

SAFETY MANUAL

ASPHALT – CONCRETE – EARTHWORK

BROOKS CONSTRUCTION CO., INC.

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SECTION 1

SAFETY PROGRAM OBJECTIVE & GOALS

This manual establishes procedures directed toward providing a safe and healthful working environment for all employees. These procedures apply to all work or services performed on any construction project or operating facility that is managed, constructed, or operated by Brooks Construction Co., Inc. The most important component of a safety program is clearly written objectives and goals.

Objectives:

- A. To provide guidelines for implementing a safety plan that will direct safety and health programs on construction projects or operating facilities to maintain compliance with Brooks Construction Co., Inc., Client/Owner procedures, and federal, state and/or local statutory requirements or regulations.
- B. To minimize occupational injury and illnesses, reduce equipment and property damage, and eliminate reoccurrence.
- C. To require each subcontractor's supervisory employees to be familiar with and follow the provisions outlined in the Subcontractor's contract.
- D. To establish responsibility and accountability for the safety program on each construction jobsite.

Goals:

- A. Achieving the common goal of zero accidents / incidents. Secondly, a goal of zero lost days.
- B. Increase of safety education through mandatory and voluntary training.
- C. Maintaining an Experience Modification Rating (EMR) below 1.0.

Safety Mission Statement

To provide a safe and healthy work environment on all Brooks Construction Co., Inc. projects for our employees, all subcontractors' employees and property owners. To protect the public from any construction activity that could potentially injure them or damage their property.

Brooks Construction Co., Inc. recognizes that safety requires a team effort, and that everyone must fulfill his or her safety role.

SECTION 2



Since 1909
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TO: All Company Employees

SUBJECT: Health & Safety Program

Safety for our employees has always been a prime concern of this company. We have had a good safety record over the years.

However, we want to take this opportunity to reaffirm our belief in a strong safety program which will continue to create and thus provide a safe place for all employees to work.

Accidents cost time and money, but most of all, accidents can cost lives.

We hope you will share our concern for providing a safe place in which to work, because to make a safety program effective, all of us must work together. Help yourself and your co-employees to be aware of and practice safe work habits.

Sincerely,

Andrew F. Brooks
President

John R. Brooks
Executive Vice President

BROOKS CONSTRUCTION COMPANY, INC

SECTION 3



RE: Safety Commitment

Brooks Construction Company, Inc. has implemented a strong field safety program for our personnel. We have worked closely with our loss prevention experts to develop better awareness in the workplace for the prevention of accidents and injury.

We have also begun to develop a seasonal timeline for our Safety programs during the busy construction season. This is in addition to training that occurs just prior to the beginning of the season and any special training issues that arise due to individual or specific job site requirements.

We have also developed an employee recognition program for those that promote safe workplace practices and have no incidents during a season. Our goal, our mission, is to keep Brooks 1st, by having Safety in everyone's mind!

We are happy to discuss any safety issues with you should this not answer your questions.

Sincerely,

Director of Safety
Brooks Construction Company, Inc.

SECTION 4

FUNCTIONS AND RESPONSIBILITIES

Director of Safety

The Director of Safety shall be responsible for the administration and implementation of the safety program. They must provide direction for all safety activities within Brooks Construction Co., Inc. The Director of Safety has the authority to immediately stop or modify any situation of work or procedure, which is likely to result in an injury or property loss.

Director of Safety Responsibility:

- A. Coordinate safety activities and implement new safety procedures for Brooks Construction Co., Inc. operations and jobsites.
- B. Analyze accident records to determine trends and high hazard jobs and procedures.
- C. Coordinate and conduct safety education programs for management, supervisors, and employees.
- D. Perform reviews and update of the Brooks Construction Co., Inc. Safety Process.
- E. Attend and conduct jobsite safety meetings on a regular basis.
- F. Conduct jobsite inspections on a regular basis and train the jobsite personnel to conduct meaningful "self-inspections."
- G. Monitor all operations to assure compliance with applicable OSHA and local safety requirements.
- H. Ensure adequate supply of necessary safety equipment and supplies.

Crew Forman Responsibility

- A. Check employees at the start of each workday to be sure that they are ready to perform their assigned tasks.
- B. Conduct site safety inspections (Task Hazard Analysis) daily. During the course of the workday give safety instructions as part of task assignments.
- C. Ensure that you and your crew members have the proper tools and equipment to perform their tasks safely. If deficiencies are found, immediately notify the Director of Safety in order to facilitate corrective measures.
- D. Look for any unusual symptoms that could interfere with an employee performing his or her work safely.
- E. Ensure that employees have been properly instructed on the safe operation of all equipment.
- F. Immediately correct safety problems that pose a present hazard to the employees.
- G. Give Toolbox Talks as scheduled by Project Superintendent/Manager or Director of Safety.

Supervisory Leadership

- A. Practice safety by setting a good example for your crew.
- B. Create a positive attitude in your crew to work safely. Constantly reinforce your crew to act and work in a safe manner.

Employee Responsibility

- A. Perform daily tasks in a safe manner in compliance with Brooks Construction Co., Inc. safety policies, OSHA standards, and local safety requirements.
- B. Familiarize yourself with and follow the safety guidelines outlined in the Brooks Construction Co., Inc. Employee Safety Handbook.
- C. Protect your coworkers and equipment from safety hazards.
- D. Recognize safety hazards and report them to your Foreman or Superintendent.
- E. Stop work, on your own, if an immediately dangerous situation exists and immediately notify your Foreman or Superintendent.
- F. Employees are encouraged to contact the Director of Safety for suggestions on safety program improvement, noted deficiencies, and to report employee misconduct.
- G. Participate in the site safety inspections (Task Hazard Analysis).
- H. Participate in Toolbox Talks.
- I. Ask your Foreman or Superintendent if you are not certain about safety and work procedures.
- J. Utilize personal protective equipment (PPE) in accordance with Brooks Construction Co., Inc. safety policies and OSHA standards.
- K. Familiarize yourself with jobsite emergency procedures.
- L. Report all near misses, accidents and/or injuries immediately to your Foreman or Project Manager.

SECTION 5

SAFETY EDUCATION AND TRAINING

Policy

Training is designed to enable employees to learn his/her jobs properly and to reinforce safety policies and procedures. Safety Training also provides an opportunity to communicate safety principles and commitment of management to the workplace. Consequently, Brooks Construction Co., Inc. will provide safety training to all employees.

Safety Orientation

Safety Orientation is a part of the overall orientation that all new hires must receive. This orientation is conducted by the foreman and shall include the following topics:

Director of Safety's Statement
Goals & Objectives of the Safety Program,
Personal Protective Equipment, Housekeeping,
Hand & Power Tools, Excavations,
Lockout / Tag-out,
Hazard Communication (GHS),
First Aid, Accident Reporting,

After completion of the Safety Orientation the new hire's supervisor/foreman will provide additional specific safety training applicable to the assigned job. This training will consist of:

- Emergency plans, evacuation routes, and assembly locations
- Location of the First Aid-Kit & Extinguishers
- Use of tools & equipment, lifting & material handling equipment on the job.

Foremen have a check list that is filled out and signed by the new employee. The check list should then be sent to the Director of Human Resources and the Director of Safety to be filed.

Supervisor Training

It is the policy of Brooks Construction Co., Inc. that all supervisors including but not limited to jobsite foreman, project managers, estimators and the director of safety are trained in and have an understanding of the company safety policies and procedures.

Toolbox Talks

Each crew will perform a 15-minute toolbox safety talk monthly. The toolbox talk shall be selected by the director of safety and shall be relative to the hazards associated with the current project, scope of work, and company policies. Each attending employee shall sign the toolbox talk before it is given to the director of safety.

Safety Discussions

Each Foreman is encouraged to have a safety discussion along with the jobsite goals and assignments each day.

SECTION 6

SAFETY RULES AND USE OF SAFETY EQUIPMENT

SAFETY RULES AND USE OF SAFETY EQUIPMENT will be enforced to provide a work environment which is as free as possible from recognized hazards.

- A. Work areas and job sites shall be kept clean and orderly at all times. Cleanliness helps reduce slips, trips and falls on the jobsite.
- B. Employees are expected to comply with all safety and health requirements whether established by management or by federal, state, or local law. All employees of Brooks Construction Company, Inc. are expected to comply with Occupational Health and Safety Act (OHSA) Standards for both the construction industry, Federal Register 1926; and applicable general industry, Federal Register 1910 with all supplements, additions, and deletions.
- C. HiVis vest are to be worn at all times by all employees, vendors and subcontractors. Hard Hats and Safety Glasses will be worn as require per task being performed.
- D. Protective devices for eye and face protection are to be worn when machines or operations present potential eye or face injury. Eye and face protection may also be required per contract.
- E. Class 3 or greater safety vests/shirts will be worn by all employees, vendors and subcontractors.

- F. Hearing protection will be worn as job operations make it necessary. If you have to raise your voice to be heard, use your disposable ear plugs. Additional noise levels will be addressed by 29 CFR 1910.95
- G. Disposable dust masks/respirators are provided for nuisance dust. They are difficult to fit test and maintain a good face seal. Any half-mask or full-mask respirators require the wearer to be "fit tested" and will be provided per 29 CFR 1910.134 (OHS general industry standards).
- H. Sturdy work shoes are required for on-the-job use. Safety shoes (ANSI Z41 approved) are encouraged. Durable shoes shall be worn and under no conditions should street shoes or tennis shoes be worn. Sandals, jogging shoes, or other soft recreational shoes are not allowed.
- I. Dressing appropriately for work is necessary. Shirts and trousers provide protection to the body from: contact with hot asphalt, dermatitis, sunburn, and other skin irritations. At least a short sleeved T-shirt will be worn along with long leg trousers while at work. A long sleeved shirt or welder's sleeves is recommended for use when burning or welding. Inappropriate dress and grooming, which is considered by the supervisor to contribute to an unprofessional appearance and/or unsafe working conditions, will not be permitted.
- J. First aid equipment is available to crews, plants, and at all work areas. Supervisory personnel are trained in First Aid and CPR methods, per OSHA standards.

SECTION 7

DISCIPLINE AND ENFORCEMENT OF SAFETY RULES

Policy

This procedure is established to provide for the discipline of employees who repeatedly violate safety rules. Safety rules are written and enforced to protect the employee from injury and theft. They are also written to provide for a "safe and healthful place of employment."

Procedure

- A. Superintendents and Foremen are responsible for the enforcement of the safety and health program on Brooks Construction Co., Inc. jobsites. In order to accomplish this, they must ensure that each employee is properly instructed in the use of safety equipment and safe work practices Superintendents, Foremen, Project Management and the Director of Safety are responsible for the enforcement of the safety and health program on Brooks Construction Co., Inc. jobsites. In order to accomplish this, they must ensure that each employee is properly instructed in the use of safety equipment and safe work practices. It is imperative that the Superintendent or Foreman warns employees when they violate a safety rule and discharge any employee who refuses to comply with the Brooks Construction Co., Inc. safety rules.
- B. Please see attached **Addendum for Brooks Construction Safety Point Policy**.
NOTE: Documentation of written warnings and termination are mandatory to comply with Federal Regulations and Labor Agreements. This documentation must be timely, complete, distributed, and readily available for review. Warnings and all discipline will be in accordance with applicable labor contracts.

The reviewing of these incidents is important to correct the problems so that the accident/injury does not occur again. This review allows Brooks the opportunity to find safer and more efficient ways to provide employee safety and lessen property damage. If unprofessional use, care, physical damage, or loss due to negligence occurs to company owned vehicles or equipment, the employee may be subject to discipline, up to and including termination. Possible reimbursement of repairs or payment of deductibles will be on a case-by-case basis.

Safety Review Committee
Accident and Injury Evaluation

Reviews may be based upon frequency, severity, or conditions of the accident or injury.

Equipment, Vehicles, and Property:

Employees using company vehicles and equipment are trusted to use them in a safe and productive manner. If damage to a vehicle, property, or equipment occurs, it is to be reported immediately to your supervisor and the Director of Safety. A Brooks' accident report will be filled out and forwarded to the Director of Safety.

Personal Injury:

Employees injured on the job or on company property are to report the injury immediately to their supervisor and the Director of Safety. The employee will also be required to submit and take a post-accident Drug and Alcohol Test. Post-accident drug and alcohol testing designed to accurately identify impairment caused by substance abuse will be performed only upon reasonable suspicion that drug or alcohol use contributed to the accident unless otherwise required by applicable law. It is the employee's responsibility to complete the forms required for First Report of Injury and Workman's Compensation. Failure to complete or submit these forms could delay any compensation to the employee.

Formal Review:

A review committee will consist of the employee's supervisor, the Director of Safety, division management, and company management. After review of the accident report, the employee may be required to meet with the review committee to evaluate the cause and extent of the injury or accident.

SECTION 8

DRUG AND ALCOHOL POLICY

Brooks Construction Company, Inc. is committed to providing a safe working environment and, likewise, expects its employees to report to their jobs physically and mentally fit for work. Furthermore, the company is committed to maintaining its reputation as an "employer of choice" to its employees and a "company of choice" to its customers. To achieve these goals, Brooks must take a firm and positive stand against drug and alcohol abuse. This policy is intended to ensure a drug-free work environment for the benefit of employees and customers of the company.

With respect to existing employees, *the objective of our policy is to eliminate substance abuse, not the substance abuser.* To this end, the company is prepared to help and support

all employees requesting assistance in dealing with drug or alcohol problems. No one will be disciplined for requesting assistance. In fact, the company has established an Employee Assistance Program that provides confidential services to employees who seek help in dealing with drug or alcohol problems. The program may include referral to outside treatment or rehabilitation facilities. In most instances, the majority of treatment costs will be paid for by the employee's applicable benefit plan.

Employees who voluntarily request or seek assistance in dealing with an alcohol or drug abuse problem may do so without jeopardizing their continued employment with Brooks Construction, as long as that employee meets all other established standards of conduct and job performance, either under this policy, the general policies of Brooks Construction, or under any company rules. Voluntary requests for assistance will not prevent disciplinary action for violation of Brooks Construction's illegal drug and alcohol abuse policy. Employees who undergo voluntary counseling or treatment and who continue to work must meet all established standards of conduct and job performance.

The company policy states that use, possession, distribution or being under the influence of alcohol or illegal drugs while at work is strictly prohibited and may result in actions up to and including immediate termination, even for a first offense. As a condition of employment, all employees agree to abide by the terms of this policy and further agree to submit to a drug or alcohol test if requested. This includes, but is not limited to post-accident/post-injury drug and alcohol testing. Post-accident drug and alcohol testing designed to accurately identify impairment caused by substance abuse will be performed only upon reasonable suspicion that drug or alcohol use contributed to the accident unless otherwise required by applicable law. Additionally, Brooks Construction reserves the right to conduct random drug and alcohol testing at their discretion.

Illegal drugs or alcohol are not to be brought onto job sites or company property, even if stored in a personal vehicle for later consumption or use off-site.

With prior written permission from Andrew F. Brooks or John R. Brooks, alcohol may be served at special company functions and/or on company property. In these instances a licensed bartender will be present and consumption will be limited according to law and at management's discretion.

Any supervisor who suspects that an employee is under the influence of alcohol or illegal drugs in the work place they the employee may be required to submit to an alcohol or drug test. Additionally, random testing may take place as outlined elsewhere in this policy.

Any employee who refuses to submit to a required drug and/or alcohol test shall be disqualified and terminated from his/her job for a period of at least one year.

An employee who tests positive on a work-related drug or alcohol screen, or who is cited by the police for driving under the influence of alcohol or drugs while operating a company vehicle, will be subject to a minimum suspension of five (5) working days. In order to return to work, the employee must provide Brooks Construction with evidence of a clean drug and alcohol screen immediately prior to their return to work. This screen, conducted by a company-designated testing facility, is at the employee's expense. Additionally, the

employee must agree to submit to random drug and alcohol screens at their own expense for twelve (12) months following their return to work. If the employee remains employed by Brooks Construction and successfully passes all random drug and alcohol screens throughout the twelve (12) months, he/she will be reimbursed for one-half (1/2) the total cost of all screening tests, including the initial test required to return to work. Receipts must be submitted to Human Resources within thirty days of completing the twelve months of random testing in order for reimbursement to occur.

Employees who are unable to provide the company with evidence of a clean drug and alcohol screen conducted by a company-designated facility at the end of their five-day (5) suspension may have their employment terminated. They may re-apply for employment, however, re-employment is not guaranteed, and those who are re-employed must consent to random drug and alcohol screens at their own expense for twelve (12) months following their return to work.

An employee at work or while driving a company vehicle who fails a drug or alcohol test at any time during the twelve (12) month random testing period shall be terminated immediately with no possibility of future employment. An employee at work or while driving a company vehicle who fails a drug or alcohol test more than one (1) time during their employment with Brooks Construction will be terminated immediately with no possibility of future employment.

Any employee who has voluntarily or mandatorily utilized the company's Employee Assistance Program for substance abuse treatment or referral will be required to consent in writing to allow and undergo periodic testing for up to one year after release from the treatment program.

All test results, assistance requests, and treatment records will be maintained in files separate from the employee's personnel file and will be held in the strictest of confidence, disclosed only to those having a legitimate need to know such information.

The testing program contains a minimum of a five panel drug test that tests for amphetamines, cocaine, opiates (2000ng/ml), PCP and THC. All employees who test positive for illegal drugs and/or alcohol are subject to discipline up to and including termination.

As mandated by Indiana law (IC-4-13-18), employees, who are covered by union contracts that define how employees who violate, or are suspected of violating the illegal drug and alcohol abuse policy, will be dealt with according to the contract.

As mandated by Indiana law (IC-4-13-18), all non-union employees and union employees who are not covered by a collectively-bargained drug-screening program will be subject to a random drug screening program. A minimum of two percent of the company's workforce that is not covered by a collectively-bargained drug-screening policy will submit to random drug screens each month.

In all instances, employees covered by Brooks Construction Co., Inc. health insurance benefits will be advised of agencies known to the employer that provide drug treatment or rehabilitation programs.

All job performance problems, prohibited conduct, and attendance problems will result in discipline according to the company's normal policies, independent of any drug or alcohol implications or causes.

As a condition of continuing employment with the company, each employee must abide by the terms of this policy. They must also notify the company of any criminal drug statute conviction for a violation occurring in the company's workplace or at a company worksite no later than five days after such conviction.

Department of Transportation Drivers

Department of Transportation (DOT) regulated employees are also subject to the following tests:

All DOT regulated employees will be tested for alcohol and drugs at the first medical examination (of the DOT regulated employee) after implementation of a drug testing program.

Brooks Construction will additionally conduct random testing of all DOT regulated employees according to DOT regulations. At an unspecified time or times determined at the sole discretion of Brooks Construction, names of DOT-regulated employees will be randomly drawn. Each employee drawn will be immediately required to submit to a urine and/or blood sample for alcohol or drug testing. The tests performed will test for amphetamines, cocaine, opiates (2000ng/ml), PCP and THC, according to DOT regulation. Per DOT requirements, an employee who tests positive for alcohol or drugs as a result of any such test or an employee who refuses to provide a sample shall be disqualified and terminated from his/her job for a period of at least one (1) year.

Whenever a DOT regulated employee is involved in or contributes to an accident, Brooks Construction shall require the employee to submit a urine and/or blood sample for alcohol or drug testing as soon as it is reasonably possible, but in no case later than thirty two (32) hours after the accident. An employee who tests positive for alcohol or drugs as a result of any such test will be in violation of this policy. Whenever a DOT regulated employee is involved in an accident involving a fatality, the driver shall submit immediately to a urine and/or blood sample for alcohol or drug testing. An employee who tests positive for alcohol or drugs as a result of such test or an employee, who refuses to provide a sample, shall be disqualified and terminated from his/her job for a period of at least one (1) year.

All DOT regulated employees will also, at all times, be subject to the controlled substance testing procedures and guidelines as contained in the Federal Motor Carrier Safety Regulations Pocketbook.

SECTION 9

FIRST AID AND MEDICAL SERVICES

This section describes the First Aid, medical services, and emergency transportation provided for employees who become injured on Brooks Construction Co., Inc. jobsites.

Responsibility

The Director of Safety evaluates the First Aid and medical services required to meet the safety and health needs of the project. First Aid treatment will be administered by a valid certified employee. This certification in First Aid training must be obtained from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence. Community medical resources near the jobsites such as clinics, hospitals, and ambulance services will be designated and utilized as much as possible. Each clinic or hospital that is providing emergency services to Brooks Construction Co., Inc. employees will be contacted to establish procedures for implementing the Brooks Construction Co., Inc. Drug and Alcohol Testing Policy.

Any injury at work that requires more than the first aid kit needs to be reported to the Director of Safety. Employees will be expected to fill out a First Report of Injury and turn it into the office by the next work day. Serious injuries that require more than first aid, should be reported to "911" first for EMS assistance, and then immediately to the Director of Safety.

For any injury, remember that you have a first aid kit to assist you. This is for small cuts, burns, eye irritations, etc. If your first aid treatment doesn't seem to help, transport to the nearest treatment facility. Don't forget to replace any used first aid items.

Emergency Transportation

- A. The Director of Safety or Foreman will decide what type of transportation will be used. If medical attention is necessary during a transport, the ambulance will be used. If there is any doubt, the ambulance will always be the first choice.
- B. The hospital emergency room or the clinic should be notified when the transportation vehicle leaves the jobsite. All available information regarding the nature and extent of the injury should be given to the medical staff.
- C. The Director of Safety or his designee will notify the injured employee's nearest relative when he/she is on their way to the hospital.

Routine Transportation

- A. The Foreman's vehicle will be designated as first aid transportation from the jobsite to the clinic or hospital.
- B. The Foreman/Director of Safety will evaluate whether the employees should be permitted to provide their own transportation for the initial visit to the doctor for a job-related injury.
- C. When the EMPLOYEE AND FOREMAN BELIEVE THAT AN INJURY REQUIRES TREATMENT, the employee should be taken to the nearest occupational health or emergency facility. (Area facilities are listed in the Foreman's SDS binder in section 2). The Foremen or a trusted crew member should transport the employee to the

- nearest treatment facility if the employee is unable to drive. Make sure you have no doubt that the employee can safely drive themselves home or to a treatment center.
- D. When the EMPLOYEE AND FOREMAN FEEL THAT THE INJURY CAN WAIT until the end of the workday, make the Director of Safety aware. The Director of Safety will give you instructions for the employee. Keep an eye on the injured employee throughout the day. If their comments or your observations indicate that treatment needs to be immediate, transport to the nearest treatment facility immediately. (Area facilities are listed in the Foreman's SDS binder in section 2).
 - E. When the EMPLOYEE BELIEVES THAT AN INJURY REQUIRES TREATMENT, the employee should be taken to the nearest occupational health or emergency facility. (Area facilities are listed in the Foreman's SDS binder in section 2). The Foremen or a trusted crew member should transport the employee to the nearest treatment facility if the employee is unable to drive. Make sure you have no doubt that the employee can safely drive themselves home or to a treatment center.
 - F. When the FOREMAN BELIEVES THAT AN INJURY REQUIRES TREATMENT, try and convince the employee to go to the nearest occupational health or emergency facility. (Area facilities are listed in the Foremen's SDS binder in section 2). If the employee refuses first aid treatment, contact the Director of Safety. If warranted and possible, the Director of Safety will make the job-site. If you have any doubts, call the Director of Safety! The Foremen or a trusted crew member should transport the employee to the nearest treatment facility if the employee is unable to drive. Make sure you have no doubt that the employee can safely drive themselves home or to a treatment center.

Personal treatment of work injuries

Employees who obtain medical treatment for alleged work related injuries without reporting them to the Brooks Director of Safety or his designee may result in the denial of any claim for Worker's Compensation benefits and may be cause for discharge. Help them by giving them information on an acceptable treatment facility.

First Aid Equipment and Supplies

Every Brooks' location/jobsite will be equipped with a First Aid kit. The Director of Safety and Supervisor will determine the size and the contents of the first aid kit. Other medical and first aid supplies will be ordered as necessary for the employee's safety. The contents of the first aid kits shall be periodically assessed to ensure the availability of adequate first aid supplies. These kits will be checked monthly by the Foreman.

Should the need arise suitable facilities shall be provided for quick drenching or flushing of eyes or body where the eyes or body of any person may be exposed to injurious corrosive material. Portable eye washing kits are provided in the first aid kit.

Returning to work

When the employee returns to work, whether it has been hours, days or weeks, keep an eye on the employee to make sure they are doing okay. The employee needs to provide their foreman with a return to work slip with any restrictions from the Doctor. If they are experiencing problems, contact the Director of Safety. Send in the Doctor's slip to the Director of Safety's attention along with your dailies.

If the employee wants to leave the job-site, make sure they are capable of safely going home or to their vehicle. The Foreman or a trusted employee should provide transportation if the employee is unable. Contact the Director of Safety if you have problems figuring out transportation.

If you are unable to reach the Director of Safety by cell at (260) 410-4653, contact the office at (260) 478-1990 or your Superintendent.

Above all, the safety and well-being of our employees comes first. It is better to err in treating a minor injury than ignoring something that could become worse.

SECTION 10

LIGHT DUTY POLICY

Policy

Brooks Construction Co., Inc. recognizes that on the job injuries are costly to both the company and to the injured employee. Brooks Construction Co., Inc. will make every reasonable effort to bring injured workers back to suitable, temporary, Light Duty employment until they have recovered from the effects of their injuries and can resume their regular job duties. This process is limited to creating temporary Light Duty positions. It is not intended to provide permanent alternative or modified employment.

The purpose of the Light Duty Program is to bring the employee back to work immediately. The Superintendent and Director of Safety should review the suitability of the program for any individual employee every two weeks.

Goal

The goal of our Safety Program is to reduce workplace injuries to the lowest possible level. This can be accomplished. Should however, an injury occur, it must still be managed properly to reduce the economic impact to both the employee and to the company. Therefore, the goal of the Light Duty program is:

“ZERO LOST WORKDAY ACCIDENTS”

Benefits of Success

Attaining this goal can provide benefits to all parties involved. These include:

- A. For the Employee – Employment for even six hours at a full rate of pay may often provide more income to the employee than will the Temporary Disability Benefit provided through Workers’ Compensation. In addition, by remaining active and productive, the employee can avoid destructive changes in attitude and conditioning that make returning to work following a prolonged disability difficult, if not impossible.
- B. For the Job – All of our jobs require many small tasks that are associated with, but do not directly involve the actual installation or execution of our work. By effectively using employees on Light Duty to perform some of these tasks, we can improve overall job performance and increase the efficiency of our supervision of the work.
- C. For the Company – Managing our Workers’ Compensation Disability costs can improve our productivity, our competitive position in the marketplace, our reputation with our clients, and our relationship with our most valuable resource, our

employees. The Company can save money and improve cash flow by pro-actively and aggressively managing these costs.

SECTION 11

FIRST REPORT OF INJURY FORM

Purpose

This section describes how to fill out the employee report of accident and public liability forms. The First Report of Injury form is to be filled out by employees of Brooks Construction Co., Inc. that become injured on the job.

Crew foremen are responsible to make certain that the employee fills out the report and that the Director of Safety is aware of the occurrence. Verbal notification to the Director of Safety is a bonus to the process.

Report forms are available through the office, crew Foremen and in the Foremen's room.

Filling out the **First Report of Injury** form:

It is very important that time and care is taken when filling out the Report of Injury forms. The information that is requested is of value for protecting the individual who has been injured. All of the blanks that are provided on the form shall be filled out completely, in as much detail as possible. If there is not enough room on the form, use a separate sheet of paper so that no relevant information is left out.

Section 1: Employee Information

Name: The name of the employee who was injured. If more than one person was injured in the accident, a separate accident report for each individual must be filled out.

Date of Birth: The month, day, and year in which the injured was born.

Marital Status: The marital status of the injured; choose from single, married, widowed, divorced, or unknown.

Address of Injured: The home address of the injured employee. Be sure to include the number, street, apartment number, city, state, and zip code.

Phone Number: Injured employee home phone number, including the area code, of where they can be reached if questions need to be answered.

Social Security #: The social security number of the injured employee.

Occupation: The occupation of the injured employee. Example: Operator, laborer, Teamster, Foreman, etc.

Date hired: If known, enter date. If not sure, leave blank.

State of Hire: Will most likely be Indiana (IN).

Employee Status: Active, since the employee was working.

Class Code, Paid day of Injury, Salary Continued: Leave blank. These will be filled in after receipt by Director of Safety.

Rate of pay: The rate of pay at which the injured employee was being paid at the time of the accident. If not known, leave blank.

Section 2: Employer Information

Leave this section alone. Director of Safety will address any information here.

Section 3: Carrier/Claims Information

Leave this section alone. Director of Safety will address any information here.

Section 4: Occurrence Information

Date of Accident: The date on which the accident took place, not the date it was reported.

Time of Occurrence: The time at which the accident took place.

Type of Injury: Cut, strain, sprain, etc.

Type Code: Leave blank.

Last work day: Leave blank.

Time Workday Began: What time did your workday begin?

Date Disability Began: Leave for Director of Safety.

Part of Body: Arm, leg, back, etc.

Part Code: Leave blank.

RTW Date: Leave blank.

Date of Death: Leave blank.

Injury occurred on employee premises: Check yes, if on Brooks' property.

Department/Location where accident occurred: The job number/name at which the project is located.

Equipment/Materials involved: What were you using?

Specific Activity during accident: What were you doing on the job?

Work Process engaged in: Same as what were you doing?

How injury occurred: Describe how did your injury happened.

Cause of injury code: Leave blank.

Name of Physician/ Health Care: Name of clinic or hospital that treated the injury.

Name of witness: Who on your crew saw the accident happen?

Telephone number: If Brooks Construction employee leave blank or use 260-478-1990.

Date Administrator notified: Leave blank.

Date prepared: Date you are completing the report. May be different that date of injury.

Name of preparer: Name of person completing report.

Title: Teamster, laborer, operator, Foreman, etc.

Telephone number: Person completing report's home phone or 260-478-1990.

Initial Treatment: Check appropriate box or leave blank.

SECTION 12

ACCIDENT INVESTIGATIONS & FORMS

Scope:

The investigation of serious accidents, minor accidents, public liability accidents, and major incidents.

Minor Accidents

If an employee is involved in a personal injury/accident, it is the Foreman's responsibility to make certain that the employee fills out the **First Report of Injury** form. After First Aid or medical attention is given to the employee, this form must be filled out properly and sent to the Director of Safety the following day.

Serious Accidents

After the employee has been provided with urgent medical care, the Foreman must contact the Superintendent and Director of Safety. The next step is to fill out the **First Report of Injury** form completely. The form must be sent to the Director of Safety in Ft. Wayne within 24 hours. It is essential that the form be completed accurately with all of the information that is requested.

Public Liability Accidents

It is very important to fill out the **Accident Report** form completely after a non-employee has been injured or property has been damaged. Photographs (disposable camera or digital) of the damage and accident scene are very important in case of potential litigation. Label and forward the photographs with the accident report to the Director of Safety the day following the incident.

Accident Investigation

Accident investigation must be fact-finding, not fault finding. The purpose is to learn the true cause so that similar accidents/incidents can be prevented, and determine facts bearing on legal liability. Another purpose of the investigation or fact-finding is to prepare accurate documentation in case of possible litigation.

A written report will be completed for all serious accidents. The Director of Safety will complete the written report. The report should contain the following:

- A. A detailed description of the accident including answers to the following:
 - 1. *What happened?*
 - 2. *Who (individuals and companies) was involved?*
 - 3. *When did the accident occur?*
 - 4. *What injures/property damage resulted?*
- B. Take as many photographs as possible of the accident scene and surrounding area.
- C. Draw diagrams of the scene.
- D. Witnesses' statements.
- E. Conclusions should be developed regarding the physical cause of the accident, but should not deal with the placement of legal liability upon any party. It is critical to remember that the causes of an accident are seldom simple and obvious.
- F. Recommendations should be developed to correct situations and procedures that led to the accident.

Key Points to Remember

- A. Get medical attention for all injured parties, Brooks' employees, subcontractor employees and the general public.
 - B. Protect the scene's physical evidence.
 - C. Confiscate all faulty equipment or materials.
 - D. Take photographs (disposable or digital) of the accident scene.
 - E. Obtain the names, addresses, and phone numbers of all witnesses.
 - F. Keep all Brooks' personnel from making any statements to the media.
 - G. Notify Director of Safety as soon as possible.
- A. **Vehicle Damage Report** - The jobsite Foreman or his designee must fill out the Vehicle Damage Report the day of the accident. The completed accident form and supporting documentation (photographs) must be sent to the Director of Safety the following business day. The following information is of the greatest value:
- 1. Other owner's name and address of damaged vehicle.
 - 2. Brooks' equipment/vehicle information, including driver/operator.
 - 3. Any injured party's name and address.
 - 4. Description of incident.
 - 5. Damage area of all vehicles involved.

6. Any witness's names and addresses/phone numbers. This may be added to back of report.
 7. Photographs or other documentation. A sketch of the accident may be drawn on the back of the report or attached on a separate piece of paper.
- B. **Property Damage Report** - The jobsite Foreman or his designee must fill out the Property Damage Report the day of the accident. The completed accident form and supporting documentation (photographs) must be sent to the Director of Safety the following business day. The following information is of the greatest value:
1. Owner's name and address of damaged property.
 2. Any injured party's name and address.
 3. Description of incident. Give as much detail as possible.
 4. Damage area of all property involved.
 5. Any witness's names and addresses/phone numbers. This may be added to back of report.
 6. Photographs or other documentation. A sketch of the accident may be drawn on the back of the report or attached on a separate piece of paper.
- C. **Utility Cut/Damage Report** - The jobsite Foreman or his designee must fill out the Utility Damage Report the day of the accident. The completed accident form and supporting documentation (photographs) must be sent to the Director of Safety the following business day. The following information is of the greatest value:
1. Property address and owner/business name.
 2. Any injured party's name and address.
 3. Description of incident. Give as much detail – marked? Freshly disturbed?
 4. Utility locate number if known.
 5. Utility Company name, if known. If not, type of utility – gas, cable, phone, etc.
 6. Any witness's names and addresses/phone numbers. This may be added to back of report.
 7. Photographs or other documentation. A sketch of the site may be drawn on the back of the report or attached on a separate piece of paper.

SECTION 13

SEVERE WEATHER/DISASTER PLANNING

Purpose

This procedure shall set forth the guidelines for planning and implementing a project severe weather evacuation plan. It may be necessary to evacuate the construction project at any time. Potential disasters include fire, explosions or potential explosion, floods, severe storms, hurricanes or tornado warnings, fumes, gas or radiation releases, electrical failures, or structural failures. The history of such happenings reveals a saving of life and property when an evacuation procedure was effectively utilized.

Responsibilities

- A. Superintendent/Foreman – Shall act as the evacuation supervisor. The Superintendent/Foreman shall:
 1. Approve the procedure and the location of the assembly areas.

2. Determine if there is a need for evacuation.
 3. Give the order for the alarm to be sounded or communicated and direct the evacuation activities.
 4. Maintain a list of outside emergency services such as a fire department, ambulances, and police.
 5. Notify the owner as to the nature of the emergency and arrange to keep them informed.
 6. A check shall be made of all persons on the jobsite.
 7. See that trained first aid personnel attend to the injured.
- B. Employees
1. Employees shall proceed quickly to their assigned assembly areas.
 2. Employees shall remain there pending further instructions from their foreman.
- C. Subcontractor Supervisors
1. After employees have reached the assembly area, foremen shall proceed to immediately account for their crews.
 2. Subcontractor supervisors shall report to the Brooks Construction Co., Inc. Foreman, and then stand by for instructions.

Alarms/Notification

Most of Brooks Construction Co., Inc. jobsites are small in scope and nature if they do not involve highway and major roadways. Verbal and radio communication can handle the majority of alarms in these instances.

EMERGENCY EVACUATION PROCEDURE: When an emergency evacuation is needed, all employees will immediately cease work, secure all equipment, and proceed directly to the designated assembly area (parking lot, or other appropriate area). Employees shall remain there until their supervisor issues further instructions.

Training

An evacuation procedure is only good if employees are aware of it. With infrequent use, it is necessary to review this procedure at least once at each jobsite. It should be discussed in safety meetings.

Thunderstorm Safety Procedure

Thunderstorms, and their accompanying hazards, pose a threat to employees and equipment. Since thunderstorms occur in most parts of the country, it is vital that certain precautions be taken to minimize their effect. Heavy rain, hail, lightning, high winds, and tornadoes may accompany a thunderstorm. For these reasons a thunderstorm can be very destructive. Since thunderstorms are difficult to foresee, it is important that employees be educated in the safety precautions to take in the event of a thunderstorm.

- A. Employees shall seek shelter indoors during a thunderstorm when possible. When indoors, it is important employees avoid contact with electrical appliances and electrically conductive surfaces and structures.
- B. If employees are outdoors, they shall remain lower than the nearest highly conductive object. Lightning will strike the easiest source to ground, not necessarily the highest. Conductive objects such as trees, telephone poles, equipment booms, and flagpoles shall be avoided. Lightning is a thunderstorm's worst killer. Objects

that may carry electric current from a remote thunderstorm shall also be avoided. These objects would include telephone lines, pipelines, and fences. An employee shall not use electric tools outdoors if a thunderstorm is in the immediate area.

- C. The rains accompanying a thunderstorm may create flooding conditions. National Weather Bureau advisories shall be monitored for flash flood warnings. Employees shall be instructed to avoid flood plains; drainage ditches, and dried creek beds when a flash flood warning is issued.
- D. When lightning is in the immediate area, the employee shall seek shelter indoors, or remain in the vehicle away from interior metal parts. When high winds or flooding accompany the thunderstorm, the employee shall seek an appropriate protected area.
- E. Employees shall not be permitted to work on or around excavators during a thunderstorm. The excavator's boom shall be lowered when winds exceed approximately 30 miles per hour.

Tornado Safety Procedure

Tornadoes are violent storms of a short duration, which occur during all seasons and in all 50 states. This is a guide for protecting employees and preparing projects for a tornado.

- A. The National Weather Bureau issues a tornado watch when a tornado is expected in or near the area. *When a tornado watch is issued, the Brooks Construction Co., Inc. Superintendent/Foreman shall monitor the Weather Bureau advisories.*
- B. A tornado warning will state where the tornado was sighted, where the tornado is expected to move, and when it is expected to affect the area warned. When a tornado warning is issued, emergency precautions shall be taken immediately. An emergency alarm shall be sounded and all employees shall move to designate emergency shelters. The predetermined shelter should be located in a reinforced building, the basement of a building, an inner hallway on a lower floor, or a similar location that is away from windows. A large room with a wide, free-span roof shall not be used.
- C. Battery-powered radios or telephones should be available in the event of a power failure. During the tornado alert, weather information shall be monitored for further advisories.
- D. A thorough inspection of the project shall be made after a tornado has struck. The inspection team, appointed by the Brooks Construction Co., Inc. Superintendent/Project Manager, shall aid in emergency rescues and repairs and assess damage. They shall report their findings to the Brooks Construction Co., Inc. Superintendent promptly.

SECTION 14

EMERGENCY PLAN

This is a guide for procedures to be followed in the event of a serious injury to workers or property. The Director of Safety shall review this policy annually.

The key points of the Brooks Construction Co., Inc. Emergency Plan that are included in this section are:

- A. These procedures are to be adhered to in the event of:
 - 1. Serious injury to a Brooks' employee.
 - 2. Serious injury to a subcontractor's employee.
 - 3. Serious injury to a bystander.

4. Serious damage to Brooks' equipment.
 5. Serious damage to the subcontractor's equipment.
 6. Chemical spills.
- B. Administer first aid or arrange for medical treatment is the first response.
 - C. The Director of Safety or his designee must be the first to notify the Brooks' employee's nearest relative that he or she has suffered an injury requiring hospitalization.
 - D. Notify the appropriate Brooks personnel according to the Emergency Policy.
 - E. Use your personnel to keep the media from entering the jobsite.
 - F. Make no statement to the media other than that an accident has occurred.

Know your jobsite location. Landmarks and intersections will help emergency response crews.

This policy will assist you in reacting to emergencies such as:

- A. Serious injury to Brooks' employees.
- B. Serious injury to another party caused by Brooks' employees.
- C. Major loss of Brooks equipment or property belonging to the owner, subcontractor, or the public is as follows:
 1. See that the injured are cared for. The first concern at an accident scene, regardless of its seriousness, is care of the injured.
 2. Request the necessary emergency response team, Paramedics, and/or Fire Department – Superintendent.
 3. If a volatile, flammable material is spilled, immediately warn others in the area, control sources of ignition, and ventilate the area.
 4. Protect other people and property.
 5. Notify the Brooks' Director of Safety – Superintendent.
The Director of Safety will notify the President of Brooks Construction Co., Inc. and our insurance carrier.
 6. Notify the Brooks Construction Co., Inc. Project Manager – Superintendent
 7. Keep the press and news media as far away as possible from the scene. Use your foreman and safety officer.
 8. If the press and television media arrives –
 - a. Make **no** statement; other than an accident has occurred.
 - b. The **only** person to make a statement for Brooks Construction Co., Inc. will be the President of the Company or his designee.
 9. Notify the employee's nearest relative – Superintendent or Foreman.
 10. After all of the injured are cared for, begin your investigation immediately – Superintendent, Foreman, and Director of Safety.
 - a. Preserve the scene as it was after the accident.
 - b. Obtain the identity of all people who might have information about the accident.
 - c. Confiscate all materials involved – tools, etc.
 - d. Take photographs of the incident.
 - e. General uses of photographs.
 1. Orientation to the scene of the accident.
 2. Record of the detail of injury and damage.
 3. Record of relative positions of large numbers of items or damage fragments.

4. Evidence of deterioration, abuse, and lack of proper maintenance.
 5. Location of parts, or other evidence, overlooked during early stages of investigation.
- f. Marking photographs –
1. Date Taken
 2. Job Name and Number
 3. Description of picture
 4. Signature of photographer.
 5. All photographs will be sent to the Brooks Construction Co., Inc. Director of Safety.
- g. Distribution of photographs – No photograph shall be released to any party, insurance company, vendor, lawyer, subcontractor, or owner without authorization from the Brooks Construction Co., Inc.
11. Fill out the proper accident form and forward to the Director of Safety.

SECTION 15

FIRE PREVENTION AND PROTECTION

Scope

The following procedure will govern the use, inspection, and control of fire extinguishers, as well as general fire protection requirements.

Fire Protection Requirements

Foremen should consult the Director of Safety for specific needs and types of extinguishers, as well as, other fire protection requirements before starting any hot work or placing on a piece of new equipment.

Procedures for Reporting a Fire

THE FOLLOWING IS TO INSURE ALL EMPLOYEES KNOW HOW TO REPORT A FIRE:

- A. The Fire Department telephone number and other emergency services will be located at each telephone in all shops, garages, offices and buildings.
- B. Any employee discovering a fire should report to his or her nearest supervisor if possible.
 1. State your name.
 2. Give location of fire.
 3. The caller will go to the main entrance of the building or nearest entrance and direct the Fire Department to the fire.

End of Workday Inspection

In order to decrease the potential of fire at a site or location, inspections will be made daily following the close of the shift. Foremen and supervisors shall make the inspection. These supervisors will tour their areas, inspecting their building and work sites to ascertain that no open fires, smoldering sparks or potential fire hazards exist. If fire hazards are discovered, the supervisor will take whatever action is necessary to control them. The same supervisors making the fire inspection will simultaneously make security inspections of the job.

Fire Extinguishers

- A. In general, fire protection will consist of dry chemical extinguishers Class ABC.
- B. Permanently placed extinguishers must be mounted with the bottom of the extinguisher no more than five feet above the floor or ground with clear access and locations marked.
- C. Fire equipment or other emergency equipment, including fire doors, fire sprinklers, and hose boxes, will not be obstructed. The Director of Safety must be notified of any and all fires caused by or involving Brooks Construction Co., Inc. employees.
- D. No fire extinguisher may be allowed to rest on bare ground. (If used as portables, have them on suitable material.) Ideally all should be mounted on equipment.
- E. DO NOT RETURN TO SERVICE ANY DISCHARGED FIRE EXTINGUISHERS. It will be the responsibility of each Supervisor/Foreman or his designee to instruct employees in the location and use of all fire extinguishers that are available in their work area.
- F. Each welder, burner, or operator of open-flame equipment must have an individual fire extinguisher in the immediate vicinity; there must be a ten (10) pound or larger powder extinguisher within immediate reach (50 feet) of any work of this nature. It is the responsibility of Supervisor/Foremen to see that this requirement is followed at all times.

Fire Extinguisher Use

Before attempting to fight a small fire, be sure everyone is out of the immediate area or building. It is important to have someone call the fire department. If the fire starts to spread or threatens your escape path, get out immediately!

Here is an easy acronym for fire extinguisher use:

P A S S -- **P**ull, **A**im, **S**queeze, and **S**weep

Pull the pin at the top of the extinguisher that keeps the handle from being accidentally pressed.

Aim the nozzle toward the base of the fire.

Squeeze the handle to discharge the extinguisher while standing approximately 8 feet away from the fire and if you release the handle, the discharge will stop.

Sweep the nozzle back and forth at the base of the fire. After the fire appears to be out, watch it carefully since it may re-ignite!

WHEN NOT TO FIGHT A FIRE...

- If the fire could block your only exit!
- If the fire is spreading too quickly!
- If the type or size of the extinguisher is wrong!
- If the fire is too large!
- If you don't know how to use your fire extinguisher!

If any of the above conditions exist, leave immediately!

Fire Extinguisher Inspection

All extinguishers should be inspected on a monthly basis.

- A. The Supervisor, Foreman or his designee will be responsible for inspecting all fire extinguishers in their area. Inspection shall be documented on the fire extinguisher tag.
- B. All extinguishers mounted to equipment such as trucks, pavers, tractors, etc. shall also be inspected.
- C. Those extinguishers that receive little or no use over a period of time must be inspected annually for testing and re-servicing. All remaining extinguishers receive the same yearly inspection during their periodic servicing.
- D. A written record of all fire extinguisher maintenance and inspections shall be kept on file in the main office.
- E. Discharged or defective fire extinguishers shall be removed from service. Contact the garage for a replacement.

Flammable and Combustible Liquids

- A. Only approved containers and portable tanks shall be used for storage and handling of flammable and combustible liquids. Approved safety cans or Department of Transportation approved containers shall be used for the handling and use of flammable liquids in quantities of 5 gallons or less, except that this shall not apply to those flammable liquid materials which are highly viscid (extremely hard to pour), which may be used and handled in original shipping containers. For quantities of one gallon or less, the original container may be used, for storage, use and handling of flammable liquids.
- B. All containers shall be properly labeled in accordance with the Brooks Construction Co., Inc. Hazard Communication Policy. (See Section 21)
- C. Fire control for flammable or combustible liquid storage.
 - 1. At least one portable fire extinguisher, having a rating of not less than 20-B units, shall be located outside of, but not more than 10 feet from, the door opening into any room used for storage of flammable or combustible liquids.
 - 2. At least one portable fire extinguisher having a rating of not less than 20-B units shall be located not less than 25 feet, nor more than 75 feet, from any flammable liquid storage area located outside.
 - 3. At least one portable fire extinguisher having a rating of not less than 20-BC units shall be provided on all equipment with tanks used for transporting or dispensing flammable or combustible liquids.

Training

All employees should receive annual instruction on the use of fire extinguishers and the dangers of fighting a fire.

SECTION 16

PERSONAL PROTECTION EQUIPMENT

Personal Protection Equipment

Personal protection equipment and proper clothing must be worn when a hazard cannot be controlled or eliminated by engineering design or administrative controls. All protective equipment, respiratory devices, eye protection, gloves, etc., must be provided, used, and maintained in a reliable sanitary condition. PPE must be fitted to each affected employee and must address fitting and size of PPE.

Each new employee shall receive a safety vest, safety glasses, and ear plugs from their Foreman at their orientation.

Defective and damaged equipment shall not be used. Items that are deemed defective or damaged shall be destroyed and discarded immediately and new PPE will be issued to the employee.

Policy

Engineering and administrative controls shall be the primary methods used to eliminate or minimize hazard exposure in the workplace. When such controls are not practical or applicable, Personal Protective Equipment shall be utilized to reduce or eliminate personnel exposure to hazards. Personal protective equipment (PPE) will be provided, used, and maintained when it has been determined that its use is required and that such use will lessen the likelihood of occupational injuries and/or illnesses. The PPE program will be administered by the Director of Safety and will be reviewed annually.

Design

All personal protective equipment and clothing will be of safe design and construction for the work to be performed. Only those items of protective clothing and equipment that meet National Institute of Occupational Safety and Health (NIOSH) or American National Standards Institute (ANSI) standards will be accepted for use.

Hazard Assessment and Equipment Selection

A hazard assessment by the Director of Safety shall be performed to assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of Personal Protective Equipment (PPE). If such hazards are present, or likely to be present, proper PPE shall be selected and the selection of the PPE shall be communicated to the affected employee. The hazard assessment is documented/certified and will require the certifier's name, signature, date(s) and identification of assessment documents.

Training

All Employees who are required to use PPE shall be trained to know when PPE is necessary, what PPE is necessary, how to properly remove, adjust and wear PPE, the limitations of the PPE and the proper care, maintenance, useful life and disposal of the PPE. Each affected Employee shall demonstrate an understanding of the training and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE. Retraining will be conducted when the workplace changes making the earlier training obsolete, the type of PPE changes or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding. Training shall be documented and will include the employee name, the dates of training and the certification subject.

Assignment

Brooks Construction Co., Inc. will provide all necessary PPE (except Foot Protection) at no cost to the employee. Employees are expected to provide proper foot protection (i.e. hard sole work boots). Commonly provided PPE for employees is vests, ear plugs, safety glasses and hard hats. Furthermore, employees may be obligated for the cost to replace

or repair abused or neglected PPE that has been assigned to them. Brooks Construction Co. is responsible for the assurances of employee-owned equipment. If employee-owned equipment is permitted, the employer must be responsible for the assurances of its adequacy, maintenance and sanitation.

Eye & Face Protection

The majority of occupational eye injuries can be prevented by the use of suitable/approved safety spectacles, goggles, or shields. Approved eye and face protection shall be worn when there is a reasonable possibility of personal injury.

SECTION 17

ELECTRICAL SAFETY

Policy

The purpose of this policy is to establish safe work practices that are intended to prevent electrical shock or other injuries resulting from either direct or indirect contact with electrical circuits or equipment.

On occasion, Brooks Construction Co., Inc. scope of work involves working around and with electricity. Each application has its own combination of hazards that includes the potential for electric shock, burns, fire or explosions. Thus, it is essential for all employees to be aware of the hazards associated with working with electricity and use the appropriate protective methods to minimize the risk of an injury or accident.

General Safe Work Practices

- Turn off and unplug electrical equipment before attempting to repair, replace a part, clear a jam, adjust or troubleshoot.
- Do not use an electrical outlet or switch if the protective cover is ajar, cracked or missing.
- Only use dry hands and tools and stand on a dry surface when using electrical equipment.
- Always pick up and carry portable equipment by the handle and/or base. Carrying equipment by the cord damages the cord's insulation
- Unplug cords from electrical outlets by pulling on the plug instead of pulling on the cord.
- Only extension cords with three-prong plugs shall be used to ensure that equipment is grounded.
- Never remove the grounding post from a 3-prong plug so you can plug it into a 2-prong wall outlet or extension cord.
- Re-route electrical extension cords so they are not stepped on, rolled over, cut or pinched.
- Do not use cords that have cuts or breaks in the outer layer of the cord. Mark them out of service and remove from site.
- Electrical company locates will be done before excavations on job sites. Hand digging and insulated probes will be used in the immediate area.
- Do not use cords that have cuts or breaks in the outer layer of the cord. Mark them out of service and remove from site.

- **Look overhead for wires and cables. A minimum of ten feet should be maintained from electrical lines. Local utilities can insulate, visibly mark, or deaden overhead lines. Contact the Project Manager or Director of Safety to arrange for this prior to starting work.**
- **Brooks has highly visible "Overhead Wires" warning signs for use on our projects. Contact the Project Manager or Director of Safety to arrange for this prior to starting work.**

Electrical Equipment & Components

All electrical equipment and components shall be listed, labeled, and approved by a nationally recognized testing laboratory. All equipment shall be used according to manufacturer's recommendations and shall be inspected periodically for damage. All repairs made to electrical equipment shall be done by a qualified person. Inspections shall include the following:

- Is the cord's insulation frayed, cracked, or damaged, exposing internal wiring
- Are the plug's prongs bent, broken or missing?
- Is the plug or outlet blackened?
- Is there liquid spilled on or around the equipment?
- Are any protective parts broken, cracked or missing?
- Does the operator feel a slight shock when operating the equipment?
- Does the equipment or the cord overheat when running?

If any of the above conditions exist, the employee shall immediately discontinue use of the equipment and notify his/her foreman of the condition. The equipment will immediately be marked and taken out of service.

Ground Fault Circuit Interrupters (GFCI)

Brooks Construction Co., Inc. will use GFCI (ground fault circuit interrupter) on all construction sites for all 120-volt, single-phase, 15 and 20-amp receptacle outlets which are not part of the permanent wiring of the building or structure and are used by employees. This includes power supplied by all portable generators.

GFCI (ground fault circuit interrupter) is a fast-acting circuit breaker, which senses small imbalances in the circuit caused by current leakage to ground, and in a fraction of a second, shuts off the electricity. It is much more effective than a standard circuit breaker or fuse, which are really designed to protect wiring and equipment not people.

SECTION 18

EXCAVATION and TRENCHING

Scope

This subpart applies to all open excavations made in the earth's surface on Brooks Construction Co., Inc. jobsites. Excavations are defined to include trenches.

General Requirements

- A. Each contractor or subcontractor performing trenching or excavating shall employ a Competent Person to oversee the work. The Competent Person must have specific

training in and be knowledgeable about soils analysis, the use of protective systems, and the requirements of OSHA 1926, Subpart P standards. In addition, the Competent Person must have the authority to take immediate action if a hazard exists.

- B. The estimated location of utility installations, such as sewer, telephone, fuel, electric, water lines, or any other underground installations that reasonably may be expected to be encountered during excavation work, shall be determined prior to opening an excavation.
- C. When excavation operations approach the estimated location of underground installations, the exact location of the installations shall be determined by safe and acceptable means.
- D. Access and egress from trench excavations will be established. A stairway, ladder, ramp or other safe means of egress shall be located in trench excavations that are 4 feet or more in depth so as to require no more than 25 feet of lateral travel for employees.
- E. Daily inspections will be conducted by a competent person. Competent persons should examine the possibility of cave-ins, failures or protective systems, etc.
- F. Guardrails will be installed for crossings and walkways to protect against falls into open trenches or excavation holes.

Protection of Employees in Excavations

- A. Each employee in an excavation shall be protected from cave-ins by an adequate protective system when determined by standards in OSHA 1926 subpart P, under the direction of the competent person.
- B. Employees working below grade shall protect their eyes with safety glasses/shields and their heads with hard hats.
- C. The slopes and configurations of sloping and benching systems shall be selected and constructed by the employer or his designee and shall be in accordance with the requirements of OSHA 1926 subpart P.
- D. Designs of support systems, shield systems, and other protective systems shall be selected and constructed by the employer or his designee and shall be in accordance with OSHA 1926 Subpart P Appendices A, C and D.
- E. Excavation of material to a level no greater than 2 feet below the bottom of the members of a support system shall be permitted, but only if the system is designed to resist the forces calculated for the full depth of the trench, and there are no indications while the trench is open of a possible loss of soil from behind or below the bottom of the support system.
- F. Employees will be protected from vehicular traffic. For exposure to public traffic, the employees shall be provided with Class 2 reflective vest.
- G. Employees will be protected against potential falling loads and are not permitted to work under loads of digging equipment where loads may fall.
- H. Test will be conducted for hazardous atmospheres. Test shall be conducted for air contaminants (oxygen, flammable gases, etc.) and provide ventilation where necessary.
- I. Employee must be protected from water accumulation, including the use of shields and water pumps, and they must be inspected by a competent person before work begins.

Soils Analysis

- A. Requirements - (1) Classification of soil and rock deposits. A competent person shall classify each soil and rock deposit as Stable Rock, Type A, Type B, or Type C in accordance with OSHA Subpart P Appendix A.
- B. Layered systems. In a layered system, the system shall be classified in accordance with its weakest layer. However, each layer may be classified individually where a more stable layer lies under a less stable layer.
- C. Reclassification. If, after classifying a deposit, the properties, factors, or conditions affecting its classification change in any way, a competent person shall evaluate the changes. The deposit shall be reclassified as necessary to reflect the changed circumstances.

SECTION 19

COMPRESSED GAS CYLINDER POLICY

Storage and Use of Cylinders

- A. All local, state, municipal, and federal (OHSA) regulations shall be closely observed relative to the storage of oxygen and acetylene cylinders.
- B. The contents of any compressed gas cylinder must be clearly identified. Such identification should be stenciled or stamped on the cylinder or a label. No compressed gas cylinder should be accepted for use that does not legibly identify its contents by name.
- C. Cylinders shall be kept away from any sources of heat and combustible materials.
- D. Cylinders shall be stored in the upright position and secured in a location where they are not likely to be knocked over or damaged.
- E. Cylinders containing oxygen shall be placed at least 20 feet from cylinders containing combustible gases. NOTE: OHSA regulations require that "oxygen" cylinders in storage shall be separated from fuel gas cylinders or combustible materials (especially oil or grease) a minimum distance of 20 feet or by a non-combustible barrier at least five feet high having a fire-resistance rating of at least one-half hour.
- F. Unless cylinders are secured on a service truck, regulators should be removed and valve protection caps in place.
- G. Fuel gas cylinders in which leaks occur should immediately be taken out of use and handled with the following procedure:
 - 1. The valve should be closed, the cylinder tagged and moved outdoors away from sources of flame or sparks and the supplier notified. A regulator attached to the valve may be used temporarily to stop a leak through the valve seat.
 - 2. If the leak occurs at the fuse plug or other safety device, tag the cylinder, move it outdoors away from sources of flame or sparks and leave the valve slightly open to permit the gas to escape.
 - 3. Warnings against approaching the leaking cylinder with lighted cigarettes or other sources of ignition must be posted. The supplier will be notified and his instructions for returning the cylinder followed.
- H. Acetylene cylinder valves should be opened slowly not more than one and one-half (1-1/2) turns of the spindle. The valve should be opened only with the special wrench provided by the supplier. This wrench should be left in position on the stem while the cylinder is in use so that it may be quickly turned off in case of emergency.

- I. Warnings must be issued against permitting a jet of oxygen to strike oily surface, greasy clothes, and against being directed into fuel, oil, or storage tanks that have contained a flammable substance.
- J. The use of hammers and wrenches for opening oxygen cylinder valves shall be prohibited. When valves cannot be opened by hand, the supplier should be notified.
- K. When the oxygen cylinder is in use, the valve should be opened fully in order to prevent leakage around the valve stem.

SECTION 20

HAND AND POWER TOOLS

Scope:

This policy applies to all hand and power tools including personal tools.

General Requirements

- A. Condition of tools. All hand and power tools and similar equipment, whether furnished by the employer or the employee shall be maintained in a safe condition. Employees shall inspect tools before each use and defective/damaged tools shall be tagged and removed from service immediately.
- B. Employees shall notify their Superintendent or Foreman of any defective/damaged tools so that they can be tagged and its condition assessed. The Superintendent/Foreman shall turn the tool in for repair and or replacement. Employees shall inspect tools that have been repaired before use to verify repair.
- C. The operator's manual shall be reviewed before using a new tool. Pay particular attention to the use of the tool, safe operating procedures, guarding, and necessary personal protective equipment.
- D. Guarding - When power operated tools are designed to accommodate guards, they shall be equipped with such guards when in use.
- E. Personal protective equipment. Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases shall be provided with the particular personal protective equipment necessary to protect them from the hazard.
- F. Cords and hoses shall be protected from damage and routed through the jobsite such that they are not tripping hazards.

Hand Tools

- A. Employers shall not issue or permit the use of unsafe hand tools.
- B. A wrench, including adjustable, pipe, end, and socket wrenches shall not be used when jaws are sprung to the point that slippage occurs.
- C. Impact tools, such as drift pins, wedges, and chisels, shall be kept free of mushroomed heads.
- D. The wooden handles of tools shall be kept free of splinters or cracks and shall be kept tight in the tool.

Power Tools

- A. Electric powered tools shall either be grounded with a third wire ground or double insulated. Electric powered tools and power cords shall have the third wire ground completely and in place. Double insulated tools shall be clearly marked as such.
- B. All employees shall be protected from shock by the use of Ground Fault Circuit Interrupters.
- C. Pneumatic power tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.
- D. Safety clips or retainers shall be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled.

Fuel Powered Tools

- A. All fuel-powered tools shall be stopped while being refueled, serviced, or maintained.
- B. When fuel powered tools are used in enclosed spaces, air monitoring for the accumulation of toxic gases shall take place.

SECTION 21

HAZARD COMMUNICATION PROGRAM

Policy

Brooks Construction Co., Inc. has developed a Hazard Communication Program in compliance with OSHA 1926.59, to ensure that all our employees and our subcontractors' employees are informed of hazardous substances known to be present at the jobsite. We will make every effort to provide our employees and all workers on our jobsites a safe workplace.

It will be the responsibility of the Project Managers and Superintendents to ensure that the proper information is obtained and disseminated to the appropriate employees. It will be the employee's responsibility to follow safe practices as outlined in the Safety Data Sheets. The effectiveness of the Hazard Communication Program depends upon the active support and involvement of all personnel.

A copy of the Hazard Communication Program will be on file at every jobsite. The program is available with the SDS books in every Foreman's vehicle. Copies will be available from our Director of Safety, for employees and contractors.

Responsibilities

- A. Project Manager
 - 1. Require all trade contractors to have their own written Hazard Communication Program.
 - 2. Forward all SDS's to the project superintendent for placement in the master file.
- B. Field Superintendent
 - 1. Notifying each trade contractor/subcontractor about the applicability of this procedure.
 - 2. Advising and verifying trade contractors/subcontractors on the site that a hazardous substance will be introduced to the site.

3. Develop a jobsite inventory of hazardous substances.
- C. Foremen
1. Identify all jobs requiring the use of hazardous substances.
 2. Provide proper personal protective equipment.
 3. Make routine surveys of the work area to ensure safe practices are being followed.
 4. Review the SDS for the hazardous substance with the employees involved before the task begins.
 5. Ensure that required labeling practices are being followed.
- D. Employees
1. Obey established rules.
 2. Use personal protective equipment as required by Company procedures.
 3. Know the location of emergency equipment such as first aid kit, fire extinguisher, etc.
 4. Inform your foreman of:
 - a. Any symptoms of overexposure that may possibly be related to hazardous substances.
 - b. Missing labels on containers.
 - c. The use of unapproved containers for hazardous substances.
- E. Hazardous Communication Program Coordinator (HCPC) – The Director of Safety has been designated as Brooks Construction Co., Inc.'s Hazard Communication Program Coordinator, HCPC. Every jobsite will also have a jobsite coordinator who will be the Superintendent or his safety designee.

Hazardous Substances and Materials List or Inventory

A list of hazardous substances and materials on the jobsite will be available in the Foreman's vehicle. If an employee finds a chemical or material that is not on the list it must be reported immediately to the Brooks Construction Co., Inc. Superintendent, Foreman, or Director of Safety. A copy of will be supplied upon request by the Project Manager or designee.

Labels and Other Forms of Warning

Since chemical manufacturers are required to label their containers of hazardous substances we will use these labels as our primary means of warning employees about the products. Brooks Construction Co., Inc.'s HCPC and the Project Manager are responsible for ensuring that all containers are labeled. Labels are not to be removed from any container or defaced in any manner. If a label is missing or defaced beyond recognition, the Project Manager will notify the HCPC immediately. The HCPC will audit the SDS for the proper information and a Hazardous Material Information System (HMIS) label will be applied promptly.

We are not required to label portable containers into which hazardous substances are transferred from labeled containers and which are intended only for the **immediate use** by the employee who performs the transfer.

Safety Data Sheets (SDS)

Safety Data Sheets (SDS) is intended to outline the special precautions and controls necessary for handling hazardous materials. Each foreman will monitor employees under his direct supervision for proper precautions prior to the hazardous substances' introduction to the jobsite. The SDS will be the primary source of information.

Trade contractors must provide the Brooks Construction Co., Inc.'s job Superintendent with an SDS before introducing hazardous substances to a jobsite. If a trade contractor fails to do so, the general contractor can ask him to provide the SDS immediately or stop work.

Non-Routine Tasks

Any superintendent or foreman contemplating a non-routine task will first contact the Director of Safety and will ensure that all employees are informed of the chemical hazards associated with the performance of these tasks and appropriate protective measures required. This will be accomplished by a meeting of the Superintendent, Foreman, and the affected employees before work is begun.

Employee Information and Training

Training and disseminating information to the Brooks Construction Co., Inc. employees relating to the Hazard Communication Standard (CFR 1926.59) is the responsibility of the HCPC – Director of Safety or the safety designee. The HCPC will assure that all requirements are followed in order to comply with the law. At no time will any of our employees be expected to perform any non-routine tasks involving exposure to hazardous substances without proper instruction. Training will be conducted as part of the New Employee Orientation. Training will also be conducted at the jobsite through special training sessions, toolbox talks, and additional sessions before using the hazardous substance.

SECTION 22

HEARING CONSERVATION PROGRAM

The basic elements of the Brooks Construction Co., Inc. Hearing Conservation Program include noise survey procedures, controls, hearing protection, education, and training. Brooks Construction will implement a hearing conservation program for employees exposed to sound levels 85 dbA or greater. A continuing effective hearing conservation program shall be administered when employees are exposed to sound levels greater than 85 dbA on an 8 hour time-weighted average basis. Brooks Construction will have monitoring procedures in place to be used when exposure limits exceed the established level noted 90 dbA. Brooks Construction will have a testing facility conduct noise level checks whenever a new piece of equipment is used or a procedure is changed in out shops, labs or other buildings. Brooks Construction will conduct audiometric testing for all employees whose exposure is equal to or exceeds the 8 hour time-weighted average of 85 dbA on annual bases. If there is a standard threshold shift for the employee based on the annual audiogram the employee will be notified in writing within 21 days of determination. Brooks will conduct a baseline audiogram for each exposed employee within 6 months of their first exposure at or about the action level, a valid baseline audiogram shall be established against which future audiograms can be compared. If it is determined that an

employee needs a baseline audiogram the employee will not work in the affected area within 14 hours of the date and time that the baseline audiogram will be given.

Should the employee have a standard threshold shift the hearing protection that is used shall be re-evaluated and/or refitted for the employee. If necessary a medical evaluation may be required and if needed a medically fitted hearing protection device will be molded for the employees' ear at no cost to the employee.

Controls

Controls should be used whenever it is possible to significantly lower the noise exposure of the employees. This is especially important if the engineering controls reduce the noise to levels below that accomplished when available hearing protection is used. Examples of controls to consider include preventive maintenance programs, enclosing construction processes with sound dampening material, purchasing quiet equipment, baffles, and mufflers.

Hearing Protection Equipment

All employees who are exposed to excessive noise per OSHA 1926.52 should wear hearing protection. Very few medical conditions would prevent employees from wearing hearing protection. Protection may be of several types, such as disposable plastic form inserts, reusable earplugs, or muffs. Each hearing protector has advantages and disadvantages. Selection should be based on the intensity and frequency of the noise. For example, inserts generally protect more efficiently at high frequencies, while muffs are more protective at low frequencies. Check the manufacturer's specifications. *Generally, for the construction industry, the disposable (spongy) insert yields the greatest protection with the least amount of maintenance.*

Education and Training

Informing supervisors and the employees about this program is important. The subjects covered should include reasons for the program; how excessive noise affects hearing; and the proper use of the hearing protection device, which includes insertion in the ear, sanitary storage, cleaning, and the length of time the protection must be worn. As with all safety equipment, it is the first line supervisor's responsibility to ensure that hearing protection is properly used.

Employees must be provided with training on at least an annual basis, and shall be updated to be consistent with changes in the PPE and work processes.

Probably the easiest rule of thumb when educating employees on excessive noise exposure is that if employees have to raise their voices for normal conversation at three feet due to background noise, then they are probably exposed to greater than 90 decibels and a formal noise survey must be performed.

Recordkeeping

Brooks Construction must keep noise exposure measurement records for 2 years and maintain records of audiometric test results for the duration of the affected employee's employment. Audiometric test records must include the employee's name and job classification, date, examiner's name, date of the last acoustic or exhaustive calibration,

measurements of the background sound pressure levels in audiometric test rooms, and the employee's most recent noise exposure measurement. Brooks Construction must record work-related hearing loss cases when an employee's hearing test shows a marked decrease in overall hearing. We will be able to make adjustments for hearing loss caused by aging, seek the advice of a physician or licensed health-care professional to determine if the loss is work-related, and perform additional hearing tests to verify the persistence of the hearing loss.

SECTION 23

HOUSEKEEPING

Policy

Attention to general cleanliness, storage and housekeeping can prevent numerous accidents. All employees share the responsibility for maintaining good housekeeping practice and following the established housekeeping procedures. The Project Foreman, will be responsible for monitoring housekeeping as part of their facility safety inspection procedures, note any hazards or areas of non-compliance, initiate clean-up procedures and provide follow-up. Housekeeping shall take place as often as necessary to keep a clean and safe jobsite. The Project Foreman will be responsible for determining the projected wastes, trash, and/or scrap materials that will be created prior to work beginning. Based on the projected waste production the foremen will determine what kind of waste receptacles will be needed and how many will be needed.

General Housekeeping Guidelines

- All aisles, stairways, emergency exits, fire extinguishers, eye wash stations, etc., will be kept clear (a minimum of three feet of either side) of material storage and debris (temporary and permanent) at all times.
- Storage areas will be maintained orderly at all times. When supplies are received, the supplies will be stored properly.
- Spills will be cleaned-up immediately and hazardous waste shall be disposed of in accordance with state, local and federal regulations.
- All refuse and waste materials will be placed in the recognized waste containers for disposal.
- The employees will be made aware of the proper method to dispose of wastes. This may include general instructions on disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees must be trained to ensure proper disposal.
- The employees will be instructed in the segregation of wastes and opportunities for recycling. The employer should encourage proper segregation of waste materials to ensure opportunities for reuse or recycling.

SECTION 24

PORTABLE LADDER SAFETY POLICY

Policy

Ladders present unique opportunities for unsafe acts and unsafe conditions. Therefore, it is Brooks Construction Co., Inc. policy that all employees who use ladders must be trained in proper selection, inspection, use and storage.

Types of Ladders

There are generally two types of portable ladders, Stepladders (A Frame Ladders) and Straight (Extension Ladders). Each type of ladder has its own specific hazards and precautions

Step Ladders

- The spreaders shall be fully extended and locked into place before use.
- The top two steps are not to be used for sitting or standing.
- The back of the ladder should not be used for climbing, unless designed for such use.
- Stepladders should never be leaned against a wall and used as a straight ladder.

Straight Ladders

- Always select a straight ladder long enough to extend at least three feet beyond the landing.
- Straight ladders should be positioned so that the horizontal distance between the foot of the ladder and the support against which it is placed is equal to one-fourth the height of the ladder at the top of support.
- Ladder rungs must be uniformly spaced or meet OSHA/ANSI specifications. Ladder rungs, cleats, and steps shall be parallel, level and uniformly spaced, when the ladder is in position for use.

General Safety Guidelines

- Ladders shall be secured in position to prevent slipping
- Always be sure to place the ladder on solid ground or footing
- Ladders may not be used in horizontal positions for use as platforms
- Wooden ladders shall be maintained free of sharp edges, splinters and other defects
- Wooden ladders shall not be painted, as paint may hide defects that could lead to failure
- Ladders shall be visually inspected periodically. Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.
- Defective ladders are tagged and placed out of service. References: 1926.1053(b) (15-17) Cal/OSHA T8 CCR 3278. Portable and fixed ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components, shall either be immediately marked in a manner that readily identifies them as defective.
- Metal ladders shall never be used on or around exposed electrical elements
- Brooks Construction Co., Inc. will not use metal ladders
- Ladders shall be kept free of oil, grease, dirt, etc.

- Move the ladder with your work and do not overextend beyond the rails of the ladder.
- When climbing or descending a ladder always face the ladder and hold onto each rail
- Carry tools and materials in proper carrying devices in order to keep your hands free
- Ladders shall have the correct load capacity for the task. Ladders shall not be loaded beyond the maximum intended load for which they were built, nor beyond the manufacture's rated capacity.

Training

All employees using or constructing ladders shall be trained to recognize hazards related to ladders and to use proper procedures to minimize these hazards. Employees shall be trained to demonstrate competency in the following areas:

- The nature of fall hazards in the work areas;
- The proper construction, use, placement and care in handling of all ladders; and
- The maximum intended load carrying capacities of ladders used.

SECTION 25

LOCKOUT & TAGOUT

Policy

All employees will be protected from injuries caused by unexpected energizing or startup of machines or equipment, or release of stored energy during service, repair, maintenance, operation, and associated activities. This policy establishes minimum performance requirements for the control of such potentially hazardous conditions. This will be accomplished by locking out and tagging out energy isolating devices, and otherwise disabling machines or equipment to prevent unexpected energizing, start-up or release of stored energy.

General Lock Out and Tag Out Procedures

- Before working on, repairing, adjusting or replacing machinery and equipment, the following procedures will be utilized to place the machinery and equipment in a neutral or zero mechanical state.
- Before a machine or piece of equipment is turned off, the authorized employee will have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the means to control the energy.
- The employee will notify all affected employees that the machinery, equipment or process will be out of service
- The machine or equipment will be shut down using the specific procedures for that machine. An orderly shutdown will be utilized to avoid any additional or increased hazards to employees as a result of equipment de-energization.
- All energy control devices that are needed to control the energy to the machine or equipment will be physically located and operated in such a manner as to isolate the machine or equipment from the energy source.
- Lockout or tag-out devices will be affixed to energy isolating devices by authorized employees. Lockout devices will be affixed in a manner that will hold the energy isolating devices in the "safe" or "off" position and prevent the machine or equipment from being restarted

- Where tag-out devices are used they will be affixed in such a manner that will clearly state that the operation or the movement of energy isolating devices from the "safe" or "off" positions is prohibited.
- The tag-out devices will be attached to the same point a lock would be attached. If the tag cannot be affixed at that point, the tag will be located as close as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device.
- Lock out and tag out all energy devices by use of hasps, chains and valve covers with an assigned individual locks.
- Following the application of the lockout or tag-out devices to the energy isolating devices, all potential or residual energy will be relieved, disconnected, restrained, and otherwise rendered safe.
- Where the re-accumulation of stored energy to a hazardous energy level is possible, verification of isolation will be continued until the maintenance or servicing is complete.
- Release stored energy (capacitors, springs, elevated members, rotating fly wheels, and hydraulic/air/gas/steam systems) must be relieved or restrained by grounding, repositioning, blocking and/or bleeding the system.
- Prior to starting work on machines or equipment that have been locked or tagged out, the authorized employees will verify that isolation or de-energization of the machine or equipment have been accomplished.
- After assuring that no Employee will be placed in danger, test all lock and tag outs by following the normal start up procedures (depress start button, etc.). Caution: After Test, place controls in neutral position.
- Should the shift change before the machinery or equipment can be restored to service, the lock and tag must remain. If the task is reassigned to the next shift, those Employees must lock out and tag out the equipment before the previous shift may remove their lock and tag.

Removal of Lockout-Tag-out

Before lockout or tag-out devices are removed and the energy restored to the machine or equipment, the following actions will be taken:

- The work area will be thoroughly inspected to ensure that nonessential items have been removed and that machine or equipment components are operational.
- The work area will be checked to ensure that all employees have been safely positioned or removed. Before the lockout or tag-out devices are removed, the affected employees will be notified that the lockout or tag-out devices are being removed.
- Each lockout or tag-out device will be removed from each energy-isolating device by the employee who applied the device.
- Only the Employee that locks out and tags out machinery, equipment or processes may remove his/her lock and tag. Should the employee leave the facility before removing his/her lock and tag, the project manager may remove the lock and tag. The Project Manager must be assured that all tools have been removed, all guards have been replaced and all employees are free from any hazard before the lock and tag are removed and the machinery, equipment or process are returned to service. The project manager shall attempt to notify the employee who placed the lock and tag prior removal.

Training

Each **authorized employee** will be trained in the recognition of hazardous energy sources, the type and magnitude of the energy available in the workplace, and methods and means necessary for energy isolation and control.

All affected employees will be trained in the purpose and use of the energy control procedure and the prohibiting of the attempt to restart or reenergize machines or equipment that are locked out or tagged out.

Retraining will be provided for all authorized and affected employees whenever there is a change in his/her job assignments, a change in equipment or processes that present a new hazard, or when there is a change in the energy control procedures. Additional retraining shall also be conducted whenever a periodic inspection reveals, or whenever there is reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures. Brooks Construction Co., Inc. will certify that employee training has been accomplished and is being kept up to date. The certification shall contain each employee's name and dates of training.

Inspections

An annual inspection of the energy control procedure will be performed by the Director of Safety. The inspection will include a review of the responsibilities and procedures of authorized employees and the employee knowledge of the program. Supervisors are responsible for evaluating energy control procedures in their unit.

SECTION 26

SAWS AND CUTTING SAFETY

Policy

There are many hazards to consider when using a powered saw. These include cutting surface material like concrete or asphalt and ductile materials like plastic, steel and concrete. Loose or cut materials may become a projectile and strike quickly, without warning to the face or other parts of the body.

Training

Foremen, supervisors, and the Director of Safety will make certain that trained employees use the saws properly. This includes circular saws, portable cut-off (quickie) saws, and walk behind pavement saws.

Personal Protective Equipment

Employees should have safety glasses on at a minimum. A face shield offers better protection when cutting harder materials such as piping. Noise levels may require ear plugs. Nuisance dust may require a disposable mask. High dust levels will be controlled by "wet" sawing the material.

SECTION 27

WELDING & CUTTING POLICY

Policy

There are several hazards to consider when performing welding or cutting operations. These hazards include fires, explosions, electrocution, burns, welder's flash, oxygen depletion, and toxic fumes. Garage Mechanics and Project foremen will be responsible to ensure that personnel are aware of these hazards and have taken adequate steps to prevent such an occurrence.

Training

It is the policy of Brooks Construction Co., Inc. to permit only trained and authorized personnel to operate welding and cutting equipment. The Shop Manager or Director of Safety will conduct the initial training and evaluation. Training shall consist of the hazards associated with the welding and cutting equipment, hazards of the workplace, duties of the fire watch, and general hazards that apply to most welding and cutting operations.

Hot Works Procedures

- Objects to be welded, cut or heated must be moved to a designated safe location. If the object cannot be easily moved, all moveable fire hazards will be moved at least 35 feet from the worksite or protected with flame proof covers, metal guards or curtains.
- A fire extinguisher must be immediately available in the work area, free of obstruction, and maintained for instant use. The fire extinguisher shall be of suitable size and rating for the work being performed.
- The work area shall be kept clear of welding rod studs and other debris.

Electric Welding

- Ensure electrical cord, electrode holder and cables are free from defects (no cable splices are allowed within 10 feet of the electrode holder.)
- Ensure the welding unit is properly grounded.
- To avoid overheating, ensure proper contact of work leads and connections, remove any metal fragments from magnetic work clamps.
- To avoid electric shock do not wrap welding cables around a body part and avoid welding in wet conditions.

Gas Welding

- Inspect pressure gauges, hoses and torches daily for defects. Ensure all fittings are tight. If cylinders, valves, regulators, plugs, or other safety devices are damaged, they must be tagged out of service and removed from the work area.
- Valves must be opened slightly and closed immediately before a regulator is connected to the cylinder. This is called "cracking" which clears the valve of dust and dirt. The employee must stand to the side of the outlet, not in front. Valves must be cracked away from welding work, sparks, flames or other sources of ignition.
- Valves must be opened slowly to prevent damage to the regulator. Valves must not be opened more than 1½ turns. If a wrench is required it must stay in position in case of emergency for a quick shut off.

- When work is complete, cylinders must be closed and the gas released from the regulator before removing the regulator.
- Oxygen cylinders and fittings must be kept free from oil or greasy substances and may not be handled with oily hands or gloves.
- Clogged torch tip openings must be cleaned. Torches may be lit only with friction lighters.
- For proper use, handling and storage of compressed gas cylinders, refer to the compressed gas cylinder policy of this safety manual

Personal Protective Equipment

All personnel engaged in welding or burning operations shall wear the appropriate personal protective equipment. This includes but is not limited to eye and face protection against harmful radiation and flying particles, flame retardant clothing, and leather gauntlet type gloves.

SECTION 28

CONFINED SPACE POLICY

INTRODUCTION

The purpose of this program is to inform workers of practices and procedures used by the company to protect workers from the hazards of entry into confined spaces. For our operations, the most common confined spaces are entry into tanks, bins, or silos; however, there are a number of other situations that could present confined space hazards. For example; an open trench more than four feet deep, a poorly ventilated construction trailer, tunnels under stockpiles or aggregate bins, and even manholes.

LEGAL REQUIREMENT

The OSHA standard on Permit-Required Confined Spaces (1910.146) requires employers to implement practices and procedures to protect employees from hazards associated with entry and work within permit required confined spaces.

CONFINED SPACE GENERAL DEFINITIONS

1. **Acceptable Entry Conditions:** The conditions that must exist in a permit space to allow entry and to ensure that the employees involved with a permit-required confined space entry can safely enter into and work within the space.
2. **Attendant:** An individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant's duties assigned in confined space program.
3. **Authorized Entrant:** An employee who is authorized by the employer to enter a permit space.
4. **Confined Space is a space that:**
 - a. Is large enough and so configured that an employee can bodily enter and perform assigned work.
 - b. Has limited or restricted means of entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, and pits are spaces that may have limited means of entry).
 - c. Is not designed for continuous employee occupancy.

5. **Emergency:** Any occurrence (including any failure of hazard control or monitoring equipment) or event(s) internal or external to the confined space which could endanger entrants.
6. **Engulfment:** The surrounding and effective capture of a person by a liquid or finely divided solid (flowable) substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.
7. **Entry:** The act by which a person intentionally passes through an opening into a permit required confined space, and subsequent work activities in that space. The entrant is considered to have entered as soon as any part of the entrant's body breaks the plane of an opening into the space.
8. **Entry Permit:** The written or printed document to allow and control entry into a permit space (available in Confined Space manual for from the Safety Director).
9. **Entry Supervisor:** The person (such as the foreman, plant manager or plant operator) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry.
 - a. Note: An entry supervisor also may serve as an attendant or as an authorized entrant, as long as that person is trained and equipped as required by this program for each role he or she fills. Also, the duties of entry supervisor may be passed from one individual to another during the course of an entry operation.
10. **Hazardous Atmosphere:** An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is escape unaided from a permit space), injury, or acute illness from one of more of the following causes:
 - a. Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL).
 - b. Airborne combustible dust at a concentration that meets or exceeds its LFL.
 - i. Note: This concentration may be approximated as a condition in which the dust obscures vision at a distance of 5 feet (1.52 m) or less.
 - c. Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent.
 - d. Atmospheric concentration of any substance for which a dose exceeds the OSHA PEL.
 - i. Note: An atmospheric concentration of any substance that is not capable of causing death, incapacitation, and impairment of ability to self-rescue, injury or acute illness due to its health effects is not covered by this provision.
 - e. Any other atmospheric condition that is immediately dangerous to life or health.
 - i. Note: For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Material Safety Data Sheets, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.
11. **Immediately Dangerous to Life or Health (IDLH):** Any condition which poses an immediate threat of loss of life; may result in irreversible or immediate-severe

health effects; may result in eye damage; irritation or other conditions which could impair escape from the permit space.

12. **Isolation:** The process by which a permit space is removed from service and completely protected against the release of energy and material into the space by such means as: Lockout/Tag-out of all sources of energy or mechanical linkages.
13. **Non-Permitted Confined Space:** A confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.
14. **Oxygen Deficient Atmosphere:** A dangerous atmosphere containing less than 19.5 percent oxygen by volume.
15. **Oxygen Enriched Atmosphere:** A dangerous atmosphere containing more than 23 percent oxygen by volume.
16. **Permit Required Confined Space (Permit Space):** A confined space that has one or more of the following characteristics:
 - a. Contains or has a potential to contain a hazardous atmosphere.
 - b. Contains a material that has the potential for engulfing an entrant.
 - c. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section.
 - d. Contains any other recognized serious safety or health hazard.
17. **Prohibited Condition:** Any condition in a permit space that is not allowed by the permit during the period when entry is authorized.
18. **Rescue Service:** The personnel (i.e. in this case, the fire department) are designated to rescue employees from permit spaces, unless workers can be rescued without entry into the space by mean of a retrieval system.
19. **Retrieval System:** The equipment (including a retrieval line, chest or full body harness, wristlets, and lifting device or anchor) used for non-entry rescue of persons from permit spaces.
20. **Multi employers confined space:** We will not allow any Brooks employee to work in a confined space that is currently being used by another employer. Brooks will wait until one employer is done in the confined space before allowing our employees into the confined space. Brooks will complete their confined space work before allowing anther Non-Brooks employee into the confined workspace.

CONFINED SPACE PROGRAM RESPONSIBILITIES

1. **Safety Personnel**
 - a. Aid in the training program for all personnel who enter confined spaces.
 - b. Approve all monitoring equipment, safety equipment training programs and materials for safe work operations.
 - c. Aid entry supervisors in inspecting Permit Confined Space locations for determination of hazards.
 - d. Provide periodic calibration of confined space entry monitoring equipment.
 - e. Inspect completed permits annually.
2. **Supervisors**
 - a. Be able to identify a confined space and contact Safety personnel when the space is new, or workers are not trained in entry.

- b. Assure affected employees receive training appropriate for their confined space duties.
 - c. Ensure that all entry permits are completed and signed upon termination of entry and that a copy is submitted to the Safety department.
3. **Employee**
- a. Be able to identify any new confined spaces, and contact the appropriate supervisor before entry. An employee who is authorized by the employer to enter a permit space.
 - b. The employee or their representatives will be given the opportunity to participate in and review calibrated air monitoring data before entry. The employee will be notified of any potential hazards and their result. The employee will also participate in the permit review and signing.
 - c. The employee or representatives will be entitled to request additional monitoring at any time during the confined space work.

GENERAL REQUIREMENTS

1. **Hazard Identification.** Each permit space shall be identified and evaluated, including a determination of the severity of the hazard. Supervisors shall report potential permit spaces to the Safety department.
2. **Permit System.** A written permit system shall be utilized for entry into permit spaces. Permit should be obtained from the Confined Space manual or the Safety Director, and any questions regarding permits should be directed to the Safety Director.
3. **Employee Information.** For company-owned sites, signs shall be posted where feasible near permit spaces to notify employees of the hazards that may be present and that only authorized entrants may enter the permit space. Where signage is not feasible, potentially exposed employees shall be trained with regard to the danger of unauthorized entry of permit spaces. Plant Superintendent shall be responsible for insuring proper signage of permit spaces.
4. **Prevention of Unauthorized Entry.** Unauthorized entry into permit spaces shall be prevented. Prevention measures include training, signs and security measures. All employees in or around confined spaces shall attend confined space awareness training.
5. **Employee Training.** Only trained attendants, authorized entrants and personnel authorizing or in charge of entry, shall work in and around a permit space.
6. **Equipment.** Including: testing, monitoring, communication and personal protective equipment, shall be provided, maintained, and properly used. Safety personnel will aid in specifying safety equipment for each permit space.
7. **Rescue.** Rescue procedures (see emergency action plan) and equipment shall be in place prior to entry into a permit space. The use of retrieval equipment shall be required where there exists a potential for an IDLH atmosphere or engulfment. There must be adequate attachment points outside the confined space for tying-off or otherwise securing retrieval lines for all authorized entrants. Where retrieval lines themselves could constitute an entanglement hazard or otherwise cannot be used, an equivalent method for rescue shall be used. Workers will not be trained in rescue of workers for which the rescuers must enter the confined space. Trained professionals (i.e. fire department) will be relied on for these emergency services.

8. **Protection from External Hazards.** Barriers necessary to protect entrants from external hazards (pedestrian, vehicle, etc.) shall be in place prior to entry into a permit space.

CONFINED SPACE TRAINING

Confined space training shall be provided for employees required, in the course of completing their job duties, to enter any location defined as a permit entry required confined space. Training shall also be provided to all attendants and entry supervisors. The training will be conducted prior to initial assignment, prior to a change in assigned duties, if a new hazard has been created and/or if special deviations have occurred.

The documented training records shall include the employee's name, trainer's signature and the dates of training.

Employees performing the following tasks will be responsible for the following. In the event these employees do not understand the training regarding these responsibilities, or have further questions regarding a confined space, the worker shall contact the Safety Director.

Entry Supervisors

1. Know the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure (i.e. refer to SDS).
2. Verify, by checking that the appropriate entries have been made on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before approving the permit and allowing entry to begin.
3. Terminate the entry and cancel the permit as required when:
 - a. The entry operation covered by the entry permit has been completed.
 - b. A condition that is not allowed under the entry permit arises in or near the permit space.
4. Remove unauthorized individuals who enter or who attempt to enter the permit space during entry operations.
5. Determine, whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.
6. Supervisor will have access to his cell phone at all times and have the direct number for the local rescue/fire department already programmed so he can quick dial for emergency rescue service if required.

Attendant

1. Know the hazards that may be faced during entry, including the mode, signs or symptoms, and consequences of the exposure (i.e. refer to SDS).
2. Be aware of possible behavioral effects of hazardous exposure in authorized entrants.
3. Maintain a continuous accurate count of authorized entrants in the permit space and ensure that the means used to identify authorized entrants accurately identifies who is in the permit space.

4. Remain outside the permit space during entry operations until relieved by another authorized attendant.
5. Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space.
6. Monitor activities inside and outside the space to determine if it is safe for entrants to remain in the space and order the authorized entrants to evacuate the permit space immediately under any of the following conditions:
 - a. If the attendant detects a prohibited condition.
 - b. If the attendant detects the behavioral effects of hazards exposure in an authorized entrant.
 - c. If the attendant detects a situation outside the space that could endanger the authorized entrants.
 - d. If the attendant cannot effectively and safely perform all the duties required under this section.
7. Summon emergency services as soon as the attendant determines that authorized entrants may need assistance to escape from permit space hazards.
8. Take the following actions when unauthorized persons approach or enter a permit space while entry is underway:
 - a. Warn unauthorized persons that they must stay away from the permit space.
 - b. Advise the unauthorized persons that they must exit immediately if they have entered the permit space.
 - c. Inform the authorized entrants and entry supervisor if unauthorized persons have entered the permit space.
9. Perform non-entry rescue as specified by the rescue procedure.
10. Perform no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.
11. Will not be allowed to monitor more than one confined space at a time. The current confined space must be completed and closed before being allowed to move to another confined work space to monitor.

Rescue and Emergency Services:

The following information shall be provided to the emergency rescue service (i.e. fire department) for each confined space rescue:

1. Inform the rescue service of the hazards they may confront when called on to perform rescue at jobsites or company facilities.
2. Provide the rescue service with access to all permit spaces from which rescue may be necessary so that the rescue service can develop appropriate rescue plans.
3. If an injured entrant is exposed to a substance, that SDS or written information shall be made available to the medical facility treating the exposed entrant if requested.

To facilitate non-entry rescue, retrieval systems or methods shall be used whenever an authorized entrant enters a permit space, unless the retrieval equipment increases the overall risk of entry or does not contribute to the rescue of the entrant. Retrieval systems shall meet the following requirements:

1. Each authorized entrant shall use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, or above the entrant's head.

2. The other end of the retrieval line shall be attached to a mechanical device or fixed point outside the permit space in such a manner that rescue can begin as soon as the non-entry rescuer becomes aware that rescue is necessary.

Brooks does not work in confined spaces where IDLH conditions are present so emergency rescue services does not need to be on-site. If at any time this would change or become necessary we will amend our policy and procedure to address the IDLH.

SECTION 29

BLOODBORNE PATHOGEN POLICY

I. INTRODUCTION

The Occupational Safety and Health Administration (OSHA) Standard 29 CFR 1910.1030 Blood borne Pathogens Standard was issued in 1991 to reduce the occupational transmission of infections caused by microorganisms sometimes found in human blood and certain other potentially infectious materials. Although a variety of harmful microorganisms may be transmitted through contact with infected human blood, hepatitis B virus (HBV), hepatitis C virus (HCV) and the Human Immunodeficiency Virus (HIV) have been shown to be responsible for infecting workers who were exposed to human blood or certain other body fluids containing these viruses. Occupational transmission has been identified through routes like needle stick injuries and by direct contact of mucous membranes and non-intact skin with contaminated blood/materials. Occupational transmission of HBV occurs much more often than transmission of HIV and HCV. However, all possible measures must be employed when performing any task or procedure that presents risk of occupational exposure to any blood borne pathogen.

All employees who may be exposed to blood and other potentially infectious materials in the performance of tasks and procedures as part of the duties as described by their job classification are included in this exposure control plan. This plan will be renewed at least annually and updated as necessary by the **Director of Safety** and/or his/her designate. Copies of this plan are available for review by any employee.

II. EXPOSURE DETERMINATION

- A. All employees that administer first aid have occupational risk to exposure.
- B. The following is a list of all tasks and procedures or groups of closely related tasks and procedures that are performed by employees that administer first aid:

EXAMPLES

1. Assisting and applying treatment for an open cut, sore, wound, or other compromise to the skin that presents exposure to blood or other body fluids.
2. Handling of contaminated sharps and lancets used.

3. Cleaning of any surface, equipment, or materials that may have been contaminated with blood or other body fluids.
4. Responding to and assisting in situations such as falls, accidents, altercations, or other incidents that present exposure to blood or other body fluids.

III. METHODS OF COMPLIANCE

A. Standard precautions

All blood or other potentially infectious materials shall be handled as if contaminated by a blood borne pathogen. Under circumstances in which differentiation between body fluid types is difficult or impossible, all body fluids shall be considered potentially infectious materials.

B. Hand washing and other general hygiene measures

1. Hand washing is a primary infection prevention measure that is protective of the employee. Appropriate hand washing must be diligently practiced.
 - a. Employees shall wash hands thoroughly using soap and water whenever hands become contaminated and as soon as possible after removing gloves or other personal protective equipment.
 - b. In work areas where provision of hand washing facilities is not feasible, an appropriate antiseptic hand cleanser in conjunction with clean paper towels or antiseptic towelettes will be provided.
 - c. When antiseptic hand cleansers or towelettes are used, hands shall be washed with soap and running water as soon as feasible.
 - d. Employees shall wash hands and any other skin with soap and water or flush mucous membranes with water immediately or as soon as feasible following contact of such body areas with blood or other potentially infectious materials.
 - e. Eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lenses are prohibited in work areas where there is a reasonable likelihood of occupational exposure.

C. Procedures involving blood or other potentially infectious materials

1. All procedures involving blood or other potentially infectious materials shall be performed in such a manner as to minimize splashing, spraying, spattering, and generation of droplets of these substances.
2. Contaminated needles and other contaminated sharps shall not be bent, recapped, or removed.
 - a. Immediately or as soon as possible after use, contaminated sharps shall be placed in appropriate containers until properly reprocessed.
 - b. Sharps containers shall be puncture resistant, color-coded (red), leak proof on the sides and bottom, and in accordance with OSHA requirements for reusable sharps.
3. Employees are prohibited from suctioning blood or other potentially infectious materials with their mouth.

D. Personal Protective Equipment

All personal protective equipment will be provided, repaired, cleaned, and disposed of by the employer at no cost to employees.

1. Gloves shall be worn when it can be reasonably anticipated that hands will contact blood or other potentially infectious materials, mucous membranes, or non-intact skin; will contact mouth, nose, or eyes; when handling or touching contaminated items or surfaces; and/or when handling or touching food or other items to be ingested.
 - a. Disposable gloves will be made available in all applicable work areas
 - Disposable gloves shall be replaced immediately as feasible when contaminated, torn, punctured, or when their ability to function as a barrier is compromised.
 - Disposable gloves are not to be re-used.
2. Masks and eye protection shall be worn whenever splashes, spray, spatter, or droplets of blood or other potentially infectious materials may be generated and eye, nose, or mouth contamination can be reasonably anticipated.

E. Housekeeping

1. General policy: The workplace will be maintained in a clean and sanitary condition. A written housekeeping procedure, prescribing the appropriate methods and frequency of decontamination based upon the location within the facility or job site, type of surface to be cleaned, type of soil present, and tasks or procedures being performed, shall be followed.
 - a. All equipment and environmental and working surfaces shall be cleaned and decontaminated after contact with blood or other potential infectious materials.
 - b. Contaminated work surfaces shall be cleaned and decontaminated with an appropriate disinfectant after completion of procedures; immediately or as soon as feasible when surfaces are overtly contaminated or after any spill of blood or other potentially infectious materials; and at the end of the work shift if the surface may have become contaminated since the last cleaning.
 - c. All bins, pails, cans, and similar receptacles intended for reuse which have a reasonable likelihood for becoming contaminated with blood or other potentially infectious materials shall be inspected and decontaminated on a regularly scheduled basis and cleaned and decontaminated immediately, or as soon as feasible, upon visible contamination.
 - d. Broken glassware that may be contaminated shall not be picked up directly with the hands. It shall be cleaned up using mechanical means, such as a brush and dust pan or tongs.

F. Regulated Waste:

1. Contaminated sharps shall be discarded immediately or as soon as feasible in containers that are:
 - a. Closable;
 - b. Puncture resistant;
 - c. Leak proof on sides and bottom; and
 - d. Color-coded (**red**) in accordance with OSHA standard.
2. During use, containers for contaminated sharps shall be:
 - a. Easily accessible to employees and located as close as is feasible to the immediate area where sharps are used;
 - b. Maintained upright throughout use; and
 - c. Replaced routinely and not be allowed to overfill.
3. When moving containers of contaminated sharps from the area of use, the containers shall be;
 - a. Closed immediately prior to removal or replacement to prevent spillage or protrusion of contents during handling, storage, transport, or shipping;
 - b. Placed in a secondary container if leakage is possible – the second containers shall be closable, constructed to contain all contents and prevent leakage during handling, storage, transport, or shipping; and color-coded (**red**) in accordance with OSHA standard.
4. Communication of hazards to employees:
 - a. Employees will be informed of regulated waste hazards through a system of color-coded (**red**) labels, and through a training program as discussed in Section VI of this written plan.
 - b. Warning labels shall be affixed to containers of regulated waste. Labels shall be fluorescent orange or orange-red with lettering or symbols in a contrasting color, and is to be either an integral part of the container or affixed as close as feasible to the container by a method which prevents loss or unintentional removal of the label. The label shall have the biohazard symbol and the text "BIOHAZARD"; or
 - c. Red bags or red containers may be substituted for the warning label.

IV. HEPATITIS B VACCINATION POLICY

General statement of policy

All employees who have been identified as having exposure to blood borne pathogens will be offered the hepatitis B vaccination series at no cost to them. In addition, these employees will be offered post-exposure evaluation and follow-up at no cost to them should they experience an exposure incident on the job.

All medical evaluations and procedures including the hepatitis B vaccination series, whether prophylactic or post-exposure, will be made available to the employee at a reasonable time and place. This medical care will be performed by or under the supervision of a licensed physician, physician's assistant, or nurse practitioner. Medical care and vaccination series will be according to the most current recommendations of the U.S. Public Health Service. A copy of the blood borne

pathogens standards will be provided to the healthcare professional responsible for the employee's hepatitis B vaccination.

All laboratory tests will be conducted by an accredited laboratory at no cost to the employee.

Hepatitis B vaccination

The vaccination is a series of three injections. The second injection is given one month from the initial injection. The final dose is given six months from the initial dose. If a routine booster dose(s) of hepatitis B vaccine is recommended by the U.S. Public Health Service at a future date, such booster dose(s) shall be made available at no cost to the employee.

The vaccination series will not be made available to employees who have previously received the complete hepatitis B vaccination series; to any employee who has immunity as demonstrated through antibody testing; or to any employee for whom the vaccine is medically contra-indicated.

Any exposed employee who chooses not to take the Hepatitis B vaccination will be required to sign a declination statement.

V. EVALUATION AND FOLLOW-UP PROCEDURES OF EXPOSURE INCIDENTS

- A. An exposure incident is a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that results from the performance of an employee's duties.
- B. Employees who experience an exposure incident must immediately report their exposure to their supervisor. When an employee reports an exposure incident, he/she should immediately be offered a confidential medical evaluation and follow-up including the following elements:
 1. Documentation of the route(s) of exposure, and the circumstances under which the exposure incident occurred;
 2. Identification and documentation of the source individual unless identification is infeasible.
 3. Blood from the source individual will be tested as soon as feasible after consent is obtained for HBV, HCV, and HIV testing. If the source individual's blood is available, and the individual's consent is not required by law, the blood shall be tested and the results documented. The exposed employee will be informed of the results of the source individual's testing.
 4. The exposed employee's blood shall be collected as soon as feasible after consent is obtained, and tested for HBV, HCV and HIV serological status. If the employee consents to baseline blood collection, but does not give consent at the time for HIV serologic testing, the sample shall be preserved for at least 90 days. If, within 90 days of the exposure incident, the employee elects to have the baseline sample tested, such testing shall be done as soon as feasible.

5. The exposed employee will be offered post-exposure prophylaxis, when medically indicated, as recommended by the U.S. Public Health Service. The exposed employee will be offered counseling and medical evaluation of any reported illnesses.
- C. The following information will be provided to the healthcare professional responsible for evaluating the exposed employee:
1. A copy of 29 CFR 1910.1030, OSHA Blood borne Pathogens Standard;
 2. A description of the exposed employee's duties as they relate to the exposure incident;
 3. The documentation of the route(s) of exposure and circumstances under which exposure occurred;
 4. Results of the source individual's blood testing, if applicable;
 5. All medical records relevant to the appropriate treatment of the employee including vaccination status.
- D. The employee shall be provided with a copy of the healthcare professional's written opinion within fifteen (15) days of the completion of the evaluation. The written opinion will be limited to the following information:
1. The employee has been informed of the results of the evaluation;
 2. The employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment.
- All other findings shall remain confidential and shall not be included in the written report.

VI. EMPLOYEE TRAINING

Employees will be trained regarding blood borne pathogens at the time of initial assignment to tasks where exposure may occur *and* annually, during work hours. Additional training will be provided whenever there are changes in tasks or procedures which affect an employee's occupational exposure; this training will be limited to the new exposure situation.

The training approach will be tailored to the educational level, literacy, and language of the employees. The training plan will include an opportunity for employees to have their questions answered by the trainer. The **Director of Safety** or his/her designate is responsible for arranging and/or conducting training.

The following content will be included:

1. Explanation of the blood borne pathogens standard;
2. General explanation of the epidemiology, modes of transmission, and symptoms of blood borne diseases;
3. Explanation of this exposure control plan and how it will be implemented;
4. Procedures which may expose employees to blood or other potentially infectious materials;

5. Control methods that will be used at **Brooks Construction Co., Inc.** to prevent and/or reduce the risk of exposure to blood or other potentially infectious materials;
6. Explanation of the basis for selection of personal protective equipment;
7. Information about the hepatitis B vaccination program, including the benefits and safety of vaccination;
8. Information on procedures to use in an emergency involving blood or other potentially infectious materials;
9. What procedure to follow if an exposure incident occurs;
10. Explanation of post-exposure evaluation and follow-up procedures; and
11. Explanation of warning labels and/or color coding.

VII. RECORD-KEEPING PROCEDURES

Procedures are in place for maintaining both medical and training. If **Brooks Construction Co., Inc.** should cease business, and there is no successor employer to receive and retain the records for the prescribed period, then the Director of the National Institute for Occupational Safety and Health (NIOSH) will be notified at least three (3) months prior to the disposal of records. The records will be transmitted to NIOSH, if required by the Director, within the three month period.

- A. A medical record will be established and maintained for each employee with exposure. The record shall be maintained for the duration of employment plus thirty (30) years in accordance with 29 CFR 1910.1020. The record shall include the following:
 1. Name and social security number of the employee;
 2. Copy of the employee's hepatitis B vaccination status with dates of hepatitis B vaccinations and any medical records relative to the employee's ability to receive vaccination;
 3. Copy of examination results, medical testing, and any follow-up procedures;
 4. Copy of the healthcare professional's written opinion; and
 5. Copy of the information provided to the healthcare professional who evaluates the employee for suitability to receive hepatitis B vaccination as a prophylactic and/or after an exposure incident.
- B. Confidentiality of medical records: The records will be kept confidential. The contents will not be disclosed or reported to any person within or outside the workplace without the employee's expressed written consent, except as required by law or regulation. Employee medical records required under 29 CFR 1910.1030 shall be provided upon request for examination and copying to the subject employee in accordance with 29 CFR 1910.1020.

C. Training records: Training records shall be maintained for three (3) years from the date on which the training occurred. The following information shall be included:

1. Dates of training sessions;
2. Contents or summary of training sessions;
3. Names and qualifications of trainer(s); and
4. Names and job titles of all people attending.

D. Training records shall be provided upon request for examination and copying to employees, to employee representatives, and to the Commissioner of the Department of Labor and Industry in accordance with 29 CFR 1910.20.

SECTION 30

SUBCONTRACTOR SAFETY MANAGEMENT PLAN POLICY

PROGRAM OVERVIEW

The subcontractor shall have a comprehensive written safety and health program. All employees shall understand basic element of this program prior to assignment to the project.

The subcontractor's safety plan, depending on scope of their work should address the following elements:

- Safety Policy
- Control Measures
- Safety Inspections/Audits
- Disciplinary Program
- Training Policy
- Project Site Employee Orientation Program
- Recordkeeping Policy
- Accident/Exposure and investigations policy
- Emergency Action Plan
- Site-Specific medical Emergency plan
- Hazard Communication Program
- Written Trenching and Shoring Plan (if applicable)
- Written 100% Fall Protection Plan
- Personal Protective Equipment

SITE SPECIFIC SAFETY PLAN

Subcontractors are required to submit their site-specific safety plan (SSSP) prior to the pre-construction meeting. In addition, their safety and health plan is reviewed by Brooks Construction Director of Safety to assure that they meet the requirements of the site safety and risk control expectations. A subcontractor safety meeting will be held before initiating project work. This meeting is to review project requirements for safety and risk control. The subcontractor's safety officer and designated Competent Person(s) and any other necessary subcontractor's representatives shall attend the meeting. In addition, subcontractors will be included in any tool box talk safety meetings, job safety analysis

(JSA's), jobsite safety inspections, and any pre-job meetings or safety orientations with the site owner.

The subcontractor shall present project-specific safety requirements, including a review of various roles and responsibilities of personnel, an initial overview of project risks, and elements of hazard control/countermeasures appropriate to potential exposures.

SUBCONTRACTOR TRAINING REQUIREMENTS

Subcontractor training records may be maintained electronically and/or on site. These records shall be available to Brooks Construction, the site owner, and government agencies upon request.

The subcontractor shall conduct a project specific safety orientation for all subcontractor personnel who work on the project before the personnel are allowed to perform any work.

SUBCONTRACTOR INCIDENT REPORTING

The subcontractor's foreman or superintendent must ensure that all incidents are reported to Brooks Construction as soon as possible, but in no case more than four hours of the occurrence. The subcontractor's foreman or superintendent will follow up any verbal report with a copy of the subcontractor's incident report. Included with this report shall be any monitoring or corrective action plans. Copies of all incidents reported, including near misses, must be maintained on site.

Upon completion of a job, the subcontractor shall conduct a post-job safety performance review. This review shall be made available to the Brooks Construction Director of Safety, and the site owner's representative.

SUBCONTRACTOR PREQUALIFICATION

Project procurement procedures require that all subcontractors submit prequalification documentation for evaluation. Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents, and safety statistics. Acceptable safety metrics are an affirmative answer to those questions which are applicable to the subcontractor (see Subcontractor Qualification Scorecard) and average or better scores under OSHA Information (see OSHA Information Sheet) and will be used as criteria for selecting subcontractors. The Project Manager conducts the safety prequalification evaluation in accordance with the subcontractor prequalification process and scorecard form included.

**SUBCONTRACTOR SAFETY QUALIFICATION SCORECARD
SUBCONTRACTOR SAFETY MANAGEMENT PLAN**

Subcontractor Name:

Completed By: _____ **Date:** _____

Please answer the following questions.

1. **Y or N** Do you have a written safety program? If yes, provide a copy of the table of contents and a copy of your firm's policy statement.
2. **Y or N** Do you require and use site-specific safety plans?
3. **Y or N** Do you have clearly defined safety responsibilities for managers, supervisors and workers?
4. **Y or N** Do managers/executives visit the worksite? How often? Provide details.

5. **Y or N** Does your company have a written drug/substance abuse policy?
6. **Y or N** Do you have an orientation program for new hires?
7. **Y or N** Do you conduct daily site safety inspections?
8. **Y or N** Do you have a disciplinary policy and procedure?
9. **Y or N** Do you hold site safety meetings for field workers & supervisors?
How often? Weekly ___ Biweekly ___ Monthly ___ Daily
10. **Y or N** Do you have special work procedures in place for critical or potentially high hazard jobs?
11. **Y or N** Do you have Personal Protective Equipment standards in place?
12. **Y or N** Do you have Emergency Action Plans in place for your worksites?
13. **Y or N** Do you have Joint Health and Safety Committee meetings?
14. **Y or N** Do you have a pre-job planning process (JSA, JHA, on-job hazard assessment)?
15. **Y or N** Do you have an accident and incident reporting system in place?

16. **Y or N** Do you have a procedure in place to investigate and follow-up on accidents and incidents?

17. **Y or N** Have you received any OSHA citations in the past 3 years? If yes, provide an attachment describing the outcome of the inspection along with copies of citations received. Provide a description of the actions taken for any open citations.

18. **Y or N** Do you have a designated Competent Person on the project site?

SECTION 31

RESPIRATORY PROTECTION PROGRAM

PURPOSE

The purpose of this respirator program is to establish standard operating procedures to ensure the protection of all employees from respiratory hazards through proper selection and use of respirators. This program applies to all employees who are required to wear respirators during normal operations, non-routine tasks, or emergency operations such as a spill of a hazardous substance.

RESPONSIBILITIES

Program Administrator Duties

This facility has designated the Director of Safety as the program administrator to oversee the respiratory protection program. Duties of the program administrator include:

- Identifying work areas, processes or tasks that require workers to wear respirators, and evaluating hazards
- Selection of respiratory protection options
- Monitoring respirator use to ensure that respirators are used in accordance with their certifications
- Arranging for and/or conducting training
- Ensuring proper storage and maintenance of respiratory protection equipment
- Conducting or arranging for fit testing
- Administering the medical surveillance program
- Maintaining records required by the program
- Evaluating the program
- Updating written program as needed

Supervisors Duties

Supervisors are responsible for ensuring that the respiratory protection program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the employees under their charge. Duties of the supervisor include:

- Ensuring that employees under their supervision (including new hires) have received appropriate training, fit testing, and medical evaluation
- Ensuring the availability of appropriate respirators and accessories
- Being aware of tasks requiring the use of respiratory protection
- Enforcing the proper use of respiratory protection when necessary

- Ensuring that respirators are properly cleaned, maintained, and stored according to the respiratory protection plan
- Ensuring that respirators fit well and do not cause discomfort
- Continually monitoring work areas and operations to identify respiratory hazards
- Coordinating with the program administrator on how to address respiratory hazards or other concerns regarding the program

Employees Duties

Each employee has the responsibility to wear his or her respirator when and where required and in the manner in which they were trained. Employees must also:

- Care for and maintain their respirators as instructed and store them in a clean sanitary location
- Inform their supervisor if the respirator no longer fits well, and request a new one that fits properly
- Inform their supervisor or the Program administrator of any respiratory hazards that they feel may not be adequately addressed in the workplace and of any other concerns that they have regarding the program

PROGRAM ELEMENTS

Respirator Selection

Respirators are selected on the basis of the hazards to which the employees are exposed and in accordance with OSHA requirements. Only NIOSH certified respirators will be selected and used.

The Program Administrator will conduct a hazard evaluation for each operation process, or work area where airborne contaminants may be present in routine operations or during an emergency. ***The hazard evaluation will include:***

- Identification of the hazardous substances used in the workplace, department or work process;
- Review of work processes to determine where potential exposures to these hazardous substances may occur; and
- Exposure monitoring to quantify potential hazardous exposures.

The results of the hazard evaluation are located Brooks Construction Office in the Human Resources department for employee review.

The program administrator will revise and update the hazard assessment as needed (i.e., any time work process changes which may potentially affect exposure).

General requirements

- The employer shall select and provide an appropriate respirator based on the respiratory hazard(s) to which the worker is exposed and workplace and user factors that affect respirator performance and reliability.
- The employer shall select a NIOSH-certified respirator. The respirator shall be used in compliance with the conditions of its certification.
- The employer shall identify and evaluate the respiratory hazard(s) in the workplace; this evaluation shall include a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form. Where the employer cannot identify or reasonably estimate the employee exposure, the employer shall consider the atmosphere to be IDLH.
- The employer shall select respirators from a sufficient number of respirator models and sizes so that the respirator is acceptable to, and correctly fits, the user.

Respirators for Immediately Dangerous to Life and Health (IDLH) atmospheres

- The employer shall provide the following respirators for employee use in IDLH atmospheres:
- A full face piece pressure demand SCBA certified by NIOSH for a minimum service life of thirty minutes, or
- A combination full face piece pressure demand supplied-air respirator (SAR) with auxiliary self-contained air supply.
- Respirators provided only for escape from IDLH atmospheres shall be NIOSH-certified for escape from the atmosphere in which they will be used.
- All oxygen-deficient atmospheres shall be considered IDLH. Exception: If the employer demonstrates that, under all foreseeable conditions, the oxygen concentration can be maintained within the ranges specified in Table II of this section [29 CFR 1910.134(d), i.e., for the altitudes set out in the table], then any atmosphere-supplying respirator may be used.

Respirators for atmospheres that are not IDLH

- The employer shall provide a respirator that is adequate to protect the health of the employee and ensure compliance with all other OSHA statutory and regulatory requirements, under routine and reasonably foreseeable emergency situations.

NIOSH Certification

All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

Respirator Filter & Canister Replacement/Change Schedule

An important part of the Respiratory Protection Program includes identifying the useful life of canisters and filters used on air purifying respirators. Each filter and canister shall be equipped with an end-of-service-life indicator (ESLI) certified by NIOSH for the contaminant; or

If there is no ESLI appropriate for conditions a change schedule for canisters and cartridges that is based on objective information or data that will ensure that canisters and cartridges are changed before the end of their service life.

Cartridges/Filters shall be changed based on the most limiting factor below:

- Prior to expiration date
- Manufacturer's recommendations for use and environment
- After each use
- When requested by employee
- When restriction to air flow has occurred as evidenced by increased effort by user to breathe normally

Medical Evaluation

Employees who are required to wear respirators must be medically evaluated before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators until a physician has determined that they are medically able to do so.

A licensed health care professional at Parkview Occupational Health Clinic will provide the medical evaluation to employees. Medical evaluation procedures are as follows:

- The medical evaluation will be conducted using medical questionnaire provided in Appendix C of 29 CFR 1910.134 Respiratory Protection Standard. Parkview Occupational Health will provide a copy of this questionnaire to all employees requiring medical evaluation.
- To the extent feasible, the clinic will assist employees who are unable to read the questionnaire. When this is not possible the employee will be sent directly to the health care professional for assistance and medical evaluation.
- All affected employees will be given a copy of the medical questionnaire to fill out, along with a stamped and addressed envelope for mailing the questionnaire to the health care professional. Employees will be permitted to fill out the questionnaire on company time.
- Follow up medical exams will be provided to employees as required by the OSHA standard, and/or as deemed necessary by the health care professional.

- All employees will be allowed the opportunity to speak with the health care professional about their medical evaluation if they so request.
- The program administrator will provide the health care professional with a copy of this program and a copy of OSHA's respiratory protection standard. For each employee requiring evaluation, the health care professional will be provided with information regarding the employee's work area or job title, proposed respirator type and weight, length of time required to wear the respirator, expected physical work load (light, moderate, or heavy), potential temperature and humidity extremes, and any additional protective clothing required.
- After an employee has received clearance to wear a respirator, additional medical evaluations will be provided under any of the following circumstances:
 - The employee reports signs and/or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing;
 - The health care professional or supervisor informs the Program Administrator that the employees needs to be reevaluated;
 - Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation; and
 - A change occurs in workplace conditions that may result in an increased physiological burden on the employee.

NOTE: All examinations and questionnaires are to remain confidential between the employee and the physician.

Fit Testing Procedures

Parkview Occupational Health Clinic will ensure that fit-test will be administered using an OSHA-accepted qualitative fit test (QLFT) or quantitative fit test (QNFT) protocol. The OSHA-accepted QLFT and QNFT protocols are contained in Appendix A of the Respiratory Standard (1910.134).

Brooks Construction requires employees to be fit tested at the following times and with the same make, model, style, and size of respirator that they will be using.

- Before being allowed to wear any respirator with a tight-fitting face piece and at least annually thereafter;
- Whenever a different respirator face piece (size, style, model, or make) is used;
- Whenever visual observations of changes in the employee are physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight; and
- Upon employee notification that the fit of the respirator is unacceptable.

The company has established a record of the fit tests administered to employees including:

- The name or identification of the employee tested;
- Type of fit test performed;
- Specific make, model, style, and size of respirator tested;
- Date of test; and
- The pass/fail results

Use of Respirators

General Use Procedures

Employees will use their respirators under conditions specified by this program, and in accordance with the training they receive on the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or its manufacturer.

All employees shall conduct user seal checks each time that they wear their respirator. Employees shall use either the positive or negative pressure check (depending on which test works best for them) specified in Appendix B-1 of the Respiratory Protection Standard.

All employees shall be permitted to leave the work area to maintain their respirator for the following reasons: to clean their respirator if the respirator is impeding their ability to work, change filters or cartridges, replace parts, or to inspect respirator if it stops functioning as intended. Employees should notify their supervisor before leaving the area.

Employees are not permitted to wear tight fitting respirators if they have any condition, such as facial hair, facial scars, or missing dentures that prevents them from achieving a good seal. Employees are not permitted to wear headphones, jewelry, or other articles that may interfere with the face piece to face seal.

Emergency Procedures

Respirator Malfunction

For any malfunction of a respirator (e.g., such a breakthrough, face piece leakage, or improperly working valve), the respirator wearer should inform his or her supervisor that the respirator no longer functions as intended, and go to a safe area to maintain the respirator. The supervisor must ensure that the employee receives the needed parts to repair the respirator, or is provided with a new respirator.

Maintenance and Care Procedures

In order to ensure continuing protection from the respirators being use, it is necessary to establish and implement proper maintenance and care procedures and schedules. A lax attitude toward maintenance and care will negate successful selection and fit because the devices will not deliver the assumed protection unless they are kept in good working order.

Cleaning & Disinfecting

Our company provides each respirator user with a respirator that is clean, sanitary, and in good working order. We ensure that respirators are cleaned and disinfected weekly or as often as necessary to be maintained in a sanitary condition. Respirators are cleaned and disinfected using the procedures specified in Appendix B-2 of the standard or manufacturer's recommendations.

Respirators are cleaned and disinfected:

- As often as necessary when issued for the exclusive use of one employee;
- Before being worn by different individuals;
- After each use for emergency use respirators; and
- After each use for respirators used for fit testing and training.

Storage

Storage of respirators must be done properly to ensure that the equipment is protected and not subject to environmental conditions that may cause deterioration. We ensure that respirators are stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals. They are packed and stored in Quality Control Lab on Ardmore Ave in Fort Wayne, IN, in accordance with any applicable manufacturer's instructions.

Respirator Inspection

All respirators will be inspected after each use and at least monthly. Should any defects be noted, the respirators will be taken to the program administrator or supervisor. Damaged respirators will be either repaired or replaced.

Respirators shall be inspected as follows:

- All respirators used in routine situations shall be inspected before each use and during cleaning;
- All respirators maintained for use in emergency situations shall be inspected at least monthly and in accordance with manufacturer's recommendations, and shall be checked for proper function before and after each use; and
- Emergency escape-only respirators shall be inspected before being carried into the workplace for use.

Respirator inspections shall include the following:

- A check of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the face piece, head straps, valves, connecting tube, and cartridges, canisters or filters; and
- Check of elastomeric parts for pliability and signs of deterioration.

The following checklist will be used when inspecting respirators:

- Face piece:
 - cracks, tears, or holes
 - facemask distortion
 - cracked or loose lenses/face shield
- 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
- Air Supply Systems:
 - breathing air quality/grade
 - condition of supply hoses
 - hose connections
 - settings on regulators and valves

Training

The Director of Safety will be responsible to provide training to respirator training to respirator users or their supervisors on the contents of the Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection Standard. Workers will be trained prior to using a respirator in the workplace. Supervisors will also be trained prior to using a respirator in the workplace or prior to supervision of employees that must wear respirators.

The training will cover the following topics:

- The Brooks Construction Respiratory Protection Program
- The OSHA Respiratory Protection Standard
- Respiratory hazards encountered and their health effects
- Proper selection and use of respirators
- Limitations of respirators
- Respirator donning and user seal (fit) checks
- Fit testing
- Emergency use procedures
- Maintenance and storage
- Medical signs and symptoms limiting the effective use of respirators

Employees will be retrained annually or as needed (e.g., if they need to use a different respirator). Employees must demonstrate their understanding of the topics covered in the training utilizing a hands-on exercise and a written test. Respirator training will be

documented by the Program Administrator and the documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested.

Program Evaluation

The program administrator will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluation will include regular consultations with employees who use respirators and their supervisors, site inspections, air monitoring and review of records.

Identified problems will be noted and addressed by the Program Administrator. These findings will be reported to management, and the report will list plans to correct deficiencies in the respirator program and target dates for the implementations of those corrections.

Documentation and Recordkeeping

A written copy of this program and the OSHA standard is kept in the Program Administrator's office and is available to all employees who wish to review it.

Also maintained in the Program Administrator's office are copies of training and fit test records. These records will be updated as new employees are trained, as existing employees receive refresher training, and as new fit tests are conducted.

The Program Administrator will also maintain copies of the medical records for all employees covered under the respirator program. The completed medical questionnaire and the physician's documented findings are confidential and will remain at Parkview Occupational Health Clinic in Fort Wayne, IN. The company will only retain the physician's written recommendation regarding each employee's ability to wear a respirator.

Addendum

BROOKS CONSTRUCTION COMPANY SAFETY POINT POLICY

Purpose

Employees are expected to work in a safe and productive manner. Employees should not take short cuts when it comes to their safety or the safety of their co-workers.

The point system is intended to provide employees with the opportunity to correct their unsafe practices or habits. While also protecting Brooks Construction and co-workers from those employees that continually wish to practice unsafe work habits. Sub-contractors that work directly for Brooks Construction will comply with our safety program or they will be removed from our job site.

General Rules:

1. PPE (Personal Protective Equipment) – HiVis Vest will be worn on all Brooks Construction job sites, Plant property; Brooks dump sites and the yard while performing work tasks. Hard Hats and Safety Glasses will be worn based on the assigned job or task per Brooks' policies. Tennis Shoes are NOT allowed to be worn at any time. These PPE items will be required in the Shop, QC Lab and/or the office based on the requirements of the job being performed.
2. Point System
 - a. 1 point will require a verbal warning
 - b. 5 points will require a written warning (Meeting with Vice President)
 - c. 8 points will require a 2-day suspension without pay (Meeting with Owners)
 - d. 12 points will require termination
3. Points will be multiplied per each instance if an employee is reprimanded for the same safety violation. (Example an employee is told 3 different times in a rolling twelve month period to put on their safety vest this employee will have a total of 6 points. First time =1 point, Second time = 2 point, and Third time = 3 points.)
4. Points will drop off on a rolling 12 month period from the date of the incident for the employee and the foreman.
5. ONLY foreman and those in management position will be allowed to assess points to an employee.
6. As a way to draw a line in the sand and to make sure we hold all accountable for safety. Foreman will be given half the points assessed to their employee for any second safety violation they have and above. (Example as per the employee stated above they totaled 6 points so the foreman would have 2.5 points total – First time = 0 points, Second time = 1 point, and Third time = 1.5 points.) Supervisor/Foreman has to be directly available to enforce the safety policy for them to receive these points.
7. Employee safety points will be tracked via an online database in a shared drive that is accessible by the safety committee members.
8. Based on an investigation done by the Safety Committee points can be reduced or cleared based on who is deemed to be at fault.

Brooks Construction Company Protective Eyewear Policy

Purpose

The Bureau of Labor Statistics reports that 1,000 eye injuries occur at work daily. The leading causes of the injuries are flying particles (70%) and contact with a hazardous chemical (20%). While protective safety eyewear can prevent most injuries, in 60% of the injuries, the worker is not wearing any eyewear, and 4% of the workers were wearing the wrong type of protective eyewear.

An estimated 90% of all eye injuries are preventable by wearing the correct type of protection. Brooks Construction, in an interest of providing employees a safe and healthy workplace has instituted this Protective Eyewear Policy to prevent eye injuries by employees and subcontractors.

General Rules:

Protective safety eyewear conforming to ANSI Z87.1 standards must be worn anytime in which there is a potential of eye hazard, projectile, flying particulate, or chemical splash potential as warranted by the work activities. Suitable protective eyewear will be provided by Brooks Construction to employees without cost. If prescription eyewear is required, the employee will pay for the basic level of protection according OSHA standards.

All safety eyewear must meet the ANSI Z87.1 standard specifications. If the eyewear meets the specifications, it will be imprinted on the lens and/or frame. Adding side shields to non-approved "every day" eyewear does not provide adequate protection.

Listed below are jobs and tasks while working for Brooks Construction that will require Safety glass use:

- Working with fuel from supply tanks on job site,
- Working with chemicals
- Any grinding
- Any welding
- Any sand blasting
- Chipping away at material
- Picking
- Using blowers
- Cleaning and prepping lots
- Use of quickie saw
- Using a jack hammer
- Shoveling above your shoulder
- Use of air chisels
- Burning weeds
- Using walk behind saw and/or earth saw
- Using hand breaker or machine breaker
- Any cutting or torch cutting
- Using a blowing wand
- Use of easy drill
- Use of hand tools hammers, sledge hammers, drills and hand saws
- Handling concrete pump hose
- Any job site that requires safety glasses for all personal
- Use of air compressor

Maintenance:

Lenses that have become scratched, pitted or fogged should be replaced as soon as possible. Frames should be replaced when they are no longer in suitable condition and affect the wearability of the eyewear.

Brooks Construction Company Hard Hat Policy

Purpose

Hard hats are required when working in areas where there is a potential for injury to the head from falling or flying objects. In addition, hard hats designed to reduce electrical shock are required when working near exposed electrical conductors that may contact the head.

General Rules:

HARD HAT: Means Head Wear ANSI/ISEA Z89.1 Type 1, Class E, G & C approved.

OVER HEAD: Means above eye level.

PROJECT: Means road construction or any work that is to be undertaken that includes the digging of a trench deeper than 4 feet or if the job is expected to take more than one working day to complete.

EXCAVATION: Means the hole that is left in the ground, as a result of removing material.

TRENCH: Means an excavation where the excavation depth exceeds the excavation width.

WORKER: Means Employee

EMPLOYEE: Means any person that shall receive financial compensation, from Brooks Construction, for their time or service.

The wearing of a hard hat is to protect a worker from injury to the head caused by falling or flying small objects (overhead dangers). All employees must have a hard hat within easy reach, with them on the job site at all times or must be worn when specified in the following circumstances:

- All employees shall comply with the Occupational Health and Safety Act (OHSA).
- All employees shall wear hard hats if there is an obvious overhead danger.
- All employees shall wear hard hats when doing the following jobs or task:
 - Trenching
 - Working inside a building
 - Working under lifts
 - Within 20 feet of building construction
 - Within a designated fall zone
 - Working within 30 feet of excavator
 - Working within 30 feet of backhoe
 - Laying pipe
 - Working on a job site with crane operation onsite

- Any job site that requires hard hats for all personal
 - Mechanics using cranes on their trucks
- Employees shall wear a hard hat when required on a project when out of a vehicle or out of a machine with an ROP cab.
- All employees shall wear a hard hat while working in an excavation of any description.
- All employees are responsible for the condition (fit, harness, appearance) of their hard hat and to make their supervisor or appropriate person aware, if a replacement is required.