer's instructions.

- a. The use of non-locking snaphooks is prohibited.
- b. Dee-rings and locking snaphooks shall:
 - i. have a minimum tensile strength of 5000 pounds; and
 - ii. be proof-tested to a minimum tensile load of 3600 pounds without cracking, breaking, or suffering permanent deformation.
- c. Lifelines shall be:
 - i. designed, installed, and used under the supervision of Responsible Person;
 - ii. protected against cuts and abrasions; and
 - iii. equipped with horizontal lifeline connection devices capable of locking in both directions on the lifeline when used on suspended scaffolds or work platforms that have horizontal lifelines that may become vertical lifelines.

- d. Self-retracting lifelines and lanyards must have ropes and straps (webbing) made of synthetic fibers, and shall:
 - i. sustain a minimum tensile load of 3600 pounds if they automatically limit free fall distance to two (2) feet; or
 - ii. sustain a minimum tensile load of 5000 pounds (includes ripstitch, tearing, and deforming lanyards).
- e. Anchorages must support at least 5000 pounds per person attached and shall be:
 - i. designed, installed, and used under the supervision of Responsible Person;
 - ii. capable of supporting twice the weight expected to be imposed on it; and
 - iii. independent of any anchorage used to support or suspend platforms.

D. Positioning Device Systems

Body belt or body harness systems shall be set up so that an employee can free fall no farther than two (2) feet, and shall be secured to an anchorage capable of supporting twice the potential impact load or 3000 pounds, whichever is greater. Requirements for snaphooks, dee-rings, and other connectors are the same as detailed in this Program under Personal Fall Arrest Systems.

E. Safety Monitoring Systems

In situations when no other fall protection has been implemented, Responsible Person(s) shall monitor the safety of employees in these work areas. The Responsible Person(s) shall be:

1. competent in the recognition of fall hazards;
2. capable of warning workers of fall hazard dangers;
3. operating on the same walking/working surfaces as the employees and able to see them;
4. close enough to work operations to communicate orally with employees; and
5. free of other job duties that might distract them from the monitoring function.

No employees other than those engaged in the work being performed under the Safety Monitoring System shall be allowed in the area. All employees under a Safety Monitoring System are required to promptly comply with the fall hazard warnings of the Responsible Person(s).

F. Safety Net Systems

1. Safety net systems must be installed no more than 30 feet below the walking/working surface with sufficient clearance to prevent contact with the surface below, and shall be installed with sufficient vertical and horizontal distances as described in the OSHA Fall Protection Standard.
2. All nets shall be inspected at least once a week for wear, damage, or deterioration by Responsible Person. Defective nets shall be removed from use and replaced with acceptable nets.
3. All nets shall be in compliance with mesh, mesh crossing, border rope, and connection specifications as described in the OSHA Fall Protection Standard.
4. When nets are used on bridges, the potential fall area from the walking/working surface shall remain unobstructed.

5. Objects that have fallen into safety nets shall be removed as soon as possible, and at least before the next working shift.

G. Warning Line Systems

Warning line systems consisting of supporting stanchions and ropes, wires, or chains shall be erected around all sides of roof work areas.

1. Lines shall be flagged at no more than six (6) foot intervals with high visibility materials.
2. The lowest point of the line (including sag) shall be between 34 and 39 inches from the walking/working surface.
3. Stanchions of warning line systems shall be capable of resisting at least 16 pounds of force.
4. Ropes, wires, or chains must have a minimum tensile strength of 500 pounds.
5. Warning line systems shall be erected at least six (6) feet from the edge, except in areas where mechanical equipment is in use. When mechanical equipment is in use, warning line systems shall be erected at least six (6) feet from the parallel edge, and at least ten (10) feet from the perpendicular edge.

9.8. TASKS AND WORK AREAS REQUIRING FALL PROTECTION

Unless otherwise specified, Responsible Person(s) shall evaluate the worksite(s) and determine

the specific type(s) of fall protection to be used in the following situations.

A. Framework and Reinforcing Steel

Fall protection will be provided when an employee is climbing or moving at a height of over 24 feet when working with rebar assemblies.

B. Hoist Areas

Guardrail systems or personal fall arrest systems will be used in hoist areas when an employee may fall six (6) feet or more. If guardrail systems must be removed for hoisting, employees are required to use personal fall arrest systems.

C. Holes

Covers or guardrail systems shall be erected around holes (including skylights) that are six (6) feet or more above lower levels. If covers or guardrail systems must be removed, employees are required to use personal fall arrest systems.

D. Leading Edges

Guardrail systems, safety net systems, or personal fall arrest systems shall be used when employees are constructing a leading edge that is six (6) feet or more above lower levels. An alternative Fall Protection Plan shall be used if Responsible Person(s) determines that the implementation of conventional fall protection systems is infeasible or creates a greater hazard to employees. All alternative Fall Protection Plans for work on leading edges shall:

1. be written specific to the particular jobsite needs;
2. include explanation of how conventional fall protection is infeasible or creates a greater hazard to employees;
3. explain what alternative fall protection will be used for each task;
4. be maintained in writing at the jobsite by Responsible Person; and
5. meet the requirements of 29 CFR 1926.502(k).

E. Overhand Bricklaying and Related Work

Guardrail systems, safety net systems, personal fall arrest systems, or controlled access zones shall be provided to employees engaged in overhead bricklaying or related work six (6) feet or more above the lower level. All employees reaching more than ten (10) inches below the walking/working surface shall be protected by guardrail systems, safety net systems, or personal fall arrest systems.

F. Precast Concrete Erection

Guardrail systems, safety net systems, or personal fall arrest systems shall be provided to employees working six (6) feet or more above the lower level while erecting or grouting precast concrete members. An alternative Fall Protection Plan shall be used if Responsible Person(s) determines that the implementation of conventional fall protection systems is infeasible or creates a greater hazard to employees. All alternative Fall Protection Plans for precast concrete erection shall:

1. be written specific to the particular jobsite needs;
2. include explanation of how conventional fall protection is infeasible or creates a greater hazard to employees.
3. explain what alternative fall protection will be used for each task;
4. be maintained in writing at the jobsite by Responsible Person; and
5. meet the requirements of 29 CFR 1926.502(k).

G. Residential Construction

Guardrail systems, safety net systems, or personal fall arrest systems shall be provided to employees working six (6) feet or more above the lower level on residential construction projects. However, certain tasks may be performed without the use of conventional fall protection if Responsible Person has determined that such fall protection is infeasible or creates greater hazards to employees. Responsible Person shall follow the guidelines of 29 CFR 1926, Subpart M, Appendix E in the development of alternative Fall Protection Plans for residential construction projects (see Attachment A).

H. Roofing

1. Low-Slope Roofs

Fall protection shall be provided to employees engaged in roofing activities on low-slope roofs with unprotected sides and edges six (6) feet or more above lower levels. The type(s) of fall protection needed shall be determined by Responsible Person, and may consist of guardrail systems, safety net systems, personal fall arrest systems, or a combination of a warning line system and safety net system, warning line system and personal fall arrest system, or warning line system and safety monitoring system. On roofs 50 feet or less in width, the use of a safety monitoring system without a warning line system is permitted.

2. Steep Roofs

Guardrail systems with toeboards, safety net systems, or personal fall arrest systems will be provided to employees working on a steep roof with unprotected sides and edges six (6) feet or more above lower levels, as determined by Responsible Person.

I. Wall Openings

Guardrail systems, safety net systems, or a personal fall arrest system will be provided to employees working on, at, above, or near wall openings when the outside bottom edge of the wall opening is six (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. The type of

fall protection to be used will be determined by Responsible Person .

J. Ramps, Runways, and Other Walkways

Employees using ramps, runways, and other walkways six (6) feet or more above the lower level shall be protected by guardrail systems.

9.9. PROTECTION FROM FALLING OBJECTS

When guardrail systems are in use, the openings shall be small enough to prevent potential passage of falling objects. The following procedures must be followed by all employees to prevent hazards associated with falling objects.

- A. No materials (except masonry and mortar) shall be stored within four (4) feet of working edges.
- B. Excess debris shall be removed regularly to keep work areas clear.
- C. During roofing work, materials and equipment shall be stored no less than six (6) feet from the roof edge unless guardrails are erected at the edge.
- D. Stacked materials must be stable and self-supporting.
- E. Canopies shall be strong enough to prevent penetration by falling objects.
- F. Toeboards erected along the edges of overhead walking/working surfaces shall be:
 - 1. capable of withstanding a force of at least 50 pounds; and
 - 2. solid with a minimum of three and a half (3 ½) inches tall and no more than one quarter (1/4) inch clearance above the walking/working surface.
- G. Equipment shall not be piled higher than the toe board unless sufficient paneling or screening has been erected above the toe board.

9.10. CHANGES TO THE PLAN

Any changes to the Fall Protection Program (and alternative Fall Protection Plans, if in place) shall be approved by Responsible Person, and shall be reviewed by a qualified person as the job

progresses to determine additional practices, procedures or training needs necessary to prevent

fall injuries. Affected employees shall be notified of all procedure changes, and trained if necessary. A copy of this plan, and any additional alternative Fall Protection Plans, shall be maintained at the jobsite by Responsible Person.

9.11. GLOSSARY

Anchorage: a secure point of attachment for lifelines, lanyards, or deceleration devices.

Body belt: a strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

Body harness: straps that may be secured about the person in a manner that distributes the fall-arrest forces over at least the thighs, pelvis, waist, chest, and shoulders with a means for attaching the harness to other components of a personal fall arrest system.

Connector: A device that is used to couple (connect) parts of a personal fall arrest system or positioning device system together.

Controlled access zone: a work area designated and clearly marked in which certain types of work (such as overhand bricklaying) may take place without the use of conventional fall protection systems (guardrail, personal arrest, or safety net) to protect the employees working in the zone.

Deceleration device: any mechanism, such as a rope, grab, rip stitch lanyard, specially woven lanyard, tearing lanyard, deforming lanyard, or automatic self-retracting lifeline/lanyard, which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limits the energy imposed on an employee during fall arrest.

Deceleration distance: the additional vertical distance a falling person travels, excluding lifeline elongation and free fall distance, before stopping from the point at which a deceleration device begins to operate.

Guardrail system: a barrier erected to prevent employees from falling to lower levels.

Hole: a void or gap two (2) inches (5.1 centimeters) or more in the least dimension in a floor, roof, or other walking/working surface.

Lanyard: a flexible line of rope, wire rope, or strap that generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline, or anchorage.

Leading edge: the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as a deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed.

Lifeline: a component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline), that serves as a means for connecting other components of a personal fall arrest system to an anchorage.

Low slope roof: a roof having a slope less than or equal to 4 in 12 (vertical to horizontal).

Opening: a gap or void 30 inches (76 centimeters) or higher and 18 inches (46 centimeters) or wider, in a wall or partition through which employees can fall to a lower level.

Personal fall arrest system: a system including but not limited to an anchorage, connectors, and a body harness used to arrest an employee in a fall from a working level.

Positioning device system: a body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning backwards.

Rope grab: a deceleration device that travels on a lifeline and automatically, by friction, engages the lifeline and locks to arrest a fall.

Safety monitoring system: a safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.

Self-retracting lifeline/lanyard: a deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under minimal tension during normal employee movement and which, after onset of a fall, automatically locks the drum and arrests the fall.

Snaphook: a connector consisting of a hook-shaped member with a normally closed keeper, or a similar arrangement, which may be opened to permit the hook to receive an object and, when released automatically, closes to retain the object.

Steep roof: a roof having a slope greater than 4 in 12 (vertical to horizontal).

Toeboard: a low protective barrier that prevents material and equipment from falling to lower levels and which protects personnel from falling.

Unprotected sides and edges: any side or edge (except at entrances to points of access) of a walking/working surface (e.g., floor, roof, ramp, or runway) where there is no wall

or guardrail system at least 39 inches (1 meter) high.

Walking/working surface: any surface, whether horizontal or vertical, on which an employee walks or works, including but not limited to floors, roofs, ramps, bridges, runways, formwork, and concrete reinforcing steel. Does not include ladders, vehicles, or trailers on which employees must be located to perform their work duties.

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

10.0 HAZARD COMMUNICATION PROGRAM

10.1 PURPOSE: The purpose of the Hazard Communication Program is to ensure that employees are made aware of all health risks which may occur on the job, and that they are able to ensure adequate protection against these risks. This Hazard Communication Program will assist in the following:

- To help you reduce the risks involved in working with hazardous materials
- To transmit vital information to employees about real and potential hazards of substances in the workplace
- To reduce the incidence and cost of illness and injury resulting from hazardous substances
- To encourage a reduction in the volume and toxicity of hazardous substances

This program is applicable to all COMPANY employees who may be exposed to hazardous chemicals.

This program covers COMPANY employees and contractors and shall be used on owned premises.

10.2 GENERALLY: Because the company typically uses the same products, the focus of the program is on general awareness of the risks associated with them. Employees will be informed whenever a new product is used and will be trained as necessary to ensure they are aware of any new hazard.

10.3 POLICY: The Hazard Communication Program is administered by the Director of Operations.

10.3(A) Hazard Determination. The company will request Safety Data Sheets (SDS) from suppliers for all products purchased for use in the business. The company will rely on material safety data sheets obtained from product suppliers to meet hazard determination requirements.

10.3(B) Labeling. The Director of Operations, Safety Officer or an Authorized Safety Representative will be responsible for seeing that all containers entering the workplace are properly labeled. All labels shall contain the following information, per OSHA HCS Standards as of June 1, 2015:

- Hazard Pictograms
- Signal Word

- Danger – For more “severe” hazards
- Warning – For less “severe” hazards
- o Hazard Statement(s)
 - A phrase assigned to a hazard class and category that describes the nature of the hazards of a hazardous product, including, where appropriate, the degree of hazard
- o Precautionary Statement(s)
 - Phrases (and/or pictograms) that describe recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous product, or improper storage or handling of a hazardous product
- o Product Identifier
- o Supplier Identification

Each employee shall be responsible for ensuring that all portable containers used in their work area are labeled with the appropriate identity and hazard warning.










10.3(B)(i) Additional Labeling Requirements:

- When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked in accordance with OSHA’s Hazard Communication requirements.
- Damaged labels or labels with incomplete information shall be reported immediately.
- Damaged labels on incoming containers of chemicals shall not be removed.
- New labels shall be provided as needed so that all containers are properly labeled.
- Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label.
- If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled.
- Food and beverage containers should never be used for chemical storage.
- Employees who are unsure of the contents of any container, vessel or piping must contact their supervisor for information regarding the substance including:
 - o The name of the substance
 - o The hazards related to the substance
 - o The safety precautions required for working with the substance

10.3(B)(ii) Pictograms:

- As part of the new GHS Hazard Communication Standard (HCS) pictograms are required on labels to alert users of the chemical hazards to which they may be exposed.
- Each pictogram consists of a symbol representing a distinct hazard(s) and determined by the chemical hazard classification.
- The symbol will in black, on a white background, framed within a red border. Examples are as follows:

Stony Creek Services, Inc.
Health & Safety Program

 <p>Health Hazard Carcinogen Mutagenicity Reproductive Toxicity Respiratory Sensitizer Target Organ Toxicity Aspiration Toxicity</p>	 <p>Flame Flammable Pyrophorics Self-Heating Emits Flammable Gas Self-Reactive Organic Peroxides</p>	 <p>Exclamation Mark Irritant (skin and eye) Skin Sensitizer Acute Toxicity (harmful) Narcotic Effects Respiratory Tract Irritant Hazardous to Ozone Layer (Non Mandatory)</p>
 <p>Gas Cylinder Gases Under Pressure</p>	 <p>Corrosion Skin Corrosion / Burns Eye Damage Corrosive to Metals</p>	 <p>Explosion Bomb Explosives Self-Reactives Organic Peroxides</p>
 <p>Flame over Circle Oxidizers</p>	 <p>Skull and Crossbones Acute Toxicity (Fatal or Toxic)</p>	 <p>Environment (Non Mandatory per OSHA) Aquatic Toxicity</p>

10.3(C) Safety Data Sheets (SDSs). The Director of Operations, Safety Officer or an Authorized Safety Representative will be responsible for compiling and maintaining the master SDS file. Posters identifying the person responsible for maintaining SDSs and where the SDSs are located are posted at 749 Manufacturers Drive, Westland, MI 48186, in the Warehouse area. Posters notifying employees when new or revised SDSs are received will be in the same location(s).

10.3(C)(i) Source. The Director of Operations, Safety Officer or an Authorized Safety Representative will be responsible for ensuring that there is a currently effective SDS for every product used by the company. If a required SDS is not received, the Director of Operations shall contact the supplier, in writing, to request the SDS. If an SDS is not received after two such requests, the Director of Operations, Safety Officer or an Authorized Safety Representative shall contact the MIOSHA's Construction Safety and Health Division at (517) 322-1856 or General Industry Safety and Health Division (GISHD) at (517) 322-1831, for assistance in obtaining the SDS.

The Safety Officer shall do the following for each material used:

- Obtain an SDS for each chemical before it is used.
- Review each SDS when it is received to evaluate whether the information is complete and to determine if existing protective measures are adequate.
- Replace SDS sheets when updated sheets are received. Communicate any significant changes to those who work with the chemical.
- SDSs are required for all hazardous materials used on site by project personnel.

10.3(C)(i) Location. The master SDS file will be kept at the main office of the company, located at 749 Manufacturers Drive, Westland, MI 48186. SDS's will be available for review to all employees during each work shift. Copies will be available upon request to the Director of

Operations, Safety Officer or an Authorized Safety Representative.

- A full copy of all applicable SDS's is currently maintained in the following locations:
 1. In the main office
 2. On the company cloud/storage Server.
 3. In the shop area of the south building
 4. In the shop area of the north building
 5. QR Code attached to all vehicles

10.3(D) Employee Information and Training.

10.3(D)(i) The Director of Operations, Safety Officer or an Authorized Safety Representative shall coordinate and maintain records of employee hazard communication training, including attendance rosters.

10.3(D)(ii) Before their initial work assignment, each new employee will attend a hazard communication training class. The class will provide the following information and training:

Information:

- The requirements of the MIOSHA Hazard Communication Standard
- All operations in their work area where hazardous chemicals are present
- Location and availability of the written hazard communication program, the list of hazardous chemicals, and the SDS

Training:

Conduct training of all employees potentially exposed to hazardous materials on the following schedule:

- Before new employees begin their jobs.
- Whenever new chemicals are introduced into the workplace, or
- Annually thereafter.

This training will include:

- Applicable regulatory requirements.
- Names of those responsible for implementing this program.
- Location of the program, inventory and SDSs.
- Chemicals used, and their hazards (chemical, physical and health).
- How to detect the presence or release of chemicals.
- Safe work practices.
- How to read an SDS
- Document of the Training



10.3(D)(ii) New Hazards. Before any new physical or health hazard is introduced into the workplace, each employee who may be exposed to the substance will be given information in the same manner as during the hazard communication training class.

10.3(E) Multi-Employer Worksites

10.3(E)(i) Informing other contractors. If the company exposes any employee of another employer to any hazardous chemicals that we produce, use, or store, the following information will be supplied to that employer:

- The hazardous chemicals they may encounter.
- Measures their employees can take to control or eliminate exposure to the hazardous chemicals.
- The container and pipe labeling system used on-site.
- Where applicable SDSs can be reviewed or obtained.

It is the responsibility of the Director of Operations, Safety Officer or an Authorized Safety Representative to ensure that such information is provided and/or obtained prior to any services being performed by the off-site employer. As requested by Customer, SDS for all products to be used onsite are submitted for approval.

10.3(E)(ii) Hazards from other contractors. Periodically, SCS employees may potentially be exposed to hazardous chemicals brought on our site by another employer. When this occurs, we will obtain from that employer information pertaining to the types of chemicals brought on-site, and measures that should be taken to control or eliminate exposure to the chemicals.

10.3(F) List of Hazardous Chemicals

A list of all hazardous chemicals used by Stony Creek Services, Inc. is incorporated by reference via the corporate SDS book.

- A hazardous material inventory is maintained as part of the SDS Program that lists all of the hazardous materials used at this workplace.
- Chemical names are consistent with the applicable SDSs.
- This list is updated as new products are brought into our operations.

10.3(G) Hazardous Non-Routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks. Non-routine tasks are defined as:

- Tasks which are done on an infrequent basis (e.g., preventive maintenance or activities performed during plant shutdowns).
- Working on, near, or with unlabeled piping.
- Working with unlabeled containers of an unknown substance.
- Confined space entry where a hazardous substance may be present.
- A one-time task using a hazardous substance differently than intended, i.e., using a solvent to remove stains from tile floors.
- Off-site use or transportation of chemicals.

Prior to starting work on such projects, each employee will be provided with information about hazards to which they may be exposed during such an activity. This info will include:

- Specific chemical hazards.
- Protective/safety measures which must be utilized.
- Measures that have been taken to lessen the hazards include ventilation, respirators, presence of another employee and emergency procedures.

11.0 JOB SAFETY TRAINING

11.1 PURPOSE: The Job Safety Training program is designed to ensure that all employees are fully trained in the hazards that may be encountered while working for the company. The company participates in the joint union-management MUST program

11.2 GENERALLY: The company utilizes the MUST training program. Where special training is needed that is not covered in MUST, the company will identify and implement the appropriate programs.

11.3 POLICY: All safety training and mandates are to be followed by all SCS employees.

11.3(A) Training Objectives. The company's objective is to have all employees trained in basic safety programs. In addition, some employees will complete more extensive training for them to be certified for work on MUST job sites.

11.3(B) Training Program. The Director of Operations, Safety Officer or an Authorized Safety Representative shall designate, from time to time, which employees will be required to obtain OSHA 30 certification. Employees shall be required to complete the MUST program modules, which will be required as part of general knowledge, and which employees will complete the entire program.

11.3(C) Updates. The Director of Operations, Safety Officer or an Authorized Safety Representative will be responsible for ensuring that all training is up-to-date and in compliance with the MUST and OSHA 30 program requirements.

11.4(D) Records. All training records will be maintained at the office of the company. Employees will be provided with MUST or OSHA 30 cards evidence of their current level of training.

11.4 JOB SPECIFIC REQUIREMENTS

11.4(A) Responsibility. The Director of Operations, Safety Officer or an Authorized Safety Representative will be responsible for identifying any additional training requirements called for by customers.

11.4(B) Training Programs. All employees who will work on a project with special training requirements will receive the training prior to leaving for the job site unless such training is to be provided by the customer on the job site.

12. SAFETY RULES

The following are general safety rules which are not covered elsewhere in this program. Most of these rules are also covered in the MUST training program, and most are obvious, however, they are repeated here to ensure that all employees understand their importance.

ALL SAFETY RULES MUST BE OBEYED. COMPLY WITH FEDERAL, STATE AND LOCAL REGULATIONS REGARDING SAFETY AND HEALTH. FAILURE TO DO SO WILL RESULT IN STRICT DISCIPLINARY ACTION BEING TAKEN.

12.1 General Rules

- (A) Keep your mind on your work at all times. No horseplay on the job. Injury or termination or both can be the result.
- (B) Do not distract the attention of fellow workers. Do not engage in any act which would endanger another employee.
- (C) Watch where you are walking. No task is so important or urgent that we cannot take the time to do it safely.
- (D) Know what emergency procedures have been established for your job site. (location of emergency phone, first aid kit, stretcher location, fire extinguisher locations, evacuation plan, etc.)
- (E) Lift correctly - with legs, not the back. If the load is too heavy GET HELP. Stay fit. Control your weight. Do stretching exercises. Approximately twenty percent of all construction related injuries result from lifting materials.
- (F) Non-approved headphones or music ear plugs are not permitted.
- (G) The wearing of jewelry has caused serious injuries. Jewelry has caught on moving equipment and come in contact with exposed electrical parts. You should look to the hazards of the area to determine if jewelry should be worn.
- (H) Avoid wearing excessively loose, torn, or ill-fitted clothes because they are unsafe around machinery, hot metal and flames.

12.2 Cleanliness and Sanitation

- (A) A good job is a clean job, and a clean job is the start of a safe job. So, keep your working area free from rubbish and debris.
- (B) Sanitation facilities have been or will be provided for your use. Defacing or damaging these facilities is forbidden.

12.3 First Aid

- (A) Precautions are necessary to prevent sunburn and/or frostbite to protect against burns from hot or cold materials.
- (B) If any part of your body should come in contact with an acid or caustic substance, rush to the nearest water available and flush the affected part. Secure medical aid immediately. Employees are to follow all onsite specific emergency procedures, as required. If flammable liquids are spilled on clothes, you should change them.
- (C) Never move an injured person unless it is necessary. Further injury may result. Keep the injured as comfortable as possible and utilize job site first-aid equipment until an ambulance arrives.

12.4 Lifts, Scaffolds and Harnesses

- (A) Never work aloft if you are afraid to do so, if you are subject to dizzy spells, or if you are apt to be nervous or sick.
- (B) Use the "four and one" rule when using a ladder. One foot of base for every four feet of height.
- (C) Portable ladders in use shall be equipped with safety feet unless the ladder is tied, blocked, or otherwise secured. Step ladders shall not be used as a straight ladder.
- (D) Ladders must extend three feet and be secured above landing on roof for proper use.
- (E) Ladders shall be properly inspected before each use.
- (F) Defective ladders must be properly tagged and removed from service.
- (G) Keep ladder bases free of debris, hoses, wires, materials, etc.
- (H) Build scaffolds according to manufacturers' recommendations and MIOSHA Construction Safety Standard Part 12 - Scaffolding.
- (I) Scaffold planks shall be properly lapped, cleated or secured to prevent shifting.
- (J) Never throw anything "overboard." Someone passing below may be seriously injured.
- (K) Fall protection system(s) will be used in accordance with OSHA 29 CFR 1926 Subpart M (MIOSHA Part 45). People who are performing work in unguarded areas and exposed to a potential fall of 4'-0" or more will utilize fall protection equipment. In situations where a fall could result in impalement or other injury (i.e., working over a hot process, operating equipment), fall protection equipment will be utilized regardless of the potential falling distance. All employees must adhere to:

- Verify the work area has no vertical impaling objects, such as rebar. Cap the ends of the objects with an article such as a block of 2-inch by 4-inch wood, rebar cap, or another item which adequately covers the impaling end of the object.
- A personal fall prevention system must be inspected prior to use by the user.
- Safety body harness assemblies, lanyards, and other personal equipment must be inspected before each use by the employee who is using the equipment. Documented inspections will take place routinely.
- Auxiliary fall protection equipment, such as static lines, perimeter guards, or other suitable means, will be utilized by personnel traveling from one location to another in elevated positions.
- Personnel will be provided with safe access and egress to all work areas.
- Persons who are observed not utilizing fall protection equipment will be identified and the appropriate supervisor or subcontractor will be notified.
- Employees are subject to disciplinary action up to and including termination.
- Employees must use the full body harness lanyard system issued by SCS, unless authorized by the Director of Operations, Safety Officer or an Authorized Safety Representative. Always have your safety harness and lanyard protection with you when working in conditions that require the use of fall protection.
- The use of harnesses with safety lines when working from unprotected high places is mandatory. Always keep your line as tight as possible.

12.5 Use of Equipment

- (A) Many different types of equipment require that employees be trained and licensed. Do not operate equipment that you are not qualified for; check with your foremen or supervisor for license and training requirements.
- (B) Motor vehicles will be operated by licensed and authorized drivers. All posted speed limits and other traffic signs will be strictly observed. Where weather or other conditions dictate, additional precautions must be taken. Seat belts will always be worn when traveling in company vehicles. Employees are prohibited from riding on loads, fenders, running boards, side boards and tailgates. All vehicles in use will be checked at the beginning of each shift to ensure that all parts, equipment, and accessories that affect safe operation are in proper operating condition and free from defects. Do not operate any unsafe vehicle. Report any unsafe vehicle to your foremen, supervisor, Director of Operations, Safety Officer or an Authorized Safety Representative. The vehicle must be tagged out DO NOT USE and vehicle keys removed. All defects will be corrected before the vehicle is placed in service.
- (C) Do not use power tools and equipment until you have been properly instructed in the safe work methods and become authorized to use them.
- (D) The use of illegal drugs or alcohol or being under the influence of the same on the project is even more dangerous while operating equipment. Inform your supervisor if taking strong prescription drugs that warn against driving or using machinery.

- (E) Inspect and use only extension cords of the three-prong type. Use ground fault circuit interrupters (GFCIs) always and when using tools in a wet atmosphere (e.g. outdoors) or with any temporary power supply. Check the electrical grounding system daily.
- (F) Do not use a compressor to blow dust or dirt from your clothes, hair, or hands.
- (G) No one but operator shall be allowed to ride on equipment unless proper seating is provided.
- (H) Be sure that all guards are in place. Do not remove, displace, damage, or destroy any safety device or safeguard furnished or provided for use on the job, nor interfere with the use thereof.
- (I) If you must work around power shovels, trucks, and dozers, make sure operators can always see you. Barricades are required for cranes.
- (J) Never oil, lubricate, or fuel equipment while it is running or in motion.
- (K) Before servicing, repairing, or adjusting any powered tool or piece of equipment, disconnect it, lock out the source of power, and tag it out.
- (L) Air tools under pressure must not be used to clean clothes or directly applied to any part of the body.

12.6 Work Areas

- (A) Do not enter an area which has been barricaded.
- (B) Know where firefighting equipment is located and be trained on how to use it.
- (C) Barricade danger areas. Guard rails or perimeter cables may be required.
- (D) Trenches over five feet deep must be shored or sloped as required. Keep out of trenches or cuts that have not been properly shored or sloped. Excavated or other material shall not be stored nearer than two feet from the edge of the excavation. Excavations less than 5 ft may also require cave in protection in some instances.
- (E) Never enter a manhole, well, shaft, tunnel or other confined space which could possibly have a non-respirable atmosphere because of lack of oxygen, or presence of toxic or flammable gas, or has a possibility of engulfment by solids or liquids. Make certain a qualified person tests the confined area with an appropriate detector before entry, that the necessary safety equipment is worn. Standby person may be required to be stationed at the entrance.

- (F) Open fires are prohibited.
- (G) Use a spotter whenever possible or required.
- (H) Be alert for mobile equipment and overhead cranes and observe all warning signals and alarms. Always practice good communications with fellow workers. Be alert to co-workers at all times.
- (I) Do not drink water from non-potable sources. Drink only from a drinking fountain or supplied bottled water dispenser.
- (J) Use emergency eye wash stations and showers in an emergency situation.
- (K) Report the use of all fire extinguishers to your supervisor. Learn the location of the nearest stretcher and fire extinguisher.
- (L) Smoking is permitted only in designated areas and in many cases, not allowed on the jobsite.
- (M) Ensure that adequate and proper lighting is present in your work area. Report lighting issues to your foreman, supervisor, or jobsite project manager and superintendent.

12.7 Tools

- (A) Keep tools free from mushroom heads, split or cracked handles, and loose heads. Defective tools must not be used. Make sure all power tools and extension cords are properly grounded, use ground fault protection devices. Always check electrical cords for breaks in the insulation.
- (B) Make sure to use the proper tool for the job. Tools are not to be altered in any way and will be operated in accordance with manufacturing specifications. Tools, such as saws and grinders, will have guards in place during their operation.
- (C) Tools will not be abused and will be kept in good operating condition.
- (D) Gasoline powered tools will not be used in unventilated areas. Gasoline will be dispensed only in approved safety cans. These cans will be properly labeled and stored.

13.0 SAFETY DISCIPLINE

13.1 PURPOSE: The purpose of the safety discipline policy is to inform employees of the importance of complying with the program and providing guidelines for how violations are to be dealt with.

13.2 GENERALLY: Company management reserves the right to enforce any discipline it deems necessary, up to and including discharge, to the extent allowed by law and the collective bargaining agreement. The policy gives guidance in those situations where the company wishes to maintain consistency.

13.3 POLICY: SCS is committed to a fair and equitable safety disciplinary policy. The administration of discipline will be for, but not limited to, noncompliance with SCS, OSHA and MIOSHA safety policies, procedures, rules, and professional standards. Discipline can also be administered for such matters as inefficiency, incompetence, failure to maintain skills, inadequate performance levels, insubordination, and failure to follow the lawful orders of a supervisor. This progressive safety discipline policy lets employees know exactly where they stand and why disciplinary action is being taken and it gives employees a chance to present their side of the story. The type and severity of any disciplinary action taken shall be governed by principles of consistent application, prior knowledge of rules and standards, and determination of the facts.

13.3(A) Immediate discharge. Notwithstanding any rights reserved by the company to discipline employees, violation of any rule which results in injury to another employee, or any other person on a job site, will be considered just cause for immediate termination.

13.3(B) Discretionary discipline. Any violation of safety rules which results in injury to the employee him/herself, or which risks the safety of other employees or other persons on the job site, or which subjects the company to violations of any law or regulation which could result in fines or other administrative punishment, shall be dealt with at the discretion of management and the job site foreman. Appropriate discipline includes removal of the employee from the job site, immediate suspension without pay, followed by a more formal suspension, and may include immediate termination if the risk of harm to employee or the public is deemed severe.

13.3(C) Three-Step System. In the event of "minor" safety violations, those which are deemed technical in nature and do not increase the risk of harm to the employee or others, the company will typically follow a three-step disciplinary system, as follows:

- First violation: Written warning; copies to employee and employee's file.
- Second violation: 5-day suspension without pay.
- Third violation: Termination.

13.3(D) Recordkeeping. A record will be maintained of all disciplines. Records of disciplinary will be forwarded to the union as called for by the CBA.

14.0 POWER LOCKOUT PROCEDURE

14.1 PURPOSE: The purpose of this policy is to assure that employees are protected from unintended machine motion or unintended release of energy which could cause injury.

14.2 GENERALLY: Company management reserves the right to enforce any discipline it deems necessary, up to and including discharge, to the extent allowed by law and the collective bargaining agreement. The policy gives guidance in those situations where the company wishes to maintain consistency.

14.3 POLICY: All safety training and mandates are to be followed by all SCS employees. SCS utilizes the Occupational Health and Safety Administration (OSHA) guidelines for *The Control of Hazardous Energy (Lockout/Tagout)* CFR 29 Part 1910.147.

14.3(A) Management Responsibility

14.3(A)(i) The Director of Operations, Safety Officer or an Authorized Safety Representative shall train new employees and periodically instruct all of their employees regarding provisions and requirements of this lockout procedure.

14.3(A)(ii) Each foreman shall effectively enforce compliance of this lockout procedure including the use of corrective disciplinary action where necessary.

14.3(A)(iii) Each foreman shall assure that the locks and devices required for compliance with the lockout procedure are provided to their employees.

14.3(A)(iv) Prior to setting up, adjusting, repairing, servicing, installing, or performing maintenance work on equipment, machinery, tools, or processes, the foreman shall determine and instruct the employees of the steps to be taken to assure they are not exposed to injury due to unintended machine motion or release of energy.

14.3(B) Employee Responsibility

14.3(B)(i) Employees shall comply with the lockout procedure.

14.3(B)(ii) Employees shall consult with their supervisor or other appropriate knowledgeable management personnel whenever there are any questions regarding their protection.

14.3(B)(iii) Employees shall obtain and care for the locks and other devices required to comply with the lockout procedure.

14.4 GENERAL RULES

14.4(A) Lockout Rule. The power source of any equipment, machine, tool, or process to be set-up, adjusted, repaired, serviced, installed, or where maintenance work is to be performed

and unintended motion or release of energy could cause personal injury, such a power source shall be locked out by each employee doing the work. Sources of energy, such as springs, air, hydraulic and steam shall be evaluated in advance to determine whether to retain or relieve the pressure prior to starting the work.

14.4(B) Purpose of locks. Safety locks are for the personal protection of the employees and are only to be used for locking out equipment.

14.4(C) Acquiring safety locks. Safety locks, adapters, and "Danger Tags" can be obtained from a foreman, Director of Operations, Safety Officer or an Authorized Safety Representative.

14.4(D) Equipment locks. Equipment locks and adapters can be obtained from a foreman, the Director of Operations Safety Officer or an Authorized Safety Representative. The sole purpose of the "Equipment" lock and adaptor is to protect the equipment during periods of time when work has been suspended or interrupted. The locks are not to be used as a substitute for the employee's personal safety lock.

14.4(E) Personal locks. Personal locks shall contain a tag with the employee's name on it.

14.4(F) Keys. One key of every lock issued shall be retained by the employee to whom it was issued and the only other key to the lock shall be retained by the foreman, the Director of Operations Safety Officer or an Authorized Safety Representative.

14.4(G) Seeking assistance. Employees shall request assistance from their foreman, the Director of Operations, Safety Officer or an Authorized Safety Representative if they are unsure of where or how to lockout equipment.

14.5 LOCKING OUT AND ISOLATING THE POWER SOURCE

14.5(A) Equipment, machines, or processing main disconnect switches shall be turned off and locked in the off position only after the electrical power is shut off at the point of operator control. Failure to follow this procedure may cause arcing and possibly an explosion.

14.5(B) Equipment/tools connected to over a 110-volt source of power by a plug-in cord shall have a locking device applied to the plug attached to the cord leading to the machine to be considered locked out.

14.5(C) Equipment/tools connected to a 110-volt source of power by a plug-in cord shall be considered locked out if the plug is disconnected and tagged with a "do not start tag."

14.5(D) After locking out power source, the employee shall try the equipment, machine, or process controls to ensure no unintended motion will occur; or test the equipment, machine or process by use of appropriate test equipment to determine that the energy isolation has been effective.

14.5(E) When two or more employees work on the same equipment, each is responsible for

attaching his/her lock. Safety locks and adapters are to be fixed on levers, switches, valves, etc. in the non-operative (off) position.

14.5(F) An employee who is assigned to a job and upon arrival finds an "Equipment Lock," "Adaptor," and "Danger Tag" affixed to the equipment shall take the following action:

1. Affix his/her personal lock to the "Equipment Adaptor."
2. Determine who placed the equipment out of service and contact all parties who have locks on the equipment to determine if the assignment to be performed would affect their safety. The assignment will proceed only if safe to do so.
3. Try the controls to ensure no unintended motion will occur before starting work or qualified personnel shall test the equipment, machine, or process by use of appropriate test equipment to determine that the energy isolation has been effective. (Such testing equipment is only to be employed by trained qualified personnel.)

14.6 PERFORMING TESTS AND ADJUSTMENTS DURING LOCKOUT

14.6(A) Power may be turned on when it is required to perform tests or adjustments. All of the rules pertaining to removing locks and restoring power shall be followed. The equipment or process shall again be locked out if it is necessary to continue work after completing the test or adjustments.

14.6(B) If the employee leaves the job before its completion, such as job reassignment, the employee shall remove his/her personal lock and adaptor and replace it with an "Equipment" lock and adaptor. In addition, the employee will prepare and attach a "Danger Tag" indicating the reason the equipment is locked out (should more than one employee be assigned to the job, the last employee removing his/her lock will be responsible for affixing the "Equipment" lock, adaptor and the "Danger Tag").

14.6(C) Upon completion of the work, each employee will remove his/her lock, rendering the machine operable when the last lock is removed.

14.6(D) The employee responsible for removing the last lock, before doing so, shall assure that all guards have been replaced, the equipment, machine, or process is cleared for operation, and appropriate personnel notified that power is being restored. This employee is also responsible for removing the "Equipment" lock and returning it to the foreman or supervisor.

14.7 EMERGENCY SAFETY LOCK REMOVAL

14.7(A) The foreman, Director of Operations, Safety Officer or an Authorized Safety Representative will be authorized to remove an employee's lock under the following conditions:

1. Receipt of a written request signed by the appropriate supervisor which shall state the reason the employee is not able to remove the lock.

2. The supervisor is responsible for making certain all the requirements for restoring power are followed.

15.0 CONFINED SPACE ENTRY

15.1 PURPOSE: The purpose of the Confined Space Entry policy is to ensure that no employee is put at risk without adequate safeguards.

15.2 GENERALLY: There is rarely a legitimate reason for a company employee to enter a confined space. In the event that the work requires such entry, only employees who have received Confined Space Entry training will be allowed to enter such an area and shall remain in the area only for the minimum amount of time needed to complete the task.

15.3 POLICY: All safety training and mandates are to be followed by all SCS employees. SCS utilizes the Occupational Health and Safety Administration (OSHA) guidelines for *Confined Spaces in Construction* CFR 29 Part 1926.

15.3(A) "Confined Space" Defined. No employee shall enter areas defined below UNTIL AN AUTHORIZED PERSON EVALUATES THE AREA AND AUTHORIZES ENTRY.

- 15.3(A)(i) A space that is NOT DESIGNED FOR CONTINUOUS employee OCCUPANCY; and
- 15.3(A)(ii) Is large enough and so configured that a person can bodily enter into and perform assigned work; and
- 15.3(A)(iii) Has LIMITED or RESTRICTED means for ENTRY or EXIT; and
- 15.3(A)(iv) May have a POSSIBLE HAZARDOUS ATMOSPHERE that may expose employees to the risk of death, incapacitation, impairment of ability to self rescue caused by:
 - Flammable gas
 - Airborne combustible dust
 - Atmospheric oxygen concentration below 19.5 or above 23.5%
 - A toxic atmosphere or substance
 - Danger of engulfment

15.3(B) Confined Space Entry Procedure

- 15.3(B)(i) There shall be no unauthorized entry into a confined space by any person.
- 15.3(B)(ii) An authorized person shall examine, test and evaluate a potential entry space and determine if it is a "NON-PERMIT SPACE" and meets the following requirements:

- It does NOT contain any atmospheric hazards or dangers of engulfment
- capable of causing death or serious physical harm;
- The space has been PROVEN SAFE, has been VERIFIED, DOCUMENTED,
- and has a CERTIFIED GUARANTEE of a safe environment.

15.3(B)(iii) If the conditions in #2 have been satisfied, the ALTERNATE ENTRY PROCEDURE may be followed.

15.3(B)(iv) If conditions in #2 are not met and has any of the following, the PERMIT ENTRY PROCEDURE must be followed:

- Contains or has a potential to contain a HAZARDOUS ATMOSPHERE.
- Contains a material that has a potential for ENGULFING an entrant.
- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging wall or by a floor which slopes downward and tapers to a smaller cross section; or
- Contains any other recognized serious safety or health hazard.

16.0 EMERGENCY PROCEDURES

16.1 PURPOSE: The purpose of the Emergency Procedures policy is to insure that all employees are aware of the proper resources to deal with an emergency, and know the method by which employees will deal with those emergencies which may be controlled.

16.2 GENERALLY: Except in the case of initial spill response and first aid, employees are required to seek out qualified emergency response personnel. Management will ensure that employees are provided with information to locate emergency response personnel. Employees will receive training on specific areas of response as appropriate.

16.3 POLICY: The purpose of this policy is to ensure SCS prepares for and effectively responds to emergency situations and critical incidents through the appropriate use of resources. The prevention and effective management of emergency situations and critical incidents can assist in minimizing the negative impact of an unexpected event.

16.3(A) Emergency situations. The Director of Operations, Safety Officer or an Authorized Safety Representative shall provide the foreman with emergency contact information for each job site. The following shall be posted on or about the company trailer in a clearly visible location.

- Method of communication to be used at the site: telephone, radio, etc.
- Emergency telephone numbers
 - Police
 - Fire

- o Medical Response Team
- o Names of first aid responders on site.
- o Spill response contractor
- Designated person to direct emergency crews to site of emergency.
- Instruction to each employee if known harmful plants, reptiles, animals, or insects, are present regarding all of the following:
 - The potential hazards.
 - How to avoid injury.
 - Applicable first aid procedures to be used in the event of injury.

16.3(B) Initial Spill Response. In the event of a spill of any company products, it shall be the responsibility of company employees to immediately contain and clean up such spills until such time as spill response contractors arrive on the scene.

16.3(B)(i) Materials Storage. In the warehouse, all liquids are stored in the flammable liquids cabinets or in the containment area located in the southeast corner of the building. Under no circumstances should drums be stored outside the containment area. At a job site, all liquids, including flammable liquids, should be stored in such a way as to protect them from the elements, particularly from heat and sunlight. Materials should also be kept outside of high traffic areas, in order to minimize the possibility of tipping or other damage.

16.3(B)(ii) Cleanup Procedure.

- Minor leaks – In the event of a minor leak or spill (i.e., one gallon or less), use the “oil dry” materials provided. Absorbent material should not be left on floors and surfaces for longer than 12 hours.
- Leaks up to one barrel – For larger leaks of glue, use fiber for the corresponding product (e.g., SK2000 for K-13), to absorb the liquid, and then dispose in the same manner as regular waste. For larger leaks of foam, use the corresponding product (e.g., A-Side to clean up R-Side), and then dispose in the same manner as regular waste.
- Large leaks – It is highly unlikely that more than one barrel will leak at the same time, particularly at a job site. If leakage appears to occur at a rate faster than the cleanup procedure will solve, employees should contact the spill containment contractor identified in the “emergency numbers” sheet at the job site.

17. ACCIDENT INVESTIGATION AND REPORTING POLICY

17.1 PURPOSE: To establish a standard approach for notification and reporting of accidents involving employee occupational injury or illness. The reporting system will:

- Establish time frames for reporting accidents to expedite claims processing
- Provide a mechanism for identifying accident trends so that appropriate action can be taken to prevent future occurrences

Stony Creek Services, Inc.
Health & Safety Program

- Obtain the necessary information required to comply with OSHA and MIOSHA reporting requirements, as well as the requirements of our customers

17.2 GENERALLY: SCS is committed to the protection of employees and visitors during emergencies. SCS swiftly and effectively responds to emergency situations, with the foremost goals of preserving life, protecting the organization's property, and restoring operations as quickly as possible. Critical incidents can be a threatening experience and appropriate supports are required to minimize long term effects arising from exposure to the trauma.

17.3 POLICY: This policy applies to all employees of SCS.

17.3 (A) Employee Responsibilities. Employees are responsible for:

- Immediately notifying their supervisor or work leader of any work-related injury or illness
- Seeking medical evaluation and treatment at the Company's provider of choice within a time appropriate based on the type and nature of the injury
- Completing the employee portion of the Accident Report (BWC-1)

17.3 (B) Foreman Responsibility. Those employees with management or leadership accountability are responsible for:

- Completing the worksite safety checklist and ensuring that the workplace meets company standards for health and safety
- Keeping employees informed of potential safety risks specific to the job site, as well as ensuring employees are reminded of general risks
- Ensuring that injured employees seek and receive immediate and appropriate medical attention at a Company-approved occupational health clinic or urgent care center
- Immediately informing management of the accident or injury, and following directions to ensure proper treatment and compliance with this policy
- Immediately ceasing work if there is any danger or further injury, informing job-site management of the reason for ceasing work
- Initiating changes to the workplace or work procedures to prevent recurrence
- Identifying whether the accident or injury will require re-allocation of staff, and ensuring that projects are continued with minimal interruption
- Completing the supervisory portion of the Accident Report (BWC-1)
- Conducting an accident investigation (see policy below) and ensuring that all forms are properly completed
- Ensuring that employees do not return to a job site without proper medical clearance.

A BWC-1 incident report should be completed for all injuries requiring more than "cosmetic" first aid treatment (e.g., a bandage or lotion); this should be done even if true "medical treatment" is not needed. Records will be kept of all incidents; those rising to the level of "injury" will be reported to the Company's workers compensation provider.

17.3(C) Human Resources Responsibility. The manager responsible for human resources is responsible for:

- Providing prior authorization to health care providers for medical evaluation and treatment
- Ensuring that all forms required by this policy are completed
- Maintaining all OSHA and MIOSHA logs and reports
- Communicating with employees concerning the accident or injury; explaining the early return to work policy and answering any questions the employee may have

The Company's workers compensation insurance provider will be responsible for processing the claim and taking any other necessary actions.

17.4 PUBLIC/NON-EMPLOYEE ACCIDENTS

All accidents and injuries sustained by a visitor to the Company offices or warehouse should be reported immediately to appropriate on-site management. The Company should arrange for immediate first aid as appropriate and assist in obtaining medical treatment. On job-site, injuries to non-employees, including members of the public, supplier or contractor employees, must be addressed in compliance with the safety rules of the general contractor on-site. The SCS supervisor or leader on-site should immediately contact the general supervisor or superintendent for the general contractor to advise them of the situation.

17.5 NEAR-MISS ACCIDENT REPORTING

17.5(A) Purpose and Objectives. To establish a standard system for notification and reporting of near-miss accidents, to make such changes to the worksite or work processes to ensure that accidents do not occur in the future. A "near-miss" accident is a situation which under slightly different circumstances could have resulted in an injury-producing accident.

If properly administered, the "near-miss" accident reporting system will:

- Provide information necessary to prevent near-miss situations from occurring again
- Inform management of problems within the safety and health programs, unsafe work processes, or conditions that contributed to a near-miss incident
- Provide a mechanism for identifying potential accidents

17.5(B) Procedure. The following procedure should be followed in the event of a "near-miss" incident

- All near miss incidents shall be investigated and recorded on the appropriate form investigation form
- The foreman should contact management and determine whether a course of action is needed to prevent potential accidents
- Ensure that solutions to near-miss situations are communicated to other supervisors or work leaders.

17.5 MOTOR VEHICLE COLLISIONS/EQUIPMENT DAMAGE REPORTING

17.5(A) On-Road Incidents

All Company-owned vehicles are insured against physical damage and operator liability for personal injury (PI), personal injury protection (PIP) and property damage (PD). Personal vehicles are never to be used on Company business, and any damage is solely the responsibility of the owner. The Company does not pay for, or reimburse deductibles or other costs incurred by employees for damage to their vehicles.

All incidents involving a Company-owned vehicle must be reported immediately to management. The driver or the reporting supervisor/leader will be instructed on what steps to take to bring the incident to a close. Any collision or liability incident involving one or more on-road vehicles must be reported to the police immediately. If the police can not, or will not, come to the scene of the accident, the driver should immediately proceed to the nearest police station and file a report. Employees involved in a collision or damage to property should complete the accident reporting form and gather all appropriate information, including descriptions of the scene, witnesses and all appropriate information on other vehicles involved (e.g., drivers name, address and phone number, drivers license number, insurance company and policy number).

17.5(B) Off-Road Vehicles/Equipment

When any non-licensed, off-road vehicle or equipment sustains damage, or causes damage to the property of others, the incident must immediately be reported to supervision. The supervisor will contact management and conduct an accident investigation to determine the cause(s) of the event.

17.6 ACCIDENT INVESTIGATION PROCEDURE

The purpose of accident investigation is to identify unsafe actions or conditions, determine the underlying causes of the accident, and take corrective actions to prevent it from happening again. A complete accident investigation includes the objective evaluation of all facts, observations, opinions and statements of both the injured or ill employee and any eyewitnesses. Following the investigation, an action plan will be initiated to prevent or control similar recurrence.

17.6(A) When to Conduct an Accident/Incident Investigation

The investigation process should be performed when medical treatment for injury/illness or property damage occurs in the workplace. It is the responsibility of the supervisor or leader to determine if medical treatment is required; an investigation is still required if an employee refuses to accept medical treatment. Investigation is not required for incidents involving only the application of "first aid," however, if there is any question, the supervisor or leader should err on the side of conducting an investigation.

In addition to completing the BWC-1 Incident Reporting form, the supervisor or leader must complete the Accident Investigation Form, which is a very detailed report of who, what, when,

why and how an accident occurred. The Accident Investigation Form must be completed and submitted to Human Resources within five (5) calendar days, unless there are unusual circumstances requiring a longer time frame.

17.6(B) Procedure for Investigation

17.6(B)(i) Obtain assistance or treatment for the injured or ill employee

17.6(B)(ii) Check the scene:

- Secure the scene as necessary to protect evidence and prevent further injury to others
- Carefully examine the accident scene including any tools or equipment that were being used (take photographs or videotape of the scene if possible)
- Reconstruct the chain of events leading up to the injury to determine the events that contributed to the accident. Do not reenact the accident.

17.6(B)(iii) Take corrective action immediately to prevent further injury.

17.6(B)(iv) Record the details of the accident scene. Draw a diagram, take photographs or videotape all angles of any equipment involved and the conditions at the accident location.

17.6(B)(v) Document observations (who, what, when, where, why and how)

- Make notes on all facts that may relate to the cause of the accident. For example, "employee had complained of dizziness to his co-worker prior to fall."
- Record specific job procedures that were used, if the procedures were correctly followed, and if the employee was properly trained in these procedures.
- Write down any unsafe conditions in the work area (e.g., defective tools or faulty equipment)
- Write down other observations such as the time of the investigation, the lighting conditions and other environmental factors.

17.6(B)(vi) Collect the evidence if an injury occurs when machine parts or structures fail; it is essential to determine what failed and why. This can frequently be done without extensive analysis, and corrective action can be taken immediately.

17.6(B)(vii) Interview the employee and any witness(es), getting an accurate statement from those who were present when the accident occurred. This may be the most important factor in accident investigation. The employee should be assured that the aim of the investigation is not to place blame, but to discover the causes of the accident. Ask questions to clarify and fill in any gaps. If a safety rule or procedure has not been followed, corrective or disciplinary action may be necessary after the investigation is complete.

- If the injury is minor, the interview should be conducted with the injured employee after the investigation of the accident scene and after the employee has received first aid/medical treatment.

- If the injury is serious, selecting the right time for the interview is an judgment factor. Schedule the interview when the employee is comfortable and able to provide accurate information.
- It is important to identify witnesses at the scene and make brief notes. As soon as possible after the accident, schedule a private and separate interview with each witness.
- It may be necessary to question the employee or witness several times in order to verify information and stories.
- Ask the employee or witness for suggestions aimed at eliminating or reducing the impact of the hazards that caused the accident to happen.

17.6(B)(viii) Weigh the evidence; all facts should be reviewed for completeness and accuracy when assembled. Submit the completed investigation form to Human Resources for review.

17.6(B)(ix) Take further corrective action once the primary and related causes of an accident have been identified and documented; corrective action should be taken to reduce or eliminate the potential for any recurrence of the accident/incident.

17.6(B)(x) Follow-up with any witnesses you interviewed in the investigation to let them know the outcome.

17.6(B)(xi) Monitor any changes you have implemented.

17.7 Management Response To Accidents

Management must respond to all accidents immediately and decisively. Management's first concern should be the safety and well-being of the Company's employees. In addition to the obvious morale problems which can arise from failing to address unsafe conditions, the business can suffer in a variety of ways – from losing potential business due to a bad safety record to further increases in workers compensation costs

17.7(A) During the Incident

Management is responsible for providing guidance to on-site supervision or leadership to ensure the incident is handled properly. This requires:

- Ensuring that the incident is properly documented, including assisting with the accident investigation procedure
- Preventing recurrence of the accident, including taking corrective action to replace or repair damaged equipment, or further safeguarding the worksite.

In the event that unsafe conditions are present, management must ensure that the customer or general contractor is informed immediately. Employees should not be allowed to continue to work in an area which has been deemed unsafe. Management is responsible for contacting those responsible for site safety to ensure that corrective action is taken, and that all contract requirements for notification of delays have been met.

17.7(B) Post-Incident

After completion of the Accident Investigation form, management is responsible for reviewing the findings and determining the appropriate course of action, as follows:

17.7(B)(i) Violations of Safety or Work Rules - If the accident was caused by employee violation of established safety and work rules, the safety disciplinary procedure should be followed, and the necessary corrective action taken. All employees should be informed of the incident and the discipline, to ensure that they understand the seriousness of the offense.

17.7(B)(ii) Improper Training - If the accident was caused by improper training, effective training should be provided immediately, which may involve any or all of the following:

- Repetition of the training program for the affected employees
- Changes to the training program, if necessary, followed-up by refresher training for all employees who may be affected by the changes
- Changes to the trainer or education provider, or if this is not possible (e.g., on Safe2Work materials) supplementary materials and training must be provided.

17.7(B)(iii) Work Processes - If the accident was caused by a step in the work process which resulted in an injury (or which results in cumulative injury), management must redesign the work process, or provide additional equipment or safety tools, to correct the problem in the work process. All employees should immediately receive notification of the change in process including, where necessary, providing additional training.

17.7(B)(iv) Equipment or Materials - If the accident was caused by defective or improperly maintained equipment or materials, the equipment must not be used until such time as repairs are completed and clearance given to resume operation.

18.0 EMPLOYEE RETURN TO WORK POLICY

18.1 PURPOSE: The purpose of the SCS return to work policy is to assist employees in returning to the workforce as soon as possible. The company believes that if an employee is able to return to work in any capacity, it will assist both the employer and the company in ensuring a full recovery.

18.2 GENERALLY: It is the objective of the company that, wherever possible, employees return to work as soon as possible.

18.3 POLICY: SCS has adopted this return-to-work policy with the intent of utilizing eligible injured workers in a productive capacity while they are recovering from an injury.

18.3(A) Status While Injured

While under a doctor's care and unable to work in any capacity, employees are encouraged to regularly attend examinations and any directed therapy. Employees will not be permitted to

work except to the extent permitted by their physician.

18.3(B) Return to Work

18.3(B)(i) Employee Clearance - When an employee is cleared for any amount of work, he/she should immediately report to the SCS Director of Operations to inform the company of his/her status. The Director of Operations will determine what, if any, work is available.

18.3(B)(ii) Limited Return to Work – The Director of Operations will maintain a list of tasks and duties available based on varying levels of physical capacity. Once the employee has been cleared to work, the Director of Operations will review the physical report, and determine a course of action for the employee, to include:

- Training – If the employee has not completed all applicable training programs, the employee will be asked to complete said training in the office (or offsite, as appropriate).
- Light Duty Work – Tasks commensurate with the employee’s physical limitations will be assigned as appropriate.
- Office/Clerical Work – If any office or clerical work is available, for which the employee is qualified, such work may be assigned.

18.3(B)(iii) Limited Regular Duties – If the work restriction is based on the amount of time which an employee may perform his/her duties, the Director of Operations will attempt to schedule the employee on jobs where the work will not exceed the restrictions.

18.3(B)(iv) Compensation – Employees will be compensated at the shop rate for time worked in any of the duties described above.

18.3(B)(v) Failure to Report – Employees who fail to report their work restrictions on a timely basis (within 24 hours of receiving medical reports), or who refuse to return to light or restricted duty work, will be considered as “no shows” or “refusals to work” and will be subject to the normal disciplinary procedures of the company, which may include suspension and/or discharge, and loss of seniority.

19.0 EMPLOYEE ACKNOWLEDGEMENT

As an employee of Stony Creek Services, Inc., it is your responsibility to understand and execute, when necessary, the safe practices outlined in this manual. By signing below, you acknowledge that you have read and understand the SCS Health & Safety Program

Print Name _____

Signed By _____

Date _____