

Written Safety Program

The Workforce Group, LLC BOOK 1



PS Safety & Risk Management, LLC

Providing Safety Solutions for Today's Needs

555 St. Tammany, Ste. C

Baton Rouge, LA 70806

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THE WORKFORCE GROUP, LLC REVISION LOG

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Written Safety Program

The Workforce Group, LLC

Safety Programs for The Workforce Group, LLC

Table of Contents

BOOK 1

Abrasive Blasting Program -----	Section 1
Access to Employee Medical and Exposure Records-----	Section 2
Aerial Lifts -----	Section 3
Asbestos Awareness Program -----	Section 4
Assured Equipment Grounding Program -----	Section 5
Behavior Based Safety -----	Section 6
Benzene and Benzene Awareness Program -----	Section 7
Bloodborne Pathogens Program-----	Section 8
Butadiene Awareness Program-----	Section 9
Cadmium and Hexavalent Chromium Program-----	Section 10
Cold Weather Safety Program-----	Section 11
Compressed Gas Cylinders Program -----	Section 12
Confined Space Program -----	Section 13
Construction Cranes Program -----	Section 14
Disciplinary Program -----	Section 15
Driving Safety Program -----	Section 16
Driving Safety-Auto Accident Report Form -----	Section 17
Drug, Alcohol and Substance Abuse Policy and Program -----	Section 18
Electrical Safety Qualified/Non-Qualified -----	Section 19
Emergency Action Plan -----	Section 20
Fall Protection Program -----	Section 21
Fatigue Management Program -----	Section 22
Fire Protection Extinguishers Program -----	Section 23
First Aid CPR Program-----	Section 24
Fit for Duty Program-----	Section 25

Safety Programs for The Workforce Group, LLC

Forklift Program-----	Section 26
Forklift Safety Daily Pre-Operational Checklist-----	Section 27
Gas Hazards Program-----	Section 28
General Housekeeping Program -----	Section 29
General Safety Health Provision -----	Section 30
General Waste Management Program-----	Section 31
Hand and Power Tools Program -----	Section 32
Hazard Communication & Chemical Safety Program -----	Section 33
Hazard Identification & Risk Assessment Program-----	Section 34
HAZWOPER RCRA -----	Section 35
Heat Illness Prevention Program-----	Section 36
Hexavalent Chromium and Cadmium Safety Program -----	Section 37
Hydrogen Sulfide H2S Program -----	Section 38
In Plant Rail Safety Program -----	Section 39
Incident Investigation and Reporting-----	Section 40
Inert Space Entry -----	Section 41
Injury Illness Recordkeeping -----	Section 42
Ionizing Radiation-----	Section 43
Job Competency Program-----	Section 44
Ladder Safety Program -----	Section 45
Lead Awareness Program -----	Section 46
Lead -----	Section 47
Lockout Tagout Program-----	Section 48
Management of Change Procedure -----	Section 49
Manual Lifting -----	Section 50
Marine Transportation Program-----	Section 51

Safety Programs for The Workforce Group, LLC

Naturally Occurring Radioactive Material (NORM)-----	Section 52
New Employee Safety Orientation Checklist -----	Section 53
NFPA 70E -----	Section 54
Nitrogen Awareness Program -----	Section 55
Noise Awareness Program -----	Section 56

BOOK 2

Office Safety Program -----	Section 57
Overhead Crane Program -----	Section 58
Personal Protective Equipment Program-----	Section 59
Preventative Maintenance Program-----	Section 60
Process Safety Management Contractor Responsibilities (PSM) -----	Section 61
Respiratory Protection Program-----	Section 62
Rigging Material Handling Program -----	Section 63
Safety and Health Management System -----	Section 64
Safety Committee-Safety Meeting and Forms -----	Section 65
Safety Responsibilities -----	Section 66
Safety Training Program -----	Section 67
Scaffolds Program-----	Section 68
Short Service Employee Program-----	Section 69
Silica Exposure Control Plan -----	Section 70
Slips, Trips and Falls-----	Section 71
Spill Prevention and Response Program -----	Section 72
Stop Work Authority Process-----	Section 73
Subcontractor Management Plan-----	Section 74
Transportation of Hazardous Materials -----	Section 75
Trenching Shoring Excavation Program -----	Section 76

Safety Programs for The Workforce Group, LLC

Vacuum Trucks Program----- Section 77

Welding Cutting Hot Work Program ----- Section 78

Working Alone Program ----- Section 79

Working Near Water Program----- Section 80

Abrasive Blasting Program

Purpose

The purpose of this program is to provide safe guidelines for the operation and maintenance of abrasive blasting equipment and their related components

Scope

This program covers all employees involved in abrasive blasting jobs performed by the company. Whenever hazardous substances such as dusts, fumes, mists, vapors, or gases exist or are produced in the course of construction work, their concentrations shall not exceed the limits specified in the "Threshold Limit Values of Airborne Contaminants – 1970" of the American Conference of Governmental Industrial Hygienists. When ventilation is used as an engineering control method, the system shall be installed and operated according to the requirements of 1926.57 (Ventilation).

Key Responsibilities

Supervisors

- Be aware of potentially hazardous conditions that may arise during the blasting process prior to starting any blasting job and must take measures to protect employees.
- Ensure that all employees are trained on related safety topics.
- Understand the importance of regularly scheduled maintenance for continued safe operation of blast equipment. Ensure that all employees comply with this policy and all other related policies.

Blast Employees

- Be familiar with the safe operating functions of blasting equipment to be used on a job.
- Comply with all company policies.
- Have knowledge of hazards associated with respirable silica.
- Understand they are prohibited from using compressed air for cleaning unless the pressure is reduced to less than 30 pounds per square inch and be equipped with effective chip guarding and proper PPE.

Procedure

General

Abrasives and the surface coatings on the materials blasted are shattered and pulverized during blasting operations and the dust formed will contain particles of respirable size. The composition and toxicity of the dust from these sources shall be considered in making an evaluation of the potential hazards.

Dust shall not be permitted to accumulate on the floor or on ledges outside of an abrasive blasting

Safety Management Plan

Abrasive Blasting Program

enclosure. Dust spills shall be cleaned up promptly. Aisles and walkways shall be kept clear of steel shot or similar abrasives which may create a slipping hazard.

Sand-blasting personnel shall use good personal hygiene methods at all times, by washing their hands and face **before eating, drinking, or using tobacco products**, which are activities that are **never approved** in the sand-blasting area. Workers should shower before leaving the work site. Workers should change into disposable or washable work clothes at the worksite. Workers should change into clean clothing before leaving the worksite. Vehicles should not be parked in the contaminated area.

All personnel subject to silica exposure from sand-blasting operations shall be provided with information about the adverse health effects, safe work practices, hazard communication, and proper use and care of all PPE. This training will be provided by authorized outside contract training resources.

Silicosis is characterized by shortness of breath, fever, and bluish-colored skin. It could be diagnosed as pulmonary edema (fluid in the lungs), pneumonia, or tuberculosis. Silica dust can cause severe fungal infections to develop. This condition could be fatal.

There are three types of silicosis: **acute** - exposure to extremely high concentrations and symptoms develop within a few weeks to a few years; **chronic** - 10 years of exposure to low concentrations; and **accelerated** - exposure to high concentrations and develops 5-10 years after initial exposure.

Engineering control methods can be used to decrease exposure to silica dust, by using alternate blasting media, containment methods such as blast cleaning machines & cabinets, blasting rooms or portable equipment. If engineering controls cannot keep silica exposures below the NIOSH PEL, then respiratory protection must be used.

Air monitoring should be performed to measure worker exposure to airborne crystalline silica and to provide a basis for selecting engineering controls.

All employees exposed to crystalline silica shall be subject to a medical surveillance program and medical examinations before job placement and at least every three years. More frequent examinations (for example, annual) may be necessary for workers at risk for acute or accelerated silicosis. A medical exam shall include a complete medical and occupational history of the employee to collect data on worker exposure, chest x-rays, a pulmonary function test, and an annual tuberculosis evaluation. Employees will have access, upon written request, to all medical evaluations performed.

Signs should be posted to warn workers about the hazards and specify any protective equipment required.

All medically diagnosed cases of silicosis will be reported within (5) five working days to the State Department of Health and to the Occupational Safety and Health Administration (OSHA).

Equipment Handling

Follow these guidelines when moving blasting equipment to prevent back strains and crushing injuries:

- Use a forklift, crane or other type of lifting device for transporting a blast machine; always use a lifting device when the machine contains abrasive.
- Never manually move a blast machine where abrasive has been spilled on hard surfaces or on a wet or slippery surface.
- Never attempt to manually move a blast machine containing abrasive.
- Always disconnect hoses from machines to avoid interference during moving.

Air Compressors

- Air compressors must be located in a well-ventilated area. It must be able to contain large volumes of clean, toxicant-free air. This means the compressor must be placed up wind from the blasting operation and out of the range of dust and flying abrasives.
- Due to the high pressure that air compressors create, precautions must be taken to prevent unleashing of strong forces that can cause serious bodily injury.
- Air for abrasive blasting respirators must be free of harmful quantities of dust, mists, or noxious gases and must be inspected daily, prior to use and comply with CFR 1910.134(I) (Respiratory Protection).
- Never adjust the pressure setting on a compressor above the blast equipment maximum working pressure rating. The maximum working pressure rating is indicated on the manufacturer's metal identification plate.

Blast Pot

- Position blast pots and/or compressors on level ground. Machines operate best when they sit on level surfaces.
- For communication purposes place blast pot between the compressor and the surface to be blasted. This will enable the pot tender and operator to make visual contact.
- All couplings and pipefitting on the blast pot, compressor and hoses must be airtight.
- Blast pots must be inspected daily prior to use.

Hoses and Connectors

- Couplings must have safety wires in place and be secure as required by federal safety regulations. The operator shall be responsible to ensure that each coupling has safety wires in place.
- Whip checks must be installed at bull hose connections.
- Operator should hold onto the blast hose until the air pressure from the nozzle drops off to zero.
- Do not use hoses with soft spots.
- Never use tape to repair a blown-out hose.
- Immediately replace a hose if a blowout or leak occurs.
- Hose ends must come into contact with coupling gaskets to prevent leaks and to maintain static electricity conductivity.

Nozzles and Remote Controls

- Blast nozzles shall be bonded and grounded to prevent the buildup of static charges. Where flammable or explosive dust mixtures may be present, the abrasive blasting enclosure, the ducts,

Safety Management Plan

Abrasive Blasting Program

and the dust collector shall be constructed with loose panels or explosion venting areas, located on sides away from any occupied area, to provide pressure relief in case of explosion following the principles set forth in the National Fire Protection Association Explosion Venting Guide. NFPA 68-1954.

- Organic abrasives which are combustible shall be used only in automatic systems.
- Blast cleaning nozzles shall be equipped with an operating valve which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.
- All blast machines must be equipped with remote control systems to start and stop the blasting process.
- Never tape, strap, or tie down an air actuated remote control lever or choke electric remote control switch.
- If there is the slightest delay in reaction time of the handle lever or lever lock to open, check for dust and dirt build-up around pivot pins before resuming blasting. Also, test the tension on the lever springs, and replace them immediately if they do not respond rapidly.
- Substituting component pieces with other manufacturer's parts is not allowed.
- Inspect blast nozzles for wear and cracks on the inner liner. When a nozzle orifice is worn 1/16" larger than its original size, it should be replaced.
- Check nozzles and nozzle holders for deterioration of thread form. Threads on nozzles and their companion holders must not be cross-threaded, worn or distorted.
- Hoses that are being tied and lifted to blasting operations being conducted above grade, i.e., scaffolds, shall be depressurized to prevent accidental start-up.

Operator Signals

- On the job site, voice communication is often impossible. Even shouts cannot be heard over the noise of compressors and blasting. In addition, the operator's head will be enclosed in the helmet, which blocks out sound and limits vision. For these reasons, an industry wide standard set of hand and sound signals has been developed.
- Signals may be visual hand movements, flashing light, pulls on a rope or sounds made by banging a hammer or using a horn or electric buzzer.
- Every operator must become familiar with the signals to be used on the jobsite.

Respirator Use

- A specific work-site procedure shall be developed where respirators or CE blasting hoods/helmets are required to protect the health of the operator. A respiratory protection program shall be established wherever it is necessary to use respiratory protective equipment including worksite specific procedures and elements for required respirator use. Abrasive blasting respirators shall be worn by all abrasive blasting operators under certain conditions.
- Equipment for the protection of eyes, face and body shall be supplied to the operator when the respirator design does not provide such protection and to any other personnel working in the vicinity of abrasive blasting operations. This equipment shall conform to the requirements of 1926.102 (Eye and Face Protection).
- Equipment for protection of the eyes and face shall be supplied to any other personnel working in the vicinity of abrasive blasting operations.

Environmental Controls

- Organic abrasives which are combustible shall be used only in automatic systems. Where flammable or explosive dust mixtures may be present, the construction of the equipment, including the exhaust system and all electrical wiring, shall conform to the requirements of American National Standard Installation of Blower and Exhaust Systems for Dust, Stock, and Vapor Removal or Conveying, Z33.1-1961 (NFPA 91-1961), and Subpart S of 1926.57 (Ventilation).
- The work area must be inspected for exterior electrical power lines that may endanger operators.
- Operators should use care to avoid directly blasting power lines and insulators.
- Do not blast in atmospheres that contain flammable fumes.
- Take precautions at the work site to eliminate hazardous surface obstacles that may cause tripping hazards or interfere with worker mobility.
- Adequate ventilation must be provided for employees working within enclosures.
- Never operate compressor if hoses are frozen. When winter temperatures drop below freezing, check for ice prior to pressurizing hoses.
- Provide adequate drinking water for operators, especially during summer.

Personal Protective Equipment

- Secure hoses by tying them to scaffolding or personnel platforms, when working from elevations, to prevent injury from hoses falling on other personnel working below or near blasting area.
- Before using any blasting abrasive, check the MSDS to find out the chemical composition of the abrasive material.
- Equipment for the protection of eyes, face and body shall be supplied to the operator when the respirator design does not provide such protection and to any other personnel working in the vicinity of abrasive blasting operations. This equipment shall conform to the requirements of 1926.102 (Eye and Face Protection).
- Ventilation systems and dust collectors may be necessary in enclosed conditions.
- Noise from abrasive blast nozzles can be loud enough to damage the hearing of blasters and others on the work site. Workers must not be exposed to noise levels exceeding 80 decibels as an eight-hour time weighted average (80 dBA TWA), therefore all blasters shall wear earplugs.
- Blaster must wear heavy-duty gloves and steel toe boots.
- Helmet lenses should be changed as soon as pitting or frosting takes place.

ABRASIVE BLASTING CHECKLIST

Location: _____ Lead Person at Jobsite: _____

Yes No N/A**Worksite Environment**

- ☐ ☐ ☐ Has a hazardous blasting zone been established at the job site that includes the blast area and areas where dust concentrations may exceed OSHA's permissible exposure limits?
- ☐ ☐ ☐ Has the composition of the materials to be blasted been investigated for lead, asbestos and other heavy metals and toxics?
- ☐ ☐ ☐ Have electrical lines and hoses in the blast area been identified and protected from blasting operations?
- ☐ ☐ ☐ Has the atmosphere in the work area been tested to ensure that it will be safe to breath?
- ☐ ☐ ☐ Have all the work surfaces been inspected, holes covered, water and other liquids removed, and ice, snow and other slippery surfaces controlled?
- ☐ ☐ ☐ Are air movers and vacuum/dust collectors being used to provide clear visibility for the blasters?
- ☐ ☐ ☐ Is hearing protection available for personnel exposed to greater than 80 dba and double hearing protection available to those exposed to greater than 100 dba?

Air Supply

- ☐ ☐ ☐ If an oil lubricated compressor is used for breathing air, is it equipped with a high temperature and carbon monoxide alarm?
- ☐ ☐ ☐ If an oil lubricated compressor is used for breathing air, has the air quality been tested within the last quarter to determine that it meets the CGA standard for "Grade D" breathing air?
- ☐ ☐ ☐ If an air compressor or pump is used for breathing air, is it positioned so that the air intake is positioned to prevent the ingestion of engine exhaust or other toxic gases, vapors or fumes?

Yes No N/A

Safety Management Plan

Abrasive Blasting Program

☐ ☐ ☐ Is the compressor or air pump and air lines shutoff and depressurized prior to performing maintenance?

Airlines

☐ ☐ ☐ Have the airlines and connections been inspected for wear and damage and been repaired, prior to use?

☐ ☐ ☐ Have the gaskets for each connection been inspected and replaced if worn, distorted or too soft?

☐ ☐ ☐ Are airlines laid out so that they will not obstruct workers?

☐ ☐ ☐ Are safety pins and whip checks installed on all connections?

Abrasives

☐ ☐ ☐ Are appropriate NIOSH approved respirators being used during blasting and cleanup?

☐ ☐ ☐ Are mechanical lifting devices used to assist in loading and handling abrasives?

☐ ☐ ☐ Does the abrasive contain less than 1% crystalline silica?

☐ ☐ ☐ Has the Material Safety Data Sheet (MSDS) been reviewed for the blasting agent and hazardous compounds?

Blasting Machine

☐ ☐ ☐ Have all fittings and valves been checked for tightness and found to be in good operating condition?

☐ ☐ ☐ Have damaged gaskets and parts been replaced?

☐ ☐ ☐ Has the machine been inspected for dents and other damage?

Abrasive Metering Valve

☐ ☐ ☐ Does the valve handle move freely for accurate adjustment of abrasive flow?

Remote Controls

☐ ☐ ☐ Is the blast machine equipped with a remote control system? OSHA 29 CFR 1910.244

Yes No N/A

☐ ☐ ☐ Is the remote control handle allowed to be strapped, taped, wired, or otherwise secured in a position that will interfere with the movement of the lever?

Safety Management Plan

Abrasive Blasting Program

☐ ☐ ☐ Is the abrasive trap cleaned at least twice each shift to avoid restriction in the air exhaust?

Pressure Regulators

☐ ☐ ☐ Are pressure regulators specifically designed for nozzle air volumes and pressures per the manufacturers recommendations?

Screens & Covers

☐ ☐ ☐ Is a screen used to keep debris out of the blast machine?

☐ ☐ ☐ Is a cover used to protect the entry of moisture when not in use?

Blast Hose & Couplings

☐ ☐ ☐ Are the couplings inspected daily for damage prior to use?

☐ ☐ ☐ Are hoses inspected daily for wear and soft spots?

☐ ☐ ☐ Are couplings wired together and whip checks installed to prevent disengagement and whipping?

☐ ☐ ☐ Is static dissipating hose used to prevent the buildup of static electricity?

☐ ☐ ☐ Is the size of the blast hose 3 to 4 times the size of the nozzle orifice to prevent premature hose wear?

☐ ☐ ☐ Are hoses laid out in long curves to reduce premature wear and blowouts?

Nozzles

☐ ☐ ☐ Is the nozzle washer inspected before each use and replaced if worn?

☐ ☐ ☐ Is the nozzle replaced if the orifice size increases to 1/16" larger than its original size?

Blaster' Safety Equipment

☐ ☐ ☐ Is the blaster wearing a NIOSH Type CE respirator?

Yes No N/A

☐ ☐ ☐ Are others personnel working in the same area wearing appropriate respiratory protection?

☐ ☐ ☐ Are appropriate head, eye, face, and hearing protection being used by all personnel?

☐ ☐ ☐ Is the air supply at least CGA "Grade D?"

Safety Management Plan

Abrasive Blasting Program

-
- ☐ ☐ ☐ Is the breathing air filtered to remove moisture, oil mists, and particulates?
- ☐ ☐ ☐ Is the helmet inspected for wear and damage before each use?
- ☐ ☐ ☐ Are lenses replaced frequently?
- ☐ ☐ ☐ After blasting is the dust removed from the helmet and clothing before they are removed?
- ☐ ☐ ☐ Is the helmet stored in a clean, dust free location away from the blasting operation?
- ☐ ☐ ☐ Has the carbon monoxide monitor and alarm system been calibrated?

Blaster

- ☐ ☐ ☐ Has the blaster been trained qualified to the equipment, functions, blasting techniques, abrasives, maintenance requirements and safety features?
- ☐ ☐ ☐ Has the operator participated in the pre-job safety meeting?

Scaffolding

- ☐ ☐ ☐ Has the scaffold been inspected and signed off for use?
- ☐ ☐ ☐ Is the scaffolding equipment equipped with the appropriate guard rails and work platforms?
- ☐ ☐ ☐ Is the staging surfaces level, smooth, and free of obstructions?

Inspection Completed by: _____

_____	_____
Print Name	Signature
_____	_____
Date	Location

Access to Medical and Exposure Records

Purpose

The purpose of this procedure is to insure right of access to relevant exposure and medical records to employees and/or their designated representatives.

Key Responsibilities

The Workforce Group, LLC Safety Manager

- Develops local medical records practices for all worksites in accordance with this procedure and ensures employees are aware of the requirements of this procedure.
- Responsible for the review, implementation and maintenance of the local worksite medical records procedure.

Plant Manager

- Responsible for the implementation and maintenance of the medical records procedure for their facility and ensuring all assets are made available for compliance with the procedure.

Employees

- All shall be familiar with this procedure and have access to their records.

Overview

This section applies to all employee exposure and medical record, and analysis thereof, made or maintained in any manner, including on an in-house or contractual (e.g., fee-for-service) basis.

- Trade secret information disclosure must follow requirements as stated in 29 CFR 1910.1020 (f) (8).
- Recognized collective bargaining agents who have statutory authority to represent the interests of the employees within the bargaining unit are automatically considered designated representatives. While these representatives do not have the right to secure individual medical records without written consent of the employee, they have the right of access to employee exposure records and analysis without employee consent.

Definitions

Access means the right and opportunity to examine and copy.

Analysis of exposure or medical records means any compilation of data, and research, or other studies based, at least in part, on information collected from individual employee exposure or

Safety Management Plan

Access to Medical and Exposure
Records

medical records or other sources including information from health insurance claim forms provided that either the analysis must have been reported to the employer or no further work is being done by the person responsible for preparing the analysis.

Designated representative will mean any individual or organization to which an employee gives written authorization to exercise a right of access. For the purposes of access to employee exposure records and analyses using exposure or medical records, a recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

Employee exposure records could include any of the types of information listed below:

- Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained;
- Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs;
- Material safety data sheets indicating that the material may pose a hazard to human health; or In the absence of the above, a chemical inventory or any other record which reveals where and when used and the identity (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.

Employee medical records are records that concern the health status of an employee and are made or maintained by a physician, nurse, or other health care personnel or technician. "Employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse or other health care personnel, or technician.

NOTE: The following will not be considered a medical record:

- Physical specimens, such as blood or urine samples, which are routinely discarded.
- Health insurance claims, accident investigation reports and other non-medical correspondence if maintained separately from the medical file.
- The record of any voluntary employee assistance program (alcohol, drug, etc.) if maintained separately.
- Records created solely in preparation for litigation which are privileged from discovery under applicable rules of procedure or evidence.

Specific Written Consent means a written authorization containing the following:

- The name and signature of the employee authorizing the release of medical information.

Safety Management Plan

Access to Medical and Exposure
Records

-
- The date of the written authorization.
 - The name of the individual or organization that is authorized to release the medical information.
 - The name of the designated representative (individual or organization) that is authorized to receive the released information.
 - A general description of the medical information that is authorized to be released.
 - A general description of the purpose for release of the medical information.
 - A date or condition upon which the written authorization will expire (if less than one year).

A toxic substance or harmful physical agent is defined as any chemical substance, biological agent (bacteria, fungus, virus, etc.) or physical stress (noise, heat, cold, ionizing radiation or non-ionizing radiation, hypo or hyperbaric pressure, etc.) which:

- Is regulated under federal law or rule due to a hazard to health.
- Is listed in the National Institute of Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS).
- Shows positive evidence of acute or chronic health hazard in human, animal or other biological test by or known to the employer.
- Has a Material Safety Data Sheet indicating that the substance may pose hazard to human health.

Procedure

The Safety Manager will maintain applicable medical and exposure records for all employees. All requests to access medical and exposure records and analysis based on those records must be submitted to using the forms provided for that purpose.

Access to records is provided in a reasonable time, place and manner. Access to records must be provided in a reasonable time, place and manner. If access to records cannot reasonably be provided within fifteen (15) working days, The Workforce Group, LLC shall within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available.

Personal identifiers (name, address, social security number, payroll number, etc.) are removed from records before access is granted. Whenever access is requested to an analysis which reports the contents of employee medical records by either direct identifier (name, address, social security number, payroll number, etc.) or by information which could reasonably be used under the circumstances indirectly to identify specific employees (exact age, height, weight, race, sex, date of initial employment, job title, etc.), personal identifiers must be removed before access is provided.

Safety Management Plan

Access to Medical and Exposure
Records

The Workforce Group, LLC, upon request, will assure the prompt access of representatives of the Assistant Secretary of Labor for Occupational Safety and Health to employee exposure and medical records and to analyses using exposure or medical records.

Except for a recognized collective bargaining agent, any designated representative must have the employee's written permission for access to exposure records and analyses. It is necessary however, for the union representative to specify the occupational need for access to records absent the employee's consent. Union representatives must have the employee's written permission to access medical records.

Copies of medical records are provided at no cost to employees. Whenever an employee or designated representative requests a copy of a record, that record must be provided at no cost.

Any review of medical or exposure records by an employee or union representative shall be done on his or her own time, outside of normal working hours, at a time mutually agreeable to the parties. The review will be conducted in person with the individual requesting access to the records.

The employee is entitled access to his or her medical records except when a physician determines that this knowledge would be detrimental to the employee's health as in such cases of terminal illness or psychological conditions. However, if the employee provides a designated representative with specific written consent, access to medical records must be provided even if the physician has denied the employee access to the records.

The authorized physician, nurse or other responsible health care personnel maintaining employee's medical records may delete the identity of anyone who has provided confidential information concerning the employee's health status but cannot withhold the information itself.

When an analysis of medical records identifies the employee, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

Copies of exposure records of other employees with past or present job duties or working conditions like or similar to those of the employee will also be provided upon request.

Any employee or designated representative is also permitted access to any record of exposure information which pertains to a new workplace or condition(s) to which the employee is being assigned or transferred.

Safety Management Plan

Access to Medical and Exposure
Records

Records Retention

- Medical records must be preserved and retained for the duration of employment plus 30 years.
- Employee exposure records must be retained for 30 years.

Transfer of Records Should the Company Cease to Do Business

Whenever The Workforce Group, LLC ceases to do business it shall transfer all records subject to this section to the successor employer. Whenever The Workforce Group, LLC either is ceasing to do business and there is no successor employer to receive and maintain the records, or intends to dispose of any records required to be preserved for at least thirty (30) years, The Workforce Group, LLC shall transfer the records to the Director of the National Institute for Occupational Safety and Health (NIOSH) if so required by a specific occupational safety and health standard.

Employee Information

Employees are informed of the provision of recordkeeping upon initial assignment and annually thereafter. Upon an employee's first entering into employment, and at least annually thereafter, information must be given to current employees of the existence, location, availability and the person responsible for maintaining and providing access to records and each employee's rights of access to these records.

The Access to Employee Exposure and Medical Records Standard (29 CFR 1910.1020) will be readily available for review by employees upon request.

A copy of the employee notice that will be used to comply with the employee information requirements is included with policy. This notice will be posted on those bulletin boards where other notices normally appear.

Safety Management Plan

Access to Medical and Exposure
Records

**AUTHORIZATION LETTER FOR THE RELEASE OF EMPLOYEE MEDICAL
RECORDS**

I, _____ hereby authorize the

(Full name of employee)

(Name of Organization)

to release to The Workforce Group, LLC the following medical record(s):

Give specific description of the information to be released)

I give my permission for the medical information to be used for the following purpose(s):

_____ I do not give permission for any other use or reason.

_____ I understand that this authorization expires twelve (12) months from today's date
unless I specify a particular date less than twelve months which is _____

.

Signature of employee or
his/her legal representative

Date of Signature

Reviewed on: _____ with: _____
(Date) (Signature of Organization's Representative)

Copies given: Yes _____ No _____

Safety Management Plan

Access to Medical and Exposure
Records

ACCESS TO MEDICAL/EXPOSURE RECORDS NOTICE

Federal Regulation 29 CFR 1910.1020 requires us to inform you that The Workforce Group, LLC does keep records designated as Employee Exposure and Employee Medical Records.

The above regulation gives you the right to review those records with certain exceptions.

The records are maintained in the Safety Department and the Safety Manager is responsible for the records.

A copy of CFR 1910.1020 is available for viewing upon request to the Safety Manager.

Signature

Date

Note: This notice must be posted annually

Aerial Lifts

Purpose

The purpose of this program is to define the requirements for safely operating an aerial lift device.

Scope

This policy shall cover all aerial lift devices used on company property.

Key Responsibilities

Supervisors

- Shall ensure that all aerial devices are properly operated by trained personnel.
- Shall ensure that aerial lift devices are designed and constructed in conformance with applicable requirements of the American National Standards for “Vehicle Mounted Elevating and Rotating Work Platforms” ANSI A92.2-1969, including appendix.

Employees

- Shall follow all aspects of this program.

Procedure

- Aerial lifts may be “field modified” for uses other than those intended by the manufacturer provided the modification has been certified in writing by the manufacturer or by an equivalent entity.
- Lift controls shall be tested each day prior to use to determine that such controls are in safe working conditions. Tests shall be made at the beginning of each shift during which the equipment is to be used to determine that the brakes and operating systems are in proper working condition.
- Only authorized persons shall operate an aerial lift and boom and basket load limits specified by the manufacturer shall not be exceeded.
- Aerial lifts shall have a working back-up alarm audible above the surrounding noise level or the vehicle is backed up only when an observer (spotter) signals that it is safe to do so.
- The minimum clearance between electrical lines and any part of the equipment (i.e. crane or load) shall be 10 feet for lines rated 50 kV or below.
- Employees shall always stand firmly on the floor of the basket, and shall not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position.
- An approved fall restraint system shall be worn when working from an aerial lift. The

Safety Management Plan

Aerial Lifts

fall restraint system must be attached to the boom or basket. An approved fall restraint system shall be attached to the boom or basket when working from an aerial lift and it is not permitted to be attached to adjacent poles or structures.

- All employees who operate an aerial lift device shall be trained in the safe operation of the specific device they will operate. Training must conform to all OSHA requirements.

Asbestos Awareness Program

Purpose

The purpose of this procedure is to advise employees in areas where asbestos is suspected on an awareness level basis about the properties and dangers of asbestos, general guidelines and training requirements and to provide basic precautions and protections for employees to avoid exposure to asbestos containing material (ACM) or presumed asbestos containing material (PACM).

Scope

This procedure applies to The Workforce Group operations where employees whose work activities may be in the vicinity of asbestos containing materials during their work activities. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

Managers/Supervisors

- Ensure owners or operators are notified of PACM.
- Prohibit The Workforce Group employees from working until material in question is confirmed as non-asbestos or abated.
- Ensure proper employee asbestos awareness training is completed.

All Employees

- All employees are required to act in strict compliance with the requirements of this program and delay or discontinue work if there is ever an unresolved concern regarding exposure to asbestos.
- Immediately report any suspected asbestos containing material to their supervisor

Awareness Level Requirements and Information

Asbestos Exposure Control

Depending on the exposure level The Workforce Group is required to develop and train workers on an Asbestos Exposure Controls Plan.

Background of Asbestos

The word asbestos is derived from a Greek word that means inextinguishable or indestructible. Asbestos is a naturally occurring mineral that is found throughout the world. Asbestos has several characteristics that make it desirable for many commercial uses. The fibres are extremely strong, flexible, and very resistant to heat, chemicals and corrosion. Asbestos is also an excellent insulator and the fibres can be spun, woven, bonded into other materials, or pressed to form paper products. For these reasons and because it is relatively inexpensive asbestos has been widely used for many years and now is found in over three thousand different commercial products.

Exposure to asbestos fibres can cause serious health risks. The major risks from asbestos come from inhaling the fibres. Asbestos is composed of long silky fibres that contain hundreds of thousands of smaller fibres. These fibres can be subdivided further into microscopic filaments that will float in the air for several hours. Asbestos fibres can easily penetrate body tissues and cause disabling and fatal diseases after prolonged exposure.

Although exposure to asbestos is potentially hazardous, health risks can be minimized. In most cases the fibres are released only if the asbestos containing materials (ACM) is disturbed. Intact and undisturbed asbestos materials do not pose a health risk. The mere presence of asbestos does not mean that the health of occupants is endangered. When ACM is properly managed, release of fibres into the air is prevented or minimized, and the risk of asbestos related disease can be reduced to a negligible level. However, asbestos materials can become hazardous when they release fibres into the air due to damage, disturbance, or deterioration over time.

The ability to recognize the kinds of material that contain asbestos, knowing under what conditions they are dangerous, and understanding basic safety precautions, are all important in keeping exposures to a minimum.

Health Effects of Asbestos

The most dangerous exposure to asbestos is from inhaling airborne fibres. The body's defenses can trap and expel many of the particles. However, as the level of asbestos fibres increase many fibres bypass these defenses and become embedded in the lungs. The fibres are not broken down by the body and can remain in body tissue indefinitely. Exposure to asbestos has been shown to cause respiratory diseases such as lung cancer, asbestosis, mesothelioma and various types of cancer of the stomach and colon.

Safety Management Plan

Asbestos Awareness Program

Possible Locations Where Employees May Be Exposed to Asbestos During Their Job Functions

Asbestos materials are used in the manufacture of heat-resistant clothing, automotive brake and clutch linings, and a variety of building materials including insulation, soundproofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet and fire-resistant drywall. Asbestos is also present in pipe and boiler insulation materials, pipeline wrap and in sprayed-on materials located on beams, in crawlspaces, and between walls.

Client owned and/or operated equipment and facilities, where surfacing material or insulation is present, must be confirmed non-asbestos before The Workforce Group employees disturb that material. Where surfacing material or insulation cannot be confirmed non-asbestos, the client or owner must test, and where necessary abate, the material before The Workforce Group employees are permitted to work.

Types of Asbestos

Asbestos can be defined as friable or non-friable. Friable means that the material can be crumbled with hand pressure and is therefore likely to emit fibres. The fibrous or fluffy sprayed-on materials used for fireproofing, insulation, or sound proofing are considered to be friable and they readily release airborne fibres if disturbed.

Materials such as vinyl-asbestos floor tile or roofing felts are considered non-friable and generally do not emit airborne fibres unless subjected to sanding or sawing operations. Asbestos cement pipe or sheet can emit airborne fibres if the materials are cut, abraded or sawed, or if they are broken during demolition operations.

Identifying Asbestos

There are many substances that workers contact that may contain asbestos and have the potential to release fibres. Only rarely can asbestos in a product be determined from labeling or by consulting the manufacture. The presence of asbestos cannot be confirmed visually in many cases. The only way to positively identify asbestos is through laboratory analysis of samples. If the presence of asbestos is suspected always assume that it is an asbestos containing material and have it analyzed.

Employees will abide warning signs and labels and will not disturb the asbestos containing material.

Signs and labels shall identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that Asbestos Containing Material (ACM) and/or Presumed Asbestos Containing Material (PACM) will not be disturbed. The Workforce Group shall ensure that employees working in and adjacent to regulated areas comprehend the warning signs.

Safety Management Plan

Asbestos Awareness Program

General Safety Precautions

The following general precautions will reduce exposure and lower the risk of asbestos related health problems:

- Drilling, sawing, or using nails on asbestos materials can release asbestos fibres and should be avoided.
- Floor tiles, ceiling tiles or adhesives that contain asbestos should never be sanded.
- Use care not to damage asbestos when moving furniture, ladders, or any other object.
- Know where asbestos is located in your work area. Use common sense when working around products that contain asbestos. Avoid touching or disturbing asbestos materials on walls, ceilings, pipes, ducts or boilers.
- All asbestos containing materials should be checked periodically for damage or deterioration. Report any damage, change in condition or loose asbestos containing material to a supervisor.
- All removal or repair work involving asbestos must be done by specially trained personnel.
- Asbestos should always be handled wet to help prevent fibres from being released. If asbestos is soaked with water or a mixture of water and liquid detergent before it is handled, the fibres are too heavy to remain suspended in the air.
- In the presence of asbestos dust above the PEL, the use of a respirator approved for asbestos work is required. A dust mask is not acceptable because asbestos fibres will pass through it.
- Dusting, sweeping, or vacuuming dry asbestos with a standard vacuum cleaner will put the fibres back into the air. A vacuum cleaner with a special high efficiency filter (HEPA) must be used to vacuum asbestos dust.
- If a HEPA vacuum is not used clean-ups must be done with a wet cloth or mop. The only exception to this would be if the moisture presents an additional hazard such as around electricity.

Remember, the mere presence of asbestos itself does not create a health hazard unless the material is disturbed and releases fibres to the atmosphere. Protect yourself and others by being aware of where asbestos is located, the dangers involved and using common sense when working around ACM.

Multiple Worksites

The Workforce Group does not want our employees exposed by asbestos work being performed by other companies. When working on multi-contractor worksites The Workforce Group employees shall be protected from exposure. If employees working adjacent to Class I asbestos jobs are exposed to asbestos due to the inadequate containment of such jobs The Workforce Group shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

Safety Management Plan

Asbestos Awareness Program

Personnel Air Monitoring

Depending on the exposure level The Workforce Group is required to perform air sampling.

Medical Surveillance Program

All The Workforce Group employees who are exposed to asbestos at the regulated level shall be included in the The Workforce Group medical surveillance program.

Respiratory Protection

The only circumstances that will necessitate The Workforce Group employees using respiratory equipment for protection against asbestos is during the asbestos exposure assessment process, while confirming (via personnel monitoring) that the engineering controls and work practices designed and employed for a particular work activity are adequate to maintain exposure levels below the PEL/excursion limit. Asbestos work that requires respiratory equipment beyond the PEL should be performed by a qualified contractor.

Waste Disposal

Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing shall be collected and disposed of in sealed, labeled impermeable bags of greater than 6 mils thickness or other closed, labeled, impermeable containers.

Training

Asbestos awareness training is required for employees who work in areas that contain or may contain asbestos and The Workforce Group shall ensure the training is documented.

Asbestos awareness training is required for employees whose work activities may contact Asbestos Containing Material (ACM) or Presumed Asbestos Containing Material (PACM) but do not disturb the ACM or PACM during their work activities.

Subcontractors performing work shall comply with the requirements of this standard and all applicable regulatory and environmental regulatory requirements.

Assured Equipment Grounding

Purpose

The purpose of this program is to provide procedures and guidelines to eliminate all injuries resulting from possible malfunctions, improper grounding and/or defective electrical tools. This program applies to all sites, employees and contractors and shall be used on owned premises.

Definitions

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

Ground Fault Circuit Interrupter - a device for the protection of personnel that functions to de-energize a circuit or portion thereof within an established period of time when a current to ground exceeds some predetermined value that is less than that required to operate the overcurrent protective device of the supply circuit.

Responsibilities

Supervisors are designated as competent persons for the Assured Equipment Grounding Conductor Program and are responsible for program execution. One or more competent persons must be designated (as defined in 1926.32(f)) to implement and execute the program.

Employees are responsible for following the requirements of this program, to perform visual inspections and to take defective equipment out of service.

Procedures and Guidelines to Eliminate Injuries

The following procedures and guidelines are designed to eliminate all injuries resulting from possible malfunctions, improper ground and/or defective tools.

Assured Grounding Site Program Requirement

An assured grounding conductor program must be implemented on all The Workforce Group, LLC sites covering all cord sets, receptacles which are not part of the building or structure & equipment connected by cord and plug which are available for use or used by employees.

Ground Fault Circuit Interrupters

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection.

Safety Management Plan

Assured Equipment
Grounding

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- All hand portable electric tools and extension cords shall use a GFCI.
 - Additionally, approved GFCI's shall be used for 240-Volt circuits in the same service as described above.
 - GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
 - The GFCI must be the first device plugged into a permanent receptacle.
 - The GFCI must be tested before each use.

Assured Equipment Grounding Conductor Program

The Assured Equipment Grounding Conductor Program (AEGCP) shall cover all cord sets, receptacles not a part of the permanent wiring of a structure and equipment connected by cord and plug on all construction and maintenance sites.

This written description of the program shall be kept at the jobsite for inspection and copying by OSHA and any affected employee.

Removing Equipment

Restrictions for the use of equipment that does not meet requirements or if is found to be defective shall be applied and enforced. Any equipment which has not met the requirements of this program shall not be available or permitted to be used by The Workforce Group, LLC. Damaged items shall not be used until repaired.

How Often Inspection of Cords and Equipment are to be Made

Daily Visual inspections – The following shall be visually inspected before each day's use for external defects (such as deformed or missing pins or insulation damage) and for indication of possible internal damage:

- Cord sets;
- Attachment caps;
- Plug and receptacle of cord sets;
- Any equipment connected by cord and plug (with the exception of cord sets and receptacles which are fixed and not exposed to damage) such as deformed or missing plug, and
- Insulation damage
- Damaged items shall be tagged "Do Not Use" and are not to be used until repaired or shall be discarded.

How and When Tests are Performed and What Records are Maintained

All equipment grounding conductors shall be tested for continuity and shall be electrically continuous.

Safety Management Plan

Assured Equipment
Grounding

Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductors. The equipment grounding conductor shall be connected to its proper terminal.

When tests are performed:

- Before each use.
- Before equipment is returned to service following any repairs.
- Before equipment is used such as when a cord has been run over.
- At intervals not to exceed 3 months, except that cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months.

Tests performed as required by this program shall be recorded as to the identity of each receptacle, cord set and cord and plug connected equipment that passed the test and shall indicate the last date tested or interval for which it was tested. This record shall be kept by means of logs, color coding or other effective means and shall be maintained until replaced by a more current record. These records shall be made available at the job site for inspection by the Assistant Secretary and any affected employees.

All tested cord sets and cord and plug-connected equipment shall be marked, one or both ends, with colored tape to denote the month that the tests were performed. The below color code chart that must be followed for marking.

Month #	Month	Color of Tape to Apply to Cords
1	Jan	Red
2	Feb	Yellow
3	Mar	Green
4	Apr	Blue
5	May	Brown
6	Jun	White
7	Jul	Start over with Red and repeat

Behavior Based Safety

Purpose

The Workforce Group, LLC Behavior Based Safety (BBS) initiative is an education and observation process used to improve safety and reduce risk in the workplace. This process uses a proactive approach and is intended to communicate to employees the elements and the procedures of Behavior Based Safety that will assist in reducing at risk behaviors which in turn reduces injuries in our workplaces.

Scope

The Workforce Group, LLC BBS applies to all staff. Employees are permitted to participate in BBS initiatives already in place at customer locations if required by the customer. Employees are requested to participate in Behavior Based Safety process and follow the process guidelines.

Requirements

Safety awareness principles are the foundation of The Workforce Group, LLC Behavior Based Safety process. The key concepts teach employees to recognize when they may be in one of the following states:

- Rushing
- Frustration
- Fatigue
- Complacency (which can cause or contribute to these critical errors)
- Eyes not on task
- Mind not on task
- Line of fire
- Loss of balance/traction/grip (which in turn increase the risk of injury.)

Pre-task Analysis is a process to evaluate the work environment by performing a Job Safety Analysis (JSA) of each job. The purpose of which is to eliminate or control all hazards that may be encountered to complete the job. This process is included in the Behavior Based Safety process to establish the correct habits and work procedures in order to reduce at-risk behaviors.

The observation process is designed to raise safety awareness and provide a feedback mechanism for management to make changes in design, process or procedure in order to reduce at-risk behaviors. The key to this process is raising awareness of behavior through observation and feedback. The process has three key elements:

Safety Management Plan

Behavior Based Safety

Conducting Observations of Employees Work Behavior

Observations provide direct, measurable information on employee work practices identifying both safe and unsafe behaviors. The process starts with the observation of workers - fellow employees, other contractor employees and customer employees as they perform their tasks. Observers collect information about worker performance and provide feedback via the observation card. The emphasis is not on who was observed but rather what behavior was observed.

During the observation the observer records their findings on the BBS Observation Form. Items to be observed include but are not limited to:

- Personal Protective Equipment
- Procedures / Methods
- People
- Work Environment
- Equipment

Upon completion of an observation the observer is expected to have a discussion with the observed to get feedback. The observer will:

- Review the observation with observed employee.
- Start with a positive comment.
- Reinforce safe behaviors observed first.
- Describe and discuss unsafe behaviors observed.
- Solicit from observed employee explanation of his/her unsafe behavior with open-ended questions.
- Re-emphasize no consequence to observed employee.

Documenting feedback allows workers to assess what should be repeated and what should change to reduce risks in the workplace.

Collection of Data and Performing Trend Analysis

Individual departments, as well as The Workforce Group, LLC as a whole, will compare these measurements and track these results by an acceptable method so that numerical and statistical comparisons can be made over time.

BBS Observation Forms are forwarded to the corporate safety manager for input into the BBS database. Reports are generated and forwarded to management. The Workforce Group, LLC will collect data and performing trend analysis based on the information.

Elements of an Action Plan After the Trend Analysis is Completed

Once trend analysis is complete, appropriate action plans shall be developed to address unsafe behaviors. Action planning will include:

Safety Management Plan

Behavior Based Safety

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- Evaluate unsafe behaviors from trend analysis and prioritize
 - Develop action plan for unsafe behaviors based on comments and feedback from data sheets
 - Designate responsible parties and timeframes within the action plan
 - Define who is responsible for action planning
 - Ensure management support

Action Plan Follow Up

All action plans shall be arranged by a set time period. To ensure effectiveness of the BBS follow-up is necessary to ensure the closure of all actions listed. The follow-up process will include:

- Monthly frequency for review of action by the safety manager, senior management and employees.
- Assign accountability for closeout of action plans within The Workforce Group, LLC.
- Document archiving of action plans with completed action items.

Responsibilities**Oversight**

The manager/supervisor has these oversight responsibilities:

- Coach observers and develop action plans to ensure continuous improvement.
- Ensure that all employees are trained on the Behavior Based Safety elements.
- Maintain communication with workforce by channeling information in a timely manner (feedback).
- Collect and review process modification change requests from employees.
- After reviewing and giving feedback the BBS/JSA cards should be forwarded to the corporate safety director for data entry.

Each employee plays a specific role in the Behavioral Based Safety process. These roles include observee, observer, supervisor, manager and safety manager.

Person being observed

- Be willing to be observed.
- Be open and cooperative.
- Avoid being defensive.
- Participate in problem-solving meetings.
- Be familiar with the Behavior Based Safety process.

Person performing the observation

- Learn the Behavior Based Safety process and the benefits of reducing at-risk behaviors.

Safety Management Plan

Behavior Based Safety

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- Promote the Behavior Based Safety process.
 - Make observing proactive.
 - Be open to coaching.
 - Be courteous and helpful.
 - Assist workers by offering suggestions to safely perform a task or help them with a task if necessary.
 - Communicate with the workers being observed.
 - Give constructive feedback after observations.
 - Stress the safe behaviors before the at-risk behaviors.
 - Offer and work towards solutions of problems found.
 - Record a comment for every recorded “at-risk” to include what and why. Make quality observations, concentrating on quality comments.

Manager

- Actively promote and participate in the behavior safety process by supporting the goals and objectives of the Behavior Based Safety process.
- Ensure that all employees are aware of what is expected of them regarding the BBS process.
- Encourage employees to participate in observations so that incidents/injuries are reduced in the workplace.
- Provide necessary resources to keep process productive.
- Attend safety meetings and offer feedback on areas of improvement.

Supervisor

- Actively promoting and participating in the Behavior Based Safety process by reviewing BBS Observation Forms turned in at least weekly and giving feedback, completing corrective actions needed, etc.
- Refraining from using data from the Behavior Based Safety process in a punitive manner.
- Assisting in problem solving and completing corrective actions in a timely manner.
- Understanding the behavior safety process and the benefits of reducing at-risk behaviors.

Safety Manager

- Support the goals and objectives of the Behavior Based Safety process.
- Encourage, promote, provide technical support and assist in acquiring the resources needed for the Behavior Based Safety process.
- Address the concerns and suggestions of field personnel.
- Collect all observation data cards.
- Enter data into BBS database.

Safety Management Plan

Behavior Based Safety

Training

Training on the observation process will include how to conduct the observation, how to complete the observation form, what do the behaviors mean, feedback training and role play (mentoring and coaching) and employees should be aware they may be observed at any time.

Training will include:

- Program objectives and incident metrics reviewed.
- How to conduct the observation.
- How to complete the observation form.
- What do the behaviors mean.
- Feedback training and role play (mentoring and coaching).
- Employees should be aware they may be observed at any time.

Safety Management Plan

Behavior Based Safety

BBS Safety Observation Form

Your concerns for safety and suggestions as how to improve our safety program are important to The Workforce Group, LLC. Use this form to submit either safety improvement input and/or a BBS safety observation. Your name is optional and the name of the person being observed is not to be used. This information will be used to continually improve our safety system and conditions.

Improvement Input

<input type="checkbox"/> BBS Observation	<input type="checkbox"/> Unsafe Act	<input type="checkbox"/> Unsafe Condition	<input type="checkbox"/> Recognition	<input type="checkbox"/> Environmental
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Employee/Observer Input :

Employee's Action Taken or Recommendation:

Supervisor or Management Action Taken:

Safety Observation S=Safe C=Concern Critical Factors

PPE / Procedures / Methods			Body Position / Mechanics			Slips / Trips			Equipment / Work Environment		
S	C	Eye & Head	S	C	Proper Position	S	C	Proper Footwear	S	C	MSDS Needed If
S	C	Hand & Body	S	C	Ask for Help	S	C	Aware of Hazards	S	C	Lock Out
S	C	Footwear	S	C	Use Dolly	S	C	Prompt Clean Up	S	C	Tools are Safe
S	C	Trained on Task	S	C	Smaller Loads	S	C	Tripping Hazards	S	C	Adjacent Work
S	C	Work Permit / JSA	S	C	Don't Twist Body	S	C	Not Rushing	S	C	Signage if Needed
S	C	All trained in BBS	S	C	Get Close to Item	S	C	Step Conditions	S	C	Spill Control

Observer's feedback given to other employee:

Location:

Observer Name:

Date:

Promptly after observation give this form to your supervisor who will review it and who must then forward it to The Workforce Group, LLC Safety Manager for action.

Benzene and Benzene Awareness Program

Purpose

The purpose of this program is to define work practices, administrative procedures and engineering controls to protect employees exposed to benzene concentrations above the OSHA action level. This plan shall be implemented and kept current by the Safety Manager as required to reflect the most recent exposure monitoring data.

Scope

This program covers all employees who may be exposed to benzene in the course of completing job duties. This written plan shall be made available to the Assistant Secretary, the Director, affected employees and designated employee representatives. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Employees will be aware of provisions of site specific contingency/emergency plans by either The Workforce Group, LLC or of a facility owner.

The Workforce Group, LLC Safety Manager will develop and implement project/task specific benzene control procedures prior to the start of activities that may include exposure to benzene. The Workforce Group, LLC will be aware of an owner's contingency plan provisions and all employees must be informed where benzene is used in host facility and aware of additional plant safety rules.

Possible locations where employees may be exposed to benzene may include, but not limited to: petroleum refining sites, tank gauging (tanks at producing, pipeline & refining operations) and field maintenance operations.

Definitions

- Action Level – means an airborne concentration of benzene of 0.5 ppm calculated as an 8-hour time-weighted average.
- Benzene – a toxic, colorless liquid or gaseous material. Benzene has an aromatic odor, is not soluble in water and is flammable.
- Employee exposure – exposure to airborne benzene that would occur if the employee were not using respiratory protective equipment.

Safety Management Plan

Benzene and Benzene
Awareness Program

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- Health Effects – Short-term overexposure may cause irritation of eyes, nose and skin; breathlessness, irritability, euphoria, headache, dizziness or nausea. Long term effects may result in blood disorders such as leukemia and anemia.

Safety Management Plan

Benzene and Benzene
Awareness Program

Key Responsibilities**Manager or Designee**

- Ensure personnel are aware of work that has the potential of exposure to benzene.
- Ensure individuals responsible for monitoring areas of exposure are properly trained.
- Ensure personnel receive documented medical surveillance exams.
- Ensure that emergency exams are performed if an overexposure or suspected overexposure occurs.

Supervisors

- Ensure employees have the appropriate personal protective equipment (PPE) and are properly trained in its use and care.
- Ensure employees comply with the benzene control program.

Safety Manager

- In coordination with the Manager, develop and implement project/task specific benzene control procedures prior to the start of activities that may include exposure to benzene.
- Coordinate monitoring activities, ensuring monitoring equipment is in proper working order and, as necessary, modifying the benzene control procedures to reflect exposure monitoring data.
- Maintain the benzene control program, notify management of any regulatory changes and ensure compliance with regulatory, client and corporate requirements.
- Coordinate training activities.
- Coordinate the medical surveillance program, including maintenance of medical records and administration of exams.
- Ensure fire extinguishers shall always be readily available where benzene is used/stored. Benzene liquid is highly flammable and vapors may form explosive mixtures in air. Fire extinguishers must be readily available in areas where benzene is used or stored.

Employees

- Comply with the benzene control program.
- Know where benzene is used at The Workforce Group, LLC or client facilities and follow any of additional plant safety rules required by the client.
- Comply with the medical surveillance program and attend examinations as required.
- Maintain respiratory protection equipment in good working order and notify the supervisor or Safety Representative of any problems prior to starting work

Safety Management Plan

Benzene and Benzene
Awareness Program

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- Review material safety data sheets or consult with the supervisor to identify any container with benzene containing material.
 - Not smoke in prohibited areas where benzene is present.
 - Report exposures resulting in any symptoms immediately.

Procedure**Permissible Exposure Limits**

The time-weighted average limit (TWA) for benzene is:

- 8-hour TWA 1 ppm
- 12-hour TWA 0.67 ppm

The short-term exposure limit (STEL) for benzene is 5 ppm.

Regulated Areas

- The Workforce Group, LLC shall establish regulated areas wherever airborne concentration of benzene exceeds or can reasonably be expected to exceed the PEL or STEL.
- The Workforce Group, LLC will control access to regulated areas and limit access to authorized personnel.
- Safety precautions such as prohibition of smoking in areas where benzene is used/stored shall be taken. Smoking is prohibited in areas where benzene is used or stored. The following signage shall be posted in all regulated areas when the potential exists for benzene vapors to be in excess of the PEL:

**DANGER – BENZENE REGULATED AREA CANCER CAUSING AGENT FLAMMABLE –
NO SMOKING AUTHORIZED PERSONNEL ONLY RESPIRATOR REQUIRED**

Methods of Compliance

- The benzene control program shall be written and implemented to comply with OSHA regulation 29 CFR 1910.1028 (Benzene).
- The Workforce Group, LLC shall establish and implement a written program to reduce employee exposure to or below the PEL primarily by means of engineering and work practice controls to ensure compliance with the benzene control program and federal and state requirements.

Exposure Monitoring

Exposure monitoring shall be performed for the 8-hour and 12-hour TWAs or for the 15 minute STEL exposure when:

Safety Management Plan

Benzene and Benzene
Awareness Program

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- Regulated areas are established
 - An emergency occurs that could require a regulated area
 - A change in the production, process, control equipment, personnel or work practices may result in new or additional exposure to benzene
 - Cleanup of a spill, leak repair, or rupture occurs
 - If the monitoring required reveals employee exposure at or above the action level but at or below the TWA, The Workforce Group, LLC shall repeat the monitoring for each employee at least every year.
 - If the initial monitoring reveals employee exposure to be below the action level The Workforce Group, LLC may discontinue the monitoring.
 - If the monitoring reveals that employee exposures, as indicated by at least two consecutive measurements taken at least 7 days apart, are below the action level The Workforce Group, LLC may discontinue to monitor.
 - Direct reading detection instruments (Drager CMS is recommended) will be used where benzene vapors may be present in work areas not previously monitored.
 - Personal monitoring will be performed by use of vapor monitoring badges following manufacturer requirements. All samples shall be analyzed at an AIHA (American Industrial Hygiene Association) certified laboratory.

Medical Surveillance

- Baseline and annual medical exams shall be provided to employees that may work or are anticipated to participate in operations more than 10 times per year or may work in areas where benzene exposures may exceed the PEL over 30 days per year.
- The Workforce Group, LLC shall make available a medical surveillance program for employees who are or may be exposed to benzene at or above the action level 30 or more days per year; for employees who are or may be exposed to benzene at or above the PELs 10 or more days per year; for employees who have been exposed to more than 10 ppm of benzene for 30 or more days in a year prior to the effective date of the standard when employed by their current employer.
- Notification of monitoring results shall be provided to employees in writing within 15 working days of receipt of results.

Personal Protective Equipment

- PPE will be selected on the basis of its ability to prevent absorption, inhalation and ingestion.
- PPE will reflect the needs of the employee based on work conditions, amount and duration of exposure and other known environmental factors but shall contain as a minimum; boots, proper eye protection, gloves, sleeves, aprons and others as determined.

Safety Management Plan

Benzene and Benzene
Awareness Program

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- PPE shall be provided and worn when appropriate to prevent eye contact and limit dermal exposure to liquid benzene. PPE must meet the requirements of 29 CFR 1910.133 and provided at no cost to the employees.

Respiratory Protection

- A respiratory protection program shall be established in accordance with 29 CFR 1910.134. Respiratory protection is required:
 - During the time period necessary to implement engineering controls or work practices.
 - When engineering and work practices are not feasible.
 - In emergencies.

Approved respirators shall be selected according to airborne concentrations of benzene or condition of use.

- 0 to 0.67 ppm – no respirator required
- 0.67 to 6.7 ppm – half-mask respirator with OV cartridges
- 6.7 to 33 ppm – full-face respirator with OV cartridges
- Greater than 33 ppm – Due to the The Workforce Group, LLC policy of not permitting SCBA no employee shall enter a space containing more than 33 ppm.

Recordkeeping

- Medical surveillance records shall be maintained for 30 years after termination of employment
- Exposure monitoring records shall be maintained for 30 years after completion of the project
- Exposure and medical monitoring records shall be made available to affected employees or their representatives and to OSHA upon request

Communication of Benzene Hazards

- Signs and labels shall be posted at entrances of regulated areas
- The benzene control program shall be updated by the The Workforce Group, LLC Safety Manager
- Project site specific contingency and emergency procedures shall be updated by the Safety Manager and made available to project staff prior to beginning work at the specific site.

Bloodborne Pathogens Program

Purpose

This Bloodborne Pathogen Exposure Control Plan has been established to ensure a safe and healthful working environment and act as a performance standard for all employees. This program applies to all occupational exposure to blood or other potentially infectious materials. The content of this plan complies with OSHA Standard 29 CFR 1910.1030 (Occupational Exposure to Bloodborne Pathogens).

Scope

This program addresses all occupational exposure to blood or other potentially infectious materials. OSHA requires that all employers that can "reasonably anticipate exposure" of employees to infectious material to prepare and implement a written exposure control plan.

Key Responsibilities

Exposure Control Officer (The Workforce Group, LLC Safety Manager)

Has overall responsibility for developing and implementing the Exposure Control Procedure for all facilities.

Site Project Manager and Supervisors

Site project manager and supervisors are responsible for exposure control in their respective areas.

Employees

- Know what tasks they perform that have occupational exposure.
- Plan and conduct all operations in accordance with our work practice controls.
- Develop good personal hygiene habits.

Procedure

Training

The Workforce Group, LLC shall ensure that all employees with occupational exposure participate in a training program. Training is conducted for all employees with occupational exposure before initial assignment and within 1 year of previous training. Training shall be provided at the time of initial assignment & within 1 year of an employee's previous training. Training shall include:

Safety Management Plan

Bloodborne Pathogens
Program

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- What bloodborne pathogens are; how to protect themselves from exposure
 - Methods of warnings (signs, labels, etc.)
 - The OSHA requirements of bloodborne pathogens
 - The Hepatitis B vaccine shall be made available to all employees that have occupational exposure at no cost to the employee(s).



Biohazard Label

Availability of Procedure to Employees

All employees will have access to a copy of the exposure control plan. Access to a copy of the exposure control plan shall be provided in a reasonable time, place, and manner.

Reviews and Update of the Procedure

The procedure is reviewed annually and updated whenever we establish new functional positions within our facility that may involve exposure to biohazards.

Exposure Determination

- There are no job classifications in which some or all employees have occupational exposure to bloodborne pathogens that may result from the performance of their routine duties.
- Designated employees are trained to render first aid and basic life support. Rendering first aid or basic life support will expose employees to bloodborne pathogens and will require them to adhere to this program.
- In addition, no medical sharps or similar equipment is provided to, or used by, employees rendering first aid or basic life support.
- This exposure determination has been made without regards to the Personal Protective Equipment that may be used by employees.
- A listing of all first aid and basic life support trained employees in this work group shall be maintained at each work site and at each first aid kit.

Methods of Compliance**Universal Precautions**

Under circumstances in which differential between body fluids is difficult or impossible, all body fluids will be considered potentially infectious.

Engineering Controls

Engineering and work practice controls shall be used to eliminate or minimize employee exposure. Engineering controls should be examined and maintained or replaced on a regular schedule to ensure their effectiveness. Hand washing facilities shall be readily available at all work locations. If provision of hand washing facilities is not feasible, then an appropriate

Safety Management Plan

Bloodborne Pathogens
Program

antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes shall be provided by The Workforce Group, LLC.

Containers for contaminated reusable sharps that our clients provide have the following characteristics: Puncture-resistant; Color-coded or labelled with a biohazard warning label; Leak-proof on the sides and bottom.

Secondary containers which are: Leak-proof; Color-coded or labelled with a biohazard warning label; Puncture-resistant, if necessary.

Work Practice Controls

- Employees shall wash their hands immediately, or as soon as feasible, after removal of potentially contaminated gloves or other personal protective equipment.
- Following any contact of body areas with blood or any other infectious materials, employees wash their hands and any other exposed skin with soap and water as soon as possible.
- Hand washing facilities shall be available. If hand washing facilities are not feasible The Workforce Group, LLC will provide either an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes.
- Contaminated needles and other contaminated sharps should not be handled if you are not AUTHORIZED or TRAINED to do so. Contaminated needles and other contaminated sharps are not bent or recapped.
- Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas where there is potential for exposure to biohazardous materials.
- Food and drink is not kept in refrigerators, freezers, on countertops or in other storage areas where potentially infectious materials are present.
- All equipment or environmental surfaces shall be cleaned and decontaminated after contact with blood or other infectious materials.
- Specimens of blood or other potentially infectious materials must be put in leak proof bags for handling, storage and transport.
- If outside contamination of a primary specimen container occurs, that container is placed within a second leak proof container, appropriately labelled, -for handling and storage.
- Bloodborne pathogens kits are located on top of first aid kits and are to be used in emergency situations by the caregiver. Once the seal is broken on kit and any portion has been used it is not to be reused. Pathogen Kits shall be ordered and replaced promptly. Biohazard bags are identified by stickers and located in the first aid area. Contaminated supplies are to be disposed at once.

Safety Management Plan

Bloodborne Pathogens
Program

Personal Protective Equipment

When the possibility of occupational exposure is present, PPE is to be provided at no cost to the employee such as gloves, gowns, etc. PPE shall be used unless employees temporarily declined to use under rare circumstances. PPE shall be repaired and replaced as needed to maintain its effectiveness. All PPE shall be of the proper size and readily accessible.

Our employees adhere to the following practices when using their personal protective equipment:

- Any garments penetrated by blood or other infectious materials are removed immediately.
- All potentially contaminated personal protective equipment is removed prior to leaving a work area.
- Gloves are worn whenever employees anticipate hand contact with potentially infectious materials or when handling or touching contaminated items or surfaces.
- Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an "exposure barrier".
- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
- Any PPE exposed to bloodborne pathogens shall be disposed of properly.
- PPE shall be used unless employees temporarily declined to use PPE under rare circumstances.
- PPE should be cleaned, laundered & properly disposed of if contaminated.
- The Workforce Group, LLC will repair and replace PPE as needed to maintain its effectiveness.

Housekeeping

Our staff employs the following practices:

- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious materials.
- Protective coverings (such as plastic trash bags or wrap, aluminum foil or absorbent paper) are removed and replaced.
- All trash containers, pails, bins, and other receptacles intended for use routinely are inspected, cleaned and decontaminated as soon as possible if visibly contaminated.
- Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.).

Post-Exposure and Follow Up*Post-Exposure Evaluation & Follow-Up*

Safety Management Plan

Bloodborne Pathogens
Program

If there is an incident where exposure to bloodborne pathogens occurred we immediately focus our efforts on investigating the circumstances surrounding the exposure incident and making sure that our employees receive medical consultation and immediate treatment.

The The Workforce Group, LLC Safety Manager/ Supervisor investigates every reported exposure incident and a written summary of the incident and its causes is prepared and recommendations are made for avoiding similar incidents in the future. We provide an exposed employee with the following confidential information:

- Documentation regarding the routes of exposure and circumstances under which the exposure incident occurred.
- Identification of the source individual (unless not feasible or prohibited by law).

Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified healthcare professional to discuss the employee's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

Information Provided to the Healthcare Professional. We forward the following:

- A copy of the Biohazards Standard.
- A description of the exposure incident.
- Other pertinent information.

Healthcare Professional's Written Opinion

After the consultation, the healthcare professional provides our facility with a written opinion evaluating the exposed employee's situation. We, in turn, furnish a copy of this opinion to the exposed employee. The written opinion will contain only the following information:

- Whether Hepatitis B Vaccination is indicated for the employee.
- Whether the employee has received the Hepatitis B Vaccination.
- Confirmation that the employee has been informed of the results of the evaluation.
- Confirmation that the employee has been told about any medical conditions resulting from the exposure incident which require further evaluation or treatment.
- All other findings or diagnoses will remain confidential and will not be included in the written report.

Record Keeping

All records shall be made available upon request of employees, OSHA's Assistant Secretary and the Director of OSHA for examination and copying. Medical records must have written consent

Safety Management Plan

Bloodborne Pathogens
Program

of employee before released. The Workforce Group, LLC shall meet the requirements involving transfer of records set forth in 29 CFR 1910.1020(h).

The respective Human Resources representative shall maintain Bloodborne Pathogen exposure records.

Employee medical records shall be kept confidential and are not to be disclosed without the employee's written consent, except as required by 29 CFR 1910.1030 or other law.

Accurate medical records for each employee with occupational exposure must be maintained for at least the duration of employment plus 30 years and shall include at least the following:

- Employee's name, Social Security number and The Workforce Group, LLC employee number.
- Employee's Hepatitis B vaccination status, including vaccination dates.
- All results from examinations, medical testing and follow-up procedures, including all health care professional's written opinions.
- Information provided to the health care professional.
- Any Hepatitis B Vaccine Declinations.

Training records shall be maintained for 3 years from the date on which the training occurred and shall include at least the following:

- Outline of training program contents.
- Name of person conducting the training.
- Names and job titles of all persons attending the training.
- Date of training.

Labels and Signs

Biohazard warning labelling shall be used on containers of regulated waste; Sharps disposal containers; contaminated laundry bags and containers; contaminated equipment.

Information

Information provided to our employees includes:

- The Biohazards Standard itself.
- The epidemiology and symptoms of bloodborne diseases.
- The modes of transmission of bloodborne pathogens.
- Our facility's Exposure Control Procedure (and where employees can obtain a copy).
- Appropriate methods for recognizing tasks and other activities that may involve exposure.

Safety Management Plan

Bloodborne Pathogens
Program

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- A review of the use and limitations of methods that will prevent or reduce exposure.
 - Selection and use of personal protective equipment.
 - Visual warnings of biohazards within our facility including labels, signs and "color-coded" containers.
 - Information on the Hepatitis B Vaccine.
 - Actions to take and persons to contact in an emergency involving potentially infectious material.
 - The procedure to follow if an exposure incident occurs, including incident reporting.
 - Information on the post-exposure evaluation and follow-up, including medical consultation.

Safety Management Plan

Bloodborne Pathogens
Program

VACCINATION DECLINATION FORM

Date: _____

Employee Name: _____

Employee ID#: _____

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

Employee Signature_____
Date_____
Facility Representative Signature_____
Date

Safety Management Plan

Bloodborne Pathogens
Program

POST-EXPOSURE EVALUATION AND FOLLOW-UP CHECKLIST

The following steps must be taken, and information transmitted, in the case of an employee's exposure to bloodborne pathogens:

ACTIVITY**COMPLETION DATE**

Employee furnished with documentation
regarding exposure incident.

Source individual identified.
() Source individual

Appointment arranged for employee
with healthcare professional.
()
Professional's name

Documentation forwarded to healthcare professional

<hr/>	Bloodborne Pathogens Standard
<hr/>	Description of exposed employee's duties
<hr/>	Description of exposure incident, including routes of exposure

Butadiene Awareness Program

Purpose

The purpose of this program is to establish requirements for the use and handling of materials that expose employees to butadiene.

Scope

This program covers all employees.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper work procedures for butadiene
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.
- As part of the JSA and other hazard evaluation processes, identifies and evaluates butadiene hazards and potential exposures during planning and the conduct of work.
- Reviews and approves the Task-Specific Safety Analysis.
- As necessary, quantitatively determines the presence of butadiene in materials, substrates, and other media. This may involve the collection of samples for analysis by a qualified laboratory or field testing using acceptable test methods.
- Provides results of any butadiene survey to management/supervision, along with information regarding hazard potential and control measures. As appropriate, makes recommendations to management/supervision to maintain, modify, upgrade, or downgrade controls accordingly.
- Takes prompt corrective measures (or supports any Competent Person in this role) to eliminate hazards; such as recommending to management/supervision to implement or modify engineering, administrative, work practice, and personal protection (including respiratory protection) controls.
- Conducts periodic exposure assessment.
- As appropriate, assists management/supervision in ensuring that workers have the necessary training and medical surveillance based upon the activity and hazard.
- In evaluating butadiene hazards and specifying controls for a job, (a) utilizes reliable historical exposure monitoring data generated for other similar operations or activities,

Safety Management Plan

Butadiene Awareness
Program

(b) utilizes objective data, and/or (c) plans and conducts initial monitoring to determine exposures and assess the effectiveness of hazard controls.

- Conducts initial and periodic exposure monitoring in accordance with National Institute for Occupational Safety and Health (NIOSH)/OSHA methods if lacking historical or objective data.
- Maintains effective records of jobs monitored, so that a historical database can be used to specify controls and eliminate unnecessary and redundant monitoring for future activities.
- Supports project management/supervision in responding to exposures above the PEL when workers were not adequately protected.
- As appropriate, participates in pre-job and daily worker briefings regarding task-specific butadiene hazards and controls, work practices/plans (such as JSAs), and other applicable information, including any changes that are made to controls or to the work practices or plans.

Employees

- Shall follow all requirements regarding the safe work procedures for butadiene.

Possible Locations, Controls and Records

Butadiene may be present at refineries and petrochemical plants. Butadiene is used in the production of styrene-butadiene rubber and polybutadiene rubber for the tire industry. Other uses include copolymer latexes for carpet backing and paper coating as well as resins and polymers for pipes and automobile and appliance parts. It is also used as an intermediate in the production of such chemicals as fungicides.

The Workforce Group, LLC shall institute engineering and work practice controls to reduce and maintain exposures below the permissible exposure limits. When any exposures to butadiene are above the permissible exposure limits The Workforce Group, LLC shall establish and implement a written plan to reduce employee exposures below the PEL. The written plan must be reviewed annually.

The Workforce Group, LLC will have an exposure goal program if butadiene exposures are above the action level. The goal program should include a leak prevention, detection, and repair program; a ventilation repair and maintenance program; the use of pump exposure control technology; use of gauging devices and unloading devices. Employees shall be trained for the exposure goal program.

The Workforce Group, LLC will keep records related to exemptions from the standard, exposure monitoring, respirator fit testing, medical screening and surveillance. Employee and OSHA access to records will be provided.

Butadiene Procedure

Characteristics

Butadiene is a flammable, colorless gas with a mild, aromatic odor at room temperature and pressure. Butadiene may also exist as a cryogenic liquid. Butadiene is insoluble in water, stable, and reacts with oxidizers.

Physical Hazards

- Flammable gas
- Explosive peroxides
- Fire hazard when exposed to heat, flame, or strong oxidizers
- Release of toxic gases such as carbon monoxide during a fire

Health Hazards

- There are no recorded cases of accidental exposures at high levels that have caused death in humans, but this could occur.
- Overexposure can cause respiratory and eye irritation
- Contact with liquid butadiene can cause burns and frostbite
- Acute (short term) health hazards include:
 - Central nervous system effects
 - Blurred vision
 - Nausea
 - Fatigue
 - Headache
 - Decreased blood pressure
 - Decreased pulse rate
 - Unconsciousness
- Chronic (long term) health hazards include:
 - Cancers of the lymphohematopoietic system (carcinogen)
 - Lymphoma
 - Leukemia
 - Potential reproductive toxicity

Practices

Permissible Limits

No employee can be exposed over the permissible exposure limits of 1 part per million (ppm) butadiene measured as an 8-hour time weighted average and 5 ppm as determined over a sampling period of 15 minutes. The Workforce Group, LLC will ensure that no employee is exposed over the 8-hour and 15 minute permissible exposure limits for butadiene.

Safety Management Plan

Butadiene Awareness
Program

Exposure Monitoring

The Workforce Group, LLC will conduct initial exposure monitoring for butadiene. If the initial monitoring indicates exposures are above the 8-hour permissible exposure limit, monitoring will be conducted every three months. If above the 15 minute short term exposure limit, monitoring will be conducted every three months. If the initial monitoring indicates exposures are above the action level but below the 8-hour permissible limit, monitoring will be conducted annually.

After spills, releases, or leaks The Workforce Group, LLC will conduct exposure monitoring after spills and leaks occur to ensure that exposures have returned to the level that existed prior to the incident.

Monitoring Results

The Workforce Group, LLC must, within 15 working days after the receipt of monitoring results, notify each employee of the results in writing or by posting the results in an accessible location.

Medical Surveillance

The Workforce Group, LLC will provide a medical screening and medical surveillance program for those individuals exposed at or above the action level for 30 or more days a year. The Workforce Group, LLC (including successor owners) shall continue to provide medical screening and surveillance for employees even after transfer to a non-butadiene exposed job and regardless of when the employee is transferred.

Regulated Areas

Regulated areas shall be demarcated from the rest of the workplace in any manner that minimizes the number of employees exposed to butadiene. Access shall be limited to authorized persons. Regulated areas shall be marked with warning signs to alert employees and access is restricted to authorized persons only.

Contingency Planning

The Workforce Group, LLC shall be aware of owner's contingency plan provisions. Employees must be informed where butadiene is used in host facility and aware of additional plant safety rules.

Respiratory Protection & PPE

Respirators must be selected according to the air concentrations of butadiene measured in the workplace. NIOSH approved air purifying respirators must have organic vapor cartridges or cartridges approved for use with butadiene.

Where appropriate, to prevent eye contact and limit dermal exposure to butadiene The Workforce Group, LLC shall provide protective clothing and equipment at no cost to the employee and shall ensure its use.

Safety Management Plan

Butadiene Awareness
Program

Contact lenses should not be worn when working with this chemical.

Fire Protection

Fire extinguishers shall be readily available and smoking prohibited in areas where butadiene is present or where butadiene may be released.

Training

Training shall be provided on the health hazards associated with butadiene exposure and any use/handling requirements for butadiene at time of initial assignment and annually. The Workforce Group, LLC will assure employee participation and maintain a written record of the training contents. This training will include:

- The purpose and description of the medical screening and surveillance program;
- The quantity, location, manner of use, release and storage of butadiene and the specific operations that could result in exposure to butadiene;
- The engineering controls and work practices associated with the employee's job assignment;
- Emergency procedures and personal protective equipment;
- The measures employees can take to protect themselves from exposure to butadiene.
- Hazard communication training for potentially exposed employees.
- Training specified by the applicable butadiene standard.
- Respirator training if respirators are to be used.
- Provide information to workers regarding task-specific butadiene hazards and control methods, the JSA, work practices, medical surveillance and other applicable information, including any changes that are made to these controls.
- All training will be recorded and include the identity of the employee trained, the signature of the person who conducted the training and the date of the training.

Cadmium and Hexavalent Chromium Program

Purpose:

The purpose of this program is to establish requirements for the use and handling of materials that expose employees to cadmium and/or hexavalent chromium.

Scope

This program covers all employees.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper work procedures for cadmium and hexavalent chromium
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.
- As part of the JSA and other hazard evaluation processes, identifies and evaluates chromium or cadmium hazards and potential exposures during planning and the conduct of work.
- Reviews and approves the Task-Specific Safety Analysis.
- As necessary, quantitatively determines the presence of chromium or cadmium in materials, substrates, and other media. This may involve the collection of samples for analysis by a qualified laboratory or field testing using acceptable test methods.
- Provides results of any chromium or cadmium survey to management/supervision, along with information regarding hazard potential and control measures. As appropriate, makes recommendations to management/supervision to maintain, modify, upgrade, or downgrade controls accordingly.
- Takes prompt corrective measures (or supports any Competent Person in this role) to eliminate hazards; such as recommending to management/supervision to implement or modify engineering, administrative, work practice, and personal protection (including respiratory protection) controls.
- Conducts periodic exposure assessment.
- As appropriate, assists management/supervision in ensuring that workers have the necessary training and medical surveillance based upon the activity and hazard.
- Ensures that medical monitoring is conducted in accordance with 29 CFR 1926.1126 (for chromium) or 29 CFR 1926.1127 (for cadmium) including imposition of work restrictions where appropriate and reviewing results of medical monitoring.

Safety Management PlanCadmium and Hexavalent
Chromium Program

- In evaluating chromium or cadmium hazards and specifying controls for a job, (a) utilizes reliable historical exposure monitoring data generated for other similar operations or activities, (b) utilizes objective data, and/or (c) plans and conducts initial monitoring to determine exposures and assess the effectiveness of hazard controls.
- Conducts initial and periodic exposure monitoring in accordance with National Institute for Occupational Safety and Health (NIOSH)/OSHA methods if lacking historical or objective data.
- Maintains effective records of jobs monitored, so that a historical database can be used to specify controls and eliminate unnecessary and redundant monitoring for future activities.
- Supports project management/supervision in responding to exposures above the PEL when workers were not adequately protected.
- As appropriate, participates in pre-job and daily worker briefings regarding task-specific chromium or cadmium hazards and controls, work practices/plans (such as JSAs), and other applicable information, including any changes that are made to controls or to the work practices or plans.

Employees

- Shall follow all requirements regarding the safe work procedures for cadmium and hexavalent chromium.

Cadmium Procedure**Compliance Program**

A written compliance program shall be implemented when the PEL for cadmium is exceeded at a work site.

The following areas shall be addressed within the site compliance program and to ensure emergency plans are in place should a release of cadmium occur:

- Potential exposure determination including a description of each operation where cadmium is omitted, machinery use, material processed, controls in place, crew size, employee job responsibilities and maintenance practices.
- Air monitoring data or developing a justification for not conducting monitoring based on previous monitoring/historical data or objective data.
- Engineering controls including the specific means that will be employed to meet compliance.
- A report of technology considered in meeting the PEL.
- A detailed schedule of implementation.
- Consideration of respiratory protection.
- A documented, written plan for dealing with emergency situations involving a substantial release of cadmium.
- Work practice program.

Safety Management Plan

Cadmium and Hexavalent
Chromium Program

- Other relevant information such as protective clothing, housekeeping, hygiene areas and practices (including consideration of shower facilities), consideration of medical surveillance, training and recordkeeping.

The written program must be reviewed and updated annually or more often to reflect significant changes in the compliance status for The Workforce Group, LLC.

The program shall be provided for examination and copying upon request of affected employees, their representatives or OSHA officials.

Maintenance procedures while working on ventilation systems and changing of filters will be established. Procedures shall be developed and implemented to minimize employee exposure to cadmium when maintenance of ventilation systems and changing of filters. Examples include: Proper use of PPE, use of HEPA filtered vacuums, wet sweeping or other methods to minimize the likelihood of exposure to chromium. No compressed air shall be used to remove chromium from any surface. Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

Construction work activities that result in exposure to chromium or cadmium may include, but are not limited to, the following:

- Demolition or salvage of structures where chromium or cadmium, or materials containing chromium or cadmium, are present.
- Removal or encapsulation of materials containing chromium or cadmium.
- New construction, alteration, repair, or renovation of structures and substrates that contain chromium or cadmium.
- Installation of products containing chromium or cadmium.
- Working with/around Portland cement (in powder or dust form – chromium only).
- Torch-cutting chromium/cadmium containing paints.
- Transportation, disposal, storage, or containment of chromium or cadmium, or materials containing chromium or cadmium.
- Maintenance operations associated with construction activities.
- Welding, cutting, burning, or grinding stainless steel, chromium-/cadmium-containing alloy steel, and chromium/cadmium containing alloys.

Note!!!Exposure to chromium (especially hexavalent chromium) has also occurred when the welding rod or wire in use contains chromium.

The permissible exposure limit (PEL) for cadmium and hexavalent chromium is five (5) micrograms calculated as an 8-hour time-weighted average over a work shift. The action level (AL) of 2.5 micrograms triggers the following requirements:

Safety Management Plan

Cadmium and Hexavalent
Chromium Program

- Pre-job planning includes, as needed, a thorough identification of chromium or cadmium materials. Identification may include the product name, a Material Safety Data Sheet (MSDS) with the MSDS number (if available) or a sample content analysis. Sampling data includes location, sampling method, sampling dates, laboratory identification, and analytical method.
- If documentation is not feasible or has been determined by the project engineer to be unavailable or unreliable, chromium or cadmium content sufficient to exceed the action level for chromium or cadmium is assumed.

Results of bulk sampling, calculations of potential chromium or cadmium exposure, and other data that demonstrate compliance with this practice (as well as the pertinent standards) are attached to the work package.

Where chromium or cadmium exposure above the action level is suspected, and in the absence of monitoring data, interim protective measures are established that are equal to or greater than the assumed exposure level.

Hexavalent Chromium Procedure

Welding, Cutting, and Grinding

Certain welding and cutting activities have been shown to expose the welder/cutter, and potentially helpers, to hexavalent chromium above the action level when exhaust ventilation is not used. The activities have included the following:

- Shielded metal arc welding, Gas metal arc welding
- Flux cored arc welding, Sub arc welding
- Torch cutting through chromate-containing paints, grinding chromium-containing metals.

The types of metal involved have been stainless steel, chromium-containing alloy steel, and chromium-containing nonferrous alloys. Exposure has also occurred when the welding rod or wire in use contains chromium, and exhaust ventilation is not used.

Therefore, exhaust ventilation is always prescribed as a control measure when activities with the materials mentioned above are in use unless historical personal monitoring data performed when similar materials, using similar methods, under similar environmental conditions are used shows conclusively that the welder/cutter and helper (if applicable) are not exposed above the action level without regard to respiratory protection.

Practices and procedures shall ensure that no employee is exposed to hexavalent chromium in excess of the permissible exposure level which is 5 micrograms per cubic meter of air based on an 8 hour Time Weighted Average.

Safety Management Plan

Cadmium and Hexavalent
Chromium Program

Plasma and Air Arc Cutting and Gouging

Plasma and air arc cutting and gouging operations have been shown to expose the worker and helpers within 10 feet of the work to levels of hexavalent chromium above the permissible exposure limit (PEL) under most circumstances and conditions. Exhaust ventilation and respiratory protection (at least a half-face, tight-fitting respirator with a HEPA filter/cartridge) are always prescribed as control measures when activities with the materials mentioned above are in use; a higher level of respiratory protection may be prescribed, depending on conditions.

Note!!! Each discrete task must begin with ventilation and respiratory protection control measures in place. Respiratory protection may be downgraded only upon conclusive results of breathing zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than 50 percent of the protection factor of the respirator relative to the concentration and PEL of hexavalent chromium. Respiratory protection may be eliminated only upon conclusive results of breathing-zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than the PEL as an 8-hour time-weighted average.

Additional controls may also be appropriate to be in compliance with 29 CFR 1926.1126, depending on the results of evaluations of the materials to be used, environmental conditions, length of the work process/activity, etc.

Employees who are exposed at or above the action level 30 days or more per year are enrolled in a medical surveillance program.

Personal hygiene is very important while working with chromium or cadmium products. To avoid accidental ingestion of chromium or cadmium, employees wash thoroughly (regardless of other controls) prior to eating, chewing, smoking, or drinking.

Practices

The Workforce Group, LLC Management/supervision supported by safety professional(s), the medical contractor and training providers conducts the following basic steps to control exposure to chromium or cadmium:

- Determine the types of projects, activities, and operations that could involve chromium or cadmium, or chromium or cadmium-containing materials. For those jobs, conduct hazard identification as part of the work design, planning, and control process.
- If chromium or cadmium materials are involved, ensure that project safety (for chromium) or a competent person (for cadmium) conducts a hazard evaluation to determine the potential exposure and to recommend initial controls.
- Develop and implement a Task-Specific Safety when exposure is or is likely to be above the PEL. The JSA (or equal) addresses the scope of work activities; provides initial exposure assessment; and prescribes exposure controls, air-monitoring requirements, work practices, personal protective equipment and additional information as required.

Safety Management Plan

Cadmium and Hexavalent
Chromium Program

- Incorporate recommendations from project safety for chromium or cadmium hazard control measures into any JSA and work control documents.

Exposure Monitoring

Monitoring or measuring of employee exposure shall be conducted at least every 6 months if the initial monitoring shows employee exposure. Air monitoring will be performed at the beginning of each job task. If exposure monitoring results indicate exposure is above the PEL The Workforce Group, LLC must include in the written notification to employees the corrective action being taken to reduce exposure to or below the PEL.

- Notify each affected employee, in writing, of the results of monitoring within five (5) working days.
- Air monitoring for chromium or cadmium may be waived provided the following conditions are met:
 - Monitoring has been performed in the last 12 months.
 - Data from historical monitoring originates from work operations that closely resemble the planned work operations.
 - Workplace and environmental conditions (such as indoors or outdoors, temperature, wind speed, ventilation, and space configuration) are similar to those when the monitoring was performed.
 - The processes, types of material, control methods and work practices are similar.
 - Justification for waving initial monitoring shall be included in the Task-Specific Safety Analysis or equal. Employees involved are briefed regarding the existence of such data.

Surveillance

Medical surveillance shall be provided when an employee experiences signs or symptoms of the adverse health effects of Hexavalent Chromium (dermatitis, asthma, bronchitis, etc). Medical evaluations will be provided at no cost to employees. Examinations will be performed by or under the supervision of a physician or other licensed health care professional.

Facilities

The Workforce Group, LLC must provide change rooms for decontamination and ensure facilities prevent cross-contamination. Washing facilities shall be readily accessible for removing chromium from the skin. Workers must wash their hands and face or any other potentially exposed skin before eating, drinking or smoking.

Regulated Areas

Regulated areas shall be established when exposure to an employee is or is expected to be in excess of the PEL. Regulated areas shall be marked with warning signs to alert employees and access is restricted to authorized persons only.

Controls

If the exposure level is above the PEL for 30 days or more then engineering controls and work practices shall be provided to reduce exposure to the lowest feasible level. If employees can demonstrate that such controls are not feasible The Workforce Group, LLC shall use engineering and or work controls to reduce employee exposure to the lowest levels achievable and shall supplement them by the use of required respiratory protection.

Recordkeeping

The Workforce Group, LLC is required to maintain and make available an accurate record of all employee exposure monitoring, medical surveillance and training records.

Respiratory Protection & PPE

The appropriate respirator shall be used when engineering controls and work practices cannot reduce employee exposure during work operations where engineering controls and work practices are not feasible and emergencies. Respirators shall be provided in accordance with 1910.134 (Respiratory Protection) (see The Workforce Group, LLC Respiratory Protection Program). Specific requirements contained within 1926.1127 (Cadmium) regarding respiratory protection shall also be followed including:

- Providing employees with full face piece respirators when they experience eye irritation.
- Providing HEPA filters for powered and non-powered air-purifying respirators.
- Providing a powered air-purifying respirator instead of a negative-pressure respirator when an employee entitled to a respirator chooses to use this type of respirator and such a respirator will provide adequate protection to the employee.

PPE will be provided when there is a hazard from skin or eye contact and employees are required to use the PPE. Gloves, aprons, coveralls, goggles, foot covers and other as needed PPE shall be provided at no cost to the employee and will be removed at the end of the work shift. The Workforce Group, LLC must clean, launder and replace all protective clothing as needed.

Housekeeping

All surfaces shall be maintained as free as practicable of chromium. All spills and releases of chromium shall be cleaned promptly with approved procedures including use of HEPA filtered vacuums as the primary method, dry or wet sweeping or other methods to minimize the likelihood of exposure to chromium.

No compressed air shall be used to remove chromium from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the dust cloud created by the compressed air or no alternative method is feasible.

Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

Training

The Workforce Group, LLC shall provide appropriate types of training for employees who are potentially exposed to chromium or cadmium prior to their initial assignment and annually thereafter. The Workforce Group, LLC will assure employee participation and maintain a record of the training contents. This training includes:

- Hazard communication training for potentially exposed employees.
- Training specified by the applicable chromium or cadmium standard for workers exposed at the action level for any one day, or who are exposed to chromium or cadmium compounds that are skin irritants.
- Respirator training if respirators are to be used.
- Provide information to workers regarding task-specific chromium or cadmium hazards and control methods, the JSA, work practices, medical surveillance and other applicable information, including any changes that are made to these controls.
- Provide training annually, as appropriate, to workers who continue to have exposure to chromium or cadmium at or above the action level on any one day.
- All training will be recorded and include the identity of the employee trained, the signature of the person who conducted the training and the date of the training.
- Training records must be kept for one year.

Cold Weather Safety Program

Purpose

The purpose of this program is to address control measures to protect employees from stress or injuries when working in cold temperatures.

Scope

Each The Workforce Group, LLC worksite shall implement a site specific cold weather/cold stress hazard assessment and have the control plan approved by the The Workforce Group, LLC Safety Manager.

Responsibilities

Safety Manager

- identify and conduct an assessment of , tasks and occupations where there is the potential for cold stress
- implement and/or provide controls (engineering, administrative or personal protective equipment) to minimize cold stress
- provide training and education regarding cold stress, including early signs and symptoms of cold-related exposure

Worker Responsibilities

- adhere to all control measures or work procedures that have been designed and implemented to reduce exposure to conditions that could cause cold stress
- leave cold environments if signs or symptoms of cold-related stress appear
- wear all required cold temperature clothing and PPE
- immediately report any signs or symptoms of cold-related stress

Cold Temperature Procedures

Health Effects of Cold Stress

Warning signs of hypothermia can include complaints of nausea, fatigue, dizziness, irritability or euphoria. Workers can also experience pain in their extremities (hands, feet, ears, etc.), and severe shivering. Workers should be moved to a heated shelter and seek medical advice when appropriate.

Hazard Assessment

An assessment will be conducted by the Safety Manager to identify the types of jobs or employees who are at risk for cold exposure. Jobs that are at risk for cold exposure include, but

Safety Management Plan

Cold Weather Safety
Program

are not limited to: airport ground personnel, auto repair and refuelling, cold storage, construction and demolition, ice making, logging, mining, oil and gas drilling, pulp and paper, railroad and trucking, snow and trash removal, utility repair and warehousing. The assessment must also consider employees who work inside but have to go outside for any portion of the shift to either perform work or to travel to transportation departure or arrival points.

Facilities

- Regularly used walkways and travel ways shall be sanded, salted or cleared of snow and ice as soon as practicable.
- Employees will be informed of the dangers associated with working around unstable snow and ice build-ups. All employees will be informed of the dangers and destructive potential caused by unstable snow build-up, sharp icicles, ice dams and know how to prevent incidents caused by them.
- When dangerous overhead build-ups of snow or ice are present barricades will be used to prevent staff from walking or driving into potential fall zones.

Clothing, PPE and Supplies

Proper cold weather protection must be worn by employees when working in cold, wet and windy conditions. Protective clothing is the most important way to avoid cold stress. The type of fabric also makes a difference.

Cotton loses its insulation value when it becomes wet. Wool, silk and most synthetics, on the other hand, retain their insulation even when wet. The following are recommendations for working in cold environments:

- Wear at least three layers of clothing. An inner layer of wool, silk or synthetic to wick moisture away from the body – a middle layer of wool or synthetic to provide Insulation even when hot - an outer wind and rain protection layer that allows some ventilation to prevent overheating.
- Wear a hat or hood. Up to 40% of body heat can be lost when the head is left exposed.
- Keep a change of dry clothing available in case work clothes become wet.
- With the exception of the wicking layer do not wear tight clothing. Loose clothing allows better ventilation of heat away from the body.
- Do not underestimate the wetting effects of perspiration. Oftentimes wicking and venting of the body's sweat and heat are more important than protecting from rain or snow.
- Wear insulated boots or other footwear. Felt-lined, rubber bottomed, leather-topped boots with removable felt insoles are best suited for heavy work in cold since leather is porous, allowing the boots to "breathe" and let perspiration evaporate.
- Liner socks made from polypropylene will help keep feet dry and warmer by wicking sweat away from the skin. Always wear the right thickness of socks for your boots.

Safety Management Plan

Cold Weather Safety
Program

- In extremely cold conditions, where face protection is used, eye protection must be separated from the nose and mouth to prevent exhaled moisture from fogging and frosting eye shields or glasses.
- Clothing must be dry. Moisture should be kept off clothes by removing snow prior to entering heated shelters.

Cold weather supplies will be regularly inspected and restocked when necessary by The Workforce Group, LLC. Regular inspections on cold weather supplies such as hand warmers, jackets, shovels, etc. will be carried out to ensure that supplies are always in stock.

Preventative Controls That Are Implemented to Avoid Cold Induced Injuries

- Workers will be under constant protective observation by a co-worker or supervisor. The Workforce Group, LLC will implement a "Buddy System" to ensure that no employee is working alone in cold work environments.
- Some preventive measures include drinking plenty of liquids, avoiding caffeine and alcohol.
- It is easy to become dehydrated in cold weather. If possible, heavy work should be scheduled during the warmer parts of the day.
- Take breaks out of the cold.
- Try to work in pairs to keep an eye on each other and watch for signs of cold stress.
- Avoid fatigue since energy is needed to keep muscles warm.
- Take frequent breaks and consume warm, high calorie food such as pasta to maintain energy reserves.
- If a worker exposed to cold shows signs or reports symptoms of cold stress or injury the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician.
- For continuous work in temperatures below the freezing point, heated warming shelters such as tents, cabins or rest rooms should be available. The work should be paced to avoid excessive sweating. If such work is necessary, proper rest periods in a warm area should be allowed and employees should change into dry clothes.
- New employees should be given enough time to get acclimatized to cold and protective clothing before assuming a full work load.
- For work below the freezing point, metal handles and bars should be covered by thermal insulating material. Also, machines and tools should be designed so that they can be operated without having to remove mittens or gloves.

Training

Safety Management Plan

Cold Weather Safety
Program

The Workforce Group, LLC employees who are required to work in cold weather conditions will receive initial and annual training regarding the health effects of cold exposure and proper rewarming procedures, recognition of and first aid for frostbite and hypothermia, required protective clothing, proper use of warming shelters, the buddy system, maintaining communications, vehicle breakdown procedures and proper eating and drinking habits for working in the cold.

Health Effects

Where employees are exposed to work conditions that may present a hazard because of excessive cold The Workforce Group, LLC shall ensure that a competent person provides training to ensure the employees are familiar with the signs and symptoms of cold weather induced health problems such as hypothermia, frostbite and trench foot. Training will include:

- Hypothermia occurs when body heat is lost faster than it can be replaced. When the core body temperature drops below the normal 98.6°F to around 95°F the onset of symptoms normally begins. The person may begin to shiver and stomp their feet in order to generate heat. Workers may lose coordination, have slurred speech and fumble with items in the hand. The skin will likely be pale and cold.
- Frostbite occurs when the skin actually freezes and loses water. In severe cases, amputation of the frostbitten area may be required. While frostbite usually occurs when the temperatures are 30°F or lower, wind chill factors can allow frostbite to occur in above freezing temperatures. Frostbite typically affects the extremities, particularly the feet and hands. The affected body part will be cold, tingling, stinging or aching followed by numbness. Skin color turns red, then purple, then white and is cold to the touch. There may be blisters in severe cases.
- Trench Foot or immersion foot is caused by having feet immersed in cold water at temperatures above freezing for long periods of time. It is similar to frostbite, but considered less severe. Symptoms usually consist of tingling, itching or a burning sensation. Blisters may be present.

Workers and supervisors involved with work in cold environments should be informed about symptoms of adverse effect exposure to cold, proper clothing habits, safe work practices, physical fitness requirements for work in cold, and emergency procedures in case of cold injury. While working in cold, a buddy system should be used. Look out for one another and be alert for the symptoms of hypothermia.

First Aid Training

Employees will be trained to administer proper first aid treatment on cold induced injuries or illnesses. All The Workforce Group, LLC employees who are required to perform work in cold

Safety Management Plan

Cold Weather Safety
Program

conditions will be knowledgeable on how to administer first aid treatment on cold induced injuries or illnesses.

All training shall be documented.

Compressed Gas Cylinders Program

Purpose

The purpose of this program is to prevent injury from failing or failure of compressed gas cylinders and to establish requirements for handling, lifting and storing compressed gas cylinders safely.

Scope

This program covers all employees and contractors who handle, transport and/or use compressed gas cylinders.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper handling, storage and use requirements for compressed gas cylinders.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.

Employees

- Shall follow all requirements regarding the safe handling, storage and use of compressed gas cylinders.

Procedure

General

Cylinders shall not be accepted, stored or used if evidence of denting, bulging, pitting, cuts, neck or valve damage is observed. If damage is observed:

- The cylinder must be taken out of service.
- The cylinder's owner shall be notified to remove the cylinder from the premises.
- If owned, the cylinder shall be de-pressured and inspected as required by this program.

Cylinder Identification

Gas identification shall be stenciled or stamped on the cylinder or a label used. No compressed gas cylinder shall be accepted for use that does not legibly identify its content by name.

Safety Management Plan

Compressed Gas
Cylinders Program

Handling

Valve caps must be secured onto each cylinder before moving or storage.

Secure the cylinder in a blanket when being lifted by mechanical means. Slings, ropes or electromagnets are prohibited to be used for lifting compressed gas cylinders.

The preferred means to move compressed gas cylinders is with a cart, carrier or with a helper.

Compressed gas cylinders must not be allowed to strike each other.

When a cylinder cap cannot be removed by hand the cylinder shall be tagged "Do Not Use" and returned to the designated storage area for return to vendor.

Storing

All cylinders must be secured upright in a safe, dry, well-ventilated area that limits corrosion and deterioration.

- Cylinders must be secured by means that will prevent the cylinder from falling.
- When securing the cylinder, the restraints shall not be attached to electrical conduit or process piping.

Empty and non-empty cylinders shall be stored separately. All stored cylinders shall be capped.

Oxygen cylinders must be stored a minimum of 20 feet from combustible gas cylinders or areas where there may be open flame or arcing. Cylinders may also be stored where the oxygen is separated from combustible gas cylinders by a 5 foot or higher wall with a fire resistance rating of 30 minutes.

Storage areas for full and empty cylinders must be designated and labeled. Cylinders should be stored in definitely assigned places away from elevators, stairs or gangways.

Use

Cylinders must be equipped with the correct regulators. Regulators and cylinder valves should be inspected for grease, oil, dirt and solvents. Only tools provided by the supplier should be used to open and close cylinder valves.

Never force or modify connections.

Only regulators and gauges shall be used within their designated ratings.

The use of a pressure-reducing regulator is required at the cylinder, unless the total system is designed for the maximum cylinder pressure.

Safety Management Plan

Compressed Gas
Cylinders Program

Valves must be closed when cylinders are not in use.

Cylinders shall not be used as rollers or supports.

Cylinders shall not be placed where they can come in contact with electrical circuits.

Cylinders must be protected from sparks, slag or flame from welding, burning or cutting operations.

Empty cylinders must be returned to designated storage areas as soon as possible after use.

Inspection of Compressed Gas Cylinders

The Workforce Group, LLC shall determine that compressed gas cylinders under its control are in a safe condition to the extent that this can be determined by visual inspection. Visual and other inspections shall be conducted as prescribed in the Hazardous Materials Regulations of the Department of Transportation (49 CFR parts 171-179 and 14 CFR part 103). Where those regulations are not applicable, visual and other inspections shall be conducted in accordance with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962. Some elements include, but are not limited to:

- Hoses and connections should be inspected regularly for damage. Hoses should be stored in cool areas and protected from damage.
- These owned cylinders shall be visually inspected prior to charging, before each use and at least annually.
- All inspections and testing must be documented.

High Pressure Cylinders are those cylinders marked for service pressures of 900 psi and greater.

- High pressure cylinders shall be taken out of service and submitted for re-qualification testing when any of the following conditions are identified by visual inspection.
- Cuts, dings, gouges, dents bulges, pitting, neck damage or evidence of exposure to fire.
- The cylinders shall be inspected and retested according to the requirements stated in 49 CFR 180.205 and .209.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Low Pressure Cylinders are those cylinders marked for service pressures of less than 900 psi.

- Low pressure cylinders fall into two categories, those requiring requalification and those that do not require re-qualification.

Safety Management Plan

Compressed Gas
Cylinders Program

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- Low pressure cylinders that do not require re-qualification shall be taken out of service and condemned when any of the following conditions are identified during inspection:
 - The tare weight of the cylinder is less than 90% of the stamped on weight of the cylinder.
 - Observed pitting, dents, cuts, bulging, gouges or evidence of exposure to fire.
 - Low pressure cylinders subject to re-qualification shall be taken out of service, inspected and retested when visual inspection identifies any of the following conditions; dents, bulges, pitting or neck damage.
 - Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Leaking Cylinders

Leaking cylinders should be moved promptly to an isolated, well-ventilated area, away from ignition sources. Soapy water should be used to detect leaks. If the leak is at the junction of the cylinder valve and cylinder, do not try to repair it. Contact the supplier and ask for response instructions.

Transportation

Cylinders must be transported in a vertical secured position using a cylinder basket or cart and must not be rolled. Regulators should be removed and cylinders capped before movement. Cylinders should not be dropped or permitted to strike violently and protective caps are not used to lift cylinders.

Empty Cylinder Marking

Cylinders should be marked as "MT" and dated when empty. Never mix gases in a cylinder and only professionals should refill cylinders. Empty cylinders must be handled as carefully as when filled.

Engineering Controls

Engineering controls such as emergency shutoff switches, gas cabinets and flow restrictors should be used wherever possible to control hazards. Emergency eyewash facilities should be present where corrosive gases or materials are used.

Confined Space Program

Purpose

The purpose of this program is to ensure the safety of all employees and contractors working for The Workforce Group, LLC and to comply with all regulations and host clients that pertain to confined spaces.

Scope

This program covers all employees and other workers that may be involved in confined space entry. When work is performed on a non-owned or operated site, the operator's program shall take precedence. This document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Acceptable entry conditions - the conditions that must exist in a confined space to allow entry and to ensure that employees involved with a confined space entry can safely enter into and work within the space.

Attendant - an individual stationed outside one or more Confined spaces who monitors the authorized Entrants and who performs all Attendant's duties assigned in the The Workforce Group, LLC Confined Spaces Program. Attendants must have sufficiently completed and fully understands the Confined Space training and is approved by the HSE Manager to work in a confined space as an Attendant.

Authorized Entrant - an individual who is authorized by The Workforce Group, LLC to enter a confined space. Entrants must have sufficiently completed and fully understands the Confined Space training and is approved by the HSE Manager to work in a confined space as an Authorized Entrant.

Blanking or Blinding - the absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.

Confined Space

- A space that is large enough and so configured that an employee can bodily enter and perform assigned work;

Safety Management Plan

Confined Space Program

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- Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
 - Is not designed for continuous occupancy.

Double block and bleed - the closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.

Emergency - any occurrence (including any failure of hazard control or monitoring equipment) or an event internal or external to the confined space that could endanger Entrants.

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

Entry - the action by which a person passes through an opening into a confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the Entrant's body breaks the plane of an opening into the space.

Entry permit – means the written or printed document that is provided by The Workforce Group, LLC to allow and control entry into a confined space that contains the information specified in this program.

Entry Supervisor - the person responsible for determining if acceptable entry conditions are present at a confined space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section.

- Entry Supervisors must have sufficiently completed and fully understands the Confined Space training and is approved by the HSE Manager to work in a confined space.
- 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 section 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.
- The Entry Supervisor is responsible to test and monitor the atmosphere conditions.

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 confined space), injury, or acute illness from one or more of the following causes:

- Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL), (0% is normal).

Safety Management Plan

Confined Space Program

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- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent, (20.9 % is normal).
 - Any other atmospheric condition that is immediately dangerous to life or health. (Ex.- H₂S 10%, 0% is normal).
 - 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 that comply with the Hazard Communication Standard, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

Hot work permit - the written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.

Immediately dangerous to life or health (IDLH) - any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a confined space.

- Note: Some materials -- hydrogen fluoride gas and cadmium vapor, for example -- may produce immediate transient effects that, even if severe, may pass without medical attention, but are followed by sudden, possibly fatal collapse 12-72 hours after exposure. The victim "feels normal" from recovery from transient effects until collapse. Such materials in hazardous quantities are considered to be "immediately dangerous to life or health".

Inerting - the displacement of the atmosphere in a permit space by a non-combustible gas (such as nitrogen) to such an extent that the resulting atmosphere is non-combustible. This procedure produces an IDLH oxygen deficient atmosphere.

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

Line Breaking - the intentional opening of a pipe, line, or duct that is or has been carrying flammable, corrosive, or toxic material, an inert gas, or any fluid at a volume, pressure, or temperature capable of causing injury.

Non-Permit 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.

Safety Management Plan

Confined Space Program

Oxygen deficient atmosphere - an atmosphere containing less than 19.5 percent oxygen by volume.

Oxygen enriched atmosphere - an atmosphere containing more than 23.5 percent oxygen by volume.

Permit-Required Confined Space - a confined space that has one or more of the following characteristics:

- Contains or has a potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an Entrant.
- 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.
- Contains any other recognized serious safety or health hazard.

Permit system - the employer's written procedure for preparing and issuing permits for entry and for returning the confined space to service following termination of entry.

Prohibited condition - any condition in a confined space that is not allowed by the permit during the period when entry is authorized.

Rescue service - the personnel designated to rescue employees from Permit-Required Confined Spaces.

Retrieval system - the equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from confined spaces.

Testing - the process by which the hazards that may confront Entrants of a confined space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

Safety Management Plan

Confined Space Program

Responsibilities**Managers/Supervisor**

- Shall ensure that all employees have been trained and fully understand the requirements of this program.
- Shall provide the necessary equipment to comply with these requirements and ensure that all employees are trained on its use.
- Shall ensure that all confined space assessments have been conducted and documented.
- Shall ensure that provisions and procedures are in place for the protection of employees from external hazards including but not limited to pedestrians, vehicles and other barriers and by use of the pre-entry checklist verifying that conditions in the permit space are acceptable for entry during its duration.
- Shall ensure that all Permit-Required Confined Spaces permits are posted.
- Shall ensure an annual review of the program including all entry permits issued that during that annual period.
- Shall ensure that confined spaces are identified properly as either a Non-Permit Confined Space or a Permit-Required Confined Space.
- Shall ensure that all confined spaces that have been identified as “no entry” have signs that state, “DANGER- DO NOT ENTER”.
- Shall ensure signs have been posted at all Permit-Required Confined Space areas that state, “DANGER – PERMIT ENTRY CONFINED SPACE” along with the proper warning word such as “ASPHYXIAANT, FLAMMABILITY or TOXIC HAZARD”
- Shall file all permits at the area offices for review. Permits shall be kept on file for one year.

Affected Employee

- Shall attend Confined Space Entry training commensurate with their duties and when duties change as required.
- Shall comply with all aspects of this program.
- Authorized Entrants, Attendants and Entry Supervisors may be any The Workforce Group, LLC employee that is authorized by management to work in a confined space setting and that has been trained and is proficient in the understanding of program requirements.

Authorized Entry Supervisor Duties

- Shall have a tailgate safety meeting, with all workers to be involved in the confined space entry and review the job to be performed and what safety concerns may be present.
- Shall confirm that all isolation, Lock/out and Tag/outs have been completed prior to entry into a confined space.
- Shall ensure that the requirements of this program are followed and maintained.

Safety Management Plan

Confined Space Program

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- Shall test all atmosphere conditions prior to entry and shall complete and maintain the confined space permit form, and have it accessible for review on the job site at all times.
 - Shall notify The Workforce Group, LLC supervisor of entry into a confined space, and notify the supervisor of any changes that may occur, during an entry.
 - If the confined space poses a hazard that cannot be eliminated, the Entry Supervisor must arrange for a rescue services.
 - If the confined space poses no hazards to the Entrants, the Entry Supervisor can reclassify the confined space to a Non-Permit Confined Space.
 - A stand-by rescue team is not required to be on site for Non-Permit Confined Space entries.

Authorized Attendant Duties

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- Is aware of possible behavioral effects of hazard exposure in authorized Entrants.
- Continuously maintains communication and an accurate count of authorized Entrants in the confined space and ensures that the means used to identify authorized Entrants, and accurately identifies who is in the confined space.
- Remains outside the confined space during entry operations until relieved by another Attendant.
- If more than one confined space is to be monitored by a single attendant, the program must include the means & procedures that will be used in order to enable the attendant to respond to emergencies in one or more permit spaces that he/she is monitoring without distraction from all responsibilities.
- Attendants may enter a confined space to attempt a rescue, if they have been trained and equipped for rescue operations as required and only when they have been relieved by another authorized Attendant.
- Monitors activities inside and outside the confined space to determine if it is safe for Entrants to remain in the space and orders the authorized Entrants to evacuate the confined space immediately under any of the following conditions:
 - If the Attendant detects a prohibited condition;
 - If the Attendant detects the behavioral effects of hazard exposure in an authorized Entrant;
 - If the Attendant detects a situation outside the space that could endanger the authorized Entrants;
 - If the Attendant cannot effectively and safely perform all the duties required.
- Summon rescue and other emergency services as soon as the Attendant determines that authorized Entrants may need assistance to escape from confined space hazards.
- Takes the following actions when unauthorized persons approach or enter a confined space while entry is underway:

Safety Management Plan

Confined Space Program

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- Warn the unauthorized persons that they must stay away from the confined space;
 - Advise the unauthorized persons to exit the confined space immediately, if they have entered the space;
 - Inform the authorized Entrants and the Entry Supervisor if unauthorized persons have entered the confined space.
 - Performs no duties that might interfere with the Attendant's primary duty to monitor and protect the authorized Entrants.
 - Authorized Attendants shall not monitor more than one confined space at a time.

Authorized Entrant Duties

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- Uses appropriate personal protective equipment properly, e.g., face and eye protection, and other forms of barrier protection such as gloves aprons, coveralls, and breathing equipment;
- Is aware of possible behavioral effects of hazard exposure in authorized Entrants;
- Shall witness and verify calibrated air monitoring data and if approved, sign off, before entry is made.
- Is entitled to request additional monitoring at any time.
- Maintain communication with the Attendants to enable the Attendant to monitor the Entrants status as well as to alert the Entrant to evacuate if needed; and
- Exit from confined spaces as soon as possible when ordered by an Attendant or Entry Supervisor, when the Entrant recognizes the warning signs or symptoms of an exposure exists, or when a prohibited condition exists, or when an alarm is activated.

Procedure**Non-Permit Confined Space Entry**

If testing of the confined space atmosphere is within acceptable limits without the use of forced air ventilation and the space is properly isolated, the space can be entered by following the requirements for Level I confined space entry.

- Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
- Entrants shall review and sign the confined space permit.

Employees may enter and work in the confined space as long as LEL, O2, and toxicity hazards remain at safe levels.

- Complete the The Workforce Group, LLC Confined Space Entry Permit to document that there are no confined space hazards. Make this certification available to all personnel entering the space.

Safety Management Plan

Confined Space Program

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- A trained Attendant must always be outside the confined space. The Attendant must monitor the authorized Entrants for the duration of the entry operation.

Exception: The Attendant requirements for Level I confined space entry may be exempted, if the job assessment is performed and has determined that there are no inherent dangers to allow single person entry.

- This provision is intended to permit field operations to enter crankcases, shallow valve boxes, cellars, excavations, etc. without an Attendant being present and all other aspects of the entry permit complied with.
- When there are changes in the use and configuration of a confined space that might increase the hazards to the Entrants (e.g., using epoxy coating on a tank floor, welding, painting, etc.), re-evaluate the space. If necessary, reclassify the space as a Permit-Required Confined Space.
- Continuously monitor the confined space atmosphere to ensure that it is still safe.
- The space must not contain a hazardous atmosphere while personnel are inside.
- If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
- Re-evaluate the space to determine how the hazardous atmosphere developed.
- The Entry Supervisor shall cancel the entry permit.
- Take action to protect personnel before any subsequent activity to re-enter the space takes place.
- Reissue the The Workforce Group, LLC Confined Space Entry Permit before allowing Entrants to re-enter the space.
- If necessary, reclassify the space as a Permit-Required Confined Space.
- Ensure that vehicle or other equipment exhaust does not enter the space.

Permit-Required Confined Space Entry

If the space is properly isolated and results of air monitoring are above acceptable parameters without local exhaust ventilation in operation, classify the entry as a Permit-Required Confined Space.

- Complete the The Workforce Group, LLC Confined Space Entry Permit before proceeding with work in a Permit-Required Confined Space.
- Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
- Entrants shall review and sign the confined space permit.
- At least one trained Attendant must always be outside the Permit-Required Confined Space.
- The Attendant must monitor the authorized Entrants for the duration of the entry operation.
- Only authorized Entrants may enter a Permit-Required Confined Space.

Safety Management Plan

Confined Space Program

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- All Entrants must sign in and out on the entry permit when entering and leaving a Permit-Required Confined Space.
 - The back of the permit or a sign-in sheet must be used for this purpose.
 - Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited.
 - Conditions must be continuously monitored where Entrants are working to determine that acceptable conditions are maintained during entry.
 - If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
 - The Entry Supervisor shall cancel the entry permit.
 - Re-evaluate the space to determine how the hazardous atmosphere developed.
 - Take action to protect personnel before any subsequent activity to re-enter the space takes place.
 - Re-issue the The Workforce Group, LLC Confined Space Entry Permit before allowing Entrants to re-enter the space.
 - Employees or their representatives are entitled to request additional monitoring at any time.
 - The permit must be terminated when the entry operations are complete or when permit conditions change (i.e., hazardous air monitoring results are noted, unsafe behaviors are observed, etc.).
 - The minimum rescue equipment required for Permit-Required Confined Space entry is covered in the Rescue & Emergency section of this program.
 - Permit-Required Confined Space entry operations will be reviewed when The Workforce Group, LLC believes that the requirements of this confined space program may not adequately protect personnel.
 - If deficiencies are found in the program, the program will be revised and personnel will be trained in the new revisions before subsequent entries are authorized.

Pre-Job Planning and Space Preparation

The Entry Supervisor must determine that the confined space is properly isolated by blinding, disconnecting, and/or by following local Lockout/Tagout procedures.

The Entry Supervisor must discuss with all Entrants the hazards of the space, communication methods and emergency procedures during the confined space entry.

Eliminate any condition making it unsafe to open the equipment to atmosphere.

Promptly guard the opening to prevent an accidental fall through the opening and to protect each employee working in the space from foreign objects entering the space.

Safety Management Plan

Confined Space Program

If applicable, wash, steam, ventilate or degas the confined space to properly free it of possible contaminants. Vent vapors to a safe location.

Do not allow unauthorized personnel to enter a confined space. Barricade and/or guard all confined spaces to prevent entry of unauthorized Entrants.

If performing hot work in the confined space, precautions must be taken consistent with the The Workforce Group, LLC Hot Work Permit procedure.

Ensure that vehicle or other equipment exhaust does not enter the space.

Pre-Entry Safety Meeting

The Entry Supervisor must declare when the confined space is ready for entry.

The Entry Supervisor shall hold a pre-entry safety meeting to discuss all requirements and procedures with all authorized Entrant(s) and Attendant(s) involved with the entry. He/she will discuss other concerns such as previous contents, vessel coating, PPE required etc., during this meeting.

The Entry Supervisor must coordinate entry operations when employees of more than one company are working simultaneously in the confined space. This coordination is necessary so that one company's work does not endanger the employees of another company.

Equipment

Check all work equipment to ensure that it has the proper safety features and is approved for the locations where it will be used. The Entry Supervisor shall ensure that all equipment is properly maintained in a safe condition and that Entrants use the equipment properly.

The following equipment must be considered and may be required when entering a confined space:

- Atmospheric Testing and Monitoring Equipment.
- Barriers, Shields, and Signs – Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited. Any signs used must state “Danger – Permit Entry Confined Space” along with the proper warning word such as “Asphyxiant, Flammability or Toxic Hazard”. All barricades must be capable of preventing a person from inadvertently walking into or kicking an object into the space.
- Communications Equipment – Only use intrinsically safe equipment in areas where a hazardous atmosphere may exist. Use a communication system that will keep the Attendant in constant, direct communication with the Entrant(s) working in the confined space. Also, use a communication system that allows the Attendant to summon help from rescue or emergency service.

Safety Management Plan

Confined Space Program

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- Entry and Exit Equipment – (For example: ladders may be needed for safe entry and exit).
 - Lighting Equipment – Needed for safe entry, work within the space and exit. Lighting equipment used in the confined space must be certified safe for the location.
 - Portable electric lighting used in wet and/or other conductive locations (drums, tanks, vessels) must be operated at 12 volts or less. 120 volt lights may be used if protected by a ground-fault circuit interrupter.
 - Personal Protective Equipment – Ensure that personnel wear the required personal protective equipment. For respiratory protection requirements, refer to the Respiratory Protection Program.
 - Rescue and Emergency Equipment – Except if provided by outside rescue services.
 - The Attendants must also have an approved first aid kit.
 - Vacuum Trucks – When used, trucks must be properly grounded or bonded to prevent static sparks.
 - Ventilating Equipment – Local exhaust air movers used to obtain acceptable atmospheric entry conditions (e.g., Copus air movers).
 - Other – Any other equipment necessary for safe entry into and rescue from permit required confined spaces.

Air Monitoring

- Before an employee enters the space, the internal atmosphere shall be tested, with a calibrated direct-reading instrument, for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants, in that order. Monitoring of the space must inform the entrants of the potential hazards and results and they must participate in the permit review and signing.
- Air shall be periodically test while continuous ventilation is applied.
- Any employee, who enters the space, or that employee's authorized representative, shall be provided an opportunity to observe the pre-entry testing required by this paragraph.
- Employees or their representatives are entitled to request additional air monitoring at any time.

Ventilation

Continuous forced air ventilation must be used and tested as follows:

- An employee may not enter the space until the forced air ventilation has eliminated any hazardous atmosphere;
- The forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is or will be present within the space and shall continue until all employees have left the space;
- The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space.

Safety Management Plan

Confined Space Program

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- The atmosphere within the space shall be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. Any employee, who enters the space, or that employee's authorized representative, shall be provided with an opportunity to observe the periodic testing and may request additional monitoring at any time.
 - If a hazardous atmosphere is detected during entry each employee shall leave the space immediately and the space shall be evaluated to determine how the hazardous atmosphere developed; and measures shall be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.

Multiple Employer Procedure

In order not to endanger the employees of any other employer, the Entry Supervisor shall:

- Verify that all contractor employees have been trained in confined space and that all contractor employees fully understand the The Workforce Group, LLC procedures pertaining to Confined Space.
- Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting the requirements of this section.
- Apprise the contractor of the elements, including the hazards identified and the employees experience with the space, that make the space in question a permit space.
- Inform the contractor of any precautions or procedures that The Workforce Group, LLC has implemented for the protection of employees in or near permit spaces where contractor personnel will be working.
- Coordinate entry operations with the contractor, when both The Workforce Group, LLC personnel and contractor personnel will be working in or near confined spaces.
- Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in confined spaces during entry operations.
- In addition to complying with the confined space requirements that apply to all employees; each contractor, who is retained to perform permit space entry operations, shall:
 - Obtain any available information regarding confined space hazards and entry operations from the The Workforce Group, LLC Entry Supervisor.
 - Coordinate entry operations with the The Workforce Group, LLC Entry Supervisor, when both The Workforce Group, LLC personnel and contractor personnel will be working in or near permit spaces.
 - Inform The Workforce Group, LLC of the confined space program that the contractor will follow and of any hazards confronted or created in the confined space, either through a debriefing or during the entry operation.

Safety Management Plan

Confined Space Program

Rescue and Emergency ServicesGeneral

Rescue service must be on-site for immediately dangerous to life and health (IDLH) conditions while work is being performed. Rescue services must be either:

- Provided by the host facility,
- Provided by an outside service which is given an opportunity to examine the entry site, practice rescue and decline as appropriate, or
- Provided by The Workforce Group, LLC by selecting a rescue team that is equipped and trained to perform the needed rescue services.
- The Attendant shall order the other Entrants not to move the injured nor allow untrained or unauthorized workers into the space that are not trained to handle a confined space rescue.
- Material Safety Data Sheet's for substances that an injured Entrant was exposed to must be provided to the medical facility treating the injured worker.

Permit-Required Confined Space Rescue:

- When the Attendant becomes aware of the need for rescue, the Attendant shall immediately summon the onsite rescue team by the agreed upon communication method, verbally, radio or cell phone, without leaving the vicinity of the confined space.
- The Attendant shall prevent unauthorized personnel from attempting a rescue.
- After the rescue team has been notified, the Attendant shall alert the Entry Supervisor of the emergency via the same communication methods.
- The preferred means of providing rescue service is through the use of a qualified outside rescue service vendor (client host). The outside rescue service vendor must be:
 - Informed of the hazards that they may confront during a rescue;
 - Provided access to the Permit-Required Confined Space to examine the entry site, practice rescue, and decline as appropriate.
 - Access to the space allows the rescue service and local supervision to jointly develop appropriate rescue plans.
 - If the host operator is designated to provide rescue services for The Workforce Group, LLC, the agreement of services must be included in contract for the job.
- If The Workforce Group, LLC employees are to perform Permit-Required Confined Space rescues, they must be:
 - Provided and trained in the use of the proper personal protective equipment necessary to make the rescue;
 - Provided PPE at no cost
 - Trained to perform the assigned duties;
 - Required to practice making rescues at least once every 12 months;

Safety Management Plan

Confined Space Program

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- Trained in basic first aid and CPR.
 - A minimum of one member of the rescue team must hold a current certification in first aid and CPR.

Non-entry Rescue

- To facilitate non-entry rescue, an Entrant must be attached to a retrieval system whenever he/she enters a Permit-Required Confined Space with a vertical depth of more than 5 feet.
- The retrieval equipment is not required if it will increase the overall risk of the entry, e.g., creating an entanglement hazard, or will not contribute to the rescue of the Entrant.
- Each Entrant shall use a full body harness equipped with a “D” ring located between the shoulders or above the head.
- Wristlets may be used instead of the full body harness, if the use of the full body harness is not feasible or creates a greater hazard *and* that using wristlets is the safest and most effective alternative.
- The retrieval line must be attached to the “D” ring and the other end of the retrieval line attached to a retrieval device or fixed point located outside the space so that rescue can begin as soon as the rescuer becomes aware that rescue is necessary.

Issuance/Reviewing of Permit

Only when all pre-entry requirements are satisfied, the Entry Supervisor shall issue a completed and signed confined space permit. The confined space permit is valid for one shift.

In the event of any unauthorized entry, employee complaints, a hazard not covered by the permit, the occurrence of an injury or near miss the entry permit shall be cancelled and a review shall be conducted to provide employee protection and for revising the program prior to authorizing subsequent entries.

An annual review of this program, using the cancelled permits retained within 1 year after each entry shall be conducted by the HSE Manager to revise the program as necessary, to ensure that employees are protected. If no confined space entries were performed during a 12 month period, no review is necessary.

Termination and Closing or Cancelling of Permits

The Entry Supervisor shall terminate the confined space permit, at the end of the job operation, at the end of the shift or when the Entry Supervisor or Attendant determine that conditions in or near the confined space have changed and is hazardous to the Entrants.

The Entry Supervisor shall, at the conclusion of entry operation, close out the permit and provide the safety department the original copy of the Confined Space Permit.

Safety Management Plan

Confined Space Program

Training

Training shall be provided so that all employees whose work is regulated by this program acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned to them.

Training shall be provided to each affected employee, before the employee is first assigned duties under this program, if a new hazard has been created or special deviations have occurred and before there is a change in assigned duties.

The employee shall be retrained:

- Whenever there is a change in confined space operations that presents a hazard about which an employee has not previously been trained.
- Whenever the supervisor has reason to believe either that there are deviations from the permit space entry procedures required by this section or that there are inadequacies in the employee's knowledge or use of these procedures.

The training shall establish employee proficiency in the duties required by this program and shall introduce new or revised procedures, as necessary.

The supervisor shall certify that the training required by this program has been accomplished.

- The certification shall contain each employee's name, the signatures or initials of the trainers, and the dates of training.
- The certification shall be available for inspection by employees, their authorized representatives, management, clients and the safety department.

Construction Cranes Program

Purpose

Overhead cranes, hoists, and rigging equipment are used by The Workforce Group, LLC employees for lifting and moving materials. In order to maintain a safe workplace for its employees and comply with new regulations, only qualified individuals shall operate these devices. This program outlines the procedures for safe operations and the training requirements regarding overhead cranes, hoists and rigging equipment.

Scope

Applies to all The Workforce Group, LLC employees who operate overhead cranes, hoists, and rigging equipment in the scope of their job duties and assignments. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

A/D director (Assembly/Disassembly director); means an individual who meets this subpart's requirements for an A/D director, irrespective of the person's formal job title or whether the person is non-management or management personnel.

Articulating crane means a crane whose boom consists of a series of folding, pin connected structural members, typically manipulated to extend or retract by power from hydraulic cylinders.

Assembly/Disassembly means the assembly and/or disassembly of equipment covered under this standard. With regard to tower cranes, "erecting and climbing" replaces the term "assembly," and "dismantling" replaces the term "disassembly." Regardless of whether the crane is initially erected to its full height or is climbed in stages, the process of increasing the height of the crane is an erection process.

Assist crane means a crane used to assist in assembling or disassembling a crane.

Attachments means any device that expands the range of tasks that can be done by the equipment. Examples include, but are not limited to: an auger, drill, magnet, pile-driver, and boom-attached personnel platform.

Safety Management Plan

Construction Cranes Program

Audible signal means a signal made by a distinct sound or series of sounds. Examples include, but are not limited to, sounds made by a bell, horn, or whistle.

Blocking (also referred to as “cribbing”) is wood or other material used to support equipment or a component and distribute loads to the ground. It is typically used to support lattice boom sections during assembly/ disassembly and under outrigger and stabilizer floats.

Boatswain’s chair means a single-point adjustable suspension scaffold consisting of a seat or sling (which may be incorporated into a full body harness) designed to support one employee in a sitting position.

Bogie means “travel bogie,” which is defined below.

Boom (*equipment other than tower crane*) means an inclined spar, strut, or other long structural member which supports the upper hoisting tackle on a crane or derrick. Typically, the length and vertical angle of the boom can be varied to achieve increased height or height and reach when lifting loads. Booms can usually be grouped into general categories of hydraulically extendible, cantilevered type, latticed section, cable supported type or articulating type.

Boom (*tower cranes*): On tower cranes, if the “boom” (i.e., principal horizontal structure) is fixed, it is referred to as a jib; if it is moveable up and down, it is referred to as a boom.

Boom angle indicator means a device which measures the angle of the boom relative to horizontal.

Boom hoist limiting device includes boom hoist disengaging device, boom hoist shutoff, boom hoist disconnect, boom hoist hydraulic relief, boom hoist kick-outs, automatic boom stop device, or derricking limiter. This type of device disengages boom hoist power when the boom reaches a predetermined operating angle. It also sets brakes or closes valves to prevent the boom from lowering after power is disengaged.

Boom length indicator indicates the length of the permanent part of the boom (such as ruled markings on the boom) or, as in some computerized systems, the length of the boom with extensions/attachments.

Boom stop includes boom stops, (belly straps with struts/standoff), telescoping boom stops, attachment boom stops, and backstops. These devices restrict the boom from moving above a certain maximum angle and toppling over backward.

Boom suspension system means a system of pendants, running ropes, sheaves, and other hardware which supports the boom tip and controls the boom angle.

Safety Management Plan

Construction Cranes Program

Builder means the builder/constructor of equipment.

Center of gravity: The center of gravity of any object is the point in the object around which its weight is evenly distributed. If you could put a support under that point, you could balance the object on the support.

Certified welder means a welder who meets nationally recognized certification requirements applicable to the task being performed.

Climbing means the process in which a tower crane is raised to a new working height, either by adding additional tower sections to the top of the crane (top climbing), or by a system in which the entire crane is raised inside the structure (inside climbing).

Come-a-long means a mechanical device typically consisting of a chain or cable attached at each end that is used to facilitate movement of materials through leverage.

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

Controlled load lowering means lowering a load by means of a mechanical hoist drum device that allows a hoisted load to be lowered with maximum control using the gear train or hydraulic components of the hoist mechanism. Controlled load lowering requires the use of the hoist drive motor, rather than the load hoist brake, to lower the load.

Controlling entity means an employer that is a prime contractor, general contractor, construction manager or any other legal entity which has the overall responsibility for the construction of the project – its planning, quality and completion.

Counterweight means a weight used to supplement the weight of equipment in providing stability for lifting loads by counterbalancing those loads.

Crane/derrick includes all equipment covered by this subpart.

Crawler crane means equipment that has a type of base mounting which incorporates a continuous belt of sprocket driven track.

Crossover points means locations on a wire rope which is spooled on a drum where one layer of rope climbs up on and crosses over the previous layer. This takes place at each flange of the drum as the rope is spooled onto the drum, reaches the flange, and begins to wrap back in the opposite direction.

Safety Management Plan

Construction Cranes Program

Dedicated channel means a line of communication assigned by the employer who controls the communication system to only one signal person and crane/derrick or to a coordinated group of cranes/derricks/signal person(s).

Dedicated pile-driver is a machine that is designed to function exclusively as a pile driver. These machines typically have the ability to both hoist the material that will be pile-driven and to pile-drive that material.

Dedicated spotter (power lines): To be considered a dedicated spotter, the requirements of § 1926.1428 (Signal person qualifications) must be met and his/her sole responsibility is to watch the separation between the power line and: the equipment, load line and load (including rigging and lifting accessories), and ensure through communication with the operator that the applicable minimum approach distance is not breached.

Directly under the load means a part or all of an employee is directly beneath the load.

Dismantling includes partial dismantling (such as dismantling to shorten a boom or substitute a different component).

Drum rotation indicator means a device on a crane or hoist which indicates in which direction and at what relative speed a particular hoist drum is turning.

Electrical contact occurs when a person, object, or equipment makes contact or comes in close proximity with an energized conductor or equipment that allows the passage of current.

Employer-made equipment means floating cranes/derricks designed and built by an employer for the employer's own use.

Encroachment is where any part of the crane, load line or load (including rigging and lifting accessories) breaches a minimum clearance distance that this subpart requires to be maintained from a power line.

Equipment means equipment covered by this subpart.

Equipment criteria means instructions, recommendations, limitations and specifications.

Fall protection equipment means guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems.

Fall restraint system means a fall protection system that prevents the user from falling any distance. The system is comprised of either a body belt or body harness, along with an

Safety Management Plan

Construction Cranes Program

anchorage, connectors and other necessary equipment. The other components typically include a lanyard, and may also include a lifeline and other devices.

Fall zone means the area (including but not limited to the area directly beneath the load) in which it is reasonably foreseeable that partially or completely suspended materials could fall in the event of an accident.

Flange points are points of contact between rope and drum flange where the rope changes layers.

Floating cranes/derricks means equipment designed by the manufacturer (or employer) for marine use by permanent attachment to a barge, pontoons, vessel or other means of flotation.

For example means “one example, although there are others.”

Free fall (of the load line) means that only the brake is used to regulate the descent of the load line (the drive mechanism is not used to drive the load down faster or retard its lowering).

Free surface effect is the uncontrolled transverse movement of liquids in compartments which reduce a vessel’s transverse stability.

Hoist means a mechanical device for lifting and lowering loads by winding a line onto or off a drum.

Hoisting is the act of raising, lowering or otherwise moving a load in the air with equipment covered by this standard. As used in this standard, “hoisting” can be done by means other than wire rope/ hoist drum equipment.

Include/including means “including, but not limited to.”

Insulating link/device means an insulating device listed, labeled, or accepted by a Nationally Recognized Testing Laboratory in accordance with 29 CFR 1910.7.

Jib stop (also referred to as a jib backstop), is the same type of device as a boom stop but is for a fixed or luffing jib.

Land crane/derrick is equipment not originally designed by the manufacturer for marine use by permanent attachment to barges, pontoons, vessels, or other means of floatation.

List means the angle of inclination about the longitudinal axis of a barge, pontoons, vessel or other means of floatation.

Safety Management Plan

Construction Cranes Program

Load refers to the object(s) being hoisted and/or the weight of the object(s); both uses refer to the object(s) and the load-attaching equipment, such as, the load block, ropes, slings, shackles, and any other ancillary attachment.

Load moment (or rated capacity) indicator means a system which aids the equipment operator by sensing (directly or indirectly) the overturning moment on the equipment, i.e., load multiplied by radius. It compares this lifting condition to the equipment's rated capacity, and indicates to the operator the percentage of capacity at which the equipment is working. Lights, bells, or buzzers may be incorporated as a warning of an approaching overload condition.

Load moment (or rated capacity) limiter means a system which aids the equipment operator by sensing (directly or indirectly) the overturning moment on the equipment, i.e., load multiplied by radius. It compares this lifting condition to the equipment's rated capacity, and when the rated capacity is reached, it shuts off power to those equipment functions which can increase the severity of loading on the equipment, e.g., hoisting, telescoping out, or luffing out. Typically, those functions which decrease the severity of loading on the equipment remain operational, e.g., lowering, telescoping in, or luffing in.

Locomotive crane means a crane mounted on a base or car equipped for travel on a railroad track.

Luffing jib limiting device is similar to a boom hoist limiting device, except that it limits the movement of the luffing jib.

Marine hoisted personnel transfer device means a device, such as a "transfer net," that is designed to protect the employees being hoisted during a marine transfer and to facilitate rapid entry into and exit from the device. Such devices do not include boatswain's chairs when hoisted by equipment covered by this standard.

Marine worksite means a construction worksite located in, on or above the water.

Mobile crane means a lifting device incorporating a cable suspended latticed boom or hydraulic telescopic boom designed to be moved between operating locations by transport over the road.

Moving point-to-point means the times during which an employee is in the process of going to or from a work station.

Multi-purpose machine means a machine that is designed to be configured in various ways, at least one of which allows it to hoist (by means of a winch or hook) and horizontally move a suspended load. For example, a machine that can rotate and can be configured with removable forks/tongs (for use as a forklift) or with a winch pack, jib (with a hook at the end) or jib used in conjunction with a winch. When configured with the forks/tongs, it is not covered by this

Safety Management Plan

Construction Cranes Program

subpart. When configured with a winch pack, jib (with a hook at the end) or jib used in conjunction with a winch, it is covered by this subpart.

Nationally recognized accrediting agency is an organization that, due to its independence and expertise, is widely recognized as competent to accredit testing organizations. Examples of such accrediting agencies include, but are not limited to, the National Commission for Certifying Agencies and the American National Standards Institute.

Nonconductive means that, because of the nature and condition of the materials used, and the conditions of use (including environmental conditions and condition of the material), the object in question has the property of not becoming energized (that is, it has high dielectric properties offering a high resistance to the passage of current under the conditions of use).

Operational aids are devices that assist the operator in the safe operation of the crane by providing information or automatically taking control of a crane function. These include, but are not limited to, the devices listed in § 1926.1416 (“listed operational aids”).

Operational controls means levers, switches, pedals and other devices for controlling equipment operation.

Operator means a person who is operating the equipment.

Overhead and gantry cranes includes overhead/bridge cranes, semigantry, cantilever gantry, wall cranes, storage bridge cranes, launching gantry cranes, and similar equipment, irrespective of whether it travels on tracks, wheels, or other means.

Paragraph refers to a paragraph in the same section of this subpart that the word “paragraph” is used, unless otherwise specified.

Pendants includes both wire and bar types. Wire type: a fixed length of wire rope with mechanical fittings at both ends for pinning segments of wire rope together. Bar type: instead of wire rope, a bar is used. Pendants are typically used in a latticed boom crane system to easily change the length of the boom suspension system without completely changing the rope on the drum when the boom length is increased or decreased.

Personal fall arrest system means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body harness and may include a lanyard, deceleration device, lifeline, or suitable combination of these.

Portal crane is a type of crane consisting of a rotating upperstructure, hoist machinery, and boom mounted on top of a structural gantry which may be fixed in one location or have travel

Safety Management Plan

Construction Cranes Program

capability. The gantry legs or columns usually have portal openings in between to allow passage of traffic beneath the gantry.

Power lines means electric transmission and distribution lines.

Procedures include, but are not limited to: instructions, diagrams, recommendations, warnings, specifications, protocols and limitations.

Proximity alarm is a device that provides a warning of proximity to a power line and that has been listed, labeled, or accepted by a Nationally Recognized Testing Laboratory in accordance with 29 CFR 1910.7.

Qualified evaluator (not a third party) means a person employed by the signal person's employer who has demonstrated that he/she is competent in accurately assessing whether individuals meet the Qualification Requirements in this subpart for a signal person.

Qualified evaluator (third party) means an entity that, due to its independence and expertise, has demonstrated that it is competent in accurately assessing whether individuals meet the Qualification Requirements in this subpart for a signal person.

Qualified person means a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, successfully demonstrated the ability to solve/resolve problems relating to the subject matter, the work, or the project.

Qualified rigger is a rigger who meets the criteria for a qualified person.

Range control limit device is a device that can be set by an equipment operator to limit movement of the boom or jib tip to a plane or multiple planes.

Range control warning device is a device that can be set by an equipment operator to warn that the boom or jib tip is at a plane or multiple planes.

Rated capacity means the maximum working load permitted by the manufacturer under specified working conditions. Such working conditions typically include a specific combination of factors such as equipment configuration, radii, boom length, and other parameters of use.

Rated capacity indicator: See load moment indicator.

Rated capacity limiter: See load moment limiter.

Safety Management Plan

Construction Cranes Program

Repetitive pickup points refer to, when operating on a short cycle operation, the rope being used on a single layer and being spooled repetitively over a short portion of the drum.

Running wire rope means a wire rope that moves over sheaves or drums.

Runway means a firm, level surface designed, prepared and designated as a path of travel for the weight and configuration of the crane being used to lift and travel with the crane suspended platform. An existing surface may be used as long as it meets these criteria.

Section means a section of this subpart, unless otherwise specified.

Sideboom crane means a track-type or wheel-type tractor having a boom mounted on the side of the tractor, used for lifting, lowering or transporting a load suspended on the load hook. The boom or hook can be lifted or lowered in a vertical direction only.

Special hazard warnings means warnings of site-specific hazards (for example, proximity of power lines).

Stability (flotation device) means the tendency of a barge, pontoons, vessel or other means of flotation to return to an upright position after having been inclined by an external force.

Standard Method means the protocol in Appendix A of this subpart for hand signals.

Such as means “such as, but not limited to.”

Superstructure: See Upperworks.

Tagline means a rope (usually fiber) attached to a lifted load for purposes of controlling load spinning and pendular motions or used to stabilize a bucket or magnet during material handling operations.

Tender means an individual responsible for monitoring and communicating with a diver.

Tilt up or tilt down operation means raising/lowering a load from the horizontal to vertical or vertical to horizontal.

Tower crane is a type of lifting structure which utilizes a vertical mast or tower to support a working boom (jib) in an elevated position. Loads are suspended from the working boom. While the working boom may be of the fixed type (horizontal or angled) or have luffing capability, it can always rotate to swing loads, either by rotating on the top of the tower (top slewing) or by the rotation of the tower (bottom slewing). The tower base may be fixed in one location or

Safety Management Plan

Construction Cranes Program

ballasted and moveable between locations. Mobile cranes that are configured with luffing jib and/or tower attachments are not considered tower cranes under this section.

Travel bogie (tower cranes) is an assembly of two or more axles arranged to permit vertical wheel displacement and equalize the loading on the wheels.

Trim means angle of inclination about the transverse axis of a barge, pontoons, vessel or other means of floatation.

Two blocking means a condition in which a component that is uppermost on the hoist line such as the load block, hook block, overhaul ball, or similar component, comes in contact with the boom tip, fixed upper block or similar component. This binds the system and continued application of power can cause failure of the hoist rope or other component.

Unavailable procedures means procedures that are no longer available from the manufacturer, or have never been available, from the manufacturer.

Upperstructure: See Upperworks.

Upperworks means the revolving frame of equipment on which the operating machinery (and many cases the engine) are mounted along with the operator's cab. The counterweight is typically supported on the rear of the upperstructure and the boom or other front end attachment is mounted on the front.

Up to means "up to and including."

Wire rope means a flexible rope constructed by laying steel wires into various patterns of multi-wired strands around a core system to produce a helically wound rope.

What is Not Defined as a Crane

- Forklifts, Track Loaders, Excavators (Track Hoe/Backhoe), Concrete Pump Trucks w/boom
- Power Shovels, Digger Derricks, Tow Trucks, Vehicle Mounted Work Platforms
- Self-propelled Elevating Work Platforms, Stacker Cranes, Mechanic's Trucks With Hoisting Devices
- Come-A-Longs and Chain Falls, Gin Poles For Communication Tower Work
- Tree Trimming and tree removal work
- Anchor handling with a vessel or barge using an affixed A-frame

Key Responsibilities

Safety Management Plan

Construction Cranes Program

Managers and Supervisors

- Are responsible to ensure that employees and contractors are trained and qualified on the proper operations and have been trained in crane and hoist safety.
- Shall ensure modifications or additions that may affect the capacity or safe operation of the equipment must not be made without written approval from the manufacturer or approval from a registered professional engineer. The manufacturer must approve all modifications/additions in writing. A registered professional engineer must be qualified with respect to the equipment involved and must ensure the original safety factor of the equipment is not reduced.
- Shall ensure all manufacturer procedures applicable to the operational function of equipment must be complied with. All manufacturer procedures applicable to the operational functions of equipment, including its use with attachments, must be complied with.
- Are responsible to see that all provisions of this program are followed and that crane inspections are performed and the equipment is in safe operating condition.
- Are responsible for identifying hazard areas by marking the boundaries of the crane swing radius with warning lines, railings or similar barriers or other safety measures to be used when the equipment has the potential to strike and injure an employee or pinch/crush an employee against any other object.

Employees

- Employee operators are responsible to follow the requirements of this program and report any damage or needed repairs immediately to their supervisor.
- Operators must meet the physical qualifications, pass a physical, a written examination, understand and be able to use a load chart as well as calculate loads for the crane type operated.
- Employees designated as crane operators are responsible for the entire lift. In addition, crane operators are responsible to:
 - Make the required inspections,
 - Ensure that the crane is maintained,
 - Ensure that all personnel working in the area around the crane are kept clear of all hazards related to crane operations.
 - Determine the weights, and correct rigging required for loads to be lifted.

Crane Operator Certification/Qualification

Operators must be determined to be qualified before they are permitted to operate any crane. Only those employees qualified by training or experience shall be allowed to operate equipment and machinery.

Safety Management Plan

Construction Cranes Program

Within 4 years of November 8th 2010 The Workforce Group, LLC must ensure operators must be qualified/certified by one of the following methods:

Certification by an Accredited Crane Operator Testing Organization

- Accredited by a nationally recognized accrediting agency
- Certification is portable
- Valid for five years
- Program must be reviewed by a nationally recognized accrediting agency every three years

Qualification by an Audited Employer Program

- Developed or approved by an auditor certified by an accredited crane operator testing organization
- Auditor is not an employee of The Workforce Group, LLC
- Tests should be administered per nationally recognized test administration standards
- Program shall be audited within the first three months, then once every three years
- Qualification is not portable and valid for five years

Qualification by the U.S. Military**Licensing by a Government Entity**

- Must meet or exceed requirements of the OSHA standard
- Valid only within the jurisdiction of the government entity
- Valid for time specified by the government entity, but no longer than five years

Certification/Qualification Criteria**Pass written test that include:**

- Controls and operational performance
- Ability to calculate the load/capacity
- Procedures for power line contact
- Site preparation
- Ability to read manuals/charts relevant to the equipment being operated

Pass practical examination**Ability to perform a pre-shift inspection****Operational and maneuvering skills****Application of load chart information****Application of safe shut down and securing procedures**

Safety Management Plan

Construction Cranes Program

Administrative Criteria

- The Workforce Group, LLC must revoke operator's certification if they have reason to believe the employee is not qualified to operate.
- The current training records must be on file during the operator's employment.

Rigger Qualifications

Riggers assemble, rig, hook and unhook, guide, and disassemble crane equipment and materials. Riggers must meet the requirements of a qualified person. A qualified rigger is a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to resolve problems relating to the subject matter, the work, or the project.

Riggers must be trained in all the requirements of the regulations that apply to their respective roles. For example, riggers must be trained and qualified to perform assembly and disassembly operations when their job tasks require them to perform such operations.

Signal Person Qualification

All signal persons must be qualified to give signals. In order to be qualified, the signal person must:

- Know and understand the type of signals used; if hand signals are used, the signal person must know and understand the Standard Method for hand signals.
- Be competent in the application of the type of signals used.
- Have a basic understanding of equipment operation and limitations, including the crane dynamics involved in swinging and stopping loads and boom deflection from hoisting loads.
- Know and understand the regulatory requirements for signals (29 CFR 1926.1419 to 1926.1422) and the signal person qualifications (29 CFR 1926.1428).
- Demonstrate that he or she meets the qualification requirements for signalers through an oral or written test and through a practical test.

Signal Person Evaluations

The qualification of signal persons must be evaluated and documented by either:

- A third party qualified evaluator, *or*
- The employer's qualified evaluator (i.e., an employee competent in accurately assessing whether the signaler has met the qualification requirements)

Signal Person Refresher Training

If subsequent actions by the signal person indicate that the individual does not meet the Qualification Requirements, The Workforce Group, LLC must not allow the individual to

Safety Management Plan

Construction Cranes Program

continue working as a signal person until retraining is provided and a reassessment is made that confirms that the individual meets the Qualification Requirements.

Documentation of Signaler Qualification

The Workforce Group, LLC must make the documentation for whichever option is used available at the site while the signal person is employed by The Workforce Group, LLC. The documentation must specify each type of signaling (e.g. hand signals, radio signals) for which the signal person meets the requirements of the rule.

Authority to Stop Operations

The operator has the authority to stop and refuse to handle loads whenever there is a safety concern. Whenever there is a safety concern, the operator must have the authority to stop and refuse to handle loads until a qualified person has determined that safety has been assured.

Ground Conditions

Cranes must not be used unless ground conditions are able to support the equipment and any supporting materials per the manufacturer's specifications. The Workforce Group, LLC (controlling entity) will ensure that equipment must not be assembled or used unless ground conditions are firm, drained and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met.

The Workforce Group, LLC will locate all hazards that are identified in all available documents and inform the crane user of them.

Overhead Power Lines in Crane Operations

- No part of crane, line or load may be able to reach within 20 feet of a power line during setup. Exceptions: de-energized and grounded power lines or use of a dedicated spotter or proximity alarms.
- Assembly/disassembly below power lines is prohibited, unless line is de-energized and grounded.
- All power lines are presumed to be energized unless confirmed to be de-energized by the utility owner/operator and visibly grounded at the worksite.
- All power lines presumed to be un-insulated.
- Employees shall understand limitations of insulating links, proximity alarms and range control devices, if used.
- Dedicated spotters shall be trained.
- There must be at least one electrocution hazard warning sticker conspicuously placed in the cab of the crane.

Safety Management Plan

Construction Cranes Program

Power Lines

A pre-operation hazard assessment will be performed to identify the work zone and determine if any part of the equipment could reach closer than 20 feet to a power line. The work zone shall be identified by demarcating boundaries such as flag and range limiting devices, or defining the work zone as 360 degrees around the equipment up to the maximum working radius. The hazard assessment must determine if any part of the equipment could get closer than 20 feet to a power line.

Measures must be taken if it is determined that any part of the equipment, load line or load could get closer than 20 feet to a power line. If it is determined that any part of the equipment, load line or load could get closer than 20 feet to a power line then at least one of the following measures must be taken:

- Ensure the power lines have been deenergized and visibly grounded
- Ensure no part of the equipment, load line or load gets closer than 20 feet to the power line
- Determine the line's voltage and minimum approach distance permitted in Table A (below).

Voltage (kV)	Minimum Clearance Distance(feet)
Up to 50	10
50 to 200	15
200 to 350	20
350 to 500	25
500 to 750	35
750 to 1000	45
Over 1000	As established by the line owner

Some special requirements for working below power lines include training of operators and crew on:

- Procedures to follow after power line contact
- Danger of a potential energized zone
- Operator's emergency procedures
- Safest means to evacuate equipment
- Need for employees to avoid approach
- Safe clearance from power lines

Required Equipment**Mandatory Safety Devices Equipment**

All safety devices must be in proper working order before operation begins. Safety devices are required to be on all equipment and must be in proper working order before operations begin. If

Safety Management Plan

Construction Cranes Program

any of the devices are not in proper working order the equipment must be taken out of service and operations must not resume until the device is working properly again. The following is mandatory equipment:

- Crane level indicator
- Boom stops
- Jib stops
- Locks for foot pedal brakes
- Horns
- Integral check valves for hydraulic outriggers
- Rail clamps and stops for equipment on rails

The following required equipment must be in service except where specified temporary alternative measures are met:

- Boom hoist limiting device
- Luffing jib limiting device
- Anti two-block device (cranes manufactured after 2/28/92) Exception: lattice booms used for dragline, clam shell, scrap magnet, drop ball, marine operations and pile driving work
- Boom angle or radius indicator
- Jib angle indicator (luffing jibs)
- Boom length indicator (telescopic booms)
- Load weighing devices (load moment indicators, rated capacity indicators or rated capacity limiters –cranes manufactured after 3/29/03)
- Outrigger position indicators (cranes manufactured after 1/1/08)
- Hoist drum rotation indicator (if drum is not visible to operator)

An accessible fire extinguisher of 5BC rating, or higher, shall be available at all operator stations or cabs of equipment.

Procedures applicable to the operation of the equipment must be readily available in the cab at all times. The operator shall have access to procedures applicable to the operation of the equipment. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.

If the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block and this marking shall be clearly legible from the ground floor.

Whenever internal combustion engine powered equipment exhausts in enclosed spaces, test shall be made and recorded to see that employees are not exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres.

Material Hoists, Personnel Hoists and Elevators

General Requirements

Hoist Specifications

All material hoists must conform to the requirements of ANSI/ASME A10.5-1969, Safety Requirements for Material Hoists. Note: ANSI/ASME have updated this standard; however, OSHA allows The Workforce Group, LLC to follow the updated consensus standard without penalty when it provides equal or greater employee protection.

The Workforce Group, LLC must comply with the manufacturer's specifications and limitations for the operation of all hoists and elevators. Where manufacturer's specifications are not available, a professional engineer competent in the field must determine the limitations assigned to the equipment.

Rated load capacities, recommended operating speeds, and special hazard warnings or instructions must be posted on cars and platforms.

Wire Rope

Hoisting ropes must be installed in accordance with the wire rope manufacturer's recommendations. Wire rope must be removed from service when any of the following conditions exists:

- In hoisting ropes, six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay
- Abrasion, scrubbing, flattening, or peening, causing loss of more than one-third of the original diameter of the outside wires
- Evidence of any heat damage resulting from a torch or any damage caused by contact with electrical wires
- Reduction from nominal diameter of more than three sixty-fourths in. for diameters up to and including three-fourths in.; one-sixteenth in. for diameters seven-eighths to 1 1/8 in.; and three thirty-seconds in. for diameters one and one-quarter in. to one and one-half in.

Prohibited Operations

The installation of live booms on hoists and the use of endless belt-type man lifts are prohibited.

The manufacturer's instructions, procedures and prohibitions must be followed and complied with when assembling and/or disassembling equipment.

Material Hoists

Operating rules must be established and posted at the operator's station of the hoist. Such rules must include signal system and allowable line speed for various loads. Rules and notices must be posted on the car frame or crosshead in a conspicuous location, including the statement "No

Safety Management Plan

Construction Cranes Program

Riders Allowed." No person must be allowed to ride on material hoists except for the purposes of inspection and maintenance.

Protective Gates, Bars, and Coverings

All entrances of the hoistways must be protected by substantial gates or bars, which must guard the full width of the landing entrance. All hoistway entrance bars and gates must be painted with diagonal contrasting colors, such as black and yellow stripes.

Bars must be not less than 2- by 4-in. wooden bars or the equivalent, located 2 ft. from the hoistway line. Bars must be located neither less than 36 in. nor more than 42 in. above the floor. Gates or bars protecting the entrances to hoistways must be equipped with a latching device.

Overhead protective covering of 2-in. planking, 3/4-inch plywood, or other solid material of equivalent strength must be provided on the top of every material hoist cage or platform.

The operator's station of a hoisting machine must be provided with overhead protection equivalent to tight planking not less than 2 in. thick. The support for the overhead protection must be of equal strength.

Hoist Towers

All material hoist towers must be designed by a licensed professional engineer. Hoist towers may be used with or without an enclosure on all sides. Whichever alternative is chosen, the following applicable conditions must be met:

- When a hoist tower is enclosed, it must be enclosed on all sides for its entire height with a screen enclosure of 1/2-in. mesh, No. 18 U.S. gauge wire or equivalent, except for landing access.
- When a hoist tower is not enclosed, the hoist platform or car must be totally enclosed (caged) on all sides for the full height between the floor and the overhead protective covering with 1/2-in. mesh of No. 14 U.S. gauge wire or equivalent. The hoist platform enclosure must include the required gates for loading and unloading. A 6-ft-high enclosure must be provided on the unused sides of the hoist tower at ground level.

Car-arresting devices must be installed to function in case of rope failure.

Personnel Hoists**Specifications**

All personnel hoists used by employees must be constructed of materials and components that meet the specifications for materials, construction, safety devices, assembly, and structural integrity as stated in the ANSI/ASME A10.4-1963, Safety Requirements for Workmen's Hoists. ANSI/ASME have updated this standard; however, OSHA allows The Workforce Group, LLC to

Safety Management Plan

Construction Cranes Program

follow the updated consensus standard without penalty when it provides equal or greater employee protection.

Hoist Towers

Hoist towers outside the structure must be enclosed for the full height on the side or sides used for entrance and exit to the structure. At the lowest landing, the enclosure on the sides not used for exit or entrance to the structure must be enclosed to a height of at least 10 ft. Other sides of the tower adjacent to floors or scaffold platforms must be enclosed to a height of 10 ft. above the level of such floors or scaffolds. Towers inside of structures must be enclosed on all four sides throughout the full height. Towers must be anchored to the structure at intervals not exceeding 25 ft. In addition to tie-ins, a series of guys must be installed. Where tie-ins are not practical, the tower must be anchored by means of guys made of wire rope at least one-half in. in diameter, securely fastened to anchorage to ensure stability.

Hoistway Doors and Gates

Hoistway doors or gates must be not less than 6 ft. 6 in. high and must be provided with mechanical locks that cannot be operated from the landing side, and must be accessible only to persons on the car. A door or gate must be provided at each entrance to the car, which must protect the full width and height of the car entrance. Doors or gates must be provided with electrical contacts that do not allow movement of the hoist when door or gate is open.

Cars

Cars must be permanently enclosed on all sides and the top, except sides used for entrance and exit that have car gates or doors. Safeties must be capable of stopping and holding the car and rated load when traveling at governor tripping speed. Cars must be provided with a capacity and data plate secured in a conspicuous place on the car or crosshead. An emergency stop switch must be provided in the car and marked "Stop."

Covering

Overhead protective covering of 2-in. planking, 3/4-in. plywood, or other solid material or equivalent strength must be provided on the top of every personnel hoist.

Engine Prohibition

Internal combustion engines must not be permitted for direct drive.

Stopping Device

Normal and final terminal stopping devices must be provided.

Ropes

The minimum number of hoisting ropes used must be three for traction hoists and two for drum-type hoists. The minimum diameter of hoisting and counterweight wire ropes must be 1/2 in. Following are the minimum safety factors for suspension wire ropes:

Safety Management Plan

Construction Cranes Program

Rope speed (feet per minute)	Minimum factor of safety
50	7.60
75	7.75
100	7.95
125	8.10
150	8.25
600	10.70

See the chart at 29 CFR 1926.552(c)(14) for additional safety factors.

Personnel Hoists Used in Bridge Tower Construction

Such hoists must be approved by a registered professional engineer and erected under the supervision of a qualified engineer competent in this field.

When a hoist tower is not enclosed, the hoist platform or car must be totally enclosed (caged) on all sides for the full height between the floor and the overhead protective covering with 3/4-in. mesh of No. 14 U.S. gauge wire or equivalent. The hoist platform enclosure must include the required gates for loading and unloading.

These hoists must be inspected and maintained on a weekly basis. Whenever the hoisting equipment is exposed to winds exceeding 35 miles per hour, it must be inspected and put in operable condition before reuse.

Wire rope must be taken out of service when any of the following conditions exist:

- In running ropes, six randomly distributed broken wires in one lay or three broken wires in one strand in one lay
- Wear of one-third the original diameter of outside individual wires
- Kinking, crushing, bird caging, or any other damage resulting in distortion of the rope structure
- Evidence of any heat damage from any cause
- Reductions from nominal diameter of more than three sixty-fourths in. for diameters to and including three-fourths in., one-sixteenth in. for diameters seven-eighths in. to 1 1/8 in. inclusive, three thirty-seconds in. for diameters 1 1/4 to 1 1/2 in. inclusive
- In standing ropes, more than two broken wires in one lay in sections beyond end connections or more than one broken wire at an end connection.

Elevators

Permanent elevators under the care and custody of The Workforce Group, LLC and used by employees for work covered by this Act must comply with the requirements of ANSI/ASME A17.1-1965 with addenda A17.1a-1967, A17.1b-1968, A17.1c-1969, A17.1d-1970, and

Safety Management Plan

Construction Cranes Program

inspected in accordance with A17.2-1960 with addenda A17.2a-1965 and A17.2b-1967. ANSI/ASME have updated these standards; however, OSHA allows The Workforce Group, LLC to follow the updated consensus standards without penalty when they provide equal or greater employee protection.

Base-Mounted Drum Hoists**Specifications**

All base-mounted drum hoists in use must meet the applicable requirements for design, construction, installation, testing, inspection, maintenance, and operations, as prescribed by the manufacturer.

The Workforce Group, LLC must ensure that exposed moving parts such as gears, projecting screws, setscrews, chain, cables, chain sprockets, and reciprocating or rotating parts that constitute a hazard are guarded.

All controls used during the normal operation cycle must be located within easy reach of the operator's station.

Electric Motor-Operated Hoists

Electric motor-operated hoists must be provided with:

- A device to disconnect all motors from the line upon power failure and not permit any motor to be restarted until the controller handle is brought to the "off" position
- Where applicable, an over-speed preventive device
- A means whereby remotely operated hoists stop when any control is ineffective

Overhead Hoists

All overhead hoists in use must meet the applicable requirements for construction, design, installation, testing, inspection, maintenance, and operation, as prescribed by the manufacturer.

The safe working load of the overhead hoist, as determined by the manufacturer, must be indicated on the hoist, and this safe working load must not be exceeded.

The supporting structure to which the hoist is attached must have a safe working load equal to that of the hoist. The support must be arranged so as to provide for free movement of the hoist and must not restrict the hoist from lining itself up with the load.

The hoist must be installed only in locations that will permit the operator to stand clear of the load at all times.

Safety Management Plan

Construction Cranes Program

Air hoists must be connected to an air supply of sufficient capacity and pressure to safely operate the hoist. All air hoses supplying air must be positively connected to prevent disconnected during use.

Conveyors

Specifications

All conveyors in use must meet the applicable requirements for design, construction, inspection, testing, maintenance, and operation, as prescribed in the ANSI/ASME B20.1-1957, Safety Code for Conveyors, Cableways, and Related Equipment. ANSI/ASME have updated this standard; however, OSHA allows The Workforce Group, LLC to follow updated consensus standards without penalty when they provide equal or greater employee protection.

Means for stopping the motor or engine must be provided at the operator's station. Conveyor systems must be equipped with an audible warning signal to be sounded immediately before starting up the conveyor. If the operator's station is at a remote point, similar provisions for stopping the motor or engine must be provided at the motor or engine location.

Emergency stop switches must be arranged so that the conveyor cannot be started again until the actuating stop switch has been reset to running or "on" position.

Guards

Screw conveyors must be guarded to prevent employee contact with turning flights. Where a conveyor passes over work areas, aisles, or thoroughfares, suitable guards must be provided to protect employees required to work below the conveyors.

Marking and Lockout/Tagout

All crossovers, aisles, and passageways must be conspicuously marked by suitable signs (see 29 CFR 1926.200). Conveyors must be locked out, or otherwise rendered inoperable, and tagged out with a "Do Not Operate" tag during repairs and when operation is hazardous to employees performing maintenance work.

Rigging Practices

Major incidents involving rigging operations are caused by:

- the failure of equipment from overloading, incorrect assembly or disassembly, or lack of proper maintenance;
- dropped or falling loads, usually as a result of the misuse or malfunction of hoisting lines and rigging; and
- lack of safeguards, especially in proximity to high-voltage lines. Training is key in minimizing the risk of incidents

Safety Management Plan

Construction Cranes Program

An important element of the The Workforce Group, LLC material handling program is proper rigging practices. Rigging of loads must be done with relative precision and performed by trained, experienced personnel. To ensure that safe practices are followed, a competent and qualified person must direct the assembly/disassembly of equipment. The assembly/disassembly of equipment must be directed by a competent and qualified person to see that:

- Rigging equipment that has the necessary capacity to do the job is available.
- Rigging equipment is in a safe working condition.
- Loads are rigged correctly.
- Safety of the rigging crew and other potentially exposed personnel is maintained.

Rigging and Sling Inspections and Safety Requirements

- Only select rigging equipment that is in good condition.
- All rigging equipment shall be inspected annually; defective equipment is to be removed from service and destroyed to prevent inadvertent reuse.
- The load capacity limits shall be stamped or affixed to all rigging components.
- All devices shall be visually inspected prior to use and removed from service for any of the following conditions:
 - Nylon slings with:
 - Abnormal wear.
 - Torn stitching.
 - Broken or cut fibers.
 - Discoloration or deterioration.
 - Wire rope slings (see Wire Rope Inspection) with:
 - Kinking, crushing, bird caging, or other distortions.
 - Evidence of heat damage.
 - Cracks, deformation, or worn end attachments.
 - Six randomly broken wires in a single rope lay.
 - Three broken wires in one strand of rope.
 - Hooks opened more than 15% at the throat.
 - Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.
 - Alloy steel chain slings with:
 - Cracked, bent, or elongated links or components.
 - Cracked hooks.
 - Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

Safety Management Plan

Construction Cranes Program

Rigging a Load

- Determine the weight of the load - do not guess.
- Determine the proper size for slings and components.
- Do not use manila rope for rigging.
- Ensure that shackle pins and shouldered eyebolts are installed in accordance with the manufacturer's recommendations.
- Ensure that ordinary (shoulderless) eyebolts are threaded in at least 1.5 times the bolt diameter.
- Use safety hoist rings (swivel eyes) as a preferred substitute for eye bolts wherever possible.
- Pad sharp edges to protect slings.
- Remember that machinery foundations or angle-iron edges may not feel sharp to the touch but could cut into rigging when under several tons of load.
- Wood, tire rubber, or other pliable materials may be suitable for padding.
- Do not use slings, eyebolts, shackles, or hooks that have been cut, welded, or brazed.
- Install wire-rope clips with the base only on the live end and the U-bolt only on the dead end.
- Follow the manufacturer's recommendations for the spacing for each specific wire size.
- Determine the center of gravity and balance the load before moving it.
- Initially lift the load only a few inches to test the rigging and balance.

Inspections

Following assembly and erection of hoists, and before being put in service, an inspection and test of all functions and safety devices must be made under the supervision of a competent person.

A similar inspection and test are required following major alteration of an existing installation.

All hoists must be inspected and tested at not more than 3-month intervals. The Workforce Group, LLC must prepare a certification record, which includes the date the inspection and test of all functions and safety devices was performed; the signature of the person who performed the inspection and test; and a serial number, or other identifier, for the hoist that was inspected and tested. The most recent certification record must be maintained on file.

Cranes shall be inspected on the following schedule:

- After Modification
- After Repair Or Adjustment
- Post Assembly
- Each Shift
- Monthly
- Annual Comprehensive

Safety Management Plan

Construction Cranes Program

Additional inspections will occur for the following situations:

Severe Service

- Shock load, corrosive atmosphere, etc.
- Inspect exposed items/conditions
- Document

Not In Regular Use

- Idle more than three months
- Monthly inspection must be performed
- Document

Cranes and hoists that have been overloaded shall be inspected prior to being returned to service. The inspection and testing requirements are included.

Initial inspection and test shall be performed by a qualified third party.

- Prior to initial use all new and altered cranes shall be inspected and tested to ensure compliance with the provisions of 29 CFR1910.179 and ABSI B30.2.
- Only after determining, by this inspection, testing and proper documentation, that the crane is in safe operating condition, shall it be put into service.

The Workforce Group, LLC shall designate a competent person who shall inspect all machinery and equipment prior to each use, and during use, to make sure it is in safe operating condition. Any deficiencies shall be repaired, or defective parts replaced, before continued use. Daily pre-use inspections shall be performed by the crane operator (designated as The Workforce Group, LLC's designated competent person) prior to beginning shift and through observation during normal operation. Daily inspections shall include:

- Any deficiencies shall be repaired, or defective parts replaced, before continued use.
- All functional operating mechanisms for maladjustment interfering with proper operation.
- Deterioration or leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems.
- Hooks, if deformations or cracks are found the hook shall be tagged out of service until repaired and tested by qualified personnel.
- Hoist chains, including end connections, for excessive wear, twist, distorted links interfering with proper function, or stretch beyond manufacturer's recommendations.

Severe Service Inspection

Severe service inspections shall be conducted to inspect exposed items and conditions resulting from a shock load, corrosive atmosphere, etc. Inspections shall be documented.

Safety Management Plan

Construction Cranes Program

Not in Regular Use Inspection

If equipment is idle for more than three months a monthly inspection shall be performed before being placed in service. The same criteria for monthly inspections shall be followed.

Monthly Inspection

Monthly inspections of equipment by a competent person are documented. Equipment must be inspected monthly by a competent person and documented. Documentation must include the following:

- Items checked,
- Results of inspection, and
- Name and signature of the inspector.

Documentation must be retained for 3 months. Documented monthly inspection not required if the daily inspection is documented and records are retained for 3 months.

If safety hazards are found during inspections, the equipment in question shall be tagged out and not used until repairs are made. Any deficiencies constituting a safety hazard shall cause the equipment to be tagged out of service until repairs are made.

Annual Inspection

A thorough, annual inspection and functioning testing of the hoisting machinery shall be documented made by a qualified person, or by a government or private agency recognized by the U.S. Department of Labor using the detail inspection criteria per regulation. The Workforce Group, LLC shall maintain a record of the dates and results of inspections for each hoisting machine and piece of equipment and kept on file for 12 months or until the next annual inspection.

Wire Rope Inspection

Wire rope will be inspected on the following schedule:

- Shift Inspection – Before each shift.
- Monthly Inspection - All wire ropes, including running ropes and the inspection shall be documented.
- Annual Inspection – At least every 12 months, unless not feasible due to set up. This will be a more detailed inspection including wire rope that is normally hidden during daily or monthly inspections and the inspection shall be documented.

A The Workforce Group, LLC competent person will conduct visual inspections before each shift, monthly and annually for wire rope and categorize deficiencies in:

Category I Deficiencies

Safety Management Plan

Construction Cranes Program

- Significant distortion of the wire rope structure such as kinking, crushing, un-stranding, bird caging, signs of core failure, or steel core protrusion between the outer strands.
- Significant corrosion.
- Electric arc (from a source other than power lines) or heat damage.
- Improperly applied end connections.
- Significantly corroded, cracked, bent, or worn end connections (such as from severe service).

If a Category I deficiency is identified, an immediate determination shall be made by the qualified person as to replacement of the wire rope, or if the deficiency is localized, the wire rope may be severed at the bad spot and may be continued to be used.

Category II Deficiencies

Visible broken wires as follows:

- In running wire ropes: six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay.
- In rotation resistant ropes: two randomly distributed broken wires in six rope diameters or four randomly distributed broken wires in 30 rope diameters.
- In pendants or standing wire rope more than two broken wires in one rope lay located in rope beyond end connections and / or one or more broken wire in a rope lay located at an end connection.

If a category II deficiency is identified an immediate determination shall be made by the qualified person as to, based on manufacturer recommendations, either remove or monitor the wire rope for continued deterioration.

The qualified person determines when to replace the wire rope (no more than 30 days after the deficiency is identified).

A qualified person assesses the deficiency in light of the load and other conditions of use and determines it is safe for continued use.

A qualified person establishes the parameters of use.

All workers who conduct shift inspections are notified.

The qualified person's findings and procedures are documented.

Category III Deficiencies

- Electrical contact to power line
- Core protrusion or other distortion indicating core failure in rotation resistant wire rope
- Broken strand

If a category III deficiency is identified, operations involving use of the wire rope shall be prohibited until the:

Safety Management Plan

Construction Cranes Program

- Wire rope is replaced (ALWAYS with power line contact).
- Deficiency is localized and problem corrected.

Operational Procedures

Only qualified personnel shall operate cranes and equipment covered by this program. Operators shall comply with the following safety rules while operating cranes and hoists:

- Employees shall not be exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres when internal combustion engine powered equipment is used. Tests shall be conducted and documented.
- Do not engage in any practice that will divert your attention while operating the crane.
- Respond to signals only from the person who is directing the lift or any appointed signal person.
- Obey a stop signal at all times, no matter who gives it.
- Do not move a load over people.
- People shall not be placed in jeopardy by being under a suspended load.
- Do not work under a suspended load unless the load is supported by blocks, jacks, or a solid footing that will safely support the entire weight.
- Have a crane or hoist operator remain at the controls or lock open and tag the main electrical disconnect switch.
- Ensure that the rated load capacity of a crane's bridge, individual hoist, or any sling or fitting is not exceeded.
- Know the weight of the object being lifted.
- Check that all controls are in the OFF position before closing the main line disconnect switch.
- If spring-loaded reels are provided to lift pendants clear off the work area, ease the pendant up into the stop to prevent damaging the wire.
- Avoid side pulls. These can cause the hoist rope to slip out of the drum groove, damaging the rope or destabilizing the crane or hoist.
- To prevent shock loading, avoid sudden stops or starts. Shock loading can occur when a suspended load is accelerated or decelerated, and can overload the crane or hoist. When completing an upward or downward motion, ease the load slowly to a stop.

A visual inspection of the equipment will be conducted by a competent person prior to each shift. A competent person must conduct a visual inspection of equipment prior to each shift. The inspection must consist of observation for apparent deficiencies. Some of the inspection items include control mechanisms, pressurized lines, hooks and latches, wire rope, electrical apparatus, tires (when used), and ground conditions. The designated competent person operator shall do the following steps before making lifts with any crane or hoist:

- Test the upper-limit switch and slowly raise the unloaded hook block until the limit switch trips.

Safety Management Plan

Construction Cranes Program

- Visually inspect the hook, load lines, trolley, and bridge as much as possible from the operator's station; in most instances, this will be the floor of the building.
- If provided, test the lower-limit switch.
- Test all direction and speed controls for both bridge and trolley travel.
- Test all bridge and trolley limit switches, where provided, if operation will bring the equipment in close proximity to the limit switches
- Test the pendant emergency stop.
- Test the hoist brake to verify there is no drift without a load.
- If provided, test the bridge movement alarm.
- Lock out and tag for repair any crane or hoist that fails any of the above tests.
- Any deficiencies shall be repaired, or defective parts replaced, before continued use.

Moving a Load

- Center the hook over the load to keep the cables from slipping out of the drum grooves and overlapping, and to prevent the load from swinging when it is lifted.
- Inspect the drum to verify that the cable is in the grooves.
- Use a tag line when loads must traverse long distances or must otherwise be controlled.
- Manila rope may be used for tag lines.
- Plan and check the travel path to avoid personnel and obstructions.
- Lift the load only high enough to clear the tallest obstruction in the travel path.
- Start and stop slowly.
- Land the load when the move is finished.
- Choose a safe landing area.
- Never leave suspended loads unattended
- In an emergency where the crane or hoist has become inoperative, if a load must be left suspended, barricade and post signs in the surrounding area, under the load, and on all four sides.
- Lock open and tag the crane or hoist's main electrical disconnect switch.

Parking a Crane or Hoist

- Remove all slings and accessories from the hook.
- Return the rigging device to the designated storage racks.
- Place the emergency stop switch (or push button) in the OFF position.

Cranes or hoists shall not be loaded beyond their rated capacity for normal operations.

Any crane or hoist suspected of having been overloaded shall be removed from service by locking open and tagging the main disconnect switch. Overloaded cranes shall be inspected, repaired, load tested, and approved for use before being returned to service.

Safety Management Plan

Construction Cranes Program

Fall Protection

Anyone conducting non-assembly/disassembly work, maintenance or repair on cranes or hoists at heights greater than 6 ft (1.8 m) shall use fall protection. Fall protection includes safety harnesses that are fitted with a lifeline and securely attached to a structural member of the crane or building. Anchorages must be any substantial part of the boom or to any substantial piece on the equipment (using correct fall protection equipment). A fall arrest system is permitted to be anchored to the crane/derrick's hook or other part of the load line where the following requirements are met:

- A qualified person has determined the set-up and rated capacity meets or exceeds the anchorage requirements
- The operator is aware it is being used for this purpose

Exceptions to using fall protection involving non-assembly/disassembly work:

- While at a work station or going to and from a work station.
- When walking point to point along a horizontal lattice boom that has been lowered to the ground and supported.
- In the cab or on the deck

Fall protection must be used when working over 15 feet during the assembly/disassembly process, except when the employee is:

- At or near the draw-works
- In the cab, or on the deck

Signalling

A signal person must be provided if the operator's view is obstructed, if site specific safety concerns require it or if the operator determines that it is necessary. A signal person must be provided for the following situations:

- The point of operation is not in full view of the operator
- The view is obstructed when the equipment is traveling
- The operator or the person handling the load determines it is necessary due to site specific concerns.

Signals to the operator shall be in accordance with the standard hand signals prescribed by the applicable ANSI standard for the type of crane in use unless voice communications equipment (telephone, radio, or equivalent) is used.

- Signalers must be qualified.
- Signals shall be discernible or audible at all times.
- Some special operations may require addition to or modification of the basic signals.

Safety Management Plan

Construction Cranes Program

- For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator, and shall not be in conflict with the standard signals.

STANDARD HAND SIGNALS

STOP – With arm extended horizontally to the side, palm down, arm is swung back and forth.



EMERGENCY STOP – With both arms extended horizontally to the side, palms down, arms are swung back and forth.



HOIST – With upper arm extended to the side, forearm and index finger pointing straight up, hand and finger make small circles.



RAISE BOOM – With arm extended horizontally to the side, thumb points up with other fingers closed.



SWING – With arm extended horizontally, index finger points in direction that boom is to swing.



RETRACT TELESCOPING BOOM – With hands to the front at waist level, thumbs point at each other with other fingers closed.



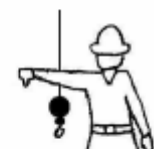
RAISE THE BOOM AND LOWER THE LOAD – With arm extended horizontally to the side and thumb pointing up, fingers open and close while load movement is desired.



DOG EVERYTHING – Hands held together at waist level.



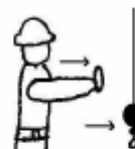
LOWER – With arm and index finger pointing down, hand and finger make small circles.



LOWER BOOM – With arm extended horizontally to the side, thumb points down with other fingers closed.



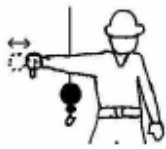
EXTEND TELESCOPING BOOM – With hands to the front at waist level, thumbs point outward with other fingers closed.



TRAVEL/TOWER TRAVEL – With all fingers pointing up, arm is extended horizontally out and back to make a pushing motion in the direction of travel.

Safety Management Plan

Construction Cranes Program



LOWER THE BOOM AND RAISE THE LOAD – With arm extended horizontally to the side and thumb pointing down, fingers open and close while load movement is desired.



MOVE SLOWLY – A hand is placed in front of the hand that is giving the action signal.



USE AUXILIARY HOIST (whipline) – With arm bent at elbow and forearm vertical, elbow is tapped with other hand. Then regular signal is used to indicate desired action.



CRAWLER CRANE TRAVEL, BOTH TRACKS – Rotate fists around each other in front of body; direction of rotation away from body indicates travel forward; rotation towards body indicates travel backward.



USE MAIN HOIST – A hand taps on top of the head. Then regular signal is given to indicate desired action.



CRAWLER CRANE TRAVEL, ONE TRACK – Indicate track to be locked by raising fist on that side. Rotate other fist in front of body in direction that other track is to travel.



TROLLEY TRAVEL – With palm up, fingers closed and thumb pointing in direction of motion, hand is jerked horizontally in direction trolley is to travel.

Training

Mandatory training is required for:

- Overhead power lines
- Signal persons
- Competent/qualified persons
- Operators
- Crush/pinch points
- Tag-out

Administrative Requirements

Training Costs

Safety Management Plan

Construction Cranes Program

The Workforce Group, LLC must provide all training required under the crane and derrick rules at no cost to the employee.

Refresher Training

The Workforce Group, LLC must provide refresher training in relevant topics for each employee when there is an indication that retraining is necessary on the basis of The Workforce Group, LLC actions or an evaluation of the employee's knowledge.

Training Evaluation

The Workforce Group, LLC must evaluate each employee who has been trained in crane and derrick operations to verify that he or she understands the information provided in training. The rule allows The Workforce Group, LLC to determine the most appropriate method of evaluation.

Note: The crane operator training applies only in states that do not have their own licensing and certification requirements. All other training and qualification requirements apply to all personnel.

Crane Operator Training

The Workforce Group, LLC must comply with federal requirements to train crane operators employed by them. During the certification phase-in period (i.e., November 2010 to November 2014) in states without operator licensing laws, The Workforce Group, LLC must ensure that crane and derrick operators covered by the rules are competent to operate the equipment safely. Where an employee assigned to operate machinery does not have the required knowledge or ability to operate the equipment safely, The Workforce Group, LLC must train that employee before operating the equipment. The Workforce Group, LLC must ensure that each operator is evaluated to confirm that he or she understands the information provided in the training.

Operator-in-training requirement effective November 10, 2014

The rules for operator-in-training (e.g., prequalification/certification training, operator's trainer monitoring, multiple-lift rigging operations) in states without operator licensing rules are applicable on November 10, 2014. Until that date, operators must comply with the minimum training requirements required under the transition period from November 8, 2010 to November 10, 2014.

Minimum Training Requirements

Before operating crane equipment, each crane operator must be trained to know how to safely operate the specific type of equipment he or she will operate, including all of the following:

- Safe practices for testing the boom hoist brake on friction equipment and all other equipment with a boom (see 29 CFR 1926.1430(c)(4)(i) for the specific safe practices);
- The manufacturer's emergency procedures for stopping unintended equipment movement, where available;
- The controls and operational/performance characteristics;

Safety Management Plan

Construction Cranes Program

- Use of, and the ability to calculate (manually or with a calculator), load and capacity information on a variety of configurations of the equipment;
- Procedures to prevent and respond to power line contact;
- Technical knowledge similar to the subject matter criteria listed in Appendix C of the regulation applicable to the specific equipment (such as general technical information about wire ropes and rigging devices, site information, operations for carrying loads and multicrane lifts, and use of load charts);
- Technical knowledge applicable to the suitability of the supporting ground and surface to handle expected loads, to site hazards, and to site access;
- The applicable manuals, consensus standards, and other materials incorporated into the regulation.

The operator must be able to read and locate relevant information in the equipment manual and other materials containing information about the safe operation of equipment.

Operator Skills Demonstration

The Workforce Group, LLC must ensure that the operator has demonstrated the skills necessary for safe operation of the equipment, including:

- The ability to recognize, from visual and auditory observation, the items listed in the regulation for shift inspection (29 CFR 1926.1412(d));
- Operational and maneuvering skills;
- Application of load chart information;
- Application of safe shutdown and securing procedures.

Overhead Power Line Training

In cases where crane equipment is expected to come closer to live power lines than the minimum clearance distance permitted under the rules for power line safety The Workforce Group, LLC must train each crane operator and crew member assigned to work with equipment the procedures to be followed in the event of electrical contact with a power line. Such training must include:

- Information regarding the danger of electrocution from the operator simultaneously touching the equipment and the ground.
- The importance to the operator's safety of remaining inside the cab except where there is an imminent danger of fire, explosion, or other emergency that necessitates leaving the cab.
- The safest means of evacuating from equipment that may be energized.
- The danger of the potentially energized zone around the equipment (step potential).
- The need for crew in the area to avoid approaching or touching the equipment and the load.
- Safe clearance distance from power lines.

Safety Management Plan

Construction Cranes Program

- Power lines are presumed to be energized unless the utility owner/operator confirms that the power line has been and continues to be deenergized and visibly grounded at the worksite.
- Power lines are presumed to be uninsulated unless the utility owner/operator or a registered engineer who is a qualified person with respect to electrical power transmission and distribution confirms that a line is insulated.
- The limitations of an insulating link/device, proximity alarm, and range control (and similar) device, if used.
- The procedures to be followed to properly ground equipment and the limitations of grounding.

Employees working as dedicated spotters must be trained to enable them to effectively perform their task, including training on the applicable requirements of this section.

Tag Out and Start-up Procedures Training

Each operator must be trained in the tagout and start-up procedures specified in the rule for crane and derrick equipment that is out of service (see Operation rule at 29 CFR 1926.1417(f) and (g)).

Operators of Derricks, Sideboom Cranes and equipment with a maximum manufacturer-rated hoisting/lifting capacity of 2,000 lb. or less

Such operators are exempt from the detailed training requirements for other cranes. However, before operating such equipment, they must be trained in the safe operation of the type of equipment they will be operating.

Assembly/Disassembly (A/D) Director

The A/D director is a person who supervises equipment assembly and disassembly operations and must understand the applicable A/D procedures.

The A/D director must meet the criteria for a competent and qualified person under the following conditions:

- Where the assembly and disassembly is performed by only one person, that person is considered the A/D director and must meet the training criteria for both a competent person and a qualified person;
- Where the A/D director is assisted by one or more qualified persons, he or she must meet the criteria for a competent person and is not required to be a qualified person.

Authorized Personnel Training

Each employee assigned to work on or near the equipment (i.e., authorized personnel) must be trained to:

- Recognize swing radius hazards;
- Recognize struck-by and pinch/crush hazard areas posed by the rotating superstructure;
- Keep clear of holes and crush/pinch points.

Competent Person Training

The competent person (i.e., one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them) must be trained in any additional requirements of his or her role and responsibility under the new rules. For example, a competent person assigned to conduct a visual inspection of equipment during each shift the equipment is used must be trained in the required elements of a shift inspection.

Crew Member Training

Assembly and Disassembly Operations

Before commencing assembly/disassembly operations, the A/D director must ensure that the crew members understand:

- Their tasks and the hazards associated with their tasks;
- The hazardous positions and locations that they need to avoid.

Work Near Power Lines

Crew members assigned to work with crane and derrick equipment must receive the same overhead power line training as required for crane operators, regardless of the distance from the power lines. See the Crane Operator Training subsection for more information.

Dedicated Spotter

The dedicated spotter must meet the qualifications for a signal person and complete the training requirements for crew member.

The dedicated spotter's sole responsibility is to watch the separation between power lines and the crane or derrick equipment, load line and load (including rigging and lifting accessories) and ensure through communication with the operator that the applicable minimum approach distance is not breached.

Maintenance and Repair Employee Qualifications and Training

Maintenance and repair personnel must be trained to operate the equipment under limited conditions necessary to perform the maintenance or repair. The operation is limited to those functions necessary to perform maintenance, inspect the equipment or verify its performance. Such personnel may operate the equipment under the direct supervision of a qualified or certified crane operator, or if they are familiar with the operation, limitations, characteristics, and hazards associated with the type of equipment.

Safety Management Plan

Construction Cranes Program

Qualified Person

A maintenance and repair employee must be a qualified person (i.e., a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project). Maintenance and repair workers are not considered “operators” and are therefore not required to be trained in all of the areas required for crane operators.

Tagout and Start-up Procedures Training

Each maintenance and repair person must be trained in tagout and start-up procedures specified in the rule (see Operation rule at 29 CFR 1926.1417(f) and 29 CFR 1926.1417(g)).

Qualified Person

Qualified person is an employee by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project. Riggers and signalers are examples of personnel that must meet the requirements for qualified person.

The Workforce Group, LLC must train each qualified person regarding the requirements of the crane and derrick regulations applicable to their respective roles.

Fall Protection Training

The Workforce Group, LLC must train each employee who may be exposed to fall hazards while on or hoisted by crane equipment on all of the fall protection requirements in the rule (29 CFR 1926.1423(a) to 1926.1423(j)), and the applicable criteria and practices in the fall protection rule for construction at 29 CFR 1926.502.

TRAINING RECAP TABLE

Personnel	Activity or Equipment	Training Requirement
All personnel	Work with cranes and derricks	Hazards and procedures to keep clear of holes and crush/pinch points
All personnel	Exposed to fall hazards while on or hoisted by equipment	Fall protection
All personnel on floating cranes/cranes on barges	Floating cranes/derricks and cranes/derricks on barges	Understand hazard warning signs and markings
Assembly/Disassembly (A/D) Director	Supervise assembly and disassembly operations	Meet criteria of a competent person and qualified person
Authorized personnel	Work in areas near rotating crane/derrick superstructure	How to recognize struck-by and pinch/crush hazards
Competent Person	All, including shift and monthly inspections	Applicable to respective role
Crew member	Assembly and disassembly operations	Understand tasks, hazards, positions/

Safety Management Plan

Construction Cranes Program

Personnel	Activity or Equipment	Training Requirement
		areas to avoid
Crew member	Work near power lines	Power line safety information and procedures
Dedicated Spotter	Work near power lines	Qualify as a signal person
Dedicated Spotter	Work near power lines	Power line safety information and procedures
Maintenance and Repair Personnel	Operate equipment	Qualify to operate
Maintenance and Repair Personnel	Equipment out of service	Tagout and start-up procedures
Operator	Derricks, sidebooms, small hoist/lift capacity cranes (2,000 lbs. or less) only	Know how to safely operate equipment (no specific training requirements)
Operator	Friction equipment	Test the boom hoist brake
Operator	Unintended equipment movement	Know manufacturer's emergency procedures
Operator	Operate specific type of crane (other than derricks, sidebooms, cranes of 2,000 lb or less capacity)	Know how to safely operate, inspect, calculate load, shut down, and secure
Operator	Work near power lines, and within minimum power line clearance	Power line safety and procedures in the event of electrical contact
Operator	Crane/Derrick equipment out of service	Tagout and start-up procedures
Qualified Person	All, including annual inspections	Applicable to respective role; possess a recognized degree, certificate, or professional standing, or have extensive knowledge, training, and experience.
Rigger	Assemble, rig, disassemble equipment and materials	Same as for qualified person
Signal Person	Communicate with operator of crane/derrick with greater than 2,000 lb. lift capacity	Qualify as a signal person with written or verbal test, retrain if needed
Signal Person	Communicate with operator of crane/derrick with lift capacity of 2,000 lb. or less	Proper use of signals applicable to the use of the equipment

Safety Management Plan

Construction Cranes Program

**CRANES AND DERRICKS IN CONSTRUCTION
PRE-SHIFT INSPECTION BY A COMPETENT PERSON
29 CFR 1926.1412-1413**

CRANE: _____ DATE: _____

INSPECTOR: _____

Check the box next to each item after it has passed inspection. Note any deficiencies or other observations that could pose a risk of injury or property damage.

EQUIPMENT TYPE: _____ EQUIPMENT MODEL: _____

MANUFACTURER: _____ SERIAL NUMBER: _____

Circle One		Item or Function Inspected	Notes
Yes	No	Control mechanisms for maladjustments interfering with proper operation	
Yes	No	Control and drive mechanisms for apparent excessive wear of components and contamination by lubricants, water or other foreign matter	
Yes	No	Air, hydraulic, and other pressurized lines for deterioration or leakage, particularly those which flex in normal operation	
Yes	No	Hydraulic system for proper fluid level	
Yes	No	Hooks and latches for deformation, cracks, excessive wear, or damage such as from chemicals or heat	
Yes	No	Wire rope reeving for compliance with the manufacturer's specifications	
		Wire Rope Category I	
Yes	No	Significant distortion of the wire rope structure such as kinking, crushing, unstranding, birdcaging, signs of core failure or steel core protrusion between the outer strands	
Yes	No	Significant corrosion	
Yes	No	Electric arc damage (from a source other than power lines) or heat damage	
Yes	No	Improperly applied end connections	
Yes	No	Significantly corroded, cracked, bent, or worn end connections (such as from severe service).	
		Wire Rope Category II	
Yes	No	Visible broken wires, as follows:	
Yes	No	In running wire ropes: Six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay, where a rope lay is the length along the rope in which one strand makes a complete revolution around the rope.	
Yes	No	In rotation resistant ropes: Two randomly distributed broken wires in six rope diameters or four randomly distributed broken wires in 30	

Safety Management Plan

Construction Cranes Program

Circle One		Item or Function Inspected	Notes
		rope diameters.	
Yes	No	In pendants or standing wire ropes: More than two broken wires in one rope lay located in rope beyond end connections and/or more than one broken wire in a rope lay located at an end connection	
Yes	No	A diameter reduction of more than 5% from nominal diameter.	
		Wire Rope Category III	
Yes	No	In rotation resistant wire rope, core protrusion or other distortion indicating core failure.	
Yes	No	Prior electrical contact with a power line.	
Yes	No	A broken strand.	
		Wire Rope Critical Review Items	
Yes	No	The competent person must give particular attention to all of the following:	
Yes	No	Rotation resistant wire rope in use	
Yes	No	Wire rope being used for boom hoists and luffing hoists, particularly at reverse bends.	
Yes	No	Wire rope at flange points, crossover points and repetitive pickup points on drums.	
Yes	No	Wire rope at or near terminal ends.	
Yes	No	Wire rope in contact with saddles, equalizer sheaves or other sheaves where rope travel is limited.	
Yes	No	Electrical apparatus for malfunctioning, signs of apparent excessive deterioration, dirt or moisture accumulation	
Yes	No	Tires (when in use) for proper inflation and condition	
Yes	No	Ground conditions around the equipment for proper support, including ground settling under and around outriggers/stabilizers and supporting foundations, ground water accumulation, or similar conditions	
Yes	No	The equipment for level position within the tolerances specified by the equipment manufacturer's recommendations, both before each shift and after each move and setup.	
Yes	No	Operator cab windows for significant cracks, breaks, or other deficiencies that would hamper the operator's view.	
Yes	No	Rails, rail stops, rail clamps and supporting surfaces when the equipment has rail traveling.	
Yes	No	Safety devices and operational aids for proper operation	

SIGNATURE OF INSPECTOR _____ DATE _____

Disciplinary Program

Purpose

The purpose of this program is to establish a firm but fair disciplinary action policy to enforce the safety system.

Scope

This document is applicable to all employees.

Responsibilities

It is the responsibility of each and every person employed by The Workforce Group, LLC to work in a safe and efficient manner. The safety system provides guidelines and procedures to help insure that safe work practices are observed. In the event that any employee violates provisions of the The Workforce Group, LLC safety system or works in a manner that threatens his own health and safety or the health and safety of the employees around him, he will be subject to disciplinary action, up to and including termination of employment.

The safety manager, operations managers, supervisors and foremen hold positions responsible for enforcing the safety system and for issuing disciplinary action as required by this section of the safety manual.

The Workforce Group, LLC is committed to safety and senior management holds all supervisory staff responsible and accountable for safety within their respective areas.

Physical inspections by The Workforce Group, LLC officials or insurance representatives must be done periodically and indicate those violations showing overall lack of commitment to The Workforce Group, LLC safety goals shall be under the same level of disciplinary actions.

Requirements

Safety is a core value and a condition of employment at The Workforce Group, LLC. The following actions constitute a safety violation:

- Not following verbal or written safety procedures, guideline or rules of The Workforce Group, LLC or our clients
- Horse play, failure to wear required PPE, and or abuse of PPE
- Being under the influence of drugs or alcohol during work
- Bringing weapons on the job site
- Failure to report incidents or injuries

Safety Management Plan

Disciplinary Program

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- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.

Procedure

The following procedures will be followed after issuing a safety violation notice:

- The first offense will result in a verbal warning. The employee will be met with and informed that he or she is being issued a verbal warning and informed of the infraction, rule or procedure that was violated and the corrective action to be taken. Proper procedure will be discussed to clarify the situation and allow the employee to correct his behavior. The person making this verbal warning will inform the operations manager of his branch that this warning has been issued so the operations manager may make a written record of the warning.
- The second offense will result in a written reprimand and additional training. The reprimand will be written on the standard Safety Reprimand form (see below) and will describe the unsafe activity or behavior that needs correction. Refer to the section of the safety program that was violated (when applicable). The employee receiving the reprimand has the right to submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become a part of the employee's employment records.
- The third offense will result in another written reprimand (using the standard form) and punitive layoff, the duration of which will be decided at the time of the disciplinary action and is to be weighed by the severity of the offense. Again, the employee may submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become a part of the employee's employment records.
- The fourth offense may result in the termination of the offending employee.

The above actions are to be placed against a sliding twelve month scale. If an employee receives a reprimand on January 1 and commits his fourth offense on or before December 31st of the same year, he is terminated. The employee does not have to commit the same violation each time to receive further reprimands. He could receive a verbal reprimand for smoking in a no smoking area on his first offense and get a written reprimand for his second offense which might be a forklift violation and yet another for failing to use proper personal protective equipment. He will be terminated upon his fourth offense in the last twelve months.

In the case of serious safety violations such as by-passing guarding or other unsafe activities that put the violator or other employees at serious risk of injury, the manager may move the violator directly to the second or third warning level. If the violator's actions put him or others at risk of death or dismemberment the manager has the option to terminate him with no further warning.

Safety Management Plan

Disciplinary Program

Safety Reprimand Form

Date: _____ Reprimand # _____

Issued To: _____

Signature: _____

Issued By: _____

Signature: _____

Violation (Describe in Detail):

Follow up Training: _____

Presented by: _____

Date of Training: _____

Trainee Signature: _____

Driving Safety Program

Purpose

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

Key Responsibilities

The Workforce Group, LLC Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the program and related procedures. These procedures are kept in the designated safety manager's office.

Site Manager

- Responsible for the implementation and maintenance of the program for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local workplace vehicle safety program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.

Vehicle and Transportation Related

Driving Safety

Operators of The Workforce Group, LLC or client on or off road vehicles shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.

Only authorized employees will drive a motor vehicle in the course and scope of work or operate a company owned vehicle.

Drivers shall have 3 years of driving experience on the vehicle he/she is licensed to drive & regularly drives.

Drivers will be appropriately assessed, licensed and trained to operate the vehicle they have been authorized to operate.

No passengers shall be on trucks used to deliver goods.

Safety Management Plan

Driving Safety Program

Backing is prohibited whenever practicable. Where backing is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.

Drivers must have either a reversing alarm, use a spotter or walk around the truck/trailer prior to backing.

Passenger compartments are to be free from loose objects that might endanger passengers in the event of an incident. Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.

Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer.

Signs, stickers or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

Employees driving vehicles are required to follow safe driving practices:

- Obey all federal and local driving laws or regulations as well as requirements of clients;
- Immediately report any citation, warning, traffic violation, collision, vehicle damage or near miss associated with company or client vehicle operation or while driving on company duties to the supervisor;
- Immediately report any restriction or change to their driving privileges to the supervisor.
- Seat belts shall always be worn by all occupants whenever the vehicle is in motion; only seats fitted with three-point inertia-reel type seatbelts shall be used. All vehicles capable of more than 10 mph/15 kph shall have seat belts installed.
- Defensive drivers continually assess conditions and hazards and remain prepared for any challenge that may approach them;
- When speaking with a passenger, always keep your eyes on the road;
- Both hands on the wheel;
- No use of cell phones, radios or other electronic devices while driving any vehicle - vehicle must be safely parked prior to using a mobile phone or 2-way radio.
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving;
- Drive for conditions, not just the speed limit;
- Alcohol or illegal drugs are not allowed to be in a company, client or leased vehicle at any time;
- Drivers shall not operate a motor vehicle while under the influence of alcohol, illegal drugs, or prescription or over-the counter medications that might impair their driving skills.

Safety Management Plan

Driving Safety Program

Drivers are to be prepared before leaving:

- Perform 360 walk around – report new damage;
- Check windshield for cracks that could interfere with vision;
- Inspect for vehicle damage and immediately report any damage to the supervisor if not previously observed;
- Make sure dirt or snow is removed from lights on all sides of the vehicle;
- Brush or clean off snow or ice on all windows to ensure complete vision;
- Check fuel level to be certain the destination can be reached;
- Check to ensure the license plates and inspection tag on vehicle are current;
- Ensure that there is a first aid kit and inspected fire extinguisher in the company vehicle;
- Ensure driver is rested and alert for driving;
- Employees are not to perform repairs or maintenance other than routine fluid additions.

Vehicle Requirements

- All vehicles shall be fit for the purpose, and shall be maintained in safe working order.
- No vehicle less than 1000 kg is to be used on public roads.
- Tires, including spares if full size, are to be of same type, profile and tread pattern, except when the vehicle or tire Manufacturer recommends a different type for certain axles.
- Tire type and pattern is to be recommended by the vehicle or tire manufacturer for use on the vehicle in the area of operation.
- Vehicles are to be fitted with a spare wheel and changing equipment to safely change a wheel, or a suitable alternative.
- Vehicles longer than 6 meters/20 feet or with restricted rear view (i.e. pickup trucks that are fully loaded) are to be fitted with an audible reversing alarm.
- All seats are to be fitted with headrests
- All light duty vehicles (including buses) are to be equipped with an adjustable left, right and central rear view mirrors
- Loads shall be secure and shall not exceed the manufacturer's specifications and legal limits for the vehicle.
- All vehicles are to be equipped with a multipurpose fire extinguisher with a capacity of at least 0.9 kg/2 lb. The fire extinguisher shall be securely mounted on a bracket and located so that it is easily accessible in an emergency without becoming a hazard in case of an incident.
- All light vehicles shall be equipped with a securely stowed first aid kit.
- All drivers of light vehicles shall carry a high visibility jacket for use in case of emergency stops.
- All light duty vehicles carry a minimum of one collapsible hazard warning triangle.
- Rollover protection will be installed in any vehicle to address high risk environments. The rollover protection engineered will conform to recognized regulatory standard and industry preferred practices.

Safety Management Plan

Driving Safety Program

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- All light equipment vehicles shall be outfitted with two red high-intensity lights located as high, as far apart, and as far back as practical, wired to the headlight switch, but also with an override switch, if permitted by local regulations.

Transportation

If workers are required to travel in a worker transportation vehicle The Workforce Group, LLC must ensure that reasonable measures are taken to evaluate road, weather and traffic conditions to ensure the safe transit of the workers.

The operator of a worker transportation vehicle must ensure that the worker transportation vehicle has been inspected by a qualified person before first use on a work shift.

Seated workers must wear seat belts while being transported in a vehicle equipped with seat belts.

A worker must not ride in a vehicle in a standing position, unless protected from being thrown off balance.

A worker must not ride in a vehicle with any part of the body outside the vehicle unless essential to the work process and then only if the worker is adequately restrained.

Materials, goods, tools or equipment carried in a portion or compartment of a vehicle in which workers are riding must be located and secured to prevent injury to the operator or workers.

Any enclosed portion or compartment of a vehicle in which workers are transported must have:

- effective ventilation, independent of doors, providing clean air,
- adequate lighting and means for heating and cooling,
- an effective means of communication between the operator and passengers, and
- more than one means of exit.

Traffic Control

The Workforce Group, LLC shall develop, in writing, and implement a traffic protection plan for its workers at a worksite if any of them may be exposed to a hazard from vehicular or pedestrian traffic that may endanger the safety of any worker. It shall include the following control measures:

- Effective means of traffic control shall be provided whenever the unregulated movement of vehicular traffic constitutes a hazard to workers.
- Traffic control shall include barricades and cones as the primary control and, where required, signs, flagmen or other techniques and devices made necessary by the prevailing circumstances.

Safety Management Plan

Driving Safety Program

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- Operations or equipment, encroaching on the traveled way, shall be protected by barricades and cones as the primary control and, where required other effective devices.
 - The Workforce Group, LLC must train workers in the traffic control safe work procedures.
 - The Workforce Group, LLC will ensure that before a worker is designated as a flag person, the worker is trained in the safe work procedures for the safe control of traffic operations and wears the appropriate high visibility outer clothing and/or equipment.
 - If a worker at a project on a highway may be endangered by vehicular traffic unrelated to the project, the project shall make use of as many measures as necessary to adequately protect the worker.
 - A worker who is required to set up or remove traffic control measures on a roadway or a shoulder of a roadway shall be a competent worker, shall be equipped with the appropriate high visibility apparel, shall not perform any other work while setting up or removing the measures and shall be given adequate written and oral instructions in a language that he or she understands, with respect to setting up or removing the measures.

ATV Vehicles

If a The Workforce Group, LLC work site utilizes ATV vehicles then the following shall apply:

- If the manufacturer has not set limits for operation of the ATV on sloping ground, 5% is the maximum allowable slope unless The Workforce Group, LLC has developed and implemented written safe work procedures appropriate for any steeper slope on which the equipment is to be used.
- The Workforce Group, LLC must ensure that each ATV operator is properly licensed and trained in the safe operation of the vehicle. The training program for an ATV operator must cover:
 - the operator's pre-trip inspection,
 - use of personal protective apparel,
 - operating skills according to the ATV manufacturer's instructions,
 - basic mechanical requirements, and
 - loading and unloading the vehicle, if this is a job requirement.
- An ATV operator and any passenger on an ATV must wear approved eye and hearing protection as required by local regulatory requirements and the The Workforce Group, LLC PPE Program. An ATV operator and any passenger on an ATV must wear clothing suitable for the environmental conditions and when necessary to protect against the hazards presented at the worksite, suitable gloves and clothing which covers the ankles and legs and the arms to the wrists and appropriate footwear.
- The Workforce Group, LLC requires that approved helmets shall be worn by the operator and passenger.

Safety Management Plan

Driving Safety Program

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- Loading and unloading of an ATV onto or off a carrier vehicle must be done in a safe manner. If ramps are used when loading or unloading an ATV they must be placed at a suitable angle, be sufficiently wide and have a surface finish which provides an adequate grip for the ATV's tires.

Auto Accident Report Form

Keep In Your Glove Box

When an accident occurs:

First Steps	Do Not Say	While Still At the Scene
<ul style="list-style-type: none">• Remain calm• Get to a safe place• Check for injuries• Administer First Aid• Call police/EMT	<ul style="list-style-type: none">• It's all my fault, (even if it is).• My insurance will pay for everything.• It's OK, I have full coverage.	<ul style="list-style-type: none">• Get as much information as possible on this report.• Take Pictures• When the police come, cooperate and tell them what you know.

Accident Details

Day/Date/Time AM/PM	
Weather/Road Conditions	
Location of Accident	
Accident Details	

Damage Descriptions

Your Vehicle	Other Vehicle
Towing Company Name & Phone	Towing Company Name & Phone

Other Driver/Vehicle Information

Owner's Name:	
Owner's Address:	
Owner's Phone:	
Vehicle Make:	
Vehicle Model & Year:	
Vehicle Color:	
License Plate Number	
Insurance Company:	
Agent Name & Phone:	
Other Drivers Name:	
Other Drivers Address:	
Other Drivers Phone:	

Passengers/Injuries:

Your Vehicle	Other Vehicle
# Passengers:	# Passengers:

Police Information

Officer Name:	
Department:	
Phone:	
Badge Number:	
Other Info:	

Witness Information

Name:		Name:	
Address:		Address:	
Home Phone:		Home Phone:	
Work Phone:		Work Phone:	

Sketch The Accident Scene:

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Drug, Alcohol and Substance Abuse Policy and Program

Purpose

The Workforce Group, LLC. (hereinafter referred to as the “Company”) believes substance abuse to be a serious threat to the abusing employee, the Company’s staff, the public and, more importantly, the Company’s customers and guests. The Company values its customers, guests and employees and recognizes the need for a safe and healthy work environment. Furthermore, the Company recognizes the problem of drug, alcohol and substance abuse in our society and is aware that employees using drugs, alcohol or other substances are less productive and are often a risk to the safety, security and welfare of the Company, its employees, its customers and others.

Therefore, the Company is introducing a workplace drug and alcohol testing policy to ensure that the Company will have a drug and alcohol-free environment.

Company Policy

It is the policy of the Company to maintain a workplace and workforce free of drugs, alcohol and other such substances. The presence of illegal drugs, alcohol or other such substances in one’s system, on one’s person, on Company Premises, while conducting company business or while operating company vehicles, machinery or equipment is prohibited by this policy. Compliance with the policies and guidelines set forth herein below is a condition of beginning and continued employment with the Company. It supersedes any other Company policy or practice on this subject. At any time, the Company may, at its sole discretion, amend, supplement, modify or change any part of this policy without any prior notice whatsoever.

The policy does not represent or express an implied contract, and it does not affect an employee’s status as an at-will employee under Louisiana law. If you have any questions about the policy, please immediately direct them to the Company administrator and/or his or her representatives.

The following policies, programs and guidelines with regard to the use, abuse, possession, presence of and sale of illegal drugs, alcohol or other such substances shall become effective immediately.

Safety Management Plan

Drug, Alcohol and Substance
Abuse Policy and Program

Definitions

For purposes of the Company Drug and Alcohol Testing Program policies and guidelines (hereinafter referred to as the “Program”), the following definitions are applicable:

1.) “Company Premises” encompasses Company affiliates and subsidiaries and all their properties, offices, parking lots, facilities, lands, platforms, buildings, structures, fixtures, installations, boats, aircrafts, automobiles, trucks and all other vehicles, machinery and other equipment, whether owned, leased or used.

2.) “Company Business” shall encompass employees whenever on duty and under the Company’s control, whether at other work sites or during transit to and from work sites or while in the course and scope of the Company’s employment or pay status.

3.) “Employees” shall include all full-time, part-time, casual or contract employees and all employment applicants and candidates as well.

4.) “Illegal Drugs, Alcohol or Other Such Substances” includes illegal drugs, unauthorized controlled substances, look-a-likes, inhalants of abuse, designer and synthetic drugs and shall include any drug which is not legally obtainable or which is legally obtainable but has not been legally obtained or used. The term includes prescribed drugs not legally obtained and prescribed drugs not being used for prescribed purposes or in excessive dosages. The terms include, but are not limited to, central nervous systems stimulants such as cocaine and amphetamines; hallucinogens; PCP or Phencyclidine; narcotics analgesics as found in opiates or opium (like morphine and codeine) and opium derivatives (heroin); inhalants from volatile solvents like glue, paint or gasoline or from aerosols like hair sprays, deodorants, insecticides or from anesthetic gases like Ether, chloroform or amyl nitrate; cannabinoids; cannabis such as found in marijuana, hashish or hash oil; Propoxyphene (Darvon); Barbiturates; Methadone; and Benzodiazepines (Valium).

Prohibition of Illegal Drugs, Alcohol or Other Such Substances

At any time while an Employee is on Company Premises or on Company Business, the following activities are strictly prohibited:

1. The use of or abuse of any Illegal Drug, Alcohol or Other Such Substances;
2. The possession, transport, transfer or purchase of Illegal Drugs, Alcohol or Other Such Substances;
3. The presence in the body, presence on one’s person or reporting to work under the influence of Illegal Drugs, Alcohol or Other Such Substances;

Safety Management Plan

Drug, Alcohol and Substance
Abuse Policy and Program

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4. The sale or marketing of Illegal Drugs, Alcohol or Other Such Substances or other drug related paraphernalia;
 5. The use, abuse, presence in one's system or possession of Illegal Drugs, Alcohol or Other Such Substances while utilizing, operating or in control or possession of Company property, including Company owned, leased or rented equipment and/or vehicles; and
 6. Using, consuming, transporting, distributing or attempting to distribute, manufacture, or dispense Illegal Drugs, Alcohol and Other Such Substances.

Any Employee involved in any of the foregoing activities at any time during a work shift or while working for, on behalf of or while representing the Company, whether or not on Company Business, Company Premises or Property is in violation of the Program and the Employee is subject to disciplinary action, including, but not limited to, immediate termination. Depending on the circumstances, other action, including, without limitation, (1) notification of the appropriate law enforcement, regulatory or licensing agencies and (2) denial, suspension or termination of workers' compensation benefits and unemployment compensation benefits may be taken against any Employee who violates these policies, mandates and prohibitions.

The Program equally applies to all Employees. Compliance with these policies mandates and prohibitions will be required as a condition of employment for all Employees. There shall be no exceptions.

Unauthorized Use of Intoxicating Beverages

An Employee whose blood alcohol level is over 0.04% (40 MG/DL blood) while on Company Premises, during working hours, or while conducting Company Business is in violation of this Company policy and subject to immediate discharge or termination.

**Prescription Drugs (Legally Controlled Substances
and All Off-the-Shelf or Over-the-Counter Medicines)**

All Employees must report the use of any medically prescribed or authorized drugs or substances (including over-the-counter or off-the-shelf medication) which can impair or lessen job performance (whether allowed to be dispensed with or without prescription) to their immediate supervisor and upon request by the Employee's supervisor or the Company's Drug Policy Administrator, must provide proper written medical authorization to the Company from a physician. This includes, without limitation, drugs such as tranquilizers, muscle relaxers, pain medication and anti-depressants. It is the Employee's responsibility to determine from a physician(s) whether prescribed, off-the-shelf or over-the-counter drugs, medicines or other such substances that may impair job performance. Failure to report the use of such drugs, medicines

Safety Management Plan

Drug, Alcohol and Substance
Abuse Policy and Program

or other substances, failure to provide proper evidence of medical authorization or the use (as evidenced by presence in an Employee's body fluids or otherwise) of such drugs, medicines or other such substances in amounts in excess of the label recommendations for over-the-counter or off-the-shelf drugs, medicines or other such substances may result in disciplinary actions, up to, and, including, immediate termination.

Employees must not consume prescribed drugs or off-the-shelf or over-the-counter drugs, medicines or other such substances more often than prescribed by their doctor or as directed on the off-the-shelf or over-the-counter medication label(s). All prescribed, off-the-shelf or over-the-counter medication must be in its original container with the Employee's name, the doctor's name and prescription number on the label and each prescription must not be older than one year of the date issued. However, the Company at any time reserves the right to have a licensed physician determine whether the prescription drug use increases the risk of injury to the Employee, the Company's residents or guests while the Employee is working. If such a finding is made, the Company may limit, suspend or terminate the Employee's work activities during the period job safety may be adversely affected by the consumption of such medication.

Any Employee refusing to cooperate with submitting to questioning, medical or physical testing or examinations, when requested by the Company or its designee, is in violation of this Company policy and subject to disciplinary action, including, but not limited to, immediate termination.

Drug and Alcohol Testing Procedures

In order to achieve the objectives of this Policy, the Company asserts and reserves its legal right to test any and all Employees for the presence of Illegal Drugs, Alcohol or Other Such Substances in their system or for the use or abuse of Illegal Drugs, Alcohol or Other Such Substances. Employees may be asked to submit to a medical examination and/or to submit urine, saliva, breath and blood samples for testing for the presence of Illegal Drugs, Alcohol or Other Such Substances. Any information obtained through such examinations and/or testing may be retained by the Company and is the property of the Company. The Company reserves the right, in its discretion and within the limits of federal and state laws, to examine, screen and/or test for the presence of Illegal Drugs, Alcohol or Other Such Substances as stated herein in the following situations:

1. **Pre-Hire Employment Testing.** All job applicants or newly hired employees may be required to undergo screening for the presence of Illegal Drugs, Alcohol or Other Such Substances as a condition of beginning employment with the Company. Applicants will be required to voluntarily submit to a urinalysis test conducted by a laboratory designated by the Company and by signing a Consent Agreement(s) in connection with such testing will release the Company and said laboratory from liability in connection therewith. Any Applicant with a positive test result may be denied employment with the Company. The Company will not

Safety Management Plan

Drug, Alcohol and Substance
Abuse Policy and Program

and cannot tolerate the current abuse of Illegal Drugs, Alcohol or Other Such Substances.

2. **For Cause/Post-Accident or Incident Testing.** If an accident or incident occurs involving an Employee while on Company Business or on Company Premises, no matter how minor or insignificant, the Company will require a drug and/or alcohol test. A drug and/or alcohol test may also be required after any situation where there has been a “near miss” incident or accident, even though no injury or property damage occurs. When there is reasonable cause to suspect that an Employee’s behavior, performance, error in judgment, or unsafe actions are related to the use or abuse of Illegal Drugs, Alcohol or Other Such Substances, the Company’s Competent Person/Supervisor may require that the Employee submit to a drug and/or alcohol test. Failure by an employee and/or his supervisor to report any accident or incident which meets the post-accident or post-incident testing criteria is in violation of this Company Policy and subject to disciplinary action which includes, without limitation, immediate termination. An Employee’s testing positive may make him or her ineligible for workers’ compensation benefits and/or unemployment compensation benefits.
3. **Random Testing.** All Employees and/or specified Employees are subject to routine random drug and/or alcohol testing in order to detect the use, abuse, or presence in an Employee’s system of Illegal Drugs, Alcohol or Other Such Substances without any advance notice or prior warning.
4. **Post-Treatment, Counseling, Rehabilitation or Return to Work Testing.** Employees who return to work following a (1) medical leave of absence, (2) a work related injury, (3) drug, alcohol or substance abuse counseling or (4) rehabilitation may be subject to drug and/or alcohol testing upon return to work and for up to one year following the Employee’s return to work. A positive test result will constitute grounds for immediate termination. It is a condition of reinstatement of employment with the Company for an Employee, upon completion of a drug and/or alcohol counseling program, or any other return-to-work established procedure, to submit to an alcohol and/or drug screening test.

Searches

In order to achieve the objective of the Company’s Policy, the Company reserves the right at all times to search Employees who are entering and departing the Company Premises, conducting Company Business or when circumstances warrant or when reasonable suspicion or cause exists to have properly authorized supervisors or search personnel (including drug detection dogs) conduct unannounced reasonable searches and inspections. These searches may extend to other Company Premises as described above as well as to the Employee’s personal effects. Employee

Safety Management Plan

Drug, Alcohol and Substance
Abuse Policy and Program

personal property subject to inspection includes, but is not limited to, lockers, baggage, briefcases, boxes, bags, parcels, lunch-boxes or bags, food/beverage containers, desks, tools, clothing and vehicles. The purpose of said search is to determine if Employees or others on Company Premises, or conducting Company Business, are in possession of, using, abusing, transporting or concealing any Illegal Drugs, Alcohol or Other Such Substances, or other items prohibited by this policy. Searches may be initiated without prior notice or advanced warning and conducted at times and locations as deemed appropriate by the Company. Any Employee found to have Illegal Drugs, Alcohol or Other Such Substances in their possession, on their person or in their personal area (desks, car, and lunch container) will be subject to immediate termination or discharge. The Company reserves the right to conduct any search it deems appropriate as set forth in this Company Policy.

Alcohol Testing

Testing Employees for the presence of alcohol will initially be performed through the use of breath, skin and/or other alcohol detector tests. If an Employee tests positive for alcohol in such a test, such positive result may, if challenged by the Employee, be confirmed through the use of a breath analyzer or blood alcohol test. A breath analyzer or blood alcohol test result (or breath scan/comparable alcohol detector test which is not challenged) showing a concentration of 0.04% or greater shall be grounds for appropriate disciplinary action, including, without limitation, immediate discharge and/or termination.

Consequences of a Positive Drug or Alcohol Test

1. In the event of a confirmed positive test result for the presence, use or abuse of Illegal Drugs, Alcohol or Other Such Substances during a pre-employment drug or alcohol screening, the applicant will not be hired.
2. In the event of a confirmed positive test result for the presence, use or abuse of Illegal Drugs, Alcohol or Other Such Substances for current Employees during a drug/alcohol screen provided for by this Company Policy, the Employee (1) will be immediately terminated and discharged, for cause, and not allowed to work on any client/host site or facility (2) may be reported to state and federal authorities and agencies and (3) may be denied workers' compensation benefits or unemployment compensation benefits.

Safety Management Plan

Drug, Alcohol and Substance
Abuse Policy and Program

By Signing Herein Below:

- 1. I expressly confirm that I have read and understood the Company's Policy;**
- 2. I understand that participation in the Company's policy is a mandatory condition on my employment; and**
- 3. I further agree and expressly consent to all terms, conditions, mandates and prohibitions set forth in the Company's policy.**

Company Name: The Workforce Group, LLC.

Applicant or Employee Name (**Print**): _____

Applicant Last Four of Social Security Number: _____

Applicant or Employee's Signature: _____

Date: _____

Supervisor's Signature: _____

Date: _____

Electrical Safety: Qualified / Non Qualified

Purpose

The purpose of the Electrical Safety program is to set forth procedures for the safe use of electrical equipment, tools, and appliances at The Workforce Group, LLC.

Scope

This program applies to all The Workforce Group, LLC employees, temporary employees, and contractors. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected Personnel - Personnel who normally use and work with electrical equipment, tools, and appliances, but who do not make repairs or perform lock out/tag out procedures.

Appliances - Electrical devices not normally associated with commercial or industrial equipment such as air conditioners, computers, printers, copiers, coffee pots, microwave ovens, toasters, etc.

Circuit Breaker - A device designed to open and close a circuit by non-automatic means and to open the circuit automatically on a predetermined over current without injury to itself when properly applied within its rating.

Disconnecting Means - A device, or group of devices, or other means by which the conductors of a circuit can be disconnected from their source of supply.

Disconnecting Switch - A mechanical switching device used for isolating a circuit or equipment from a source of power.

Double Insulated Tool - Tools designed of non-conductive materials that do not require a grounded, three wire plug.

Ground - Connected to earth or some conducting body that serves in place of the earth.

Grounded Conductor - A conductor used to connect equipment or the grounded circuit of a wiring system to a grounding electrode or electrodes.

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

Ground Fault Circuit Interrupter (GFCI) - A device whose function is to interrupt the electric circuit to the load when a fault current to ground exceeds some predetermined value that is less than that required to operate the over current protective device of the supply circuit. The Workforce Group, LLC shall use GFCIs in lieu of an assured grounding program.

Insulated - A conductor encased within material of composition and thickness that is recognized as electrical insulation.

Premises Wiring - That interior and exterior wiring, including power, lighting, control, and signal circuit wiring together with all of its associated hardware, fittings, and wiring devices, both permanently and temporarily installed, which extends from the load end of the service drop, or load end of the service lateral conductors to the outlet (s). Such wiring does not include wiring internal to appliances, fixtures, motors, controllers, motor control centers, and similar equipment.

Qualified Person - One that has been trained in the repair, construction and operation of electrical equipment and the hazards involved.

Strain Relief - A mechanical device that prevents force from being transmitted to the connections or terminals of a cable or extension cord.

Class I Locations - Are those in which flammable gases or vapors are or may be present in the air in quantities sufficient to produce explosive or ignitable mixtures.

Class 1 Division 1 - Is a location (a) in which hazardous concentrations of flammable gases or vapors may exist under normal operating conditions; or (b) in which hazardous concentrations of such gases or vapors may exist frequently because of repairs or maintenance operations or because of leakage; or (c) in which a breakdown or faulty operation or equipment or processes might release hazardous concentrations of flammable gases or vapors, and might also cause simultaneous failure of electrical equipment.

Class 1 Division 2 - Is a location (a) in which volatile flammable liquids or flammable gases are handled, processed, or used, but in which the hazardous liquid, vapors, or gases will normally be confined within closed containers or closed systems from which they can escape only in case of accidental rupture or breakdown of such containers or systems, or in of abnormal operation of equipment or (b) in which hazardous concentrations of gases or vapors are normally prevented by positive mechanical ventilation, and which might become hazardous through failure or abnormal operations of the ventilating equipment; or (c) that is adjacent to a Class 1, Division 1 location, and to which hazardous concentrations of gases or vapors might occasionally be communicated

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

unless such communication is prevented by adequate positive-pressure ventilation from a source of clean air, and effective safeguards against ventilation failure are provided.

Class II locations - Class II locations are those that are hazardous because of the presence of combustible dust. Class II locations include the following:

Class II, Division 1 - A Class II, Division 1 location is a location (a) in which combustible dust is or may be in suspension in the air under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures; or (b) where mechanical failure or abnormal operation of machinery or equipment might cause such explosive or ignitable mixtures to be produced, and might also provide a source of ignition through simultaneous failure of electric equipment, operation of protection devices, or from other causes, or (c) in which combustible dusts of an electrically conductive nature may be present.

NOTE: This classification may include areas of, areas where metal dusts and powders are produced or processed, and other similar locations that contain dust producing machinery and equipment (except where the equipment is dust-tight or vented to the outside).

- These areas would have combustible dust in the air, under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures.
- Combustible dusts that are electrically nonconductive include dusts produced in the handling and processing produce combustible dusts when processed or handled.
- Dusts containing magnesium or aluminum are particularly hazardous and the use of extreme caution is necessary to avoid ignition and explosion.

Class II, Division 2 - A Class II, Division 2 location is a location in which: (a) combustible dust will not normally be in suspension in the air in quantities sufficient to produce explosive or ignitable mixtures, and dust accumulations are normally insufficient to interfere with the normal operation of electrical equipment or other apparatus; or (b) dust may be in suspension in the air as a result of infrequent malfunctioning of handling or processing equipment, and dust accumulations resulting there from may be ignitable by abnormal operation or failure of electrical equipment or other apparatus.

NOTE: This classification includes locations where dangerous concentrations of suspended dust would not be likely but where dust accumulations might form on or in the vicinity of electric equipment. These areas may contain equipment from which appreciable quantities of dust would escape under abnormal operating conditions or be adjacent to a Class II Division 1 location, as described above, into which an explosive or

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

ignitable concentration of dust may be put into suspension under abnormal operating conditions.

Responsibilities

Managers/Supervisor

The HSE Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees shall be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

Safe Work Practices

Inspections

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.
- Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

Repairs

- Only Qualified Personnel, who have been authorized by the department supervisor or manager, may make repairs to supply cords on electrical tools and to extension cords.
- The names of employees authorized to make repairs will be posted in the workplace.
- Only certified electricians shall be allowed to make repairs to electrical equipment and wiring systems.

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

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- The supervisor obtaining the services of a certified electrician is responsible to verify the electrician's credentials.
 - Employees shall not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.
 - Employees shall not wear conductive apparel such as rings, watches, jewelry, etc. (unless they are rendered non-conductive by covering, wrapping, or other insulating means) while working on or near open energized equipment this includes batteries on trucks, forklifts, phone backup systems or other such equipment.
 - If employees are subject to handle long dimensional conductor objects (ducts or pipes), steps for safe work practices shall be employed to ensure the safety of workers.

Extension Cords

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - All extension cords shall be plugged into one of the following:
 - A GFCI outlet;
 - A GFCI built into the cord;
 - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be remove from service and repaired or replaced.

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

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- Extension cords shall not be used on compressor skid to operated heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment shall be hard wired per applicable electrical codes.

Outlets

- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

Multiple Outlet Boxes

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

Double Insulated Tools

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

Switches, circuit breakers, and disconnects

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labelled with the voltage rating.
- Each breaker within a breaker panel must be labelled for the service it provides.
- Disconnect switches providing power for individual equipment must be labelled accordingly.

Ladders

- Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.
- Wood ladders should not be painted, which can hide defects, except with clear lacquer.
- When using ladders they shall be free from any moisture, oils, and greases.

Energized and Overhead High Voltage Power Lines & Equipment

- A minimum clearance of 10 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines shall be de-energized and grounded or other protective measures shall be provided before work is started.

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

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- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.
 - Minimum approach distance for qualified employees shall be followed per 29 CFR 1910.333(c)(3)(i) Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current). Approach distances are 10' for 50kV plus 4" for every additional 10kV.

Confined or Enclosed Work Spaces

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee shall isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

Enclosures, Breaker Panels, and Distribution Rooms

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures shall be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have "Danger: High Voltage – Authorized Personnel Only" posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

Lock Out/Tag Out

- No work shall be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with the live parts) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out shall be treated as live parts.

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

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- Per The Workforce Group, LLC policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using The Workforce Group, LLC's Control of Hazardous Energy – Lock Out/Tag Out Program. Lockouts are performed by the HSE Manager, Shop Foreman or Branch Manager. Designated employees in some branches may be trained by local management to lock out equipment. If live sources are to be worked it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.
 - Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow The Workforce Group, LLC's Control of Hazardous Energy – Lock out/Tag Out Program.
 - Authorized personnel will be trained in lock out/tag out procedures.
 - Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

Contractors

- Only approved, certified, electrical contractors may perform construction and service work on The Workforce Group, LLC or client property.
- It is the Manager/Supervisors responsibility to verify the contractor's certification.

Fire Extinguishers

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

Electric Shock-CPR

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

Electric Welders

- A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

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- A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

Equipment Grounding

- All gas compressors, air compressors, separators, vessels, etc. shall be grounded by means of using a lug and ground strap, nominal in size to a ½” bolt or larger, attached to a ground rod six feet or longer.
- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

Assured Grounding

OSHA requires that employers shall use either ground fault circuit interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

- The Workforce Group, LLC shall use GFCI's in lieu of an assured grounding program.

Ground Fault Circuit Interrupters

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords shall use a GFCI.
- Additionally, approved GFCI's shall be used for 240-Volt circuits in the same service as described above.
- GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

Training

All regular full time and temporary employees will be trained in electrical safety utilizing the The Workforce Group, LLC Electrical Safety Training course or an approved equivalent.

Employees who face a risk of electric shock, but who are not qualified persons, shall be trained and familiar with electrically related safety practices.

Safety Management Plan

Electrical Safety: Qualified / Non
Qualified

Employee shall be trained in safety related work practices that pertain to their respective job assignments.

Employees shall be trained on clearance distances.

Safe work practices shall be employed to prevent electric shock or other injuries resulting for either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

All qualified or unqualified employees or contractors under The Workforce Group, LLC supervision shall be trained to ensure they adhere to the approach distances in Table S5 of CFR 1910.333.

Voltage Range (phase to phase)	Minimum Approach Distance
Over 300V, not over 750V.....	1 ft. 0 in. (30.5 cm).
Over 750V, not over 2kV.....	1 ft. 6 in. (46 cm).
Over 2kV, not over 15kV.....	2 ft. 0 in. (61 cm).
Over 15kV, not over 37kV.....	3 ft. 0 in. (91 cm).
Over 37kV, not over 87.5kV.....	3 ft. 6 in. (107 cm).
Over 87.5kV, not over 121kV.....	4 ft. 0 in. (122 cm).
Over 121kV, not over 140kV.....	4 ft. 6 in. (137 cm).

Emergency Action Plan

Purpose

Each The Workforce Group, LLC location shall have a written Emergency Action Plan, appropriate to the hazards of the workplace, in order to respond to an emergency that may require rescue or evacuation.

Each Emergency Action Plan shall be prepared to reflect all known probable emergency conditions which may arise from within the workplace and from adjacent workplaces, the minimum of which will include fire or other emergencies.

The emergency action plan must be available to all employees to review. An emergency action plan must be in writing, kept in the workplace and available to employees for review. However, if a site has 10 or fewer employees the plan may be orally to employees.

Emergency Response Planning, Issuing and Annual Review Guidelines

Emergency Procedures shall be issued and discussed with all new/transferred personnel upon arrival for assignment.

Emergency Action Plans shall be established, implemented, reviewed, maintained and updated annually in conjunction with:

- Client emergency services department requirements.
- The Workforce Group, LLC safety staff and management.
- The requirement to ensure the plan is up to date to reflect current circumstances at the workplace.

The plan is to be reviewed before the job and when conditions warrant and should be used for routine and non-routine emergencies as well as changes in operation, and products or services which warrant new emergencies situations.

Reviewing the Emergency Action Plan with Employees

A review of the emergency action plan should occur with employees:

- When the plan is developed or the employee is assigned initially to a job.
- When the employee's responsibilities under the plan change.
- When the plan is changed.

Procedures for Emergency Evacuation Planning

The emergency action plan must include procedures for emergency evacuation. An emergency action plan must include at a minimum procedures for emergency evacuation, including type of evacuation and exit route assignments.

Safety Management Plan

Emergency Action Plan

The individual site evacuation procedure shall be appropriate to the risk must be developed and implemented to:

- Notify staff, including the first aid attendant, of the nature and location of the emergency,
- Evacuate employees safely and procedures to account for all employees after evacuation,
- Check and confirm the safe evacuation of all employees,
- Notify the fire department or other emergency responders, and
- Notify adjacent workplaces or residences which may be affected if the risk of exposure to a substance extends beyond the workplace. Notification of the public must be in conformity with the requirements of other jurisdictions, including provincial and municipal agencies.

List of Potential Emergencies

The emergency action plan must include procedures for reporting a fire or other emergency. An emergency action plan must include at a minimum procedures for reporting a fire or other emergency.

Each location shall conduct a risk assessment for hazards posed by potential hazardous substances from accidental release, fire or other such emergencies that could cause an evacuation or rescue and list the potential emergencies for The Workforce Group, LLC operations. Procedures for each of these potential emergencies shall be contained within the Emergency Action Plan. Examples include:

- Fire
- Gas Leaks/Chemical Spills
- Bomb Threats
- Medical Emergencies
- Explosion
- Workplace Violence

Guidance Procedures for Potential EmergenciesFire

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if present.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Gas Leaks/Chemical Spills - Upon smelling or noticing a gas leak or unusual vapors, or a chemical spill:

- Pull fire alarm (if present) or sound warning and evacuate the premises via the nearest exit
- Proceed to the Emergency Assembly Area
- Contact local emergency response personnel by phone or radio
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Safety Management Plan

Emergency Action Plan

If employees are required to control a release of a hazardous substance, to perform cleanup of a spill, or to carry out testing before re-entry, The Workforce Group, LLC shall provide:

- Adequate written safe work procedures and documented training.
- Appropriate personal protective equipment which is readily available to employees and is adequately maintained, and
- Material or equipment necessary for the control and disposal of the hazardous substance.

Bomb Threats

- If a threat is received by phone, mail or other means, get as much information as possible.
- If the threat is received by phone, try to keep the person on the line for as long as possible. Do not hang up the phone, even after the call has been terminated.
- Contact local emergency response personnel by phone or radio.
- If a suspicious device is identified, evacuate the immediate area and notify local emergency response personnel.

Medical Emergencies

- Call for assistance by phone or radio. Give the exact location and details of the medical emergency.
- If qualified, provide basic first aid, and keep the person comfortable. Do not move the person. Do not leave him/her unattended.
- Arrange for emergency medical transportation based on the medical planning portion of the site's Emergency Action Plan.

Explosions

- Get down on the floor, take shelter under tables or desks, and protect your face and head against flying glass and debris.
- Once it is safe to do so, evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Workplace Violence

- Notify security immediately by phone or radio and report the occurrence.
- Do NOT attempt to physically intervene. Protect yourself first at all costs.

Emergency Response Equipment**Listing of Types of Emergency Equipment**

Each site Emergency Action Plan shall identify, list the locations of and provide operational procedures for types of emergency equipment. For off-site locations, available emergency equipment should be identified and reviewed with workers prior to commencing work activities. Examples include:

- Living areas with an audible alarm and a fire hose cabinet.
- Emergency lighting, exit doors, dampers and fire stop flaps.

Safety Management Plan

Emergency Action Plan

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- First aid kits located throughout the facility and in vehicles.
 - Portable fire extinguishers being located throughout the facility and clearly marked.
 - Only authorized and trained personnel will operate emergency equipment.

Inspection & Maintenance Records

Maintenance records must be kept, including but not limited to the name of manufacturer, the type of equipment, the date put into service, when and for what purpose the equipment has been used, the date of the last inspection and name of the inspecting person, any damage suffered, and the date and nature of any of maintenance on emergency response equipment.

Ropes and associated equipment must be inspected visually and physically by qualified employees after each use for rescue, evacuation or training purposes.

The The Workforce Group, LLC designated representative will perform and maintain the The Workforce Group, LLC Emergency Inspection Checklist Form on a monthly basis. The checklist shall be maintained for retention in active files for two years and in on site archives for seven years.

Media Response Plan

The Workforce Group, LLC employees must not be interviewed by anyone unless the Legal Department has given prior approval. In most cases the Legal Department will have an attorney present for such interviews.

Note: If after The Workforce Group, LLC personnel have received approval for an interview from the Legal Department and another party's attorney appears unannounced, you should politely adjourn the interview until the The Workforce Group, LLC Legal Department can be contacted. Personnel must not give any work related interviews, affidavits, written or recorded statements, or depositions without the express approval from the The Workforce Group, LLC Legal Department.

In the case of interviews of The Workforce Group, LLC employees by non-attorneys, (law enforcement, government officials, media, etc) you must inform the Legal Department before the interview. If the interview is taped or videotaped, you must request a copy of the tape. If the interview is reduced to writing, you must ask for a copy of any notes or statements taken. This procedure is to avoid information being misrepresented.

All media requests should be referred to the The Workforce Group, LLC Chief Operating Officer. Unless requested to do so by the Legal Department, other company personnel are not to give interviews or make statements to the media. Management prefers that families of personnel involved in an incident receive initial notification from a The Workforce Group, LLC representative and not the media.

Training

The Workforce Group, LLC shall ensure training for Emergency Action Plan is delivered, documented and prepares the staff and facility for emergency conditions. The Workforce Group, LLC will designate

Safety Management Plan

Emergency Action Plan

and train employees to assist in a safe and orderly evacuation of other employees. Requirements include:

- All employees must be given adequate instruction in the fire prevention and emergency evacuation procedures applicable to their workplace.
- The designated site representative shall provide the Emergency Action Plan orientation to all new/transferred personnel before they begin work.
- All personnel shall receive a review/update orientation at least annually, or whenever any new/revised information is to be provided.
- The Emergency Action Plan Orientation Check List shall be completed after orientation and the record maintained in the individual's training records.
- The Workforce Group, LLC management shall ensure that contractors/consultants working in areas under the supervision of The Workforce Group, LLC also receive the Emergency Action Plan orientation upon arrival to the area.
- Employees expected to perform duties under the Emergency Action Plan will be trained prior to assuming their roles. This will include simulated rescue or evacuation exercises and regular retraining, appropriate to the type of rescue or evacuation being provided, and training records must be kept.
- A list of trained staff responders shall be posted and maintained indicating their name, response function, their work location and what type of equipment they have been trained for.

Location and Use of Emergency Facilities

The Workforce Group, LLC shall ensure each Emergency Action Plan lists the location and how to use emergency facilities for each work site. For off-site locations, outside services that can provide assistance in the event of an emergency should be identified and reviewed with workers prior to commencing work activities. A list shall be posted in a conspicuous area showing local emergency facilities and how to contact. Examples include:

- Client Emergency Response Department (Initial Responder for All Emergencies If Applicable)
- Local Police, Local Hospital, Poison Center (Poison Response) 1-800-332-1414, etc.

Fire Protection & Response

The Workforce Group, LLC shall ensure each Emergency Action Plan provides fire protection and response planning within each site Emergency Action Plan and is utilized during all phases of work. As a minimum, all shall include the following:

Protection

- Smoking is not permitted except in designated 'SMOKING' areas.
- Facilities shall be designed and maintained in accordance with local fire code and regulations.
- Portable fire extinguishers shall be stationed, inspected and maintained in accordance with local fire code and regulations. The Workforce Group, LLC personnel shall be trained in their use.
- Flammable and combustible liquids shall be properly stored.
- Employees shall report all fire safety issues to their immediate supervisor.

Safety Management Plan

Emergency Action Plan

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- Facilities shall be inspected by use of the The Workforce Group, LLC Emergency Inspection Checklist

Response

In the event of a fire, personnel working in facility will adhere to the following procedure for their work area:

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if present.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Roads are designated as fire lanes. Vehicles can stop there for unloading, but no parking will be allowed.

Alarm & Emergency Communication

Each Emergency Action Plan for The Workforce Group, LLC shall contain methods to address alarms and communications in case of an emergency. For off-site locations, the method of emergency notification should be identified and reviewed with workers prior to commencing work activities.

Alarm System

A system must be in place to alert employees. The alarm system shall be distinctive and recognizable as a signal to evacuate the work area or perform actions designated under the emergency action plan. For sites with 10 or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding the alarm provided all employees can hear the alarm. Each Emergency Response plan will describe how to activate an alarm and what to do after either activating or hearing an alarm.

Personnel responding to any alarm shall avoid complacency. Every alarm should be treated as an actual incident until proven otherwise. Treating and responding to alarms as a routine happening can result in injuries, fatalities and destruction of property.

Communications

The Workforce Group, LLC responders and security use telephones, cell phones and radios in conjunction with emergency response.

Rescue and Evacuation Procedures**Procedures for Rescue and Medical Services**

Each site Emergency Action Plan shall address who performs rescue services when required. It is the position of The Workforce Group, LLC that all rescue and medical duties are performed by client emergency responders or local governmental responders when on their location. For off-site locations,

Safety Management Plan

Emergency Action Plan

evacuation procedures and methods of rescue shall be identified and reviewed with workers prior to commencing work activities.

At least one member of a rescue team must be a first aid attendant trained to immobilize an injured employee.

Effective communications must be maintained between the employees engaged in rescue or evacuation and support persons.

Procedure for EvacuationPreparation for Evacuation

Each site Emergency Action Plan shall contain a procedure for evacuation if required.

The The Workforce Group, LLC designated Emergency Coordinator will maintain an active list of all The Workforce Group, LLC and contract emergency responders.

Critical Plant Operations Personnel

Staff designated to remain in the facility to shut down or supervise critical operations or equipment will be specifically trained and authorized by management to perform their duties before any evacuation may occur.

Evacuation Drills

Evacuation drills shall be conducted at least annually. Before conducting an evacuation drill a pre-drill assessment of the evacuation routes and assembly points shall be conducted. The pre-drill assessment is intended to verify that all egress components (stairs, doors, etc.) are in proper order and that occupants can use them safely.

Coordination Within a Facility

Emergency training and drills should also be coordinated within a The Workforce Group, LLC facility so that key staff are involved in the planning process and are aware of their responsibilities in an emergency as well as during the drill.

Facility management also needs to be informed of the potential for the interruption in productivity and business operations. Alternatives for the continuity of critical operations need to be considered.

Procedures to Account for All Employees After Evacuation

The emergency action plan must include procedures to account for all employees after the evacuation. An emergency action plan must include at a minimum procedures to account for all employees after evacuation. Each muster or assembly point will have a blank roster for evacuees to enter their name. All completed rosters will be gathered and checked against a master list of employees assigned or checked in at the facility to verify all employees are accounted for.

Safety Management Plan

Emergency Action Plan

Emergency Evacuation Notification and Routes

In the event of an emergency occurring within or affecting the work site, the Emergency Coordinator makes the following decisions and ensures the appropriate key steps are taken:

- Advise all personnel of the emergency.
- Activate the emergency notification sequence to alert the appropriate responders and initiate emergency notification within the building.
- Evacuate all persons to the identified assembly area and account for everyone including visitors and clients.

All personnel will proceed to the primary safe area immediately located at the identified emergency assembly area for their location.

A copy of escape routes shall be posted in all offices, at all alarm stations and at all exits.

Sweep Check by The Workforce Group, LLC Designated Responders

- The Workforce Group, LLC trained responders will establish a pattern that will permit covering the area in the shortest time, with a minimum of backtracking.
- When the evacuation alarm rings, stop work immediately, and conduct a sweep of the area. Ask everyone to leave the premises immediately and proceed to the identified emergency assembly area for their location.
- If you encounter smoke or flame, leave that section immediately, finish your sweep and evacuate the building by activating fire alarm pull stations. Remember, if in doubt get out.
- If anyone refuses to leave, note their name and location, and advise the client emergency services personnel.
- Meet the client emergency services personnel and advise them of your sweep or an area of smoke or flame that you were unable to check. Assist with head count and evacuation if required.
- Ensure that everyone stays at the emergency assembly area until the Emergency Coordinator has given an all clear to re-enter the building.
- In the event of inclement weather, the client will make arrangements to have buses either as temporary shelter or to transport personnel to another location.

Evacuation or Drill Evaluation

Following an evacuation or drill a response review shall be conducted and documented by the The Workforce Group, LLC Emergency Coordinator and lessons learned share with the appropriate responders and staff using the The Workforce Group, LLC Evacuation Report.

Emergency Response Program Management

Contact information will be provided to employees who need additional information pertaining to the plan or to their respective duties. The The Workforce Group, LLC site manager may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

Safety Management Plan

Emergency Action Plan

For the purpose of this Emergency Action Plan guidance the Emergency Coordinator will be designated by the The Workforce Group, LLC site manager. His/her alternate will be the The Workforce Group, LLC Site Safety Supervisor or otherwise designated by the site manager.

Employees performing rescue or evacuation must wear personal protective clothing and equipment appropriate to the hazards likely to be encountered.

Duties**The Workforce Group, LLC Emergency Coordinator**

The The Workforce Group, LLC Emergency Coordinator ensures that:

- Evacuation drills are conducted on an annual basis.
- Inspections of facilities are performed monthly.
- All necessary repairs of components for evacuation paths are completed.
- Plans for the modification of any part of an evacuation path are reviewed.
- An up to date list of Fire Wardens is maintained.
- Radios and reflective vests and other response equipment are available.

During an evacuation or evacuation exercise, the The Workforce Group, LLC Emergency Coordinator:

- Coordinates activities in accordance with either local authorities or the client Security and ERT as required.
- Coordinates Fire Wardens and informs them the nature of the emergency via handheld radios.

Following an evacuation or evacuation exercise, the The Workforce Group, LLC Emergency Coordinator:

- Notifies Fire Wardens that it is safe to re-enter the building.
- Prepares a report following an evacuation (actual or drill).
- Reports to management for follow up or corrective actions.

The Workforce Group, LLC Site Safety Supervisor

- Assist the The Workforce Group, LLC Emergency Coordinator when requested.

Fire Wardens

- Be equipped with radios and reflective vests. The 2equipment is to be handed into the The Workforce Group, LLC Emergency Coordinator and reissued to the next oncoming Fire Warden for the designated area.
- Be familiar with exits and muster stations for their responsible area.
- Direct residents safely out of the building to the designated muster station or to an alternate location.
- Sweep their effected area, ensuring that the alarms are properly functioning and that residents evacuate safely.

Safety Management Plan

Emergency Action Plan

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- In order to account for all employees after evacuation the fire wardens or designated personnel shall complete a head count and reconcile the evacuees with the attendance or daily housing report at the assigned muster station or alternate location.
 - Radio unaccounted for personnel to Security.
 - Notify personnel that they may re-enter the building when permission has been given by the appropriate authorities.

Residents, Contractors & Visitors

- All employees, users, contractors and visitors will follow the instructions of the Fire Wardens, Security, ERT, Safety Personnel, managers and supervisors when asked to evacuate the building.
- Know the two safest and most direct evacuation routes from their work area(s).
- Know the designated evacuation assembly point for the building.

The Workforce Group, LLC Emergency Inspection Checklist

Department:	Location:	Date of Inspection:
Inspected by:	Title:	Ext:

This form is to be used monthly.

	N/A	Yes	No
EGRESS			
Is every means of egress arranged and clearly marked, so that the way to safety is unmistakable at all times?			
Are exits signs lit?			
Are there sufficient exits for the prompt escape of all employees in case of fire or other emergencies?			
Are doors that aren't exits that could be mistaken as one, clearly marked "Not an Exit"?			
Do exit doors swing out?			
Are means of egress at least 28 inches at any point and adequate width for the number of people?			
Are egresses kept clear of obstructions and materials at all times?			
Is there proper lighting for emergency exiting? (i.e. during a power failure)			
Are at least two exits by separate ways of travel available for each occupant?			
Is the minimum width of any exit way no less than 28 inches?			
Are furnishings and decorations so placed that they will not obstruct the exits, the access thereto, or the egress there from, or the visibility thereof?			
Are explosive and highly flammable furnishings or decorations prohibited?			
EMERGENCIES/EVACUATION			
Are evacuation maps posted in readily accessible places?			
Do employees know where their muster point is located?			
Do employees know area hazards, the nearest exit and alternate routes of escape?			
Do employees know the preferred means of reporting emergencies?			
Do employees know the site emergency number(s)?			
Is the site emergency number posted on or by the phone?			
Do employees know what signal indicates evacuation?			
Can all personnel perceive the employee alarm?			
Do employees with special assistance needs been addressed?			

Safety Management Plan

Emergency Action Plan

<u><i>This form is to be used monthly.</i></u>	N/A	Yes	No
Employees questioned know where the emergency shut off is for the natural gas			
FIRE PROTECTION			
Are fire hydrants accessible?			
Are fire hydrants inspected yearly and records maintained to show the date?			
Are control and operating valves locked open or electronically supervised?			
Are fire hoses maintained and periodically tested?			
Are combustible materials kept away from ignition sources?			
Are standpipe and hose system components visually inspected quarterly?			
Is the accumulation of flammable and combustible materials controlled so they do not contribute to fire emergency?			
All product, supplies, merchandise etc not piled within 18" of Sprinkler heads			
No Combustibles within three feet of Hot Water Tank, Space Heaters and/or Electrical panels			
All Compressed Gas Cylinders tied or chained to eliminate tipping			
DETECTION AND ALARM SYSTEMS			
Are detection systems installed and maintained?			
Are all trouble alarms and fire signals investigated?			
Do detection/alarm systems shut down or reverse HVAC systems for smoke control?			
Do detection/alarm systems close smoke or fire doors?			
Do detection/alarm systems activate local alarms?			
Are alarm and PA systems periodically tested?			
PORTABLE FIRE EXTINGUISHERS			
Does everyone know where the nearest fire extinguisher is stored?			
Has the area fire extinguisher been maintenance tested within the last year and tagged to show the date?			
Are fire extinguishers accessible and the proper type for the fire hazard?			
Are employees trained in how to use fire extinguishers?			
Is there a fire extinguisher mounted within 75 ft of any point in an area?			
Are the extinguishers clean and well cared for?			
Is the seal and lock pin in place?			
Clear access to extinguishers? Not blocked			
Is the extinguisher location plainly marked, so as to be visible at a distance?			

Safety Management Plan

Emergency Action Plan

This form is to be used monthly.**N/A****Yes****No**

Is the extinguisher class marked on the extinguisher?

FIRST AID / MEDICAL SUPPLIES

Are first aid supplies stocked, clean, accessible and sanitary?

Are there eye/body wash facilities near injurious corrosive materials?

Is a person or persons adequately trained to render first aid available in the near proximity to the workplace?

Are AEDs present and operators trained?

Condition of First Aid Kits Acceptable

Are employees/subcontractors familiar with the incident/accident reporting process?

Do employees/subcontractors know where accident/incident forms are located?

Date of last inspection of sprinkler system (required yearly) _____

Comment/Actions:

Safety Management Plan

Emergency Action Plan

The Workforce Group, LLC Evacuation Report

This form is to be used to record all emergency evacuations (including drills).

Building Details

Building Name _____ Number of Floors (including ground) _____

Designated Muster Station _____ Person Completing Form _____

Evacuation Details

Evacuation Date/Time: _____/_____/_____ Evacuation Drill Yes ☐ No ☐

Trigger for Evacuation: Fire Alarm Activated ____ Drill ____ ERT ____ Security ____

Emergency Situation:

Condition: Staff Only ____ All Occupants ____ After Hours ____ Unoccupied ____

Weather _____

Number of Evacuees _____ Elapsed Time to Evacuate _____ minutes

Evacuation was orderly with no panic Yes ☐ No ☐

Mobility-impaired persons present (sight, hearing, physical, etc.)? Yes ☐ No ☐

The majority of evacuees went to the mustering points? Yes ☐ No ☐

Were the building occupants notified of this drill? Not a drill ☐ Yes ☐ No ☐

Emergency Control Organization

Emergency Coordinator _____ Deputy Emergency Coordinator _____

Emergency Coordinators were stationed at the proper emergency control point? Yes ☐ No ☐

All Fire Wardens reported to the Emergency Coordinator? Yes ☐ No ☐

If not, who did not report in? _____

All Fire Wardens were identifiable (vests, hard hats, flash lights)? Yes ☐ No ☐

Control of external building exits achieved? Yes ☐ No ☐

Did the Fire Wardens perform their duties correctly? Yes ☐ No ☐

Evacuation maps and emergency procedures posters are up-to-date? Yes ☐ No ☐

Building Fire & Emergency Equipment

Was the evacuation signal audible throughout the building? Yes ☐ No ☐

Automatic closing fire doors closed when the fire alarm activated? Yes ☐ No ☐

Card access doors automatically released when the fire alarm activated? Yes ☐ No ☐

Fire doors and emergency exits unobstructed? Yes ☐ No ☐

Signature of Person Completing Report _____ **Date** _____

Safety Management Plan

Emergency Action Plan

Emergency Response Members

Client: Maintenance ☐ Security ☐ The Workforce Group, LLC Emergency Coordinator
☐ HSE ☐

Emergency Response Team Fire Brigade ☐ Ambulance ☐ Police ☐ Other:

The Workforce Group, LLC Action Sheet

Issue(s)	Action(s) Required	By Who	By When	Sign Off/Date

Records

- Keep the original in your Emergency Response folder and monitor to ensure all action items completed as soon as possible. Report delays to senior management.
- Copies shall be distributed in accordance with the The Workforce Group, LLC Site Emergency Action Plan.

Safety Management Plan

Emergency Action Plan

Emergency Action Plan Orientation Check List

Employee Name _____

Department _____

Hire/Transfer Date _____

Orientation Date _____

- ☐ Emergency Procedures
- ☐ Evacuation route(s) from assigned work area
- ☐ Evacuation from an unfamiliar area
- ☐ Location of Emergency Assembly Areas
- ☐ Receiving and following instructions during an emergency
- ☐ ALL CLEAR and re-entry procedure
- ☐ Reporting hazards and/or substandard conditions
- ☐ Advising anyone who may require assistance during an emergency evacuation
- ☐ Location of Emergency Equipment (i.e. Fire Extinguishers, etc.)

Employee Signature: _____

Orientation Conducted by: _____

Job Position/Title: _____

Sample Emergency Action Plan Core Requirements

POTENTIAL EMERGENCIES (BASED ON HAZARD ASSESSMENT)	The following are identified potential emergencies: <ul style="list-style-type: none"> • Fire • List others 	
EMERGENCY PROCEDURES	In the event of a fire occurring within or affecting the work site, the Emergency Coordinator (or deputy) makes the following decisions and ensures the appropriate key steps are taken: <ul style="list-style-type: none"> • advise all personnel • pull the fire alarm to alert the nearest fire station and initiate all fire alarms within the building • evacuate all persons to a safe point in the assembly area and account for everyone including visitors and clients 	
LOCATION OF EMERGENCY EQUIPMENT	Emergency equipment is located at: <ul style="list-style-type: none"> • Fire Alarm – List • Fire Extinguisher – List • Fire Hose – List 	
WORKERS TRAINED IN THE USE OF EMERGENCY EQUIPMENT	(1) _____ (2) _____ (3) _____ (4) _____	
EMERGENCY RESPONSE TRAINING REQUIREMENTS	Type of Training <ul style="list-style-type: none"> • Use of fire extinguishers • Practice fire drills 	Frequency <ul style="list-style-type: none"> • Orientation and annually • At the call of site management
LOCATION AND USE OF EMERGENCY FACILITIES	The nearest emergency services are located at: <ul style="list-style-type: none"> • List facilities 	
FIRE PROTECTION REQUIREMENTS	<ul style="list-style-type: none"> • List all site fire protection requirements. 	

Safety Management Plan

Emergency Action Plan

ALARM AND EMERGENCY COMMUNICATION REQUIREMENTS	<ul style="list-style-type: none"> • Pulling the fire alarm automatically alerts the fire department and initiates an alarm within the building • The fire alarm signal is (describe sound and pattern)
FIRST AID	<p>First aid supplies are located at:</p> <ul style="list-style-type: none"> • List <p>First Aiders are:</p> <ul style="list-style-type: none"> • List all names <p>Transportation for ill or injured workers is by (describe). The contact number or radio channel is (describe).</p>
PROCEDURES FOR RESCUE AND EVACUATION	<p>In case of fire:</p> <ul style="list-style-type: none"> • Advise all personnel • Pull the fire alarm • Evacuate all persons to a safe point in the staff parking lot and account for everyone including visitors and clients • Assist ill or injured workers to evacuate the building • Provide first aid to injured workers if required • Call emergency response personnel to arrange for transportation of ill or injured workers to the nearest health care facility if required.
DESIGNATED RESCUE AND EVACUATION WORKERS	<p>The following workers are trained in rescue and evacuation (or describe client rescue organization):</p> <p>(1) _____</p> <p>(2) _____</p> <p>(3) _____</p> <p>(4) _____</p>
<p>Completed on: _____</p> <p>Signed: _____</p>	

Fall Protection Program

Purpose

The purpose of this program is to provide fall protection procedures to prevent injury to employees while performing work assignments at elevated levels.

Any changes to this Fall Protection Program must be approved by the HSE Manager, who is designated the Qualified Person. This is based on training received in fall protection planning and has demonstrated skills and knowledge in the preparation of fall programs, plans and the hazards involved.

Scope

Applies to all The Workforce Group, LLC employees who have work assignments at work levels that exceed 6 feet in height where guardrails or nets are not utilized. This includes work near and around excavations. Guardrails, safety nets, or personal fall arrest systems shall be used where feasible. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

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

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

"Body harness" means straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest and shoulders with means for attaching it to other components of a personal fall arrest system.

"Buckle" means any device for holding the body belt or body harness closed around the employee's body.

"Carabineer" - see Snaphook

"Connector" means a device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabineer, or it may be an integral component of part of the system (such as a buckle or D-ring sewn into a body belt or body harness, or a snap-hook spliced or sewn to a lanyard or self-retracting lanyard).

"Deceleration device" means any mechanism, such as a rope grab, rip-stitch lanyard, specially-woven lanyard, tearing or deforming lanyards, automatic self-retracting lifelines/lanyards, etc.,

Safety Management Plan

Fall Protection Program

which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

"Deceleration distance" means the additional vertical distance a falling employee travels, excluding lifeline elongation and free fall distance, before stopping, from the point at which the deceleration device begins to operate. It is measured as the distance between the location of an employee's body belt or body harness attachment point at the moment of activation (at the onset of fall arrest forces) of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.

"Equivalent" means alternative designs, materials, or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

"Failure" means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

"Free fall" means the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

"Free fall distance" means the vertical displacement of the fall arrest attachment point on the employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

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

"Infeasible" means that it is impossible to perform the inspection work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

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

"Leading edge" means the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

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

Safety Management Plan

Fall Protection Program

"Lower levels" means those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

"Personal fall arrest system" means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these.

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

"Rope grab" means a deceleration device which travels on a lifeline and automatically, by friction, engages the lifeline and locks so as to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

"Safety Nets...Safety nets shall be provided when workplaces are higher than 25 feet above ground or water surfaces or other surfaces where the use of ladders, scaffolds, catch platforms, temporary floors, safety lines or safety belts are impractical.

Nets shall extend 8 feet beyond the edge of the work surface where employees are exposed and shall be installed as close under the work surface as practical but in no case more than 25 feet below the work surface. Nets shall be positioned in a manner to prevent the user from coming into contact with below surfaces or structures. Proper clearance positioning of nets shall be determined by impact load testing. Work procedures shall not begin until nets are in place and have been properly tested.

New nets shall meet accepted performance standards of 17,500 foot pounds minimum impact resistance as determined and certified by the manufacturers and shall bear a label of proof test. Edge ropes shall provide a minimum breaking strength of 5000 pounds.

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

"Snaphook" means a connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types: (1) The locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or (2) The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. As of January 1, 1998, the use of a non-locking snaphook as part of personal fall arrest systems and positioning device systems is prohibited.

Safety Management Plan

Fall Protection Program

"Unprotected sides and edges" means any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches (1.0 m) high.

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

"Work area" means that portion of a walking/working surface where job duties are being performed.

Safety Management Plan

Fall Protection Program

Drawing of Components

Figure A

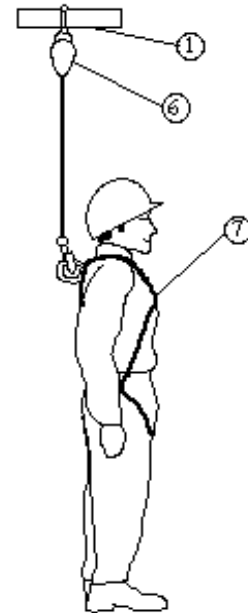


Figure B

- 1. Tie-off Point
- 2. Lifeline
- 3. Rope Grab
- 4. Shock Absorbing Lanyard
- 5. Cross-Arm Strap
- 6. Retractable Lifeline
- 7. Full-Body Harness
- 8. Restraining Belt
- 9. Restraining Lanyard
- 10. Carabineer

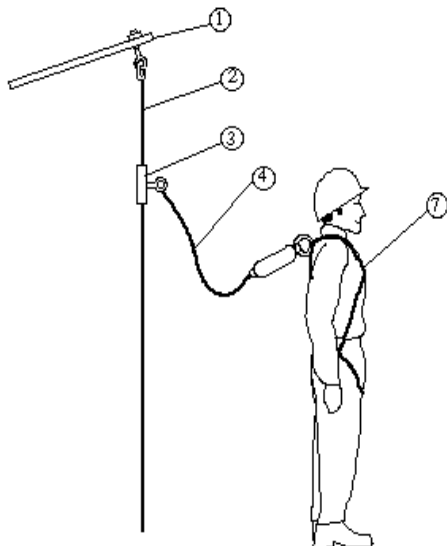


Figure C

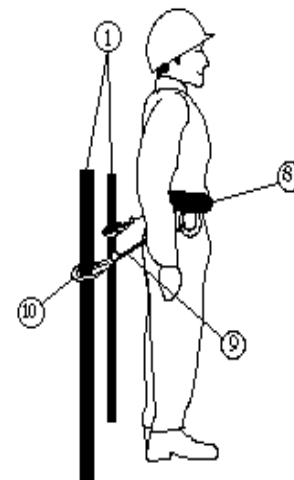


Figure D

Safety Management Plan

Fall Protection Program

Responsibilities**Operations Manager**

It is the responsibility of the local operations manager (designated competent person) to implement this Fall Protection Program. Continual observational safety checks of work operations and the enforcement of the safety policy and procedures shall be regularly enforced. All jobs shall be pre-planned prior to the start of work.

Supervisor

The Supervisor shall ensure that all persons assigned to work at elevated levels, exceeding 6 feet in height or more above lower level and where guardrails or nets are not utilized, be protected by personal fall protection equipment.

- Supervisors shall make exposure determinations and shall discuss with their employees the extent to which scaffolds, ladders or vehicle mounted work platforms can be used.
- Ensure that fall protection equipment is available and in safe working condition.
- Provide for emergency rescue in the event of a fall. Pre-plan the job to ensure that employees have been properly trained in the use, limitations, inspections and rescue procedures and that training records are on file.

Employees

Employees shall ensure they have and use the fall protection equipment as required by this program and:

- Understand the potential hazards of working at elevated levels as well as gaining access to and from the work location.
- Understand the use and limitations of such equipment.
- Pre-plan the job with his/her supervisor to agree that the job can be done safely.
- Inspect such equipment before each use and to report defective equipment immediately to their supervisor.

Procedure

Fall protection is required whenever employees are potentially exposed to falls from heights of six feet or greater to lower levels. This includes work near and around excavations. Use of guard rails, safety net, or personal fall arrest systems should be used when the standard methods of protection are not feasible or a greater hazard would be created.

Fall protection is required whenever employees are potentially exposed to falls from heights that exceed applicable regulatory thresholds. Guard rails, safety nets, or personal or fall arrest systems should be used. Some applicable regulatory thresholds may include:

- General Industry 1910.23(b) - Protection for wall openings and holes. Every wall opening from which there is a drop of more than 4 feet shall be guarded.
- Construction Industry 1926.501(b)(1) - Unprotected sides and edges. Each employee on a

Safety Management Plan

Fall Protection Program

walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

- Marine Terminals 1917.112(b)(1) - Guardrails shall be provided at locations where employees are exposed to floor or wall openings or waterside edges, including bridges or gangway-like structures leading to pilings or vessel mooring or berthing installations, which present a hazard of falling more than 4 feet (1.22 m) or into the water.

- Shipyard Industry 1915.73(d) - When employees are exposed to unguarded edges of decks, platforms, flats, and similar flat surfaces, more than 5 feet above a solid surface, the edges shall be guarded by adequate guardrails.

- Steel Erection 1926.760(a)(1) - Each employee engaged in a steel erection activity who is on a walking/working surface with an unprotected side or edge more than 15 feet (4.6 m) above a lower level shall be protected from fall hazards by guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems.

When purchasing equipment and raw materials for use in fall protection systems applicable ANSI, ASTM or OSHA approved equipment shall be used.

Minimum Standards

The following are minimum standards for The Workforce Group, LLC employee personal fall protection systems:

- All D-rings must be a minimum of 2¼ inches (inside diameter).
- All snap hooks shall not allow pressure to be applied to the gate in the opening direction.
- No pelican hooks on lanyards should be used as a primary connection.
- Connectors shall be drop forged, pressed or formed steel, or made of equivalent materials.
- Connectors shall have a corrosion-resistant finish, and all surfaces and edges shall be smooth to prevent damage to interfacing parts of the system.
- D-rings and snap hooks shall have a minimum tensile strength of 5,000 pounds.
- D-rings and snap hooks shall be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.
- Snap hooks shall be sized to be compatible with the member to which they are connected to prevent unintentional disengagement of the snap hook. Only a locking type snap hook designed and used to prevent disengagement of the snap hook by the contact of the snap hook keeper by the connected member shall be used.
- Horizontal lifelines shall be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.
- Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds. Where vertical lifelines are used, each employee shall be attached to a separate lifeline.
- Lifelines shall be protected against being cut or abraded.

Safety Management Plan

Fall Protection Program

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- Self-retracting lifelines and lanyards which automatically limit free fall distance to 2 feet or less shall be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
 - Self-retracting lifelines and lanyards which do not limit free fall distance to 2 feet or less, rip stitch lanyards, and tearing and deforming lanyards shall be capable of sustaining a minimum tensile load of 5,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
 - Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per employee attached, or shall be designed, installed, and used as part of a complete personal fall arrest system which maintains a safety factor of at least two and under the supervision of a qualified person.
 - Systems used by an employee having a combined person and tool weight in excess of 310 pounds shall be modified to provide proper protection for such heavier loads.
 - The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level, or above the wearer's head, except when climbing.
 - Body harnesses and components shall be used only for employee protection and not to hoist materials.
 - Personal fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection until inspected and determined by a competent person to be undamaged and suitable for reuse.
 - Provide for prompt rescue of employees in the event of a fall or assure that employees are able to rescue themselves.
 - Personal fall arrest systems shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.
 - Personal fall arrest systems shall not be attached to guardrail systems, nor shall they be attached to hoists unless prior approval is obtained from a competent person.
 - If and when a personal fall arrest system is used at hoist areas, it shall be rigged to allow the movement of the employee only as far as the edge of the walking/working surface.

Stopping a Fall

The arresting force on an employee stopped by a fall shall be limited to a maximum arresting force of 1,800 pounds when wearing a body harness.

The fall arrest system shall be rigged such that an employee can neither free fall more than 6 feet, nor contact any lower level.

The fall arrest system shall bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet.

The fall arrest system shall have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet, or the free fall distance permitted by the system, whichever is less.

Safety Management Plan

Fall Protection Program

Protection From Falling Objects

When employees are required to work in the near vicinity of others working with materials, tools, or equipment at elevated levels, Barricades around the immediate area of the overhead work shall be erected to prohibit employees from entering the barricaded area.

Employees performing work at elevated levels shall keep tools, materials, and equipment away from the edge to keep potential objects from falling over the side. Where practical, tools, etc. shall be secured with rope, wire, etc. to keep them from falling.

Portable Ladders

Three point climbing is required while ascending/descending ladders. While on ladders, both hands and one foot, or both feet and one hand shall always be in contact with the ladder.

Tools required to perform a task shall be transported by a mechanical carrier such as a tag line, suspended bucket or tool belt.

- Tools shall not be carried by hand while climbing.
- Hands must be free to grip the ladder.
- Tools shall not be carried in clothing pockets.
- Tools shall be pulled up to the job site only after reaching the area of work.

When work is to be performed from straight/extension ladders, fall protection shall be utilized when heights exceed 6 feet.

Straight ladders shall be tied off at the top to prevent them from moving. A second person shall steady the ladder at the base while it is being tied off at the top by another employee. Do not tie off fall protection equipment to the ladder.

Storage

A dedicated storage area shall be provided for the storage of fall protection equipment and all components. The storage area shall keep the equipment clean, dry, and free from oils, chemicals, paints, and excessive heat.

Inspections

Fall protection equipment shall be inspected before each use for wear, damage, other deterioration, or other defects.

Elevated Personnel Platforms

Work performed, regardless of the nature of the work, from personnel platforms raised by forklifts, cranes, scissor lifts, etc., shall require the use of a full body harness and shall be connected to the platform.

Rescue

Prompt rescue of employees shall be provided in the event of a fall or shall assure the employees are able to rescue themselves. The pre-planning stage prior to the beginning of each elevated work assignment shall be evaluated by the supervisor to provide rescue of employees involved in a fall.

Safety Management Plan

Fall Protection Program

Fall Protection Plan

This option is available only to employees engaged in leading edge work who can demonstrate that it is infeasible or it creates a greater hazard to use conventional fall protection equipment. The fall protection plan shall conform to the following provisions:

- The fall protection plan shall be prepared by a qualified supervisor and developed specifically for the site where the leading edge work is being performed.
- The fall protection plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety net systems) are infeasible or why their use would create a greater hazard.
- The fall protection plan shall identify each location where conventional fall Protection methods cannot be used.
- These locations shall then be classified as controlled access zones.

Controlled Access Zones

When used to control access to areas where leading edge or other operations are taking place the controlled access zone shall be defined by a control line or by any other means that restricts access.

When control lines are used, they shall be erected not less than 6 feet (1.8 m) nor more than 25 feet (7.7 m) from the unprotected or leading edge.

The control line shall extend along the entire length of the unprotected or leading edge and shall be approximately parallel to the unprotected or leading edge.

The control line shall be connected on each side to a guardrail system or wall.

- Control lines shall consist of ropes, wires, tapes, or equivalent materials.
- Each line shall be flagged or otherwise clearly marked at not more than 6-foot (1.8 m) intervals with high-visibility material.
- Each line shall be rigged and supported in such a way that its lowest point (including sag) is not less than 39 inches (1 m) from the walking/working surface and its highest point is not more than 45 inches (1.3 m).
- Each line shall have a minimum breaking strength of 200 pounds.

Only employees engaged in the related work shall be permitted in the controlled access zone.

Safety Management Plan

Fall Protection Program

Safety Monitoring System

When the use of conventional fall protection equipment is deemed infeasible or the use of this equipment creates a greater hazard a Fall Protection Plan which includes a safety monitoring system shall be implemented by the supervisor.

Supervisors shall designate a competent person to monitor the safety of other employees. The competent person shall be assigned to:

- Recognize fall hazards;
- Warn employees if they are unaware of fall hazard or are acting in an unsafe manner;
- Be on the same working surface and in visual contact of working employees;
- Stay close enough for verbal communication; and
- Not have other assignments that would take his/her attention from the monitoring function.

Incident Investigations

All incidents and near misses must be investigated according to The Workforce Group, LLC's incident investigation procedure. Changes to the fall protection program shall be implemented if deemed appropriate from incident corrective actions.

Training

Employees who might be exposed to fall hazards shall be trained to enable each employee to recognize the hazards of falling and in the procedures to follow to minimize these hazards.

The employee will be trained in the use and operation of fall arrest systems, inspections, and maintenance procedures. Training must be conducted by a competent person qualified in the following areas:

- Nature of fall hazards
- Correct procedures for erecting, maintaining, disassembling and inspecting the fall protection systems to be used
- The use of operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones and other protection that might be used
- The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs
- The handling and storage of equipment and materials and the erecting of overhead protection
- The role of employees in fall protection plans
- The standards contained in this subpart (1926503 (a) (2) (I thru viii))

Training must be conducted initially and refresher retraining conducted annually or as needed due to deficiencies in training, changes in the workplace, changes in fall protection systems or procedures that render previous training obsolete or inadequacies in an employee's understanding of previous training or inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicate that the employee has not retained the requisite understanding or skill.

Safety Management Plan

Fall Protection Program

Training must be documented in writing. Written certification shall include:

- Who was trained
- Dates of training
- Signature of person providing training
- Date training was deemed adequate by The Workforce Group, LLC

Training records shall be retained in the corporate office.

Fatigue Management Program

Purpose

To ensure our employees recognize to effect of fatigue as related to safely being able to perform work and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations.

Scope

This program applies to all The Workforce Group, LLC projects and operations.

Policy

The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:

- Employees must be in a fit state to undertake work
- Employees must be fit to complete work
- Employees must take minimum periods of rest to safely perform their work

These principles will be managed through:

- The appropriate planning of work tasks, including driving, vehicle and equipment maintenance, loading and unloading and other job related duties and processes
- Providing appropriate equipment to help reduce stress and fatigue
- Regular medical checkups and monitoring of health issues as required by legislation
- The provision of appropriate sleeping accommodations where required
- Ongoing training and awareness of employee health and fatigue issues

Key Responsibilities

The Workforce Group, LLC Management

- Management accepts responsibility for the implementation of this fatigue management policy.

Site Manager

- Responsible for the implementation and maintenance of this program for their site and ensuring all assets are made available for compliance with the program.

Employees

- Employees must present in a fit state free from alcohol and drugs;
- Employees must not chronically use over-the-counter or prescription drugs to increase mental alertness.

Safety Management Plan

Fatigue Management
Program

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- Employees are prohibited from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off.
 - Workers shall report tiredness/fatigue to supervision and supervisors shall take appropriate action to assist the worker.
 - Employees must report fatigue/tiredness and lack of mental acuity to supervision. Supervision must take appropriate actions to prevent loss.
 - Employees need to be rested prior to starting work.
 - Employees need to monitor their own performance and take regular periods of rest to avoid continuing work when tired.

Work Hour Limitations

The Workforce Group, LLC has set the following work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and to increase mental fitness.

1. Every Employee shall have necessary work breaks in order to avoid fatigue. These scheduled breaks will apply to both driving and on site hours. The following shall be a minimum:
 - 15 Minutes each 2.5 hours
 - 30 Minutes after 5 Hours
 - 30 Minutes after 10 Hours
2. No Workers shall work more than:
 - 12 hours per day
 - 24 Days Continuous
3. Unfamiliar or irregular work should be avoided.

Equipment and Evaluation

The Workforce Group, LLC will provide equipment such as anti-fatigue mats for standing, lift assist devices for repetitive lifting and other ergonomic devices as deemed appropriate, chairs for workers to sit periodically and will provide periodic rest breaks for personnel. The Workforce Group, LLC will also periodically analyze and evaluate work tasks to control fatigue.

Incident Analysis

If there is an incident there shall be an initial identification/assessment of evidence. Initial identification of evidence immediately following the incident might include a listing of people, equipment, materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc. and physical factors such as fatigue, age and medical condition.

Safety Management Plan

Fatigue Management
Program

Training

The Workforce Group, LLC is committed to ensuring that all employees are competent to perform their tasks including:

- Fatigue management and health issues.
- The Workforce Group, LLC will provide initial and annual training on how to recognize fatigue, how to control fatigue through appropriate work and personal habits and reporting of fatigue to supervision.

A record of individual fatigues training and competency will be maintained.

Fire Protection / Extinguishers Program

Purpose

The purpose of this program is to provide fire extinguisher procedures to ensure equipment is operable and employees have the knowledge to safely operate in case of a fire incident.

Scope

Applies to all The Workforce Group, LLC employees and all The Workforce Group, LLC locations.

Responsibilities

The Safety Manager is responsible for developing procedures for the use and care of fire extinguishers and for developing a training program for the proper use of these devices. The Manager is responsible for implementing fire extinguisher training at his location. The shop foremen are responsible for enforcing the provisions of this section of the safety manual. All employees are responsible for following these provisions.

Procedure

Selection and Distribution

Portable fire extinguishers shall be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of the hazard which would affect their use. Fire extinguishers used by this company are for four classes of fires:

- Class A Fire Extinguishers. Use on ordinary combustibles or fibrous material, such as wood, paper, cloth, rubber and some plastics. Travel distance for employees to any extinguisher is 75 feet (22.9 m) or less.
- Class B Fire Extinguishers. Use on flammable or combustible liquids such as gasoline, kerosene, paint, paint thinners and propane. Travel distance from the Class B hazard area to any extinguisher is 50 feet (15.2 m) or less.
- Class C Fire Extinguishers. Use on energized electrical equipment, such as appliances, switches, panel boxes and power tools. Travel distance from the Class C hazard area to any extinguishing agent is 50 feet (15.2 m) or less.
- Class D Fire Extinguishers. Use on combustible metals, such as magnesium, titanium, potassium and sodium. Travel distance from the combustible metal working area to any extinguishing agent is 75 feet (22.9 m) or less.

Safety Management Plan

Fire Protection/
Extinguishers Program

Labelling Of Fire Extinguishers

Fire extinguishers are to be mounted in easily accessible locations that are indicated by a sign that reads "Fire Extinguisher". Fire extinguishers are to be located so that no employee will ever be more than 75 feet from an extinguisher. No equipment, boxes or product may be placed (even temporarily) in the way of a fire extinguisher.

Each fire extinguisher will be assigned a unique number.

Maintenance

All fire extinguishers shall be mounted no higher and no lower than four (4) feet from the floor. All fire extinguishers shall be maintained as follows:

- Numbered to identify their proper location
- Fully charged and in operable condition
- Clean and free of defects
- Readily accessible at all times

Inspection, Maintenance and Testing

All fire extinguishers are to be visually inspected by The Workforce Group, LLC employees monthly. All fire extinguishers are to receive an annual maintenance check by certified personnel from a fire extinguisher dealer. Fire extinguishers are to be inspected and re-charged by certified personnel after any use.

Any fire extinguisher that shows a loss of pressure during the monthly inspection will be inspected and re-charged by certified personnel. Completed fire extinguisher inspection logs will be maintained in the safety files and become a part of the safety records. They are to be maintained for 5 years.

Use

In the event of a fire, one employee will get the nearest fire extinguisher and use it to attempt to put the fire out. All other employees in the immediate area will prepare to evacuate if needed. All other employees in the building need to be advised that a fire is in progress.

The employee attempting to extinguish the fire will break the safety seal on the handle and pull the pin. He will then aim his extinguisher at the base of the fire and discharge it with a sweeping motion from side to side; continuing until the fire is out or the extinguisher is emptied.

Remember that a standard fire extinguisher will be emptied in about 10 to 15 seconds. If the fire is not out when the extinguisher has been completely discharged, the employees must evacuate the area.

Safety Management Plan

Fire Protection/
Extinguishers Program

Training and Education

The purpose of this section is to establish training procedures which are necessary for the proper use and understanding of a fire extinguisher and incipient stage fire fighting. Training will occur prior to initial assignment and at least annually thereafter.

On even numbered years this training will be conducted by a member of the local fire department (where possible) and will include "live fire" hands on use of the extinguisher. On odd number years this training will be conducted by the Safety Manager and will include a demonstration of the use of a fire extinguisher, without actually discharging the unit.

New employees will be given the odd number year training upon hire.

Initial Training Outline

- General principles of a fire
- Hazards employed with an incipient stage fire(s)
- When to "back off" (evacuate) of an incipient stage fire(s)
- General fire principles of a fire extinguisher
- Hazards employed with the use a fire extinguisher
- Use of a fire extinguisher

Retraining

Retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary. Retraining shall be provided for all authorized and affected employees whenever there is:

- An annual basis or
- A change in job assignment or
- The Workforce Group, LLC has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of fire extinguishers or fire prevention procedures.

Training Documentation

- All training will be documented and each employee's understanding will be subject to a "hands-on" test.
- Documentation will consist of; as a minimum, the employee's name, the trainer's name, the date of the training, and an outline of training provided.

First Aid / CPR Program

Purpose

The purpose of this program is to establish the minimum first aid supplies, equipment and actions to properly respond to injuries.

Scope

This program is applicable to all The Workforce Group, LLC employees while engaged in work at The Workforce Group, LLC facilities and/or facilities operated by others.

Responsibilities

- It is the responsibility of the site manager to ensure that first aid kits are provided and maintained.
- All employees are responsible for using first aid materials in a safe and responsible manner.
- The HSE Manager is responsible for corresponding with the Red Cross or an equivalent to keep employee training levels current.

Requirements

Planning

The site manager will:

- Ensure that a minimum of one employee, with a valid certificate, shall be present to render first aid at all times work is being performed if medical assistance is not available within 3-4 minutes.
- Ensure that provisions shall have been made prior to commencement of a project for prompt medical attention, including transportation, in case of serious injury.
- Ensure adequate first aid supplies and equipment are easily accessible when required.
- Ensure that in areas where 911 is not available, the telephone numbers of the physicians, hospitals, or ambulances to be used shall be conspicuously posted.

Medical Response

All minor first aid is to be self rendered. Because of the risks presented by certain bloodborne pathogens, no one is allowed to tend the minor injuries of another.

In the absence of an infirmary, clinic, hospital, or physician, that is reasonably accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first-aid shall be available at the worksite to render first aid. A valid certificate in first-aid training must be obtained from the U.S. Bureau of

Safety Management Plan

First Aid/ CPR Program

Mines, the American Red Cross or equivalent training that can be verified by documentary evidence.

Employees authorized to render first aid will always observe universal precautions. (Universal Precautions means that the aid giver treats all bodily fluids as if they were contaminated).

If 911 is not available refer to the list of posted phone numbers for prearranged medical response providers. All The Workforce Group, LLC authorized first responders shall have a cell phone as a means of communications; otherwise hand held radios or telephones shall be used as a means of communication.

Supplies and Equipment

First aid supplies shall be easily accessible when required. Always follow the manufacturer's instructions when using the materials in the first aid kit.

All The Workforce Group, LLC first aid kits contain appropriate items determined to be adequate for the environment in which they are used and if on a construction site are stored in a weather proof container with individual contents sealed from the manufacturer for each type of item.

The Workforce Group, LLC is responsible to ensure the availability of adequate first aid supplies and to periodically reassess the availability for supplies and to adjust its inventories. First Aid kits are to be inspected:

- On the first working day of each week to verify that they are fully stocked and that no expiration dates have been exceeded, and
- Before being sent out to each job, and
- Replace any items that have exceeded their expiration dates or that have been depleted.

Where the eyes or body of any person may be exposed to injurious corrosive materials, a safety shower and/or eye wash (suitable facilities) or other suitable facilities shall be provided within the work area. Ensure expiration dates are checked and water used in storage devices is sanitized.

An assessment of the material or materials used shall be performed to determine the type flushing/drenching equipment required. At client job sites, portable or temporary stations must be established prior to the use of corrosive materials.

Transportation

Based on the first responder's assessment of the injuries involved, decide whether the injured requires to be taken directly to a hospital's emergency room, occupational medicine provider or administer first aid on location.

Safety Management Plan

First Aid/ CPR Program

Examples of serious injuries that result in the injured being transported to a medical provider are those resulting in severe blood loss, possible permanent disfigurement, head trauma, spinal injuries, internal injuries and loss of consciousness. Keep in mind that the needs and well being of the injured are the first priority.

Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service shall be provided.

Choices to consider include: private automobile, company vehicle, helicopter, crew boat, EMS vehicles including medi-vac helicopters, or any other transportation that can provide safe transportation to the hospital or doctors office in order to provide medical attention to the injured in the quickest manner without any additional complications or injuries to the injured employee.

Transportation needs must be preplanned and coordinated with the transportation provider prior to an incident requiring such service.

Training

Volunteers or selected employees are trained by the American Red Cross or equivalent in CPR and first aid. Each of these trained and certified employees are equipped with protective gloves and other required paraphernalia. CPR training must be re-certified annually and first aid training must be re-certified every three years.

Fit for Duty Program

Purpose

The Workforce Group, LLC full and part-time staff are expected to report for work fit for duty, which means able to perform their job duties in a safe, appropriate and an effective manner free from the adverse effects of physical, mental, emotional and personal problems.

Scope

This program applies to all The Workforce Group, LLC projects and operations.

Requirements

It is the goal of The Workforce Group, LLC to provide a safe workplace for all employees. To accomplish this goal we have adopted the following fitness for duty policy requirements.

Pre-Employment Testing

Employees are physically capable of performing their job function. Pre-employment physicals should be included in the hiring process, and also when changing into certain job functions and different environments.

Training and Safe Work Requirements

Employees are properly trained for their assigned tasks. Employees must receive training specific to their assigned task. Examples might be welding, instrumentation, scaffold building, equipment operator qualifications, etc. based on a training matrix that reflects the job description and/or tasks being performed. All training is to be documented.

Safe work practices and procedures must be followed. Safe work procedures must be in place prior to work beginning. Employees shall follow our and our client's safety requirements. Examples may include, hot work permitting, confined space, lockout tagout, process safety management, electrical safety, operator safety and other standard work practices, safety rules or procedures.

Personal Medical Reporting Requirements

Employees must report all medications they are taking that could impair their ability to work safely. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor. The reporting must occur before the employee arrives for work or arranges for transportation to a remote site.

Safety Management Plan

Fit for Duty Program

Client Drug and Alcohol Testing Requirements

Drug and alcohol testing for pre-employment, post-accident or random as prescribed by the host facility shall be implemented. Procedures must include and be implemented for drug and alcohol testing as prescribed by DOT or the host client facilities.

Employee Activity and Behavior

We will monitor employee activities and behaviors to determine if employees should be removed from the work site. Employee's activities and behaviors will be monitored to determine if employee should be removed from the work site if their ability to perform their duties safely is questioned.

Fit for Duty Examination**Confidentiality**

Medical Records and other related records are protected by state and federal confidentiality laws and The Workforce Group, LLC policy. The medical record of fitness for duty examination will be maintained in the Human Resources office. Employee medical records will not be released to unauthorized personnel without the employee's written consent or subpoena in accordance with state and federal laws.

Self-Referrals

Employees are responsible for notifying their supervisor if they are fatigued to the point of not being able to perform their duties safely. Employees must be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers.

Disciplinary action may occur for an employee not reporting to work in a condition which could endanger their safety or the safety of any other person(s). See below for Management Referral in case there is a question of the employee's ability to work safely.

Management Referral**Management Personnel Responsibility**

Management personnel are responsible for monitoring the attendance, performance and behavior of their employees. When an employee's performance and/or behavior (including the odor of alcohol or possible use of any illegal substance) appears to be unsafe, ineffective and/or inappropriate, it is every manager's responsibility to challenge the employee's behavior and the ability to function, remove the employee from the job, refer the employee for a Fitness for Duty exam immediately and conduct appropriate follow up.

Safety Management Plan

Fit for Duty Program

Due to the safety issues involved, supervisors have a special responsibility to implement this policy in a consistent and fair manner.

Procedure

- When any manager or their designee observes an employee who is not performing his/her job safely, appropriately, and effectively, or an odor of alcohol is present, or whose behavior is inappropriate, that manager is to remove the employee from her/his duty immediately and call Human Resources to continue the Fitness for Duty procedure. The employee will be referred to a medical provider for a fitness for duty exam.
- The Fitness for duty evaluation may include testing for chemical (e.g. alcohol and drug) levels, referral for psychiatric evaluation or any other evaluation or follow-up deemed necessary.
- The manager or designee must document the reasons for the fitness for duty request by recording the employee's behavior and noting the names of any witnesses who observed that behavior. Documentation must be submitted to Human Resources by the next business day.
- The employee is required to cooperate fully with the manager and medical personnel. The employee must sign consent forms for both the fitness examination and communication of its results in confidence to Human Resources. Refusal to cooperate will be considered insubordination and will be grounds for disciplinary action. The employee should be suspended pending investigation, which could result in termination.
- Medical personnel will advise Human Resources if the employee is fit or not fit for duty. The medical results of the fitness for duty exam will be communicated to Human Resources.
- If medical personnel determine that the employee is FIT FOR DUTY, the employee must contact Human Resources on the next general business day and the manager in consultation with Human Resources will determine discipline in situations where misconduct may have occurred.
- If medical personnel determine that the employee is NOT FIT FOR DUTY:
 - The manager makes every effort to arrange for safe transportation home for the employee.
 - The employee must contact Human Resources, on the next general business day.
 - The manager, in consultation with Human Resources, will determine discipline in situations where misconduct has occurred.

Subsequent Fitness for Duty Exams

Dependent upon the reason for the fitness exam, employees who violate this policy a second time may be subject to progressive discipline, up to and including termination of employment.

Forklift Program

Purpose

The purpose of this program is to establish requirements for the safe operation and use of Powered Industrial Trucks.

Scope

This program applies to all The Workforce Group, LLC employees who operate a Powered Industrial Truck in the scope of their job duties and assignments. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. NOTE: All employees are required to be trained and certified prior to operating each specific type of forklift equipment. The Workforce Group, LLC shall certify all authorized employees regarding competency on all types of equipment.

Definitions

Authorized Employee – A person, at least 18 years of age and who has completed the company's required safety training for the safe operations of forklifts.

Forklift (Powered Industrial Truck) – Any mechanical device used for the movement of supplies, material or finished a product that is powered by an electric motor or an internal combustion engine.

Key Responsibilities

Manager/Supervisor

- Shall ensure that each powered forklift operator is competent to operate a forklift safely, as demonstrated by the successful completion of the training and evaluation program.
- Shall ensure that all forklifts are inspected before each shift and all repairs are made before the forklift is operated.

Employees

- Shall be current on applicable training.
- Operate forklift in accordance to the forklift standards and manufacture requirements.
- Inspect forklift at the start of shift, and remove from service if defects are found until they are corrected.

Safety Management Plan

Forklift Program

- Operate forklift in a safe manner.

Procedure**General**

All approved forklifts shall have a manufactures identification plate attached showing all specifications of the forklift and that the forklift is accepted by a nationally recognized testing laboratory.

Modifications and additions, that affect capacity and safe operation, shall not be performed without manufacturer's prior written approval. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed reflect the modification or addition.

If the forklift is equipped with front-end attachments other than factory installed attachments, the supervisor shall ensure that the forklift is marked to identify the attachments and show the approximate weight of the forklift and attachment combination at maximum elevation with load laterally centered.

The operator shall see that all nameplates and markings are in place and are maintained in a legible condition.

All forklifts shall be equipped with safety seat belts. All forklifts shall be equipped with a horn, backup alarm, beacon light, headlights and taillight.

Safety Guards

Forklifts shall be fitted with an overhead rollover cage, as per manufactures specifications.

If the type of load presents a hazard to the operator, the forklift shall be equipped with a vertical load backrest extension, as per manufactures specifications.

Training

Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee) and evaluation of the operator's performance in the workplace.

All operator training and evaluation shall be conducted by authorized persons who have the knowledge, documented training, and experience to train powered industrial truck operators and evaluate their competence.

Each operator is required to be re-evaluated every three years.

Safety Management Plan

Forklift Program

Training shall include the following topics, except in topics for locations where they are not applicable to safe operation of the truck due to type of equipment or facility conditions.

1. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate,
2. Differences between the truck and the automobile,
3. Truck controls and instrumentation: where they are located, what they do, and how they work,
4. Engine or motor operation,
5. Steering and maneuvering,
6. Visibility (including restrictions due to loading),
7. Fork and attachment adaptation, operation, and use limitations,
8. Vehicle capacity,
9. Vehicle stability,
10. Any vehicle inspection and maintenance that the operator will be required to perform,
11. Refueling and/or charging and recharging of batteries,
12. Operating limitations,
13. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate,
14. Surface conditions where the vehicle will be operated,
15. Composition of loads to be carried and load stability,
16. Load manipulation, stacking, and unstacking,
17. Pedestrian traffic in areas where the vehicle will be operated,
18. Narrow aisles and other restricted places where the vehicle will be operated,
19. Hazardous (classified) locations where the vehicle will be operated,
20. Ramps and other sloped surfaces that could affect the vehicle's stability,
21. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust,
22. Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation, and
23. The requirements of CFR 1910.178 (Powered Industrial Trucks).

Mandatory refresher training shall be provided when unsafe operations are observed, after an incident, if operating a different vehicle type, changes in conditions or any time The Workforce Group, LLC feels an operator requires refresher training.

Certification

The trainer shall certify in writing that each operator has been trained and evaluated as required.

Safety Management Plan

Forklift Program

The certification shall include the name of the operator, the date of the training, the date of the evaluation and the identity of the person(s) performing the training and/or evaluation.

OperationsGeneral

- All operators shall wear a safety seat belt when operating a forklift.
- Forklifts shall not be driven up to anyone standing in front of a bench or other fixed object.
- No person shall be allowed to stand or pass under the elevated portion of any forklift, whether loaded or empty.
- Unauthorized personnel shall not be permitted to operate forklifts.
- No riders or passengers are permitted.
- It is prohibited for arms or legs to be placed between the uprights of the mast or outside the running lines of the forklift.
- When a forklift is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, and brakes set.
- Wheels shall be blocked if the forklift is parked on an incline.
- A forklift is unattended when the operator is 25 ft. or more away from the vehicle, which remains in view, or whenever the operator leaves the forklift and it is not in view.
- When the operator of a forklift is dismounted and within 25 ft. of the forklift still in view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement.
- A safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock, or platform or freight car.
- Forklifts shall not be used for opening or closing freight doors.
- Brakes shall be set and wheel blocks shall be in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading.
- Fixed jacks may be necessary to support a semi trailer during loading or unloading when the trailer is not coupled to a tractor.
- The flooring of trucks, trailers, and railroad cars shall be checked for breaks and weakness before they are driven onto.
- There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
- An overhead guard (cages) shall be used as protection against falling objects.

Safety Management Plan

Forklift Program

- An overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., representative of the job application, but not to withstand the impact of a falling capacity load.
- Fire aisles, access to stairways, and fire equipment shall be kept clear.

Traveling

- The operator shall slow down and sound the horn at cross isles and other locations where vision is obstructed.
- If the load being carried obstructs forward view, the operator shall be required to travel with the load trailing.
- The operator shall be required to look in the direction of, and keep a clear view of the path of travel.
- Grades shall be ascended or descended slowly.
- When ascending or descending grades in excess of 10 percent, loaded forklifts shall be driven with the load upgrade.
- On all grades the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.
- Under all travel conditions the forklift shall be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay are prohibited.
- The operator shall slow down for wet and slippery floors.
- Dock board or bridge plates shall be properly secured before they are driven over.
- Dock board or bridge plates shall be driven over carefully and slowly and their rated capacity never exceeded.
- While negotiating turns, speed shall be reduced to a safe level by means of turning the hand steering wheel in a smooth, sweeping motion.
- Except when maneuvering at a very low speed, the hand steering wheel shall be turned at a moderate, even rate.

Loading

- Only stable or safely arranged loads shall be handled.
- Caution shall be exercised when handling off-center loads, which cannot be centered.
- Only loads within the rated capacity of the forklift shall be handled.
- Forklifts equipped with attachments shall be operated as partially loaded forklifts when not handling a load.

Safety Management Plan

Forklift Program

- A load engaging means shall be placed under the load as far as possible; the mast shall be carefully tilted backward to stabilize the load.
- Extreme care shall be used when tilting the load forward or backward, particularly when high tiering.
- Tilting forward with load engaging means elevated shall be prohibited except to pick up a load.
- An elevated load shall not be tilted forward except when the load is in a deposit position over a rack or stack.
- When stacking or tiering, only enough backward tilt to stabilize the load shall be used.

Operation of the Truck

- If at any time a forklift is found to be in need of repair, defective, or in any way unsafe, the forklift shall be taken out of service until it has been restored to safe operating condition.
- Fuel tanks shall not be filled while the engine is running.
- Spillage of oil or fuel shall be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.
- When fueling with Liquefied Petroleum Gas (LPG), precautions and handling requirements set forth in the "Safe Handling of LPG" program shall be followed.
- No forklift shall be operated with a leak in the fuel system.
- Open flames shall not be used for checking electrolyte level in storage batteries or gasoline level in fuel tanks.
- Operator must verify trailer chocks, supports, and dock plates are secured prior to loading/unloading.

Maintenance of Forklifts

- Only authorized personnel shall perform maintenance, and make repairs.
- Those repairs to the fuel and ignition systems of forklifts, which involve fire hazards, shall be conducted only in locations designated for such repairs.
- Forklifts in need of repairs to the electrical system shall have the battery disconnected prior to such repairs.
- Only parts equivalent with those used in the original design shall replace all parts of any forklift requiring replacement parts.
- Forklifts shall not be altered so that the relative positions of the various parts are different from what they were when originally received from the manufacturer, nor shall they be

Safety Management Plan

Forklift Program

altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts.

- Additional counter weighting of fork trucks shall not be done unless approved by the truck manufacturer.
- Forklifts shall be inspected before being placed in service, and shall not be placed in service if the inspection shows any condition adversely affecting the safety of the forklift.
- Inspection shall be made at least daily – prior to each shift. (visual – non documented) Inspection items shall be posted on each forklift. Operators must insure the vehicle is safe prior to operating.
- Where forklifts are used on a round-the-clock basis, they shall be inspected before each shift.
- Defects when found shall be immediately reported to the supervisor, and corrected before operating the forklift.
- When the temperature of any part of any forklift is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the forklift shall be removed from service and not returned to service until the cause for such overheating has been eliminated.
- Forklifts shall be kept in a clean condition, free of lint, excess oil, and grease.
- Noncombustible agents, where at all possible, shall be used for cleaning trucks.
- Low flash point (below 100 degrees F.) solvents shall not be used.
- High flash point (at or above 100 degrees F.) solvents may be used if precautions regarding toxicity, ventilation, and fire hazard are mitigated with the agent or solvent used.

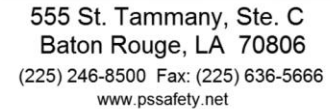
MONTH/YR: _____ **FORKLIFT #** _____

****FIRST HALF OF THE MONTH**[illegible]

[illegible]

Continued checklist --	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Hand Guards (found on stand up riding tow tractors, walking pallet trucks, walking transtackers): Are they in place?																
Tow Hook: Does it engage and release smoothly?																
Tow Hook: Does the safety catch work properly?																
Control Lever: Does the lever operate properly?																
Safety Interlock (found on order pickers): If the gate is open, does the vehicle run?																
Gripper Jaws (found on order pickers) Do the jaws open and close quickly and smoothly?																
Work Platform (found on order pickers) Does the platform raise and lower smoothly?																
Cleanliness of vehicle																
Initials of Inspector:																
COMMENTS: (Put date and Comments that need addressing)																

MONTH/YR: _____ **FORKLIFT #** _____



If any item on the forklift needs attention, take a copy of this checklist and give it to your supervisor, make notes, (**on the copy**), in the comment section below:

[illegible]

[illegible]

Continued checklist --	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	
Hand Guards (found on stand up riding tow tractors, walking pallet trucks, walking transtackers): Are they in place?																
Tow Hook: Does it engage and release smoothly?																
Tow Hook: Does the safety catch work properly?																
Control Lever: Does the lever operate properly?																
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Work Platform (found on order pickers) Does the platform raise and lower smoothly?																
Cleanliness of Vehicle:																
Initials of Inspector:																
COMMENTS: (Put date and Comments that need addressing)																

Gas Hazards Program

Purpose

It is the intention of The Workforce Group, LLC to Provide gas hazards training and detection equipment that meets or exceeds all federal standards. This Program is associated with our Respiratory Protection Program.

Scope

This program applies to all The Workforce Group, LLC projects and operations. This program supplements the The Workforce Group, LLC Respiratory Protection Program that is in accordance with 29CFR1910.34.

Procedure

Gas Hazards Equipment

- Each employee shall use a portable gas monitor as required in all high gas or potentially high hazard areas.
- The gas monitor must be calibrated prior to use per manufacturer's recommendations and certain a current calibration sticker on the monitor providing the date of last calibration.
- Bump test are required to be completed at the beginning of each day the monitor is in use per the requesting Owner Client and manufacturer's guidelines to insure the monitor is functioning correctly.

Owner Client Contingency Plans Awareness

The Workforce Group, LLC shall insure all employees are aware of the Owner Client's contingency plan provisions including evacuation routes and alarms. The Workforce Group, LLC employees shall participate in emergency evacuation drills and practice and rescue procedures.

Use Maintenance and Care of Gas Monitors

- Only utilize monitors issued by either The Workforce Group, LLC or made available by the Owner Client. No personal monitors are allowed.
- Have the gas monitor on the outside of all clothing.
- Check the calibration date prior to bump testing. If the calibration date is expired turn the unit in immediately and do not use.

Safety Management Plan

Gas Hazards Program

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- Bump test each shift prior to using the monitor.
 - Monitors are sensitive equipment. Avoid physical damage and immediately report any monitor that does not appear to be performing as expected.

Training

All affected employees will receive gas hazards awareness training before their initial assignment and annually thereafter. This shall be in conjunction with the The Workforce Group, LLC Respiratory Protection training. Training shall address, as a minimum;

- Locations of alarm stations
- Gas Monitoring Equipment-Portable Fixed Detection
- Gas Alarms
- Gas Hazards-Characteristics of gases, to include oxygen deficiency, oxygen or nitrogen enrichment, carbon monoxide and hydrogen sulfide
- Any plant or department specific gases of concern
- Signs of symptoms of overexposure
- Personal Rescue Procedures
- Use and care of Self-Contained Breathing Apparatus (SCBA)- includes donning and emergency procedures
- Evacuation Procedures
- Staging Areas-Primary and Secondary

Gas Hazard Awareness training shall be documented and available for review.

General Housekeeping Program

Purpose

This program contains requirements for practical and useful safety guidelines in the daily housekeeping habits and rules encountered at The Workforce Group, LLC.

Scope

This program is designed to help reduce disabling injuries and lost work-time. This program contains practical and useful safety guidelines to serve as habits and rules, which will help to achieve a safer attitude and a safer work environment.

Definitions

Accident – Any unforeseen or unexpected event that may or may not result in injury or damage to people, property or the environment.

General Work Habits

- To reduce accidents, we need to report to work physically and mentally rested, prepared to perform our job safely and properly.
- Report any unsafe conditions and unsafe acts to your supervisor as soon as possible.
- Short cuts should be avoided.
- Keep alert at all times especially while performing your duty(s). Personal concerns or emotions may impair your ability to perform your job safely. Report any injury or near miss to your supervisor as soon as possible.
- If you are taking prescribed drugs, some which may have side effects, inform your supervisor BEFORE beginning the day's work.

Work Area Housekeeping

- Good housekeeping and general upkeep are an essential part of every job.
- Work areas, aisles, walkways, stairways and equipment shall be kept clear of loose materials, extra tools, unnecessary equipment, and scraps.
- Approved storage areas shall be kept orderly.
- A safe access to work area(s) shall be maintained at all times.
- Materials such as lumber and pipe shall be stored in an orderly and secure manner.
- Custodial equipment such as finish buffers, stripping buffers or vacuum cleaners shall be in good working order and stored when not being used.
- All electrical cords shall be UL approved and in good condition. Any unapproved or damaged cord(s) shall be taken out of service immediately (see 29 CFR Part 1910.303, Subpart S – Electrical).
- Spills such as grease, water, or oil shall be isolated (with flags or barricades) immediately, and cleaned up as soon as possible; a delay could result in an accident. Never block aisles, traffic lanes, fire exits, emergency equipment or pull stations with equipment or materials.

Safety Management PlanGeneral Housekeeping Program

- Keep mechanical or electrical rooms clear at all times; do not use them for storage areas.
- Dispose of flammable and combustible scrap materials in approved containers. These containers must be emptied daily.
- Discard oily or greasy rags promptly.
- Wear a pair of gloves before you start any cleanup of broken glass. Discard all cracked and broken glass items immediately. Place the broken glass in a stiff cardboard box; use a pan and brush to pick up the large pieces of broken glass. A dampened paper towel can help to pick up glass slivers.
- Do not allow trash to accumulate so that the container is overflowing or too heavy to lift.
- Do not place lamps, asbestos containing materials, batteries, fluorescent tubes or liquids into trash receptacles.
- When handling trash, always be aware of broken glass, sharp objects and needles.
- Remember to use proper lifting and/or bending techniques when working with heavy or bulky items. Use a dolly or other approved lifting device with all large and/or heavy item(s).

Training

Supervisors must train all persons in the proper use of all equipment and familiarize people with the area(s) prior to any job assignment(s).

General Safety – Health Provision

Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of The Workforce Group, LLC facilities as related to the indicated general safety requirements that apply.

This program applies to all employees of The Workforce Group, LLC, temporary employees and any contractors working for The Workforce Group, LLC. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

The Workforce Group, LLC Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the General Safety Requirements program. These procedures are kept in the designated safety manager's office.

Site Manager

- Responsible for the implementation and maintenance of the plan for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local workplace General Safety Requirements program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.
- Shall use the safeguards, safety appliances and personal protective equipment while following all safe work practices and procedures for the workplace.

Competency and Training

Workers shall be competent to operate equipment and perform job tasks. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision. Work that may endanger a worker must be completed by a worker who is competent to do the work or by a worker who is working under the direct supervision of a worker who is competent to do the work. All workers must be trained in procedures until they are competent. The Workforce Group, LLC shall permit only qualified by training or experience workers to operate equipment and machinery.

Safety Management Plan

General Safety – Health Provision

Training must include: procedures to be taken in the event of a fire or other emergency, the location of first aid facilities, identification of prohibited or restricted areas, precautions to be taken for the protection of the worker from physical, chemical or biological hazards, any procedures, plans, policies and programs that The Workforce Group, LLC is required to develop and any other matters that are necessary to ensure the health and safety of the worker while the worker is at work.

The Workforce Group, LLC shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

Inspections

The Workforce Group, LLC shall ensure that frequent and regular inspections of the workplace, jobsites, materials, equipment and of work processes and procedures by a competent person to identify any risk to the safety or health of any person at the workplace.

The Workforce Group, LLC shall ensure that every dangerous occurrence is investigated as soon as is reasonably possible.

The Workforce Group, LLC must ensure that if a risk is identified we will correct any unsafe condition as soon as is reasonably practicable and, in the interim, take immediate steps to protect the safety and health of any person who may be at risk.

General Facility Requirements**Housekeeping**

Each work site shall be kept clean and free from materials or equipment that could cause workers to slip or trip. A floor or other surface used by any worker shall be kept free of obstructions, hazards and accumulations of refuse, snow or ice.

The Workforce Group, LLC requires that a worksite is sanitary and kept as clean as is reasonably practicable.

A reasonable supply of potable drinking water shall be kept readily accessible at a project for the use of workers.

Safe Equipment Maintenance

The Workforce Group, LLC has a duty to ensure our work site maintenance, systems of work and working environments ensure, as far as is reasonably practicable, the health, safety and welfare at work of the our workers.

Safety Management Plan

General Safety – Health Provision

We must and shall ensure that all equipment is maintained at intervals that are sufficient to ensure the safe functioning of the equipment. All equipment is to be maintained, safe to perform, adequate strength for its purpose and free from obvious defects. Damaged and faulty equipment reporting procedures must be in place.

Where a defect is found in equipment The Workforce Group, LLC will ensure that steps are taken immediately to protect the health and safety of any worker who may be at risk until the defect is corrected and the defect is corrected by a competent person as soon as is reasonably practicable.

Any machinery, tool, material, or equipment which is not in compliance with any applicable OSHA requirement is prohibited. The machine, tool, material or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

Any worker who knows or has reason to believe that equipment under the workers control is not in a safe condition shall immediately report the condition of the equipment to The Workforce Group, LLC and repair the equipment if the worker is authorized and competent to do so.

The Workforce Group, LLC prohibits and will not require or permit compressed air to be directed towards a worker for the purpose of cleaning clothing or personal protective equipment used by that worker, or for any other purpose if the use of compressed air may cause dispersion into the air of contaminants that may be harmful to workers.

Whenever workers are present at a worksite The Workforce Group, LLC will provide lighting that is sufficient to protect the health and safety of workers and suitable for the work to be done at the worksite.

No worker is allowed to smoke in an enclosed place of employment, worksite or work-related area except in an area designated for smoking.

Impairment

No person shall enter or remain at any workplace of employment while the person's behaviour or ability to work is affected by alcohol, intoxicating beverages, drugs or other substance so as to so as to create a nuisance or if his or her abilities are impaired so as to endanger any person, or to create an undue risk to workers, endanger the person or anyone else.

Improper Conduct

All workers shall engage in proper activity or behaviour. Improper behaviour that might create or constitute a hazard to any person is not acceptable. Improper activity or behaviour includes horseplay, scuffling, fighting, practical jokes, and unnecessary running or jumping.

Safety Management Plan

General Safety – Health Provision

Industrial Hygiene

Where a worker is exposed to a potential hazard of injury to the eye due to contact with a biological or chemical substance, an eyewash fountain shall be provided.

A worker who may be exposed to a biological, chemical or physical agent that may endanger the worker's safety or health shall be trained to use the precautions and procedures to be followed in the handling, use and storage of the agent, in the proper use and care of required personal protective equipment, and in the proper use of emergency measures and procedures.

No food, drink or tobacco shall be taken into, left or consumed in any room, area or place where any substance that is poisonous by ingestion is exposed.

Protective clothing or other safety device that has been worn next to the skin shall be cleaned and disinfected prior to being worn by another worker.

Workers who handle or use corrosive, poisonous or other substances likely to endanger their health shall be provided with washing facilities with clean water, soap and individual towels.

Thermal Stress

A worker must not be exposed to levels that exceed those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. Clothing corrections must be applied in accordance with the heat stress and strain section of the ACGIH Standard.

If a worker is or may be exposed The Workforce Group, LLC must conduct a heat stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable to the local provincial or territorial agency and develop and implement a heat stress exposure control plan.

If a worker is or may be exposed The Workforce Group, LLC must implement engineering controls to reduce the exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. If the above action is not practicable, the employer must reduce the exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard by providing; administrative controls, including a work-rest cycle, or personal protective equipment, if the equipment provides protection equally effective as administrative controls.

If a worker is or may be exposed, the employer must provide and maintain an adequate supply of cool potable water close to the work area for the use of a heat exposed worker.

Safety Management Plan

General Safety – Health Provision

If a worker shows signs or reports symptoms of heat stress or strain, the worker must be removed from the hot environment and treated by an appropriate first aid attendant, if available, or by a physician.

If a worker is or may be exposed to the conditions specified below The Workforce Group, LLC the employer must conduct a cold stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable and develop and implement a cold exposure control plan.

- Thermal conditions that could cause cold stress or injury,
- Thermal conditions that could cause a worker's core body temperature to fall below 36°C (96.8°F), or
- Thermal conditions that are below the levels classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard.

If a worker is or may be exposed The Workforce Group, LLC must implement effective engineering controls to reduce the exposure hazard to levels above those classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard. If the above action is not practicable The Workforce Group, LLC must reduce the exposure hazard by providing effective administrative controls or personal protective equipment if the equipment provides protection equally effective as administrative controls.

A worker who is or may be exposed must wear adequate insulating clothing and personal protective equipment. If work takes place outdoors in snow or ice covered terrain where excessive ultraviolet light, glare or blowing ice crystals present a risk of injury to the eyes workers must wear eye protection appropriate to the hazards.

If a worker exposed to cold shows signs or reports symptoms of cold stress or injury the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician.

General Waste Management Program

Purpose

The purpose of this waste management strategy was developed to provide guidance and requirements necessary for efficient, effective and compliant waste management during construction and operations.

Scope

This procedure applies to all The Workforce Group, LLC employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Procedure

The The Workforce Group, LLC Safety Manager or other designated person in his or her absence is accountable for managing waste and disposition of wastes generated at the work site.

Waste Estimation

Each work site will estimate the waste, trash and/or scrap that will be generated and taken into consideration prior to work being performed so the need for containers and waste removal, if necessary, can be determined.

Each site will utilize the following for planning of dumpster scheduling and total non-hazardous dry waste material. These figures do not include neither recycling nor waste minimization efforts and reflect no use of an incinerator. Dumpster figures are based on a 40 yard container and can be modified if another size is used by changing the table below.

SAMPLE ONLY - SOLID WASTE						
	Number of Employees	10	25	35	50	100
<u>Total Estimated Square Feet of Waste (@ 0.675 cu ft per person daily)</u>						
Daily		7	17	24	34	68
Weekly		47	118	165	236	473
Monthly (4.33 wks)		205	511	716	1,023	2,046
Annual		2,455	6,138	8,593	12,276	24,551
<u>Total Estimated Weight of Waste (@ 4lb per person daily)</u>						
Daily		40	100	140	200	400
Weekly		280	700	980	1,400	2,800
Monthly (4.33 wks)		1,212	3,031	4,243	6,062	12,124
Annual		14,549	36,372	50,921	72,744	145,488
<u>Number of Total Dumpster Fills</u> 40 yard dumpster 7x8x22 = 1,232 square feet						
Daily		0.0	0.0	0.0	0.0	0.1
Weekly		0.0	0.1	0.1	0.2	0.4
Monthly (4.33 wks)		0.2	0.4	0.6	0.8	1.7
Annual		2.0	5.0	7.0	10.0	19.9

Safety Management Plan

General Waste
Management Program

The Workforce Group, LLC must coordinate with the project site or owner to ensure proper disposal of wastes or scrap materials.

The Workforce Group, LLC must ensure the owner client is aware of whether wastes and scrap materials will be taken off site by The Workforce Group, LLC or will be disposed of on the owner client's site.

Waste Segregation

- Do not mix waste streams
- Only place waste in the designated container, satellite accumulation area (SAA), recyclable accumulation area (RAA), universal waste accumulation area (UWAA) or designated dumpster.

Recycling

Wastes should be recycled whenever practicable. The Workforce Group, LLC will encourage proper segregation of waste materials to ensure opportunities for reuse or recycling occurs at each work site. The collection of recycled material will reduce the total load on the environment. Bins of sufficient size must be lined with a plastic bag and clearly labeled for use. Posters from The Workforce Group, LLC will be posted throughout the work site to encourage recycling. Collection bins will also be placed in administrative areas will follow the following color guiding:

- Blue - Paper
- Green - Aluminum cans
- Yellow - Plastic

Cardboard will be flattened, staples and excess shipping tape removed. No cardboard shall be placed in the dumpster used for the landfill.

Waste Handling Matrix

Each work site will develop a Waste Handling Matrix (sample shown) that will:

- Address safe practices related to the immediate storage and handling of waste, scrap or leftover material.
- The handling, organization and storage of waste and scrap materials to minimize potential impact to the environment. Waste materials shall be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities receptacles must be covered to prevent dispersion of waste materials and to control the potential for runoff.

Safety Management Plan

General Waste
Management Program

Waste Stream	Location	Activity Generating Waste	Hazardous/ Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Aerosol Can Contents	Equipment Repair Shop	Puncturing of aerosol cans	Hazardous	SAA is self-contained in the equipment repair shop	Ship to assigned site for recycling or disposal	Read warnings before use of unit.
Aerosol Can Puncturing Unit Filter	Equipment Repair Shop	Filter Changes	Hazardous	Place in designated labeled container	Ship to assigned site for recycling or disposal	Change filter every 3 months
Aerosol Cans	Various Locations	Painting, lubricants, cleaning	Non-Hazardous if aerosol can is punctured and drained	Place punctured aerosol can in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster from client.	See "Scrap Metal" for waste stream management
Ash	Smart Ash Unit	Incineration of acceptable waste	Non Hazardous	Dispose of Immediately	Place in the Burnable Waste Dumpster	Gloves Goggles
Automotive and Heavy Equipment Parts-Used	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in RAA	Returned to vendors for recycling	Starters, Alternators, Pumps, Transmissions

Safety Management Plan

General Waste
Management Program

Waste Stream	Location	Activity Generating Waste	Hazardous/ Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Batteries (Alkaline)	Various Locations	Battery Failures	Universal Waste	Place in the UWAA	"D" cell and below are acceptable in the Non-Burnable Waste Dumpster	Ship to designated site for recycling or disposal
Batteries (Lead Acid)	Equipment Repair Shop and Fab Shop	Battery Failures	Universal Waste	No storage allowed. Containment boxes are labeled and available in the shops.	Lead acid batteries are returned to the Vendor upon removal	Ship to designated site for recycling
Batteries (NiCad)	Various Locations	Battery Failures	Universal Waste	UWAA in the equipment repair shop.	Ship to assigned site for recycling or disposal	Cell phones, radios
Butane Torch Bottle	Various Locations	Mechanic activities	Excluded Hazardous if recycled	Place drained Butane Torch Bottles in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster	Prosolv Butane Bottle processor 1

Safety Management Plan

General Waste
Management Program

Waste Stream	Location	Activity Generating Waste	Hazardous/ Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Cardboard/Office Paper	Parts Department & Offices	Shipping Boxes & Office Activities	Non-Hazardous	Place in RAA	Place on pallet in RAA and band for shipment to assigned site for recycling	
Computers Discarded	Parts Department & Offices	Replacement	Non-Hazardous	Place in RAA	Ship to assigned site for recycling or disposal	
Diesel Filters-Used	Equipment Repair Shop and Fab Shop	Filter Changes	Non-Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Diesel Rags	Various Locations	Mechanic activities	Non-Hazardous	Oily waste rag in clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Drained Diesel	Equipment Repair and Fab Shop	Draining diesel fuel and filters	Non-Hazardous when burned as off-Spec fuel	Place in "used oil" tank in the equipment repair shop and fab shop.	Burned for energy recovery in clean burn multi-oil heating	

Safety Management Plan

General Waste
Management Program

Waste Stream	Location	Activity Generating Waste	Hazardous/ Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
					system.	
Empty Paint Cans	Various Locations	Painting activities	Non-Hazardous	No storage allowed	Ship to assigned site for recycling or disposal	Paint cans must be RCRA empty.
Fluorescent Light Ballast	Various Locations	Failure	Non-Hazardous unless they contain PCB's or DEHP	None	Place in Non-Burnable Dumpster	Ballast will say on the label if it contains PCB's
Fluorescent Light Bulbs	Shops, Office Areas	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA in the shop area	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Glass	Various Locations	Replacement	Non-Hazardous	None	Place in Non-Burnable Dumpster	Ensure glass containers are empty.
Glycol Rags	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Minimize use of absorbent rags

Safety Management Plan

General Waste
Management Program

Waste Stream	Location	Activity Generating Waste	Hazardous/ Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Glycol-Used	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	RAA - self-contained tank on recycling unit	Recycled in glycol recycling unit	Recycling unit stored in shop
Grinding Wheels	Equipment Repair Shop and Fab Shop	Grinding activities	Non-Hazardous	None	Place in Non-Burnable Dumpster	
Hoses & Belts	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in Non-Burnable Dumpster	Place in Non-Burnable Dumpster	Drain all fluids from hoses
Metal Shavings/Cuttings	Equipment Repair Shop and Fab Shop	Fabricating activities	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Place in recycle metal dumpster	Ensure there are no free flowing cutting fluids present before disposal.
Oil Filters-Used	Equipment Repair Shop and Fab Shop	Oil filter changes	Excluded Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Oil-Used	Equipment Repair Shop, Fab Shop, Service	Draining oil and filters	Excluded Hazardous if burned for energy recovery	Receiving sumps are located in the Equipment Repair	Burned for energy recovery in clean burn	Keep lids on receiving sumps at all times. DO NOT PUT SOLVENTS

Safety Management Plan

General Waste
Management Program

Waste Stream	Location	Activity Generating Waste	Hazardous/ Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
	Trucks			Shop and Fab Shop	multi-oil heating system.	INTO USED OIL
Oily Waste (rags, absorbents)	Various Locations	Mechanic activities, equipment drips and leaks	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Collected daily. See "Ash" for management and disposal
Paint Waste (rags, rollers, brushes, etc.)	Various Locations	Painting activities	Determine on per occurrence basis. Use MSDS or testing	If hazardous, store in the assigned area. If non-hazardous, no storage is required.	If hazardous, ship to assigned site for disposal. If non-hazardous, place in burnable waste dumpster.	Need to review MSDS, do analytical test, or use generator knowledge to make waste determinations.
Parts Cleaner Rags	Equipment Repair Shop	Cleaning parts	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Scrap Metal	Various Locations	Fabrication activities & house cleaning	Excluded Hazardous if recycled	Placed in recycle metal dumpster	Place in recycle metal dumpster	Eye Protection Gloves

Safety Management Plan

General Waste
Management Program

Waste Stream	Location	Activity Generating Waste	Hazardous/ Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
				or metal only RAA's		
Sodium Vapor/ Metal Halide Light Bulbs	Various Locations	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA.	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Tires	Various Locations	Replacement	Non-Hazardous	None	Place tires up to 20" rim diameter into dumpster.	
Toner Cartridges	Offices	Copiers, printers, fax machines	Non-Hazardous	Placed in original container in RAA	Ship to assigned site for recycling or disposal	Verify toner is expended before disposal.
Water Scrubber Filter & Absorbents	Equipment Repair Shop and Fab Shop	Filtering sump water in shops	Non-Hazardous	None	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Welding Rods	Various Locations	Welding activities	Excluded Hazardous	Placed in recycle metal dumpster or metal only RAA's	Ship to assigned site for recycling or disposal	See "Scrap Metal" for waste stream management

Safety Management Plan

General Waste
Management Program

Waste Stream	Location	Activity Generating Waste	Hazardous/ Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Wood Waste	Various Locations	Various activities and shipping pallets	Non-Hazardous	Store on the far back corner of the pad or in the dump truck box if available.	Place in recycle wood dumpster	Pallets are refurbished and recycled when possible

Storage Requirements

The Workforce Group, LLC must ensure project related wastes are stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees. Proper waste receptacles must be provided for trash and materials that may be reused or recycled during a project.

PPE

For each site waste management plan The Workforce Group, LLC shall determine a PPE matrix that includes gloves, hand protection, eye and face protection and/or other necessary PPE.

Education and Training

Employees shall be instructed on managing waste generated at the work site and on the proper disposal method of wastes. Examples include:

- Instruction on the proper handling, storage and disposal of wastes and depending on the waste generated at the site to also include general instruction on disposal of non-hazardous wastes, trash or scrap materials. If wastes generated are classified as hazardous then employees shall be trained to ensure proper disposal and compliance with regulations.
- Minimization methods to reduce waste.
- Recycling methods and proper PPE to be utilized.

Hand and Power Tools Program

Purpose

The purpose of this program is to provide establish requirements for the safe operation of hand and power tools and other portable tools, including proper guarding. All hand and power tools shall be maintained in a safe condition.

This program applies to all The Workforce Group, LLC employees who use hand and power tools.

Scope

This program is applicable to all The Workforce Group, LLC employees while engaged in work at The Workforce Group, LLC facilities and/or facilities operated by others.

Responsibilities

Any tool which is not in compliance with any applicable requirement of this plan is prohibited and shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

Managers/Supervisors

- Ensure that all employees using portable tools have been trained and fully understand the operations and maintenance procedures of such tools, including their proper use.
- Provide and train employees with all additional PPE that may be needed for the safe operation of portable tools.

Employees

- Shall ensure they have and properly use the correct tool for each task.
- Shall follow manufactures safety and operating instructions before using

Requirements

General

All tools, regardless of ownership, shall be of an approved type and maintained in good condition.

- Tools are subject to inspection at any time.

Safety Management Plan

Hand and Power Tools Program

- All employees have the authority and responsibility to condemn unsafe tools, regardless of ownership.

Unsafe tools shall be tagged with a “DO NOT USE OR OPERATE” tag to prevent their use.

Employees shall always use the proper tool for the job to be performed. Makeshift and substitute tools shall not be used.

Hammers with metal handles, screwdrivers with metal continuing through the handle, and metallic measuring tapes shall not be used on or near energized electrical circuit or equipment.

Tools shall not be thrown from place to place or from person to person; tools that must be raised or lowered from one elevation to another shall be placed in tool bags/buckets firmly attached to hand lines.

Tools shall never be placed unsecured on elevated places.

Impact tools such as chisels, punches, and drift pins that become mushroomed or cracked shall be dressed, repaired, or replaced before further use.

Chisels, drills, punches, ground rods, and pipes shall be held with suitable holders or tongs (not with the hands) while being struck by another employee.

Shims shall not be used to make a wrench fit.

Wrenches with sprung or damaged jaws shall not be used.

Tools shall be used only for the purposes for which they have been approved.

Tools with sharp edges shall be stored and handled so that they will not cause injury or damage. They shall not be carried in pockets unless suitable protectors are in use to protect the edge. They shall not be carried in pockets unless suitable protectors are in use to protect the edge.

Wooden handles that are loose, cracked, or splintered shall be replaced. The handle shall not be taped or lashed with wire. The handle shall not be taped or lashed with wire.

Tools shall not be left lying around where they may cause a person to trip or stumble.

When working on or above open grating, a canvas or other suitable covering shall be used to cover the grating to prevent tools or parts from dropping to a lower level where others are present or the danger area shall be barricaded or guarded.

Safety Management Plan

Hand and Power Tools Program

The insulation on hand tools shall not be depended upon to protect users from high voltage shock (except approved live line tools).

Portable Electric Tools

The non-current carrying metal parts of portable electric tools such as drills, saws, and grinders shall be effectively grounded when connected to a power source unless:

- The tool is an approved double-insulated type, or
- The tool is connected to the power supply by means of an isolating transformer or other isolated power supply.

All powered tools shall be examined prior to use to ensure general serviceability and the presence of all applicable safety devices.

Powered tools shall be used only within their design and shall be operated in accordance with manufacturer's instructions. The use of electric cords for hoisting or lowering tools shall not be permitted.

All tools shall be kept in good repair and shall be disconnected from the power source while repairs or adjustments are being made.

Electrical tools shall not be used where there is hazard of flammable vapors, gases, or dusts without a valid Hotwork Permit.

Ground fault circuit interrupters or use of an Assured Grounding Program shall be used with portable electric tools. This does not apply to equipment run off of portable or truck mounted generators at 5kw or less that are isolated from ground or to equipment ran directly off of secondaries.

Pneumatic Tools

Pneumatic tools shall never be pointed at another person.

Pneumatic power tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.

Safety clips or retainers shall be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled.

Compressed air shall not be used for cleaning purposes, except where reduced to less than 30 psi and then only with effective chip guarding and personal protective equipment.

Safety Management Plan

Hand and Power Tools Program

Compressed air shall not be used to blow dust or dirt from clothing.

The manufacturers stated safe operating pressure for hoses, pipes, valves, filters, and other fitting shall not be exceeded.

The use of hoses for hoisting or lowering tools shall not be permitted.

Before making adjustments or changing air tools, unless equipped with quick-change connectors, the air shall be shut off at the air supply valve ahead of the hose. The hose shall be bled at the tool before breaking the connection.

Compressed air tools, while under pressure, must not be left unattended.

All connections to air tools shall be made secure before turning on air pressure.

Air at the tool shall not be turned on until the tool is properly controlled.

All couplings and clamps on pressurized air hose shall be bridged (pinned) with suitable fasteners.

Hose and hose connections used for conducting compressed air to utilization equipment shall be designed for the pressure and service to which they are subjected.

Use only approved end-fitting clamps (screw type heater hose clamps are not acceptable).

While blowing down hose, do not point it toward people.

Power tools are to be operated only by competent persons who have been trained in their proper use.

Conductive hose should not be used near energized equipment.

Foot protection shall be worn while operating paving breakers, tampers, rotary drills, clay spades, and similar impactor-type tools or at other times when instructed by supervision.

All pneumatically driven nailers, staplers, and other similar equipment provided with automatic fastener feed, which operate at more than 100 psi. pressure at the tool shall have a safety device on the muzzle to prevent the tool from ejecting fasteners, unless the muzzle is in contact with the work surface.

Airless spray guns of the type which atomize paints and fluids at high pressures (1,000 pounds or

Safety Management Plan

Hand and Power Tools Program

more per square inch) shall be equipped with automatic or visible manual safety devices which will prevent pulling of the trigger to prevent release of the paint or fluid until the safety device is manually released.

In lieu of the above, a diffuser nut (which will prevent high pressure), high velocity release (while the nozzle tip is removed), plus a nozzle tip guard (which will prevent the tip from coming into contact with the operator), or other equivalent protection, shall be provided.

Powder Actuated Tools (Tools actuated by an explosive charge)

Only those employees who have been certified in their use shall operate these tools.

Explosive charges shall be carried and transported in approved containers.

Operators and assistants using these tools shall be protected by means of eye, face, and hearing protection.

Tools shall be maintained in good condition and serviced regularly by qualified persons. The material upon which these tools are to be used shall be examined before work is started to determine its suitability and to eliminate the possibility of hazards to the operator and others.

Prior to use, the operator shall ensure that the protective shield is properly attached to the tool.

Before using a tool, the operator shall inspect it to determine to his satisfaction that it is clean, that all moving parts operate freely, all guards and safety devices are in place, and that the barrel is free from obstructions.

Before using tools the operator shall read and become familiar with the manufacturers operating guidelines and procedures.

When a tool develops a defect during use, the operator shall immediately cease to use it, until it is properly repaired in accordance with the manufactures specifications.

Tools shall not be loaded until just prior to the intended firing time, nor shall an unattended tool be left loaded. Empty tools are to be pointed at any workmen.

In case of a misfire, the operator shall hold the tool in the operating position for at least 30 seconds. He shall then try to operate the tool a second time. He shall wait another 30 seconds, holding the tool in the operating position; then he shall proceed to remove the explosive load in strict accordance with the manufacturer's instructions.

A tool shall never be left unattended in a place where it would be available to unauthorized persons.

Safety Management Plan

Hand and Power Tools Program

Fasteners shall not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface hardened steel, glass block, live rock, face brick, or hollow tile.

Driving into materials easily penetrated shall be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.

Tools shall not be used in an explosive or flammable atmosphere.

Hydraulic Power Tools

The fluid used in hydraulic powered tools shall be fire-resistant fluids approved under Schedule 30 of the U.S. Bureau of Mines, Department of the Interior, and shall retain its operating characteristics at the most extreme temperatures to which it will be exposed.

The manufacturer's safe operating pressures for hoses, valves, pipes, filters, and other fittings shall not be exceeded.

All hydraulic tools, which are used on or around energized lines or equipment, shall use non-conducting hoses having adequate strength for the normal operating pressures.

Hydraulic Jacks**Loading and Marking**

- The operator shall make sure that the jack used has a rating sufficient to lift and sustain the load.
- The rated load shall be legibly and permanently marked in a prominent location on the jack by casting, stamping, or other suitable means.

Operation and Maintenance

- In the absence of a firm foundation, the base of the jack shall be blocked. If there is a possibility of slippage of the cap, a block shall be placed in between the cap and the load.
- The operator shall watch the stop indicator, which shall be kept clean, in order to determine the limit of travel. The indicated limit shall not be overrun.
- After the load has been raised, it shall be cribbed, blocked, or otherwise secured at once.
- Hydraulic jacks exposed to freezing temperatures shall be supplied with adequate antifreeze liquid.
- All jacks shall be properly lubricated at regular intervals.

Each jack shall be thoroughly inspected before each use. Jacks, which are in unsafe condition, shall be tagged accordingly, and shall not be used until repairs are made.

Safety Management Plan

Hand and Power Tools Program

Abrasive Blast Cleaning Nozzles

The blast cleaning nozzles shall be equipped with an operating valve, which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.

Fuel Powered Tools

All fuel-powered tools shall be stopped while being refueled, serviced, or maintained, and fuel shall be transported, handled, and stored in accordance with the Flammable and Combustible Liquids Program.

When fuel powered tools are used in enclosed spaces, the applicable requirements for concentrations of toxic gases and use of personal protective equipment, shall be adhered to.

Guarding Portable Tools

Guards shall be in place and operable at all times while the tool is in use. The guard may not be manipulated in such a way that will compromise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in ANSI B15.1.

Portable Circular Saws

- All portable, power-driven circular saws having a blade diameter greater than 2 in. shall be equipped with guards above and below the base plate or shoe.
- The upper guard shall cover the saw to the depth of the teeth, except for the minimum arc required to permit the base to be tilted for bevel cuts.
- The lower guard shall cover the saw to the depth of the teeth, except for the minimum arc required to allow proper retraction and contact with the work.
- When the tool is withdrawn from the work, the lower guard shall automatically and instantly return to covering position.
- All cracked saw blades shall be removed from service.

Switches and Controls

- All hand held powered tools, circular saws, drills, tappers, fastener drivers, horizontal or vertical angle grinders, etc., shall be with a constant pressure switch or control, and may have a lock-on control provided that turnoff can be accomplished by a single motion of the same finger or fingers that turn it on.
- All hand-held powered circular saws having a blade diameter greater than 2 inches, electric, hydraulic or pneumatic chain saws, and percussion tools without positive accessory holding means shall be equipped with a constant pressure switch or control that will shut off the power when the pressure is released. All hand-held gasoline powered chain saws shall be equipped with a constant pressure throttle control that will shut off the power to the saw chain when the pressure is released.
- The operating control on hand-held power tools shall be so located as to minimize the possibility of its accidental operation, if such accidental operation would constitute a

Safety Management Plan

Hand and Power Tools Program

hazard to employees.

- Grounding of portable electric powered tools shall meet the electrical requirements that can be found in the Electrical Safety Program. All electric power tools shall be equipped with a three-prong plug.

Portable Abrasive Wheels

Safety Guards Exceptions

- Wheels used for internal work while within the work being ground.
- Mounted wheels used in portable operations 2 inches and smaller in diameter.
- Types 16, 17, 18, 18R, and 19 cones, plugs, and threaded hole pot balls where the work offers protection.
- Guards shall be made of steel or other material with adequate strength.
- A safety guard shall cover the spindle end, nut and flange projections. The safety guard shall be mounted so as to maintain proper alignment with the wheel, and the strength of the fastenings shall exceed the strength of the guard.
- Exception: safety guards on all operations where the work provides a suitable measure of protection to the operator may be so constructed that the spindle end, nut and outer flange are exposed. Where the nature of the work is such as to entirely cover the side of the wheel, the side covers of the guard may be omitted.
- Exception: the spindle end, nut, and outer flange may be exposed on portable machines designed for, and used with, type 6, 11, 27, and 28 abrasive wheels, cutting off wheels, and tuck pointing wheels.

Mounting and Inspection of Abrasive Wheels

- Immediately before mounting, all wheels shall be closely inspected and a ring test performed, to make sure they have not been damaged in transit, storage, or otherwise.
- Ring test – “tap” wheels about 45 degrees each side of the vertical centerline and about 1 or 2 inches from the periphery; then rotate the wheel 45 degrees and repeat the test; a sound and undamaged wheel will give a clear metallic tone - If cracked, there will be a dead sound and not a clear “ring.”
- The spindle speed of the machine shall be checked before mounting of the wheel to be certain that it does not exceed the maximum operating speed marked on the wheel.
- Grinding wheels shall fit freely on the spindle and remain free under all grinding conditions.
- A controlled clearance between the wheel hole and the machine spindle (or wheel sleeves or adaptors) is essential to avoid excessive pressure from mounting and spindle expansion.
- The machine spindle shall be made to nominal (standard) size plus zero minus .002 inch, and the wheel hole shall be made suitably oversize to assure safety clearance under the conditions of operating heat and pressure.
- All contact surfaces of wheels, blotters, and flanges shall be flat and free of foreign

Safety Management Plan

Hand and Power Tools Program

matter.

- When a bushing is used in the wheel hole it shall not exceed the width of the wheel and shall not contact the flanges.

Portable Grinders

Special "revolving cup guards" which mount behind the wheel and turn with it shall be used. They shall be made of steel or other material with adequate strength and shall enclose the wheel sides upward from the back for one-third of the wheel thickness. It is necessary to maintain clearance between the wheel side and the guard. The clearance shall not exceed one-sixteenth inch.

Vertical portable grinders, also known as right angle grinders, shall have a maximum exposure angle of 180 degrees and the guard shall be located between the operator and the wheel during use. Adjustment of the guard shall ensure that pieces of an accidentally broken wheel will be deflected away from the operator.

Other Portable Grinders

The maximum angular exposure of the grinding wheel periphery and sides for safety guards used on other portable grinding machines shall not exceed 180 degrees and the top half of the wheel shall be enclosed at all times.

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 dust, fumes, mists, vapors or gases shall be provided with the particular PPE necessary to protect them from the hazard.

GHS HAZCOM PROGRAM

Purpose

The purpose of this program is to ensure that the hazards of all chemicals and substances are evaluated and the information concerning their hazards is communicated to employees, including emergency response organizations, state and federal agencies, other employers and contractors, as necessary. This hazard information will be communicated, and displayed in accordance with the new **Global Harmonized System of Classification and Labeling of Chemicals**.

The Workforce Group, LLC is firmly committed to providing each of its employees a safe and healthy work environment. It is recognized that workers may use chemicals or substances that have potentially hazardous properties. When using these substances, workers must be aware of the identity, toxicity or hazardous properties of a chemical or substance, since an informed employee is more likely to be a safe employee. To this end, The Workforce Group, LLC has established a written GHS Hazard Communication Program which standardizes the format for all SDSs.

Scope

This program is applicable to all The Workforce Group, LLC employees who may be exposed to hazardous chemicals. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Chemical - any element, chemical compound, or mixture of elements and/or compounds.

Chemical Inventory List - a list of chemicals used at this facility, or by personnel that report to this facility.

Electronic Access – using electronic media (telephone, fax, internet, etc.) to obtain Safety Data Sheets or health information.

Facility - an establishment at one geographical location containing one or more work areas.

Hazardous chemical - any chemical that is a physical hazard, a health hazard, or has a Permissible Exposure Limit established for it.

Hazardous substance - see hazardous chemical.

Safety Management Plan

HAZCOM Program

Hazard Communication Program Coordinator - the person who has overall responsibility at a facility for that facility's Hazard Communication Program.

Health hazard - a substance for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic adverse health effects may occur in exposed employees.

IDLH - immediately dangerous to life and health.

Immediate Use - the chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Jobsite - an area remote from a The Workforce Group, LLC facility where hazardous chemicals are stored or used and employees are present for the purpose of The Workforce Group, LLC business.

(SDS) Safety Data Sheet - a written or printed document containing chemical hazard and safe handling information, prepared in accordance with the OSHA Occupational Safety & Health Standards, Section 1910.1200, paragraph (g).

(NFPA) National Fire Protection Association Labeling - a common industry labeling method developed by the National Fire Protection Association to identify the hazards associated with a particular chemical.

(PEL) Permissible Exposure Limit - the maximum eight-hour time weighted average of any airborne contaminant to which an employee may be exposed.

Readily available - when an employee has access during the course of his/her normal work shift.

Substance - see Chemical.

(TLV) Threshold Limit Value - the airborne concentration of a substance that represents conditions under which it is believed that nearly all normal workers may be repeatedly exposed day after day without adverse effect.

Work area - a room or defined space in a facility where hazardous chemicals are stored or used and where one or more employees are present.

Workplace - see Facility.

Workplace Chemical List - see Facility Chemical List.

Safety Management Plan

HAZCOM Program

Responsibilities

A written hazard communication program shall be developed, implemented and maintained at each The Workforce Group, LLC workplace that describes how labels and other forms of warning, safety data sheets and employee information will be met.

The Safety Manager is responsible for developing and implementing the Hazard Communications Program. Managers are responsible for maintaining Safety Data Sheets and the Chemical Inventory List for their locations. The Safety Manager reviews the SDS files and Chemical Inventory List at each location at least annually to ensure that they are complete and up to date.

Employees are responsible for following the requirements in the Hazard Communication Program, to use proper personal protective equipment, to report containers without labels immediately and to not deface any label.

Any employee who transfers any material from one container to another is responsible for labeling the new container with all required information.

All employees are responsible for learning the requirements of this section and for applying them to their daily work routine.

Requirements**Introduction**

This Hazard Communication Program was prepared for use by The Workforce Group, LLC to explain how The Workforce Group, LLC meets the requirements of the federal Occupational Safety and Health Administration's Hazard Communication Standard (29 CFR 1910.1200). It spells out how The Workforce Group, LLC will inventory chemicals stored and used, obtain and use safety data sheets, maintain labels on chemical substances, and train employees about the hazards of chemicals they are likely to encounter on the job.

Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- In addition to the program, other information required as part of our hazard communication effort is available to workers upon request.
- Asking to see this information is an employee's right.
- Using this information is part of our shared commitment to a safe, healthy workplace.

Safety Management Plan

HAZCOM Program

List of Hazardous Chemicals

The Workforce Group, LLC maintains a listing of all known hazardous chemicals known to be present or used at each job site by using the identity that is referenced on the appropriate safety data sheet (SDS). This identity is often a common name, such as the product or trade name (i.e., Lime-A-Way).

The Chemical Inventory List is updated as necessary and at least annually by the Hazard Communication Program Coordinator or their designee.

The facility Chemical Inventory List must be available for review upon request.

Safety Data Sheets

Chemical manufacturers are responsible for developing SDSs. The Workforce Group, LLC shall have a SDS for each chemical used with the exception of consumer products. SDSs must be obtained for each required chemical from the chemical manufacturer, supplier or vendor. The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Safety Data Sheets in a timely fashion is prohibited.

SDSs shall be maintained and readily accessible in each work area. SDSs can be maintained at the primary work site. However, they should be available in case of an emergency. SDSs must be made available, upon request, to employees, their designated representatives, the Assistant Secretary of Labor and the Director of OSHA.

Safety Data Sheets are filed alphabetically, by material classification, in the SDS Book. A Chemical Inventory List is provided in the front of the SDS Book, listing all SDS' contained therein. This inventory serves as the index of the SDS Book. The SDS Book shall be displayed in a prominent location in the work area where it is accessible to all employees.

A copy of a SDS request form is located in the first section of the SDS Book. An employee may use a copy of this form to request an SDS or he may ask the Manager for one. In either case the requested SDS must be given to the employee within 24 hours.

The Safety Data Sheet must be kept in the SDS library for as long as the chemical is used by the facility.

Electronic access (telephone, fax, internet, etc.) may be used to acquire and maintain SDS libraries and archives.

The Manager is responsible for seeing that the Chemical Inventory List inventory is maintained, is current and is complete. He will review the inventory and the SDS Book at least annually. When a hazardous material has been permanently removed from the work place, its SDS is to be removed from the SDS Book and the Chemical Inventory List. A file copy is to be maintained in a "dead file".

Safety Management Plan

HAZCOM Program

SDS' for hazardous materials to which The Workforce Group, LLC employees have been exposed must be maintained after the employee leaves the employment of The Workforce Group, LLC.

Before any non-routine task is performed, employees will be advised of methods and special precautions, PPE and the hazards associated with chemicals and the hazards associated with chemicals contained in unlabeled pipes in their work areas. In the unlikely event that such tasks are required, the Manager will provide SDS for involved chemical.

Employees have the right to request SDS on any chemical and it must be provided without any issues.

Labels, Labeling and Warnings:

The Manager will ensure that all hazardous chemicals used or stored in the facility are properly labeled.

- Damaged labels or labels with incomplete information shall be reported immediately.
- Damaged labels on incoming containers of chemicals shall not be removed.
- New labels shall be provided as needed so that all containers are properly labeled.
- Only containers into which an employee transfers a chemical for their own immediate use will not require labeling.
- Employees who are unsure of the contents of any container, vessel or piping must contact their supervisor for information regarding the substance including:
 - The name of the substance
 - The hazards related to the substance
 - The safety precautions required for working with the substance.

Labels, tags or markings on containers shall list as a minimum:

The HCS requires chemical manufacturers, importers, or distributors to ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged or marked with the following information:

- name, address and telephone number of the chemical manufacturer, importer, or other responsible party
- product identifier
- signal words to indicate the relative level of severity of hazard;
- hazard statement(s);
- precautionary statement(s);
- pictogram(s);
- supplemental information may be provided.
- Labels must be legible, in English, and prominently displayed. Other languages may be displayed in addition to English.

Safety Management Plan

HAZCOM Program

- The Workforce Group, LLC or employees shall not remove or deface labels on incoming containers of hazardous chemicals.

All containers must be labeled. When an employee transfers the contents of one container to another, he must label the new container with all required information. This information can be obtained from the labeling of the original container or from the material's SDS. Any container of a potentially hazardous material that will not be emptied during one shift must be labeled, without exception.

Personnel in the Shipping and Receiving Departments are responsible for proper labeling of all containers shipped by The Workforce Group, LLC and for the inspection of all incoming materials to ensure correct labeling. Chemicals received from vendors that are not properly labeled must be rejected.

NFPA Standard 704 labels shall be the preferred hazard identification method used in The Workforce Group, LLC facilities and on materials containers used on client sites. All employees, clients, subcontractors and visitors who may come in contact with a The Workforce Group, LLC hazardous substance must be briefed to ensure understanding of the NFPA 704 labeling system.

Training

Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and Safety Data Sheets.

Additional training will be provided whenever a new chemical hazard is introduced into the work area. To reinforce the importance of handling chemicals properly when performing new or non-routine tasks supervisors will conduct supplementary training as needed.

Formal training will be conducted by facility employees or individuals who are knowledgeable in the Hazard Communication program.

The Manager shall ensure records of employee training are maintained.

When an outside contractor, such as a pest control worker or a carpenter enters a The Workforce Group, LLC site to perform a service for the company, he must first present SDS' for any and all hazardous chemicals he will use. These SDS' will be treated as above with the same training requirements. The Manager will be responsible for contacting each contractor before work is

Safety Management Plan

HAZCOM Program

started to gather and disseminate any information concerning chemical hazards the contractor is bringing into the work place.

The Hazard Communication Program documented training shall, as a minimum, include:

- Requirements, details and rights of the employee as contained in the Hazard Communication regulation
- Operations and work areas where hazardous chemicals are present.
- Location of the written Hazard Communication Program, SDSs and the Chemical Inventory List.
- How to access SDS' or SDS information.
- How to read and an explanation of labels and Safety Data Sheets for pertinent hazard information and how employees can obtain and use the appropriate hazard information.
- Methods and observations that may be used to detect the presence or release of hazardous chemicals by use of monitoring devices, visual appearance or odor.
- The physical & health hazards of chemicals in the work area.
- Protection measures to be utilized to prevent exposure.
- Appropriate work practices.
- Emergency procedures.
- Proper PPE to be used.

Multi-Employer Job Sites/Multi-Work Site

Multi-Work Sites

Where employees must travel between work places during a work shift, the written HAZCOM Program shall be kept at a primary job site. If there is no primary job site, then the program shall be sent with employees.

The program shall be made available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director in accordance with requirements of 29 CFR 1910.1020(e).

Multi-Employer Job Sites

A pre-job briefing shall be conducted with the contractor prior to the initiation of work on the site.

- During this pre-job briefing, contractors shall notify The Workforce Group, LLC and present current copies of Safety Data Sheets and label information for every hazardous substance brought on-site.
- The Workforce Group, LLC shall notify and provide required SDS and label information for all hazardous materials the contractor may encounter on the job.
- The facilities labeling system and any precautionary measures to be taken by contractor during normal conditions and emergencies shall be addressed.

Safety Management Plan

HAZCOM Program

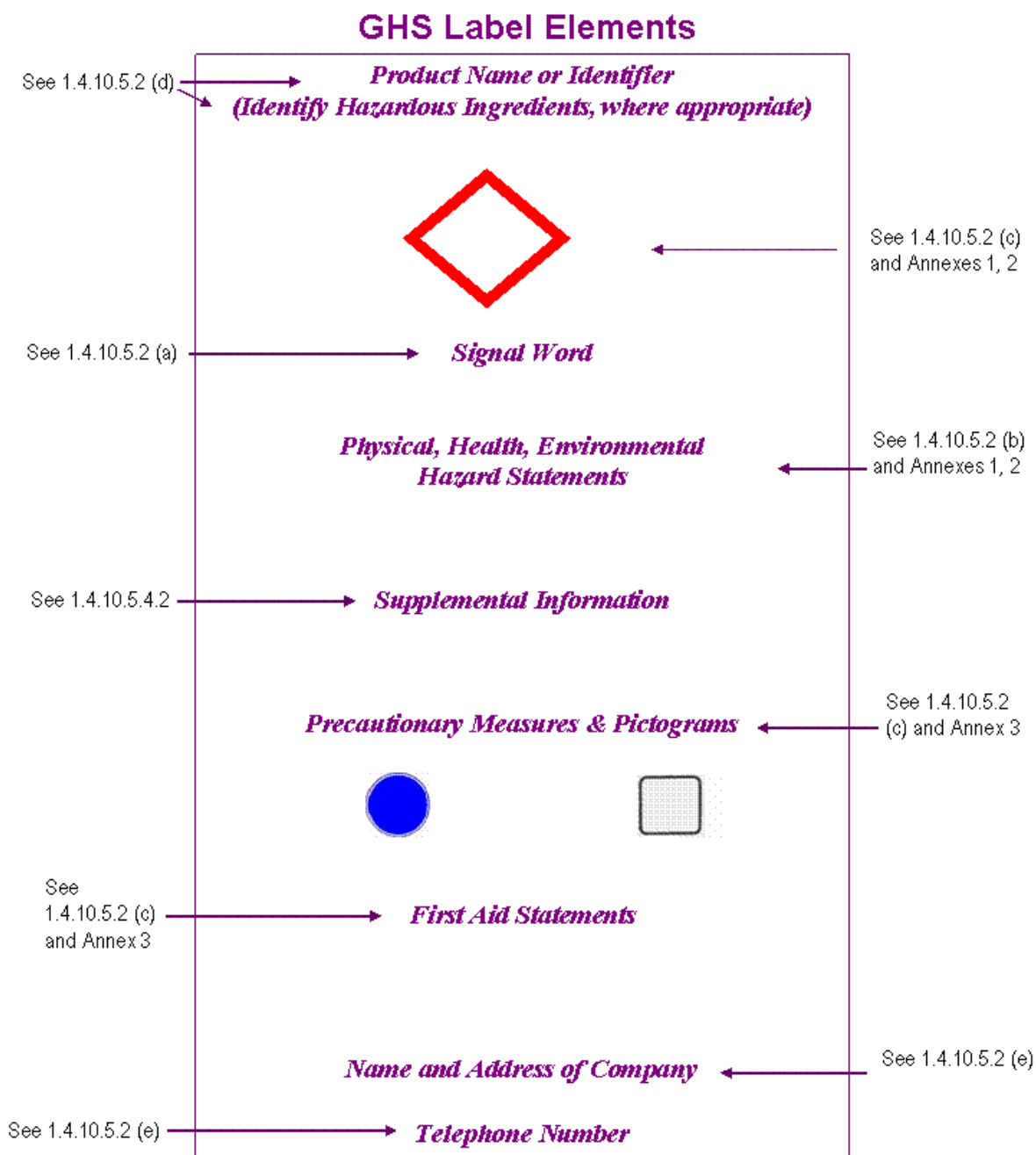
- By providing such information to other employers, The Workforce Group, LLC does not assume any obligations that other employers have for the safety of their employees.
- In this regard, other employers working on The Workforce Group, LLC property or for The Workforce Group, LLC on client's property remain fully responsible for developing and implementing their own compliant hazard communication programs.

Hazard Warnings / NFPA 704

The NFPA 704 Diamond is a means of disseminating hazard warning and information for a material. The diamond is divided into four sections. Each of the first three colored sections has a number in it associated with a particular hazard. The higher the number is, the more hazardous a material is for that characteristic. The fourth section includes special hazard information. The four sections and an explanation of the numbers in them are provided below:

NFPA Rating Explanation Guide					
RATING NUMBER	HEALTH HAZARD	FLAMMABILITY HAZARD	INSTABILITY HAZARD	RATING SYMBOL	SPECIAL HAZARD
4	Can be lethal	Will vaporize and readily burn at normal temperatures	May explode at normal temperatures and pressures	ALK	Alkaline
3	Can cause serious or permanent injury	Can be ignited under almost all ambient temperatures	May explode at high temperature or shock	ACID	Acidic
2	Can cause temporary incapacitation or residual injury	Must be heated or high ambient temperature to burn	Violent chemical change at high temperatures or pressures	COR	Corrosive
1	Can cause significant irritation	Must be preheated before ignition can occur	Normally stable. High temperatures make unstable	OX	Oxidizing
0	No hazard	Will not burn	Stable	Radioactive symbol	Radioactive
				W	Reacts violently or explosively with water
				W OX	Reacts violently or explosively with water and oxidizing










Figure 4.8









Safety Management Plan

HAZCOM Program









Pictograms and Hazards

Health Hazard  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	Flame  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	Exclamation Mark  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  <ul style="list-style-type: none"> • Gases Under Pressure 	Corrosion  <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	Exploding Bomb  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle  <ul style="list-style-type: none"> • Oxidizers 	Environment (Non-Mandatory)  <ul style="list-style-type: none"> • Aquatic Toxicity 	Skull and Crossbones  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

Transport "Pictograms"		
		
Flammable Liquid Flammable Gas Flammable Aerosol	Flammable solid Self-Reactive Substances	Pyrophorics (Spontaneously Combustible) Self-Heating Substances
		
Substances, which in contact with water, emit flammable gases (Dangerous When Wet)	Oxidizing Gases Oxidizing Liquids Oxidizing Solids	Explosive Divisions 1.1, 1.2, 1.3

Safety Management Plan

HAZCOM Program

		
Explosive Division 1.4	Explosive Division 1.5	Explosive Division 1.6
		
Compressed Gases	Acute Toxicity (Poison): Oral, Dermal, Inhalation	Corrosive
		
Marine Pollutant	Organic Peroxides	

Hazard Identification and Risk Assessment Program

Purpose

- To provide guidelines for identifying, assessing and controlling workplace hazards;
- To ensure the potential hazards of new processes and materials, changes in operation, products or services as applicable are identified before they are introduced into the workplace;
- To identify the jobs/tasks which require risk assessment.

Key Responsibilities

As specified within this program.

The Workforce Group, LLC must assess a work site and identify existing or potential hazards before work begins at the work site or prior to the construction of a new work site

Hazard and Risk Identification

The hazard identification process should be used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable. Hazards are classified/prioritized and addressed based on the risk associated with the task / (Risk analysis matrix outlining severity and probability).

The Safety Manager shall conduct a baseline worksite hazard assessment which is a formal process in place to identify the various tasks that are to be performed and the accompanying identified potential hazards. The results are included in a report of the results of the hazard assessment and the methods used to control or eliminate the hazards identified. The hazard assessment report must be signed and have the date on it.

Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work;
- Legal and other requirements;
- Previous incidents and non-conformances;
- Sources of energy, contaminants and other environmental conditions that can cause injury;
- Walk through of work environment;

Hazards identifications (as examples) are to include:

- Working Alone

Safety Management Plan

Hazard Identification and Risk
Assessment Program

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- Thermal Exposure
 - Isolation of Energy
 - Hearing Protection
 - Musculoskeletal Disorders
 - Bloodborne Pathogens
 - Confined Spaces
 - Driving
 - General Safety Precautions
 - And any other established policy or procedure by The Workforce Group, LLC
 - Any other site specific work scope

Policies are in place to identify potential hazards by the use of JSA, JHA, FLRA, work permits, inspections by department, site or company audits, toolbox meetings, incident notices, safety observations and incident investigations.

All identified hazards are then assessed for risk and risk controls are assigned within the worksite hazard assessment for that specific hazard.

At existing locations employees and/or subcontractors are actively involved in the identification of hazards. All employees and subcontractors affected by hazards identified in the hazard assessment process are informed of the hazards and the methods used to control or eliminate the hazard. Worker names and participation in the process shall be documented either on the written hazard assessment reports or in tool box meeting forms. Workers will be trained in the hazard identification process including the use and care of proper PPE, how to complete FLRA, JHAs, etc.

Unsafe hazards must be reported immediately and addressed by the supervisor. The supervisor discusses the worksite hazard assessment with employees at the respective work location during the employee's documented orientation.

Review of Hazard Assessment

Existing worksite hazard identifications are formally reviewed annually or repeated at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions and specifically updated when new tasks are to be performed that have not been risk assessed, when a work process or operation changes, before the construction of a new site or when significant additions or alterations to a job site are made.

Safety Management Plan

Hazard Identification and Risk
Assessment Program

The respective supervisor or project manager advises the Safety Manager when additional hazards are introduced into the work place in order to revise planning and assessment needs.

Risk Assessment

Each identified hazard is assessed, classified and ranked on severity of potential consequences of effecting injury to people, damage to assets, the environment or reputation of The Workforce Group, LLC The probability of risk exposure is then considered and applied.

Following risk assessment steps each risk assessed becomes classified as low, medium or high in accordance with the The Workforce Group, LLC Risk Assessment Matrix shown below. The risk level of the hazard is recorded with the associated work task within the site specific HSE plan for the job site.

Safety Management Plan

Hazard Identification and Risk
Assessment Program**THE WORKFORCE GROUP, LLC RISK ASSESSMENT MATRIX**

CONSEQUENCE					PROBABILITY				
Severity	People	Assets	Environment	Reputation	A	B	C	D	E
					Improbable	Remote	Occasional	Probable	Frequently
0	No health effect	No damage	No effect	No impact					
1	Slight health effect	Slight damage	Slight effect	Slight impact					
2	Minor health effect	Minor damage	Minor effect	Limited impact					
3	Major health effect	Localized damage	Localized effect	Considerable impact					
4	Single fatality	Major damage	Major effect	National impact					
5	Multiple fatalities	Extensive damage	Massive effect	Global impact					

Key	Manage for continuous improvement (Low)	Incorporate risk reduction measures (Medium)	Intolerable (High)
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Risk Controls

Risk assessed hazards are compiled with and addressed and mitigated through dedicated assignment, appropriate documentation of completion, and implemented controls methods including engineering or administrative controls and PPE required into the worksite hazard assessment of the site specific HSE plan. No work will begin before the worksite assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.

If the hazard cannot be eliminated then it shall be controlled by Engineering, Administrative and/or PPE controls. Engineering controls are incorporated into the process itself, sometimes as part of the equipment. Substitution could be one engineered method to follow. Administrative controls are used to minimize the exposure to a hazard by worker training and worker rotation. If the engineering or administrative controls do not achieve this then the employer must ensure the appropriate PPE is used by workers affected by the hazard. The Workforce Group, LLC may use a combination of engineering, administrative and PPE controls to achieve a greater level of worker safety.

Emergency Control of Hazards

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those personnel with

Safety Management Plan

Hazard Identification and Risk
Assessment Program

training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. The Workforce Group, LLC will make every possible effort to control the hazard while the condition is being corrected or under the supervision of client emergency response personnel in every emergency.

Certification of Hazard Assessment

The Safety Manager completes and signs the certification of hazard assessment for the worksite hazard assessment (also see PPE Program) and includes it within the site specific HSE plan. Hazards assessments are reviewed annually and updated when new tasks are to be performed that have not been risk assessed.

Job Safety Analysis (JSA)

For those jobs with the highest injury or illness rates, jobs that are new to our operation, jobs that have undergone major changes in processes and procedures or jobs complex enough to require written instructions will have a Job Safety Analysis performed. Completed JSAs are available from the Safety Manager.

Site Specific HSE Plan (SSHP)

Each work location has a site specific HSE plan. Each employee reporting to a location shall receive a documented orientation from a The Workforce Group, LLC supervisor that includes the SSHP for that site. The SSHP contains the The Workforce Group, LLC Health and Safety Policy, site specific safety requirements as well as a PPE matrix and a signed site specific worksite hazard assessment for that location, which the The Workforce Group, LLC has a responsibility to provide.

Review Process

The hazard assessment program will be reviewed to ensure no new hazards derived from the corrective measures. The review shall include a management of change consideration as well.

The safety committee shall be involved in the review process as well.

Work Area -Task Hazard Prevention and Control Worksheet
To be completed after Hazard Assessment Worksheet

Work Areas _____ **Conducted By** _____

Tasks _____ **Date** _____

Note: Respiratory & Ergonomic Assessments are conducted under separate programs

List the Specific Hazard Control Method in each block below

	SPECIFIC HAZARD	REQUIRED PPE	ENGINEERING CONTROLS	ENVIRONMENTAL CONTROLS	ADMINISTRATIVE CONTROLS	NOTES
Head						
Eyes / Face						
Skin						
Hand						
Foot						
Hearing						

WORKSITE HAZARD ASSESSMENT FORM

CERTIFICATE OF HAZARD ASSESSMENT STATEMENT FOR form shall be signed_ SITE

I certify a worksite hazard assessment was performed for this facility on date by the The Workforce Group, LLC Safety Manager. (*Signature on File*)

Task: Indicate Task Group

(Additional Tasks shall be listed in each site specific HSE plan)

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE (Refer to PPE Matrix)
<i>List individual task</i>	<i>Use Risk Matrix</i>	<i>Identify hazards associated with task</i>	<ul style="list-style-type: none"> <i>List procedures that apply</i> <i>List appropriate engineering controls</i> <i>List procedures or other administrative controls</i> 	<i>List appropriate PPE</i>
<u>Example:</u> Washing Parts	MED	Chemical Exposure (Skin, Eyes, Body)	<ul style="list-style-type: none"> The Workforce Group, LLC PPE Procedure No smoking; 	Chemical gloves, splash proof goggles chemical apron
			•	
			•	
			•	
			•	
			•	
			•	

JOB SAFETY ANALYSIS FORM

Location / Dept:				Date:		New? <input type="checkbox"/>		Revision <input type="checkbox"/>		JSA NO:	
Task						Supervisor:					
						Analysis By:					
Team Members						Reviewed By:					
						Approved By:					
Specific rules and procedures to be followed (Safe Work Practice Number ____):											
Sequence of Basic Job Steps				Potential Injury or Hazards				Recommendations to Eliminate or Reduce Potential Hazards.			
CHECK ITEMS REQUIRED TO DO THIS JOB:											
Safety Glasses	<input type="checkbox"/>	Leather Gloves	<input type="checkbox"/>	Face Shield	<input type="checkbox"/>	Fire Extinguisher	<input type="checkbox"/>	Atmospheric Testing	<input type="checkbox"/>		
Hard Hats	<input type="checkbox"/>	Work Vest	<input type="checkbox"/>	Goggles (type?)	<input type="checkbox"/>	Lockout/Tagout	<input type="checkbox"/>	Traffic Control	<input type="checkbox"/>		
Safety Shoes	<input type="checkbox"/>	Fall Harness	<input type="checkbox"/>	Flame Resistant Clothing	<input type="checkbox"/>	Warning signs	<input type="checkbox"/>	Other	<input type="checkbox"/>		

Safety Management Plan

Hazard Identification and Risk Assessment

INSTRUCTIONS FOR COMPLETING THE JOB SAFETY ANALYSIS FORM

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

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

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Purpose

This requirement covers emergency and post-emergency response operations standards, to include training for personnel responding to releases or substantial threats of releases chemical or petroleum products without regard to the location of the hazard. Even though there is a specific section devoted to hazardous materials and emergency response (29 CFR 1910.120), this section does not encompass all work procedures around emergency response and 29 CFR 1910 and 29 CFR 1926 continue to apply in every respect during emergency response operations. If there is an apparent conflict or overlap, the provision that is more protective of employee health and safety shall apply. Emergency response efforts on land or water to releases of chemicals or petroleum products originating from The Workforce Group, LLC facilities or in the course of transportation will comply with the requirements of 29 CFR 1910.120(q). The primary concern in emergency response is the safety and security of responding personnel.

Scope

This section applies to all employees and independent contractors employed by and/or contracted to The Workforce Group, LLC when responding to chemical releases.

Definitions

Emergency response: A response effort by employees from outside the immediate release area or by other designated responders (e.g., mutual-aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release of crude oil or petroleum products.

Post emergency response: That portion of an emergency response performed after the immediate threat of a release has been stabilized or eliminated and clean-up of the site has begun.

Health hazard: Chemicals which are carcinogens, toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes. It also includes stress due to temperature extremes

Requirements

Written Safety and Health Program and Emergency Response Plan

The Workforce Group, LLC and any contractors or subcontractors shall develop and implement a written pre-incident safety and health program to handle anticipated emergencies prior to the commencement of emergency response operations for their employees who are expected to be

Safety Management Plan

HAZWOPER RCRA

involved in any product spill emergency and post emergency response operations. The program shall be designed to identify, evaluate and control safety and health hazards and to provide for safe response efforts to product spill emergency and post emergency response operations. These programs shall be described in controlled manuals identified as contingency plans or hazardous materials handling procedures. The plan shall be in writing and available for inspection by employees, their representatives and OSHA representatives.

The following elements must be included in either a specific site safety plan or a combination of plans addressing the response activity:

- Pre-emergency planning and coordination with outside parties
- Personnel roles, lines of authority, training and communication
- Emergency recognition and prevention
- Safe distances and places of refuge
- Site security and control
- Evacuation routes and procedures
- A decontamination procedure shall be developed by the The Workforce Group, LLC safety office, communicated to employees through training and implemented through drills before any employees or equipment may enter areas on site where potential for exposure to hazardous substances exists.
- Emergency alerting and response procedures
- Critique method to evaluate the response and assure follow-up
- Personal protective equipment and spill control, containment, and recovery equipment
- Site and worker monitoring to ensure protective actions are commensurate with the conditions at the site.

Engineering controls, work practices and PPE shall be used to reduce and maintain exposure limits. Feasible engineering controls include the use of pressurized cabs or control booths on equipment and/or the use of remotely operated material handling equipment.

Procedure

Use of the following safety and control procedures will be used by those in charge at the scene to ensure the safety and health of personnel at spill locations.

Person Discovering the Spill

- Survey and Secure the Area. Evaluate the seriousness of the situation in regard to protecting personnel and the public. Do not approach the spill if you can smell hydrocarbons or potential chemical sources.
- Notify your supervisor as soon as possible. Remember, any device you use to call in spill notice may not be intrinsically safe. Place your call from a safe distance.

Safety Management Plan

HAZWOPER RCRA

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- If the situation requires, stay at the scene and control access at a safe distance from the spill until the initial response team arrives. The spill area will become subject to regulatory controls with restricted access

Initial Spill Control Actions

- Initial spill control actions designed to halt the spread of a spill, direct its movements, or minimize the area affected by the spill shall not be initiated in the immediate spill area until all of the following occur:
 - o A complete site safety analysis
 - o Air monitoring shall be used to identify and qualify airborne levels of hazardous substances. The monitoring will address initial entry, periodic monitoring, possible IDLH conditions and wherever exposure may be a possibility.
 - o Gas detector readings are 10% or less of the lower explosive limit (LEL). If the readings are above 10% of the LEL, spill control actions shall be terminated in the immediate area and moved to an area where LEL conditions are less than 10%.

Initial Approach and Gas Testing

- Gas testing personnel shall be trained to competently operate their equipment and other site specific requirements.
- Combustible gas detectors (LEL meters) must have current calibrations and be function tested prior to an approach to a spill site.
- At a minimum, the oxygen, LEL and permissible exposure level (PEL) must be evaluated throughout the regulated area at as many points around the spill perimeter as possible. These levels shall be monitored periodically throughout the work shift to detect changes in airborne hazards that may result from work activities, changing weather conditions, etc.
- Approach to the incident site.
 - o Perform a function test and check the zero reading on the gas detector.
 - o Don the respirator.
 - o Observe the readings on the gas detectors as you approach the spill site.
 - o Continue until one of the following conditions occurs.

Safety Management Plan

HAZWOPER RCRA

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- ☐ You can see all that you need to observe, or
 - ☐ The gas detector reads 10% or more of the LEL, or
 - ☐ Liquid oil or gas condensates are encountered.
 - ☐ CAUTION Care must be taken to keep the gas detectors warm and prevent rough handling.
 - ☐ NOTE If any of these conditions are exceeded, do not proceed any closer to the spill perimeter.
 - ☐ NOTE Decontamination units, first aid kits, and eye flushing supplies shall be functional and on-site prior to attempting contact with liquid oil or gas condensates.
- After the initial observations are performed, the site conditions shall be reported to the Incident Commander.
 - Mark or flag an exclusion area (hot zone) around the spill site to further control access.

Safety Procedures for Exclusion Areas

- Personnel shall be given a safety briefing on the specific hazards and hazard control procedures prior to entering the spill site.
- Decontamination units, first aid kits, and eye flushing supplies shall be functional and on-site prior to attempting contact with spill materials.
- To minimize personnel exposure and reduce potential ignition sources, where possible, all initial approaches to the suspected spill site will be from the upwind direction.
- Personnel shall not approach the site or attempt gas testing without wearing appropriate respiratory protection.

Personal Protective Equipment (PPE) and Chemical Protective Clothing

- Respiratory Protection - During spill response operations when gas detectors read 10% or more of the LEL, trained gas testing personnel shall measure PEL levels to determine appropriate respiratory protection levels.
- Skin Protection - The following PPE is recommended to minimize dermal exposure to chemicals:

Safety Management Plan

HAZWOPER RCRA

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- Hands: neoprene, nitrile or butyl rubber gloves
 - Feet: neoprene, nitrile or butyl rubber boots
 - Body: coated tyvek or PVC rain suits (as necessary)
 - Eye Protection - At a minimum, safety glasses must be worn. If a splash hazard to the eyes is present, chemical goggles or a face shield with chemical goggles shall be used. Eye protection is not required if a full-face respirator is worn.
 - NOTE: Either one-piece or two-piece chemical (magnum 445) suits can be used. Gloves and boots can be taped to the arms and legs of the suits as needed. The flaps of a two-piece suit can be taped as well. Heavy duty duct tape is recommended

Other Considerations

- The purpose of personal protective clothing and equipment is to shield or isolate individuals from the chemical, physical, and biological hazards associated with handling crude oil. No single combination of protective equipment and clothing is capable of protecting against all hazards.
- Consider the following:
 - The use of PPE can itself create significant worker hazards, such as heat stress, physical and psychological stress, and impaired vision, mobility, and communication.
 - Equipment and clothing that provide an adequate level of protection shall be used.
 - Overprotection, as well as under protection, should be avoided where possible.

Post-Emergency Response Cleanup or Decontamination Procedures

All employees leaving a contaminated area shall be appropriately decontaminated and all contaminated clothing and equipment leaving a contaminated area shall be appropriately disposed of or decontaminated. Engineering controls, work practices and PPE shall be used to reduce and maintain exposure limits.

The Workforce Group, LLC does not provide removal of contaminated substances such as soil or other elements of the natural environment.

Decontamination procedures shall be monitored by the The Workforce Group, LLC safety department to determine their effectiveness. When such procedures are found to be ineffective, appropriate steps shall be taken to correct any deficiencies

Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, they shall be provided and meet the requirements of 29 CFR 1910.141. Decontamination shall be performed in geographical areas that will minimize the

Safety Management Plan

HAZWOPER RCRA

exposure of uncontaminated employees or equipment to contaminated employees or equipment. Take into consideration ground water, wind direction, construction material, barriers and fencing, signage and training.

PPE and equipment shall be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness. Employees whose non-impermeable clothing becomes wetted with hazardous substances shall immediately remove the clothing.

Unauthorized employees shall not remove protective clothing or equipment from change rooms.

General Safety/Physical Hazards

During training drills, spill responses, and remediation operations, the physical working environment of personnel shall be continually evaluated. Exposure to either hot or cold weather conditions along with long working hours, could adversely affect both the psychological and physiological condition of those involved. Continued exposure may result in physical discomfort, loss of efficiency, and a higher susceptibility to accidents and injuries.

Personnel must be constantly alert to signs of distress and eliminate or protect against accident causes. There is a need to constantly review methods and procedures for routine work and emergency response situations so that all personnel may function as safely and effectively as possible.

Supervision shall keep the following procedures and safety precautions in mind when working with petroleum and petroleum products and as decisions are made in how the work is to be conducted:

- A job shall be planned and all personnel briefed as to the procedures to be followed and the responsibilities of each person.
- Supervision shall remain on the job at all times or designate a qualified person to take their place if called away.
- When responding to hydrocarbon spills or gas leaks, the hazardous area shall be defined. No personnel or equipment shall be permitted in the area of a spill until the hazards associated with the contaminated area have been clearly defined by a qualified person.
- Before moving to the job site, supervision should check tools and safety equipment (including personal protective equipment), to ensure everything is safe, usable, and all required tools and safety equipment are available
- Vehicles, heavy equipment, hand tools, and power equipment shall not be moved into a spill area until adequate precautions have been taken. When power equipment is moved

Safety Management Plan

HAZWOPER RCRA

into a spill area to expedite repairs, it should be removed from the area as soon as work with it is completed. Personnel who are not required should be kept out of the work area.

- Use of matches, lighters, and smoking materials shall be in a place designated as safe by supervision.
- Upon completion of equipment repairs, necessary operating checks should be made before placing the unit in service.
- The senior official at an emergency response site is the most senior official on the site who has the responsibility for controlling operations at the site.
- Medical Surveillance – Any emergency response person who exhibits signs or symptoms which may have resulted from exposure to hazardous substances during the course of an emergency shall be provided with medical consultation at no cost to them. This shall include all employees who are or may be exposed to hazardous substances or health hazards at or above the established permissible exposure limit, above the published exposure levels for these substances, without regard to the use of respirators, for 30 days or more a year.

Training

The The Workforce Group, LLC new hire orientation program trains all new The Workforce Group, LLC employees and independent contractors so they will know what to do in case they witness or discover a chemical release. They are instructed to leave the area and take no further action beyond notifying the The Workforce Group, LLC facility operations personnel of the release.

Training for employees expected to participate in an emergency or post-emergency response shall be completed before they take part in response operations. The Workforce Group, LLC and contractor personnel shall receive initial and refresher training. The level of training received will be commensurate with their assigned duties and functions and take place in the area they are working in.

Initial Emergency Response Training

Who Needs Emergency Response Training?

- Support Personnel: This designation applies to The Workforce Group, LLC or contractor personnel who are supporting in the operation of equipment or material (such as general laborers, equipment operators, mechanized earth moving operators or crane and hoisting equipment operators), and who are needed temporarily to perform immediate emergency

Safety Management Plan

HAZWOPER RCRA

support work that cannot reasonably be done in a timely manner by The Workforce Group, LLC employee responders. Support personnel who will be or may be exposed to the hazards at an emergency response scene shall be trained on the use of personal protective equipment and also will cover work practices which minimize hazardous risks and safe use of engineering controls & equipment.

- First Responder Awareness Level: The Workforce Group, LLC personnel who are likely to witness or discover a hazardous substance release and have been trained to initiate an emergency response sequence by notifying The Workforce Group, LLC facility operations personnel of the release. Personnel at this level must receive initial training or have had enough experience to objectively demonstrate competency. Annual refresher training or demonstration of competency is also required. First Responder Awareness Level employees shall have sufficient training or experience to objectively demonstrate competency in the following areas:
 - An understanding of what hazardous substances are, and the risks associated with them in an incident.
 - An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
 - The ability to recognize the presence of hazardous substances in an emergency.
 - The ability to identify the hazardous substances if possible.
 - An understanding of the role of the first responder awareness individual in the client's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook.
 - The ability to realize the need for additional resources, and to make appropriate notifications.
- First Responder Operations Level: The Workforce Group, LLC personnel who are identified in contingency plans as responders to releases or potential releases of hazardous materials -- as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release -- shall be trained to this level. Their function is to contain the release from a safe distance and help it from spreading. All personnel at this level must receive 8 hours of initial training or have had sufficient experience to objectively demonstrate competency. Annual refresher training or demonstration of competency is also required. Certification is required.
- Hazardous Materials Technicians: The Workforce Group, LLC personnel, who are identified in contingency plans as responders to releases or potential releases of hazardous materials for the purpose of stopping the release, shall be trained to this level. Technicians have the knowledge of how to implement emergency response plans, know the classification, identification and verification of known or unknown substances,

Safety Management Plan

HAZWOPER RCRA

functions with an assigned role in the incident command system, how to select and use proper PPE, perform advanced containment and understands decontamination and toxicology. All personnel at this level must receive at least 24 hours of training equal to first responder operations level. Annual refresher training or demonstration of competency is required. Certification is required.

- Hazardous Materials Specialists: All The Workforce Group, LLC and personnel working as field Safety Specialist shall be trained to this level. Material Specialists receive at least 24 hours of training the technical level and have the ability to develop a site and safety control plan. Annual refresher training or demonstration of competency is also required. Certification is required.
- On-Scene Incident Commander: The Incident Commander must have at least 24 hours of training equal to the first responder operations level and know how to implement the program and system, PPE requirements, hazard and risk assessment, state and federal regulations and all elements of decontamination. Certification is required.

Post-Emergency Response Training

For chemical spills, a minimum of four hours of training for post-emergency response workers who have job duties and responsibilities with a low magnitude of risk shall occur.

Refresher Training

- Employees trained for Initial Emergency Response Training must receive annual refresher training of sufficient content and duration to maintain their competencies or shall demonstrate competencies in those areas at least annually. The Workforce Group, LLC must keep records of all employee training or competency demonstrations.
- Participation in drills, completion of approved response training modules, and on-the-job training based on the duties and functions each employee is expected to perform during an emergency response may be substituted for, or used in conjunction with, formal classroom training to demonstrate competency. If demonstrated competency is used in lieu of or in conjunction with classroom training then The Workforce Group, LLC must keep a record of the methodology used to demonstrate competency.

Trainers and Training Material

- The Safety Manager shall designate who has the responsibility to approve trainers and training materials used in The Workforce Group, LLC provided training for employees who are identified in contingency plans as responders to hazardous material spills, emergency and post-emergency response operations. All instructors shall have the

Safety Management Plan

HAZWOPER RCRA

training and or academic credentials and instructional experience to demonstrate competency.

Heat Illness Prevention

Purpose

This program is designed to reduce the risk of work-related heat illnesses.

Scope

This procedure applies to all work being performed in hot environments.

Definitions

"Acclimatization" means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.

"Heat Illness" means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

"Preventative recovery period" means a period of time to recover from the heat in order to prevent heat illness.

"Shade" means blockage of direct sunlight. Canopies, umbrellas and other temporary structures or devices may be used to provide shade. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning.

Requirements

All managers and supervisors are responsible for implementing and maintaining the Heat Illness Program in their work areas.

Provision of Water

Employees shall have access to potable drinking water. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity at the beginning of the work shift.

Access to Shade

Employees will be provided with access to shade. Employees suffering from heat illness or believing a preventative recovery period is needed, shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling. Such access to shade shall be permitted at all times. See definition of "Shade".

Safety Management Plan

Heat Illness Prevention

Control Measures

Each work location involved in working in hot environments shall implement measures that must be in place to control the effects of environmental factors that can contribute to heat related illnesses. The most common environmental factors are air temperature, humidity, radiant heat sources and air circulation.

Physical factors that can contribute to heat related illness shall be taken into consideration before performing a task. The most common physical factors that can contribute to heat related illness are type of work, level of physical activity and duration, and clothing color, weight and breathability.

Supervisors must ensure personal factors that contribute to heat related illness are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. The most common personal factors that can contribute to heat related illness are age, weight/fitness, drug/alcohol use, prior heat-related illness, etc.

Each work site shall develop site specific procedures but shall include the minimum:

- Bring at least 2 quarts per employee at the start of the shift and the supervisors/designated persons will monitor water containers every 30 minutes, and employees are encouraged to report to supervisor/designated person low levels or dirty water.
- Supervisors will provide frequent reminders to employees to drink frequently.
- Every morning there will be short tailgate meetings to remind workers about the importance of frequent consumption of water throughout the shift during hot weather.
- Place water containers as close as possible to the workers.
- When drinking water levels within a container drop below 50%, the water shall be replenished immediately or water levels should not fall below the point that will allow for adequate water during the time necessary to effect replenishment.
- Disposable/single use drinking cups will be provided to employees or provisions will be made to issue employees their own cups each day.
- Supervisors will set-up an adequate number of umbrellas, canopies or other portable devices at the start of the shift and will relocate them to be closer to the crew, as needed.
- Non-agricultural employers can use other cooling measures if they demonstrate that these methods are as effective as shade.
- Working hours will be modified to work during the cooler hours of the day, when possible.
- When a modified or shorter work-shift is not possible, more water and rest breaks will be provided.
- Supervisors will continuously check all employees and stay alert to the presence of heat related symptoms.
- Supervisors will carry cell phones or other means of communication, to ensure that emergency services can be called and check that these are functional at the worksite prior to each shift.

Safety Management Plan

Heat Illness Prevention

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- Every morning, workers will be reminded about address and directions to the worksite to inform medical responders and emergency procedures.
 - All newly hired workers will be assigned a buddy or experienced coworker to ensure that they understood the training and follow the company procedures.

Training

Training in the following topics shall be provided to all supervisory and non-supervisory employees:

- The environmental and personal risk factors for heat illness;
- The importance of frequent consumption of small quantities of water, up to 4 cups per hour, when the work environment is hot and employees are likely to be sweating more than usual in the performance of their duties;
- The importance of acclimatization;
- The different types of heat illness and the common signs and symptoms of heat illness;
- The importance to employees of immediately reporting to the employer, directly or through the employee's supervisor, symptoms or signs of heat illness in themselves, or in co-workers;
- The Workforce Group, LLC procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary;
- The Workforce Group, LLC procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider;
- The Workforce Group, LLC procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders.

Supervisors must receive training in the prevention of heat related illnesses prior to supervising employees working in heat. Supervisors will be trained in the The Workforce Group, LLC heat illness emergency response procedures to prevent heat illness and procedures to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.

Communication for employees shall be in a form readily understandable by all affected employees.

The Workforce Group, LLC shall ensure all contractors, subcontractors, staffing companies, etc. employees (including temporary) working outdoors have been trained in heat illness prevention.

Hexavalent Chromium and Cadmium Safety

Purpose

The purpose of this program is to establish requirements for the use and handling of materials that expose employees to cadmium and/or hexavalent chromium.

Scope

This program covers all employees.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper work procedures for cadmium and hexavalent chromium
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.
- As part of the JSA and other hazard evaluation processes, identifies and evaluates chromium or cadmium hazards and potential exposures during planning and the conduct of work.
- Reviews and approves the Task-Specific Safety Analysis.
- As necessary, quantitatively determines the presence of chromium or cadmium in materials, substrates, and other media. This may involve the collection of samples for analysis by a qualified laboratory or field testing using acceptable test methods.
- Provides results of any chromium or cadmium survey to management/supervision, along with information regarding hazard potential and control measures. As appropriate, makes recommendations to management/supervision to maintain, modify, upgrade, or downgrade controls accordingly.
- Takes prompt corrective measures (or supports any Competent Person in this role) to eliminate hazards; such as recommending to management/supervision to implement or modify engineering, administrative, work practice, and personal protection (including respiratory protection) controls.
- Conducts periodic exposure assessment.
- As appropriate, assists management/supervision in ensuring that workers have the necessary training and medical surveillance based upon the activity and hazard.
- Ensures that medical monitoring is conducted in accordance with 29 CFR 1926.1126 (for chromium) or 29 CFR 1926.1127 (for cadmium) including imposition of work restrictions where appropriate and reviewing results of medical monitoring.

Safety Management Plan

Hexavalent Chromium and
Cadmium Safety

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- In evaluating chromium or cadmium hazards and specifying controls for a job, (a) utilizes reliable historical exposure monitoring data generated for other similar operations or activities, (b) utilizes objective data, and/or (c) plans and conducts initial monitoring to determine exposures and assess the effectiveness of hazard controls.
 - Conducts initial and periodic exposure monitoring in accordance with National Institute for Occupational Safety and Health (NIOSH)/OSHA methods if lacking historical or objective data.
 - Maintains effective records of jobs monitored, so that a historical database can be used to specify controls and eliminate unnecessary and redundant monitoring for future activities.
 - Supports project management/supervision in responding to exposures above the PEL when workers were not adequately protected.
 - As appropriate, participates in pre-job and daily worker briefings regarding task-specific chromium or cadmium hazards and controls, work practices/plans (such as JSAs), and other applicable information, including any changes that are made to controls or to the work practices or plans.

Employees

- Shall follow all requirements regarding the safe work procedures for cadmium and hexavalent chromium.

Cadmium Procedure**Compliance Program**

A written compliance program shall be implemented when the PEL for cadmium is exceeded at a work site.

The following areas shall be addressed within the site compliance program and to ensure emergency plans are in place should a release of cadmium occur:

- Potential exposure determination including a description of each operation where cadmium is omitted, machinery use, material processed, controls in place, crew size, employee job responsibilities and maintenance practices.
- Air monitoring data or developing a justification for not conducting monitoring based on previous monitoring/historical data or objective data.
- Engineering controls including the specific means that will be employed to meet compliance.
- A report of technology considered in meeting the PEL.
- A detailed schedule of implementation.
- Consideration of respiratory protection.
- A documented, written plan for dealing with emergency situations involving a substantial release of cadmium.

Safety Management Plan

Hexavalent Chromium and
Cadmium Safety

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- Work practice program.
 - Other relevant information such as protective clothing, housekeeping, hygiene areas and practices (including consideration of shower facilities), consideration of medical surveillance, training and recordkeeping.

The written program must be reviewed and updated annually or more often to reflect significant changes in the compliance status for The Workforce Group, LLC.

The program shall be provided for examination and copying upon request of affected employees, their representatives or OSHA officials.

Maintenance procedures while working on ventilation systems and changing of filters will be established. Procedures shall be developed and implemented to minimize employee exposure to cadmium when maintenance of ventilation systems and changing of filters. Examples include: Proper use of PPE, use of HEPA filtered vacuums, wet sweeping or other methods to minimize the likelihood of exposure to chromium. No compressed air shall be used to remove chromium from any surface. Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

Construction work activities that result in exposure to chromium or cadmium may include, but are not limited to, the following:

- Demolition or salvage of structures where chromium or cadmium, or materials containing chromium or cadmium, are present.
- Removal or encapsulation of materials containing chromium or cadmium.
- New construction, alteration, repair, or renovation of structures and substrates that contain chromium or cadmium.
- Installation of products containing chromium or cadmium.
- Working with/around Portland cement (in powder or dust form – chromium only).
- Torch-cutting chromium/cadmium containing paints.
- Transportation, disposal, storage, or containment of chromium or cadmium, or materials containing chromium or cadmium.
- Maintenance operations associated with construction activities.
- Welding, cutting, burning, or grinding stainless steel, chromium-/cadmium-containing alloy steel, and chromium/cadmium containing alloys.

Note!!!Exposure to chromium (especially hexavalent chromium) has also occurred when the welding rod or wire in use contains chromium.

The permissible exposure limit (PEL) for cadmium and hexavalent chromium is five (5) micrograms calculated as an 8-hour time-weighted average over a work shift. The action level (AL) of 2.5 micrograms triggers the following requirements:

Safety Management Plan

Hexavalent Chromium and
Cadmium Safety

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- Pre-job planning includes, as needed, a thorough identification of chromium or cadmium materials. Identification may include the product name, a Material Safety Data Sheet (MSDS) with the MSDS number (if available) or a sample content analysis. Sampling data includes location, sampling method, sampling dates, laboratory identification, and analytical method.
 - If documentation is not feasible or has been determined by the project engineer to be unavailable or unreliable, chromium or cadmium content sufficient to exceed the action level for chromium or cadmium is assumed.

Results of bulk sampling, calculations of potential chromium or cadmium exposure, and other data that demonstrate compliance with this practice (as well as the pertinent standards) are attached to the work package.

Where chromium or cadmium exposure above the action level is suspected, and in the absence of monitoring data, interim protective measures are established that are equal to or greater than the assumed exposure level.

Hexavalent Chromium Procedure

Welding, Cutting, and Grinding

Certain welding and cutting activities have been shown to expose the welder/cutter, and potentially helpers, to hexavalent chromium above the action level when exhaust ventilation is not used. The activities have included the following:

- Shielded metal arc welding, Gas metal arc welding
- Flux cored arc welding, Sub arc welding
- Torch cutting through chromate-containing paints, grinding chromium-containing metals.

The types of metal involved have been stainless steel, chromium-containing alloy steel, and chromium-containing nonferrous alloys. Exposure has also occurred when the welding rod or wire in use contains chromium, and exhaust ventilation is not used.

Therefore, exhaust ventilation is always prescribed as a control measure when activities with the materials mentioned above are in use unless historical personal monitoring data performed when similar materials, using similar methods, under similar environmental conditions are used shows conclusively that the welder/cutter and helper (if applicable) are not exposed above the action level without regard to respiratory protection.

Practices and procedures shall ensure that no employee is exposed to hexavalent chromium in excess of the permissible exposure level which is 5 micrograms per cubic meter of air based on an 8 hour Time Weighted Average.

Safety Management Plan

Hexavalent Chromium and
Cadmium Safety

Plasma and Air Arc Cutting and Gouging

Plasma and air arc cutting and gouging operations have been shown to expose the worker and helpers within 10 feet of the work to levels of hexavalent chromium above the permissible exposure limit (PEL) under most circumstances and conditions. Exhaust ventilation and respiratory protection (at least a half-face, tight-fitting respirator with a HEPA filter/cartridge) are always prescribed as control measures when activities with the materials mentioned above are in use; a higher level of respiratory protection may be prescribed, depending on conditions.

Note!!! Each discrete task must begin with ventilation and respiratory protection control measures in place. Respiratory protection may be downgraded only upon conclusive results of breathing zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than 50 percent of the protection factor of the respirator relative to the concentration and PEL of hexavalent chromium. Respiratory protection may be eliminated only upon conclusive results of breathing-zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than the PEL as an 8-hour time-weighted average.

Additional controls may also be appropriate to be in compliance with 29 CFR 1926.1126, depending on the results of evaluations of the materials to be used, environmental conditions, length of the work process/activity, etc.

Employees who are exposed at or above the action level 30 days or more per year are enrolled in a medical surveillance program.

Personal hygiene is very important while working with chromium or cadmium products. To avoid accidental ingestion of chromium or cadmium, employees wash thoroughly (regardless of other controls) prior to eating, chewing, smoking, or drinking.

Practices

The Workforce Group, LLC Management/supervision supported by safety professional(s), the medical contractor and training providers conducts the following basic steps to control exposure to chromium or cadmium:

- Determine the types of projects, activities, and operations that could involve chromium or cadmium, or chromium or cadmium-containing materials. For those jobs, conduct hazard identification as part of the work design, planning, and control process.
- If chromium or cadmium materials are involved, ensure that project safety (for chromium) or a competent person (for cadmium) conducts a hazard evaluation to determine the potential exposure and to recommend initial controls.
- Develop and implement a Task-Specific Safety when exposure is or is likely to be above the PEL. The JSA (or equal) addresses the scope of work activities; provides initial exposure assessment; and prescribes exposure controls, air-monitoring requirements, work practices, personal protective equipment and additional information as required.

Safety Management Plan

Hexavalent Chromium and
Cadmium Safety

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- Incorporate recommendations from project safety for chromium or cadmium hazard control measures into any JSA and work control documents.

Exposure Monitoring

Monitoring or measuring of employee exposure shall be conducted at least every 6 months if the initial monitoring shows employee exposure. Air monitoring will be performed at the beginning of each job task. If exposure monitoring results indicate exposure is above the PEL The Workforce Group, LLC must include in the written notification to employees the corrective action being taken to reduce exposure to or below the PEL.

- Notify each affected employee, in writing, of the results of monitoring within five (5) working days.
- Air monitoring for chromium or cadmium may be waived provided the following conditions are met:
 - Monitoring has been performed in the last 12 months.
 - Data from historical monitoring originates from work operations that closely resemble the planned work operations.
 - Workplace and environmental conditions (such as indoors or outdoors, temperature, wind speed, ventilation, and space configuration) are similar to those when the monitoring was performed.
 - The processes, types of material, control methods and work practices are similar.
 - Justification for waving initial monitoring shall be included in the Task-Specific Safety Analysis or equal. Employees involved are briefed regarding the existence of such data.

Surveillance

Medical surveillance shall be provided when an employee experiences signs or symptoms of the adverse health effects of Hexavalent Chromium (dermatitis, asthma, bronchitis, etc). Medical evaluations will be provided at no cost to employees. Examinations will be performed by or under the supervision of a physician or other licensed health care professional.

Facilities

The Workforce Group, LLC must provide change rooms for decontamination and ensure facilities prevent cross-contamination. Washing facilities shall be readily accessible for removing chromium from the skin. Workers must wash their hands and face or any other potentially exposed skin before eating, drinking or smoking.

Regulated Areas

Regulated areas shall be established when exposure to an employee is or is expected to be in excess of the PEL. Regulated areas shall be marked with warning signs to alert employees and access is restricted to authorized persons only.

Safety Management Plan

Hexavalent Chromium and
Cadmium Safety

Controls

If the exposure level is above the PEL for 30 days or more then engineering controls and work practices shall be provided to reduce exposure to the lowest feasible level. If employees can demonstrate that such controls are not feasible The Workforce Group, LLC shall use engineering and or work controls to reduce employee exposure to the lowest levels achievable and shall supplement them by the use of required respiratory protection.

Recordkeeping

The Workforce Group, LLC is required to maintain and make available an accurate record of all employee exposure monitoring, medical surveillance and training records.

Respiratory Protection & PPE

The appropriate respirator shall be used when engineering controls and work practices cannot reduce employee exposure during work operations where engineering controls and work practices are not feasible and emergencies. Respirators shall be provided in accordance with 1910.134 (Respiratory Protection) (see The Workforce Group, LLC Respiratory Protection Program). Specific requirements contained within 1926.1127 (Cadmium) regarding respiratory protection shall also be followed including:

- Providing employees with full face piece respirators when they experience eye irritation.
- Providing HEPA filters for powered and non-powered air-purifying respirators.
- Providing a powered air-purifying respirator instead of a negative-pressure respirator when an employee entitled to a respirator chooses to use this type of respirator and such a respirator will provide adequate protection to the employee.

PPE will be provided when there is a hazard from skin or eye contact and employees are required to use the PPE. Gloves, aprons, coveralls, goggles, foot covers and other as needed PPE shall be provided at no cost to the employee and will be removed at the end of the work shift. The Workforce Group, LLC must clean, launder and replace all protective clothing as needed.

Housekeeping

All surfaces shall be maintained as free as practicable of chromium. All spills and releases of chromium shall be cleaned promptly with approved procedures including use of HEPA filtered vacuums as the primary method, dry or wet sweeping or other methods to minimize the likelihood of exposure to chromium.

No compressed air shall be used to remove chromium from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the dust cloud created by the compressed air or no alternative method is feasible.

Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

Safety Management Plan

Hexavalent Chromium and
Cadmium Safety

Training

The Workforce Group, LLC shall provide appropriate types of training for employees who are potentially exposed to chromium or cadmium prior to their initial assignment and annually thereafter. The Workforce Group, LLC will assure employee participation and maintain a record of the training contents. This training includes:

- Hazard communication training for potentially exposed employees.
- Training specified by the applicable chromium or cadmium standard for workers exposed at the action level for any one day, or who are exposed to chromium or cadmium compounds that are skin irritants.
- Respirator training if respirators are to be used.
- Provide information to workers regarding task-specific chromium or cadmium hazards and control methods, the JSA, work practices, medical surveillance and other applicable information, including any changes that are made to these controls.
- Provide training annually, as appropriate, to workers who continue to have exposure to chromium or cadmium at or above the action level on any one day.
- All training will be recorded and include the identity of the employee trained, the signature of the person who conducted the training and the date of the training.
- Training records must be kept for one year.

Hydrogen Sulfide H₂S Program

Purpose

The purpose of this program is to establish minimum requirements for site specific H₂S safety, which will enhance safety in the occupational setting where hydrogen sulfide is present or is recognized as being potentially present.

Scope

This program sets forth accepted practices for Hydrogen Sulfide (H₂S). This program applies to all employees of The Workforce Group, LLC, temporary employees, and any contractors working for The Workforce Group, LLC. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

- Contingency Plan - a site-specific written document that provides an organized plan for alerting and protecting the public within an area of exposure following the accidental release of all potentially hazardous atmospheric concentrations of hydrogen sulfide.
- Exposure Level - permissible exposure level of hydrogen sulfide is 10 PPM for an 8-hour, time weighted average.
- Gas Detector Instrument - An instrument/detector to measure levels of H₂S. Instruments may be electronically or manually operated.
- Hydrogen Sulfide (H₂S) - is an extremely deadly, toxic gas that in its pure state is colorless and is heavier than air. Additionally:
 - It is the second most toxic gas known to man, ranking behind hydrogen cyanide and ahead of carbon monoxide.
 - It has the odor of rotten eggs at low concentrations.
 - In higher concentrations rapidly paralyze the olfactory nerves (sense of smell).
 - Is soluble in water and is flammable and poses a definite threat of explosion.
- Parts Per Million (PPM) - parts of vapor or gas per million parts of contaminated air by volume.
- Personal H₂S Monitor - An electronic instrument worn on the person that is set to alarm at 10 PPM of H₂S.
- Possible Locations of H₂S – While clients are required to notify The Workforce Group, LLC of known H₂S locations the majority of time H₂S can be located in drilling

Safety Management Plan

Hydrogen Sulfide H₂S Program

operations, recycled drilling mud, water from sour crude wells, blowouts, tank gauging, during routine field maintenance involving hydrocarbons, tank batteries and wells.

- Venting - the process of discharging a material to the atmosphere through a series piping and/or venting devices, to facilitate the proper and safe dispersion of toxic materials and to minimize personnel exposure.

Key Responsibilities

Managers and Supervisors

- Shall ensure all employees who are to be assigned to work at locations where hydrogen sulfide is known to be present, or suspected to be present in any concentration, have been trained in hydrogen sulfide safety.
- To ensure employees have been medically approved to wear respirators and trained on the safe use of respirators, including a respirator fit test in accordance with The Workforce Group, LLC's Respiratory Protection Program.
- To ensure employees have been trained and familiar with personal H₂S monitors and gas detection instruments.
- To have been provided with the client's safety procedures.
- To ensure the necessary respiratory equipment to perform the work safely is available.
- That each employee has been provided with a copy of this program.

Employees

- Employees are responsible to comply with this program.

Procedure

Physical Effects of Hydrogen Sulfide

- H₂S paralyzes the sense of smell. Do Not Rely On Smell To Detect H₂S – Rely Strictly On Instruments Designed To Measure Concentrations Of H₂S.
- Hydrogen sulfide is a very dangerous and deadly gas - it is colorless and heavier than air.
- It can accumulate in low places and in small concentrations it has a strong, pungent, somewhat distasteful odor similar to rotten eggs. In higher concentrations, it can deaden the sense of smell (olfactory nerve).
- Exposure to certain concentrations of H₂S can cause serious injury or death.

Toxic Effects of Hydrogen Sulfide

CONCENTRATION	PHYSICAL EFFECT
.01 PPM	Can smell odor.
10 PPM	Obvious and unpleasant odor. Beginning eye irritation. ANSI permissible exposure level for 8 hours (enforced by

Safety Management Plan

Hydrogen Sulfide H₂S Program

	OSHA).
100 PPM	Immediately Dangerous to life or Health (IDLH) Kills smell in 3-15 minutes; may sting eyes and throat. May cause coughing and drowsiness. Possible delayed death within 48 hours.
200 PPM	Kills smell shortly, stings eyes and throat. Respiratory irritation. Death after 1-2 hours exposure.
500 PPM	Dizziness; breathing ceases in a few minutes. Need prompt rescue breathing (CPR). Self-rescue impossible because of loss of muscle control.
700 PPM	Unconscious quickly; death will result if not rescued promptly. 1000 PPM Unconscious at once, followed by death within minutes.

General

The Workforce Group, LLC should have a written confined space program per 29 CFR 1910.146 and employees should be trained under CF 1910.146(g) and The Workforce Group, LLC will be aware of owners contingency plan provisions.

Each person entering a H₂S designated location, regardless of the concentration, shall wear a personal H₂S monitor that is set to alarm at 10 PPM and shall carry a 5-minute escape pack with them at all times.

When work requires opening any equipment on location that has the potential of releasing concentrations of H₂S at 100 PPM or higher, two or more H₂S trained persons shall be present and follow these procedures prior to and during the opening of the equipment:

- Each person entering the H₂S location shall don a personal H₂S monitor prior to entry.
- A tailgate meeting will be held with everyone on location to discuss the work plan, the responsibilities of each person and the site specific contingency plan.
- Each person shall have either a self contained breathing apparatus (SCBA) or a supplied airline respirator equipped with a 5-minute escape pack, and shall be worn when opening the equipment to the surrounding atmosphere.
- At least one person (per two workers), equipped with a SCBA will act as a stand-by person and may not participate in the work being performed until the atmosphere has been tested and found to have no H₂S present in quantities over 10 PPM. The stand-by person shall be stationed up wind, within 100 feet and in clear view of the workers.
- If an operator or other third party provides the stand-by person, it will be the responsibility of the The Workforce Group, LLC manager/supervisor in charge to verify that the person has been H₂S, CPR, and First Aid trained, and that they have been provided the proper respiratory equipment.

Safety Management Plan

Hydrogen Sulfide H₂S Program

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- Only The Workforce Group, LLC employees may wear The Workforce Group, LLC respirator equipment.
 - If The Workforce Group, LLC employees will use client or other third party equipment, the equipment must be inspected to ensure it is safe to use and meets The Workforce Group, LLC's requirements.
 - After the equipment has been locked and tagged out (per The Workforce Group, LLC Lockout/Tagout Program), opened and the H₂S concentration has been cleared to less than 10 PPM, the stand-by person will no longer be required. Work may then be performed without respiratory equipment, except for the required 5-minute escape pack.

Safe Work Procedures

- Maintain compliance with permit requirements of The Workforce Group, LLC and any requirements by the client.
- Verify that proper safety equipment is available, functioning properly and is utilized.
- Check and remain aware of wind conditions and direction.
- Perform a thorough check of the downwind area prior to the start of any potentially hazardous work activity.
- Check for other personnel and ignition sources.
- Ventilate work areas by venting and purging lines and vessels prior to beginning any work activities.
- Keep all non-essential personnel away from work areas.
- Immediately vacate the area when any H₂S monitor sounds and do not re-enter without proper respiratory protection.

Equipment

The following equipment shall be provided and used as required by this program:

- Personal H₂S monitor set to alarm at permissible exposure limit of 10 PPM for OSHA 1926 requirements and 20 PPM for OSHA 1910 requirements. Fixed monitors may be present as well at the same alarm setting.
- Portable H₂S gas testing instrument, either electronic or manual pump operated, capable of testing the suspected concentrations of H₂S in the system.
- Each testing instrument must be capable of testing the suspected concentrations of H₂S by using the manufacturer's recommended calibrated tube or other means of measuring the concentration of gas.
- Testing instruments shall be calibrated periodically according to the manufacturer's recommendation, and at least annually.
- Calibration kits with regulator for calibrating the personal monitor.
- Calibration gas cylinder for testing the personal monitor.
- NIOSH-certified self-contained breathing apparatus (air pack) with a minimum of a 30-minute air supply or airline respirator with escape SCBA should be used.

Safety Management Plan

Hydrogen Sulfide H₂S Program

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- Full face, air supplied, positive pressure hose line respirator, with 5 minute escape pack attached.
 - Respirator wearers requiring corrective eyewear will be fitted with spectacle kits according to the respirator manufacturer, at no expense to the employee.
 - Respirators and their components, including all fittings of hoses, shall not be interchanged, which if done, would violate the approval rating of said respirator or related equipment.

Medical

Each employee shall have completed a medical evaluation by a physician or licensed health care professional to determine the employee's ability to wear a respirator as required by the The Workforce Group, LLC Respiratory Protection Program.

Each employee will successfully complete the medical questionnaire and examination before being allowed to be fit tested with a respirator.

Training

Employees required to work on H₂S locations will be trained. Training shall consist of:

- Physical and chemical properties of H₂S
- Sources of H₂S
- Human physiology
- Signs and symptoms of H₂S exposure, acute and chronic toxicity
- Symptomatology of H₂S exposure
- Medical evaluation
- Work procedures
- Personal protective equipment required working around H₂S
- Use of contingency plans and emergency response
- Burning, flaring, and venting of H₂S
- State and federal regulatory requirement
- H₂S release dispersion models
- Rescue techniques, first aid, and post exposure evaluation
- Use, care, and calibration of personal monitors and gas detection instruments
- Respirator inspections and record keeping

Each respirator wearer will complete Respiratory Protection training and a Respirator Fit Test, after being given a medical clearance and before entering any H₂S location.

Employees and other personnel visiting H₂S locations who will not be involved in the work shall be briefed on the following prior to entering:

- Site-specific sources of H₂S

Safety Management Plan

Hydrogen Sulfide H₂S Program

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- Health hazards of H₂S
 - Routes of egress
 - Emergency assembly areas
 - Applicable alarm signals and
 - How to respond in the event of an emergency.

Rescue

Each employee, when working alone in a H₂S designated area, shall plan and become familiar with self-escape procedures to include being aware of wind direction and obstacles to avoid when exiting the work area.

Employees working under the buddy system shall pre-plan an emergency rescue and/or evacuation procedure prior to commencing work, and arrange for periodic communications with his/her supervisor, and document the discussion on each employee's service report.

Respirator Inspections

Respirators will be inspected by the employee before each use and at least monthly.

The inspection will include the respirator face piece, hose, harness, 5minute escape pack cylinder and all other components of the air supply systems used.

Monthly inspections will be documented as per The Workforce Group, LLC Respiratory Protection Program, and will be kept on file at the local office for review during safety audits.

Monitors and Gas Detector Calibration

Each personal H₂S monitor shall be calibrated at least monthly and the results recorded on the calibration log.

Those monitors that do not require calibrating shall be bump checked with calibration gas to test alarms, monthly or prior to use if not used routinely.

In-Plant Rail Safety Program

Purpose

The Workforce Group, LLC is required to participate as a contract employer at client locations with railroads or tracks. The Workforce Group, LLC has no facilities with railroads or tracks however has a duty to ensure The Workforce Group, LLC or its contractors are aware of the hazards and controls associated with working on or near rails or tracks at a client facility

Key Responsibilities

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her region is required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Only trained personnel can be involved in working on or near rails or tracks at a client facility.

Procedure

Obtain Permission to Work In Advance

Prior to performing work within six (6) feet of any railroad track, permission must be obtained from the owner client railroad supervisor or designated person to take the track out of service. If required, complete a client work permit prior to beginning work.

Safety Equipment

Approved hard hats, high visibility clothing, approved metatarsal boots, gloves and approved safety glasses with permanently attached side shields shall be worn in designated areas associated with rails.

Protection of Workers from Moving Equipment

Never attempt to crawl under rail equipment or climb over moving rail equipment or attempt to cross in front of moving equipment.

Never position any part of the body in a potential pinch point. Rail equipment can move in either direction at anytime with no warning.

Railroad Crossing Safety

In all cases pedestrians/employees shall cross at existing designated pedestrian rail crossings where provided. Additionally, vehicle crossings are not intended as pedestrian crossings unless they are so identified and/or located, and no other pedestrian crossings exist in the area.

Safety Management Plan

In-Plant Rail Safety Program

If a designated rail crossing is not available the following general safety procedures for crossing railroad tracks shall be followed:

- Do not cross within 10 feet of the end of a parked rail car.
- Do not cross between uncoupled cars.
- Stop, look and listen prior to proceeding across the tracks
- Never step on rails, as they may be slippery.

Training

Appropriate training based on complexity of the job and potential hazards related to in plant rail hazards shall be provided to all applicable employees. Assessments shall be used to determine whether the employees have the knowledge and have demonstrated skills to safely perform their work assignments.

All training shall be conducted and documented in advance of working on or near in plant rails.

Retraining and testing shall be required for unsatisfactory/unsafe performance of job assignments.

Incident Investigation and Reporting

Purpose

The purpose of this program is to have effective procedures for reporting and evaluating/investigating incidents and non-conformances in order to prevent further occurrences.

Responsibilities

Responsibilities for incident investigation will be assigned prior to occurrence of an incident. Individual responsibilities for reporting and investigation must be pre-determined and assigned prior to incidents.

The Workforce Group, LLC Safety Manager

- Ensures investigations are conducted and assists in identifying corrective actions.

Site Manager and Supervisors

- Investigates (or assists in) incident investigations
- Corrects non-conformances
- Accompany injured employees to the medical provider for initial treatment.

Employees

- Immediately report any injury, job related illness, spill or damage to any property to their immediate supervisor. If their immediate supervisor is not available the employee is then to immediately notify the project manager. Employees who could be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

Procedure

After immediate rescue or response, actions to prevent further loss will occur if the scene is safe. For example, maintenance personnel should be summoned to assess integrity of buildings and equipment, engineering personnel to evaluate the need for bracing of structures, and special equipment/response requirements such as safe rendering of hazardous materials or explosives employed.

Investigations of Incidents & Non-conformances

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformances.

Safety Management Plan

Incident Investigation and
Reporting

The following must be reported to the employee's supervisor immediately. If that person is not available then the The Workforce Group, LLC Safety Manager shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment or assets
- Work related injuries or illnesses; Property damage including vehicle incidents
- Hazardous chemical spillage, loss of containment and contamination
- Non-conformance to safety or environmental rules, policies or standards

The supervisor shall make the necessary notifications and begin the incident investigation process.

In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Incident investigation occurs as soon as possible, while the facts are still fresh within the minds of those involved (i.e. witnesses). Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

Equipment

Proper equipment will be available to assist in conducting an investigation. Equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, flags, equipment manuals, etc. The Safety Manager shall have an incident investigation kit prepared in advance.

Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

EXTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY	WHEN	INCIDENT
Minor First Aid	Owner Client	24 hrs	Yes
Injury Above Minor First Aid	911 / Site Medical Response / Owner Client	ASAP	Yes
As Required Injury Reporting	OSHA / Owner Client	Within 8 hrs	Yes

Safety Management Plan

Incident Investigation and
Reporting

Fire / Explosion	911 / Site Fire Response / Owner Client	ASAP	Yes
Reportable Spill	Site Environmental / Owner Client	Within 24 hrs	Yes
Property/Vehicle Damage	Owner Client	Within 24 hrs	Yes

INTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY	WHEN	INCIDENT
Minor First Aid	Safety Manager	ASAP	Yes
Injury Above Minor First Aid	Safety Manager	ASAP	Yes
As Required Injury Reporting	President then Safety Manager	ASAP	Yes
Fire / Explosion	Safety Manager	ASAP	Yes
Reportable Spill	Safety Manager	ASAP	Yes
Property/Vehicle Damage	Safety Manager	ASAP	ASAP

Time Elements for OSHA and Client Notification

Required incidents must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the owner client as soon as possible or in a timely manner (within 24 hours of incident).

Incident Review Team and Incident Investigation Report

All incidents will be investigated to the appropriate level with regards to incident severity. While all incidents should be investigated, the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method determined by the The Workforce Group, LLC Safety Manager. They will form an Incident Review Team that participates in the determination of the final root cause investigative incident report. The team consists of representatives of management or other designees as assigned by the The Workforce Group, LLC Safety Manager.

Initial Identification/Assessment of Evidence

Initial identification of evidence immediately following the incident could include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

Safety Management Plan

Incident Investigation and
Reporting

Collection/Preservation and Security of Evidence

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. All shall be dated.

Witness Interviews and Statements

Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed. All items shall be dated.

The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Results of incident investigations are communicated to employees via the Incident Notice form.

Preparation of the Written Incident Report

Written incident reports will be prepared and include the Field Incident Report Form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included.

The supervisor completes the The Workforce Group, LLC Field Incident Report and takes the below steps when beginning an incident investigation.

- Provide emergency assistance, as needed and qualified for
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident
- Notify management by phone according to the Incident Notification Matrix
- Identify potential witnesses
- Use investigation tools, as needed (camera, drawings, video, etc.)
- Tag out for evidence any equipment that was involved
- Interview witnesses (including the effected employee) and obtain written, signed statements and fax to the The Workforce Group, LLC Safety Manager
- Prepare The Workforce Group, LLC Field Incident Report, sign the form, fax it to the The Workforce Group, LLC Safety Manager
- Implement any immediate corrective actions needed

Incident Notice Form

The Workforce Group, LLC shall provide documentation and communication of lessons learned and review of similar operations to prevent reoccurrence. Lessons learned are reviewed and

Safety Management Plan

Incident Investigation and
Reporting

communicated. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

In order to communicate incident information and lessons learned from incidents the The Workforce Group, LLC Safety Manager shall send the Incident Notice to all work sites. The form shall be posted on employee bulletin boards and shall be discussed in weekly safety meetings until all employees at the job site have been informed of the incident.

Corrective Actions Resulting from Incident Investigations

Incident investigations should result in corrective actions, individuals should be assigned responsibilities relative to the corrective actions, and these actions should be tracked to closure.

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by the The Workforce Group, LLC Safety Manager to ensure timely follow up and completion.

Corrective actions are also used as needed for revisions to site specific safety plans and the The Workforce Group, LLC Safety and Health Management System.

Injury Classifications

Injuries shall be classified per the following:

First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.

Number of Lost or Restricted Work Days – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

Occupational Injury – An injury which results from a work related activity.

Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

Safety Management Plan

Incident Investigation and
Reporting

Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.

Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include an injured associate is kept at work but not performing within the essential functions of their regular job.

Work or Work Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in flu shot, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

Training

The Workforce Group, LLC shall train personnel in their responsibilities and incident investigation techniques. Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques. Training requirements relative to incident investigation and reporting are described below:

- Training frequency will be based on the specific area of responsibility but shall not exceed once every two years.
- Training requirements relative to incident investigation and reporting shall include:
 - Awareness

Safety Management Plan

Incident Investigation and
Reporting

-
- First Responder Responsibilities
 - The Initial Investigation at the Accident Scene
 - Managing the Accident Investigation
 - Collecting Data
 - Analyzing Data
 - Developing Conclusions and Judgments of Need
 - Reporting the Results

Safety Management Plan

Incident Investigation and
Reporting

FIELD INCIDENT REPORT FORM

The Employee's Immediate Supervisor is to fill this form out then route it to the Safety Manager. Attach employee's and any witnesses written, signed statement.

If a major injury is involved freeze the scene (equipment, paperwork, etc.) and prevent injury location from being disturbed until advised by the Safety Manager.

<input type="checkbox"/> Job Related Illness	<input type="checkbox"/> Job Related Injury	<input type="checkbox"/> Near Miss	Property Damage ____ <Than \$500 Damage ____ >Than \$500 Damage
Date & Time of Incident: _____	When/Who Within Mgmt Was Notified? _____		Supervisor Name: _____
Location of Incident: _____	Date & Time Employee Reported to Supervisor: _____		Time/Date of Treatment: _____
Employee Name: _____		Position: _____	Experience In Position: _____
Treatment: ____ None ____ First Aid ____ Clinic ____ Hospital			Copy of Treatment Record Attached? Yes No
Was this incident the result of violating a safety rule or procedure? Yes ____ No ____			
Describe Body Injury or Job Illness or Property Damage: <input type="checkbox"/> Form allows for space to be added			
Classification: ____ First Aid ____ Medical Recordable ____ Work Restrictions ____ Lost Time			
How Did the Incident Happen (Completed by First Line Supervisor)? What exactly happened? What was the employee doing? If there was an injury, describe it. Give as many details as possible and use additional paper if needed. <input type="checkbox"/> Form allows for space to be added			
Casual Factors Involved (Completed by First Line Supervisor): Describe the events and conditions that contributed to the incident. Include information about the equipment, workers, environment and other factors that will assist in the investigation. <input type="checkbox"/> Form allows for space to be added			
Supervisors Suggested Improvements to Prevent a Future Occurrence: <input type="checkbox"/> Form allows for space to be added			
First Line Supervisor's Name	First Line Supervisors Signature	Date	
Project Manager Comments	<input type="checkbox"/> Form allows for space to be added		
Safety Manager Comments	<input type="checkbox"/> Form allows for space to be added		
Senior Management Comments	<input type="checkbox"/> Form allows for space to be added		

INCIDENT NOTICE

This notice is to be posted on all bulletin boards and documented in safety meetings and toolboxes at all locations until all staff are aware of the contents

Vehicle Property Damage

Date: **XX-XX-XXXX**

WHAT HAPPENED?

Provide just a one line factual statement...no names! Example:

A worker damaged a company vehicle by striking a concrete block while making a right turn on a road between buildings.

INSERT PHOTO

INSERT PHOTO

HOW DID IT HAPPEN?

Provide a concise determination...make the message clear! Example:

The main cause of this incident was the unsafe employee behavior by choosing not to pay attention to objects in the area while driving.

WHAT DO WE DO NOW TO PREVENT THIS FROM HAPPENING AGAIN?

Insert your corrective actions...again no names. Example:

All drivers must:

- Continually assess road conditions and hazards and be prepared for any challenge that may approach them.
- Slow down around construction, large vehicles, emergency vehicles, wildlife, congested work areas, fog, rain or anything else that adds a hazard to your driving.

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Inert Space Entry

Purpose

The purpose of this program is to ensure the health and safety of all employees and contractors while performing work in and/or around inert space entry situations.

Scope

This program covers all employees and other workers that may be involved in inert space entry situations and is a supplement to our Confined Space Entry and Nitrogen Awareness programs.

When work is performed on a non-owned or operated site, the operator's program shall take precedence. This document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

Managers and Supervisors

- In coordination with the Safety Manager, develop and implement inert space entry training.
- Identify possible locations where inert space entry in the workplace may be used.
- Inform the Safety Manager of upcoming work involving inert space entry, allowing the Safety Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the inert space entry requirements.

Safety Manager:

- Coordinate annual inert space entry training activities.

Employees:

- Comply with the inert space entry requirements and direct any questions or concerns to the Safety Manager.
- Attend required annual training.

Safety Management Plan

Inert Space Entry

Procedure**Hazard Identification**

- The supervisor will communicate the Job Site Analysis (JSA) to all necessary personnel. The The Workforce Group, LLC Supervisor will communicate the JSA to involved The Workforce Group, LLC or subcontractor personnel.
- A documented heat stress plan will be prepared and available on site. The Workforce Group, LLC shall have a documented heat stress plan including a work/rest regimen based on the ACGIH Threshold Limit Values. Refer to the The Workforce Group, LLC Heat Illness Prevention procedure.
- Oxygen-deficient atmospheres in inert space entry can be deadly in only a few breaths. An oxygen-deficient atmosphere rapidly overcomes the victim. There is no warning before being overcome.
- An oxygen-deficient atmosphere might exist outside a confined space opening.
- Entering oxygen-deficient atmospheres should never be attempted under any circumstances without training and proper air-supplied breathing equipment.
- Pre-job planning and walk downs with the entire inert space entry work team should emphasize confined space entry restrictions, especially when unsecured confined space access points are in the work area.
- Pre-job walk downs should accurately identify all equipment where inert gas purging may be venting into the work area.
- Barriers and warnings should be maintained around open purge vents at all times during purging activities.
- Rescuers must strictly follow safe rescue procedures.

Pre-Job Planning for Inert Space Entry

Pre-job planning or a site assessment will be conducted prior to starting work and that the assessment will be documented. Documented planning will be conducted for those operations involving potential inert space entry and this includes anytime an active purge is being applied to a system in or around equipment associated with work. Some planning or assessment elements include:

- A written Job Site Analysis (JSA) will be conducted prior to entry of the vessel. The Workforce Group, LLC shall perform a written JSA, specific to the vessel being entered and the work being undertaken. The JSA needs to address all the risks associated with the work such as:
 - setting up the inert entry and catalyst handling equipment at the work site,
 - access and egress to the equipment,
 - provisions for adequate lighting,
 - control of employee access,
 - lifting and rigging activities,

Safety Management Plan

Inert Space Entry

- removal of vessel internals, and
- installation of warning signs.
- Per the The Workforce Group, LLC Confined Space program the stand-by person cannot leave his/her post. Stand-by personnel cannot leave their post until relieved by a competent person who has been properly trained.
- The permit must clearly identify all hazards and special personal protective equipment requirements.
- The provisions and procedures for protection of employees from external hazards. The area around the inert entry operation must be barricaded to limit personnel in the area. The perimeter of this regulated area will be a minimum of 4-feet from the vessel opening or manway. Appropriate barricades will be labeled and barricaded.
- Appropriate signage will be utilized and adhered to. Appropriate signage will include adequate warning by stating Danger, Inert Gas Present or Possible Oxygen Deficient Environment.

Safety Equipment and Monitoring Requirements

- A communication system will be utilized by employees working inside the inert space and those monitoring from the outside. Personnel must maintain a communications system for use by the employees working inside the inert atmosphere and those monitoring the work from the outside.
- The communication system used must be capable of simultaneous communications. The system must be capable of simultaneous communications with all connect personnel and shall be checked prior to use to verify it functions properly. Equipment shall be rated for the environment being used in. The ability to summon emergency response personnel will also be verified prior to work beginning.
- The entrants will immediately evacuate the space if communications fail. If for any reason the primary communication link fails the persons working inside the space must be evacuated.
- Equipment used during entry will be inspected and in good working order. Inert entry requires specialized equipment that must be inspected by a competent person and be maintained in good working order.
- Employees will don a lock-on helmet with breathing air for inert confined space entry. Technicians or any other personnel entering the inert space must wear a helmet which is sufficiently secured to prevent inadvertent removal. ('clam type' helmet with integral breathing air, which cannot be accidentally removed or dislodged are acceptable). Refer to the procedures of The Workforce Group, LLC for respiratory protection.
- Breathing air must be Grade D quality. Air supply must be Certified Grade D quality breathing air and must be checked and tagged by the safety representative before use at the site. Only bottled air is permitted. Refer to the procedures of The Workforce Group, LLC for respiratory protection. In addition, any entrant will be equipped with an auxiliary escape air bottle.

Safety Management Plan

Inert Space Entry

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- Air monitoring and the results must be logged every 15 minutes. The Workforce Group, LLC shall maintain a periodic log or checklist of continuous air monitoring results. Log entries should not exceed 15 minutes and shall be part of the confined space permit.

Emergency Plan

A written emergency plan will be available on site. The Workforce Group, LLC is responsible for developing a written emergency plan. The elements of the emergency plan will include but not be limited to:

- loss of Nitrogen supply,
- high Nitrogen pressure,
- high vessel oxygen,
- high/increasing vessel temperature,
- loss of breathing air supply,
- emergency inside the vessel, and
- plant emergencies outside the vessel.

The powerful human instinct to help someone in distress, especially a friend or co-worker, all too frequently results in multiple incident victims. Workers suddenly involved in emergency activities must not allow emotions to override safe work procedures and training. Only qualified and trained personnel equipped with the necessary safety equipment should attempt a rescue.

First aid and CPR trained personnel will be available. Trained personnel to provide emergency first aid and cardiopulmonary resuscitation shall be available to respond in a timely manner.

Training

Employees will be trained prior to entry into an inert space and the training will be certified by The Workforce Group, LLC. Training shall be provided for all employees whose duties include working in or around an inert space. The Workforce Group, LLC will certify that the required training has been accomplished.

The certification shall include employee name and signature, location of training, trainer signature/initials and dates of training. Certification must be made available to employees & their authorized representative.

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

Injury Illness Recordkeeping

Purpose

The purpose of this program is to define the requirements for recording job related injuries and illnesses for The Workforce Group, LLC

Scope

This policy shall cover all The Workforce Group, LLC operations within the United States. Specific guidelines are available at the following website link:

<http://www.osha.gov/recordkeeping/index.html>.

Key Responsibilities

Safety Manager

- Shall ensure all job related injuries and illness are recorded properly in accordance with OSHA requirements.
- Shall ensure all required posting are conducted in accordance with recordkeeping guidelines
- Shall maintain all required records.
- Shall determine the proper classification of job related injuries or illnesses based on OSHA recordkeeping guidelines.

Supervisors

- Shall ensure that all job related injuries and illness are reported promptly to the The Workforce Group, LLC Safety Manager.

Employees

- Shall promptly report any actual or suspected job related injury or illness.

Procedure

If The Workforce Group, LLC is required to keep records of fatalities, injuries, and illnesses it must record each fatality, injury and illness that:

- work-related; and
- is a new case; and
- meets one or more of the general recording criteria.

The Workforce Group, LLC must enter each recordable injury or illness on an OSHA 300 Log and 301 Incident Report, or other equivalent form, within seven (7) calendar days of receiving

Safety Management Plan

Injury Illness Recordkeeping

information that a recordable injury or illness has occurred.

A The Workforce Group, LLC executive must certify that he or she has examined the OSHA 300 Log and that he or she reasonably believes, based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete.

Posting

The Workforce Group, LLC must post a copy of the annual summary in each establishment in a conspicuous place or places where notices to employees are customarily posted. The Workforce Group, LLC must ensure that the posted annual summary is not altered, defaced or covered by other material.

The annual summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.

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

See next page for examples current OSHA recordkeeping forms as of this date.

Safety Management Plan

Injury Illness Recordkeeping

OSHA RECORDKEEPING FORMS

[illegible]

Safety Management Plan

Injury Illness Recordkeeping

OSHA's Form 300A (Rev. 01/2004)				Year 2014	
Summary of Work-Related Injuries and Illnesses				U.S. Department of Labor Occupational Safety and Health Administration Form approved OSHA no. 1215-0178	
<small>All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.</small>					
<small>Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."</small>					
<small>Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.28. In OSHA's Recordkeeping rule, for further details on the access provisions for these forms.</small>					
Number of Cases					
Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases		
0	0	0	0		
(G)	(H)	(I)	(J)		
Number of Days					
Total number of days away from work	Total number of days of job transfer or restriction				
0	0				
(K)	(L)				
Injury and Illness Types					
Total number of... (M)					
(1) Injury	0	(4) Poisoning	0		
(2) Skin Disorder	0	(5) Hearing Loss	0		
(3) Respiratory Condition	0	(6) All Other Illnesses	0		
Post this Summary page from February 1 to April 30 of the year following the year covered by the form					
<small>Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: U.S. Department of Labor, OSHA Office of Statistics, Room 143644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.</small>					
Establishment Information					
Your establishment name _____					
Street _____					
City _____ State _____ Zip _____					
Industry description (e.g., Manufacture of motor truck trailers) _____					
Standard Industrial Classification (SIC), if known (e.g., 3715) _____					
OR North American Industrial Classification (NAICS), if known (e.g., 336212) _____					
Employment Information					
Annual average number of employees _____					
Total hours worked by all employees last year _____					
Sign here					
Knowingly falsifying this document may result in a fine.					
I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.					
_____ Company executive Title _____					
_____ Phone Date _____					

Safety Management Plan

Injury Illness Recordkeeping

OSHA's Form 301 Injuries and Illnesses Incident Report		<div style="border: 1px solid black; padding: 2px; font-size: 0.8em;">Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.</div> <div style="text-align: center; padding: 5px;"> U.S. Department of Labor Occupational Safety and Health Administration <small>Form approved OMB no. 1218-0176</small></div>
<p>This <i>Injury and Illness Incident Report</i> is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the <i>Log of Work-Related Injuries and Illnesses</i> and the accompanying <i>Summary</i>, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.</p> <p>Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.</p> <p>According to Public Law 91-596 and 29 CFR 1904, OSHA's recordkeeping rule, you must keep this form on file for 5 years following the year to which it pertains.</p> <p>If you need additional copies of this form, you may photocopy and use as many as you need.</p>	<div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">Information about the employee</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">Information about the physician or other health care professional</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">Completed by _____ Title _____ Phone _____ Date _____</div>	<div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">Information about the case</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">What happened? Tell us how the injury occurred. Examples: "When ladder slipped on wet floor, worker fell 20 feet"; "Worker was sprayed with chlorine when gasket broke during replacement"; "Worker developed soreness in wrist over time."</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">What was the injury or illness? Tell us the part of the body that was affected and how it was affected; be more specific than "hurt", "pain", or "sore." Examples: "strained back"; "chemical burn, hand"; "carpal tunnel syndrome."</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">What object or substance directly harmed the employee? Examples: "concrete floor"; "chlorine"; "radial arm saw." If this question does not apply to the incident, leave it blank.</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">If the employee died, when did death occur? Date of death _____</div>

Public reporting burden for this collection of information is estimated to average 22 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Persons are not required to respond to the collection of information unless it displays a current valid OMB control number. If you have any comments about this estimate or any other aspects of this data collection, including suggestions for reducing this burden, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

Ionizing Radiation

Purpose

The purpose of this program is to protect employees who may encounter ionizing radiation and its hazards while performing work.

Scope

This procedure applies to The Workforce Group, LLC operations where employees may be exposed to ionizing radiation.

This program is to ensure essential information regarding the hazard of ionizing radiation is communicated to our staff to minimize any potential exposure to ionizing radiation. When work is performed on a non-owned or operated site, the operator's or their radiation services contractor's program shall be followed.

Introduction

Exposure/Effects

As a rule, the dangers of radioactive exposure are less visible than those of other hazardous materials, and the presence of dangerous levels of radioactivity is hard to detect; it can only be detected with special monitors. Its effect on the human body may not be evident for days, weeks, or even years after exposure occurs. As ionizing radiation is applied to humans, the effects may include dermatitis, redness of the skin, skin cancer, hair loss, and eye inflammation.

The human body is able to tolerate a certain level of ionizing radiation; after all, we are continuously exposed to ionizing radiation from natural sources, such as cosmic radiation from outer space, and from radioactive materials in the earth. The degree of injury that is inflicted on a person by radiation exposure depends on several factors, such as the amount of the radiation dose, the duration of the dose, the rate at which the dose was received, the type of radiation received, and the body parts receiving the dose.

Requirements

The Occupational Safety and Health Administration regulates ionizing radiation at 29 CFR 1910.1096.

The annual permissible dose for total body exposure is five rem per year, with three rem permitted within a 13-week period. (Rem is a measure of the dose of any ionizing radiation to body tissue in terms of its estimated biological effect relative to a dose of one roentgen of X-rays).

Safety Management Plan

Ionizing Radiation

No part of the body should be directly exposed to radiation. If there is a danger of exposing a body part, appropriate protection must be used. Lead aprons, gloves, and goggles should be worn by workers located in the direct field or in areas where radiation levels from scattering are high. All protective equipment should be checked annually for cracks in the lead and other signs of deterioration. For consistently elevated exposure, a thyroid shield and leaded glasses are recommended.

Definitions

"Dose" means the quantity of ionizing radiation absorbed, per unit of mass, by the body or by any portion of the body. When the provisions in this section specify a dose during a period of time, the dose is the total quantity of radiation absorbed, per unit of mass, by the body or by any portion of the body during such period of time.

"High radiation area" means any area, accessible to personnel, in which there exists radiation at such levels that a major portion of the body could receive in any one hour a dose in excess of 100 millirem.

"Rad" means a measure of the dose of any ionizing radiation to body tissues in terms of the energy absorbed per unit of mass of the tissue. One rad is the dose corresponding to the absorption of 100 ergs per gram of tissue (1 millirad (mrad) = 0.001 rad).

"Radiation" includes alpha rays, beta rays, gamma rays, X-rays, neutrons, high-speed electrons, high-speed protons, and other atomic particles; but such term does not include sound or radio waves, or visible light, or infrared or ultraviolet light.

"Radiation area" means any area, accessible to personnel, in which there exists radiation at such levels that a major portion of the body could receive in any 1 hour a dose in excess of 5 millirem, or in any 5 consecutive days a dose in excess of 100 millirem; and

"Radioactive material" means any material which emits, by spontaneous nuclear disintegration, corpuscular or electromagnetic emanations.

"Restricted area" means any area access to which is controlled by the The Workforce Group, LLC for purposes of protection of individuals from exposure to radiation or radioactive materials.

"Rem" means a measure of the dose of any ionizing radiation to body tissue in terms of its estimated biological effect relative to a dose of 1 roentgen (r) of X-rays (1 millirem (mrem) = 0.001 rem). The relation of the rem to other dose units depends upon the biological effect under consideration and upon the conditions for irradiation.

Safety Management Plan

Ionizing Radiation

Each of the following is considered to be equivalent to a dose of 1 rem:

- A dose of 1 roentgen due to X- or gamma radiation;
- A dose of 1 rad due to X-, gamma, or beta radiation;
- A dose of 0.1 rad due to neutrons or high energy protons;
- A dose of 0.05 rad due to particles heavier than protons and with sufficient energy to reach the lens of the eye;

"Unrestricted area" means any area access to which is not controlled by the The Workforce Group, LLC for purposes of protection of individuals from exposure to radiation or radioactive materials.

Procedure

The Workforce Group, LLC shall not possess, use, or transfer sources of ionizing radiation in such a manner as to cause any individual in a restricted area to receive in any period of one calendar quarter from sources in the employer's possession or control a dose in excess of the limits specified below:

TABLE G-18	Rems per calendar quarter
Whole body: Head and trunk; active blood-forming organs; lens of eyes; or gonads	1 1/4
Hands and forearms; feet and ankles	18 3/4
Skin of whole body	7 1/2

No allowance shall be made for the use of protective clothing or equipment or particle size.

Precautionary Procedures and Personal Monitoring

Survey

The Workforce Group, LLC shall ensure that survey of the area has been taken and appropriate restricted areas established at the client worksite prior to beginning work. Survey means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of levels of radiation or concentrations of radioactive material present.

Safety Management Plan

Ionizing Radiation

Monitoring

The Workforce Group, LLC shall ensure the supply of appropriate personnel monitoring equipment, such as film badges, pocket chambers, pocket dosimeters, or film rings, and shall require the use of such equipment by each employee who enters a restricted area. All shall be calibrated as required.

Signs and Emergency Signals**Signs**

Symbols shall use the conventional radiation caution colors of magenta or purple on yellow background. The symbol prescribed by this paragraph is the conventional three-bladed design.

Each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION RADIATION AREA.

Each high radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION HIGH RADIATION AREA.

Each area or room in which radioactive materials in regulated amounts are stored shall post a sign or signs bearing the radiation caution symbol and the words: CAUTION RADIOACTIVE MATERIAL.

**Emergency Signal**

Each high radiation area shall be equipped with a control device which shall either cause the level of radiation to be reduced below that at which an individual might receive a dose of 100 millirems in 1 hour upon entry into the area or shall energize a conspicuous visible or audible alarm signal in such a manner that the individual entering and the employer or a supervisor of the activity are made aware of the entry.

The signal generator shall not be less than 75 decibels at every location where an individual may be present whose immediate, rapid, and complete evacuation is essential.

Safety Management Plan

Ionizing Radiation

A sufficient number of signal units shall be installed at every location where an individual may be present whose immediate, rapid, and complete evacuation is essential.

The signal shall be unique in the plant or facility in which it is installed.

The minimum duration of the signal shall be sufficient to insure that all affected persons hear the signal.

The signal-generating system shall respond automatically to an initiating event without requiring any human action to sound the signal.

Once the system has been placed in service, periodic tests, inspections, and checks shall be made to minimize the possibility of malfunction.

In addition to the initial startup and operating tests, periodic scheduled performance tests and status checks must be made to insure that the system is at all times operating within design limits and capable of the required response. Specific periodic tests or checks or both shall include:

All employees whose work may necessitate their presence in an area covered by the signal shall be made familiar with the actual sound of the signal-preferably as it sounds at their work location. Before placing the system into operation, all employees normally working in the area shall be made acquainted with the signal by actual demonstration at their work locations.

Training

All individuals working in or frequenting any portion of a radiation area shall be informed on:

- The occurrence of radioactive materials or of radiation in such portions of the radiation area,
- The safety problems associated with exposure to such materials or radiation and in precautions or devices to minimize exposure, including but not limited to time, distance, shielding and methods of keeping exposure limits as low as reasonably achievable (ALARA).
- The applicable provisions of 1910.1096 for the protection of employees from exposure to radiation or radioactive materials, and
- Shall be advised of reports of radiation exposure which employees may request a copy of.

Recordkeeping

The Workforce Group, LLC shall post a current copy of the applicable regulations and a copy of the operating procedures applicable to the work conspicuously in such locations as to insure that employees working in or frequenting radiation areas will observe these documents on the way to

Safety Management Plan

Ionizing Radiation

and from their place of employment or shall keep such documents available for examination of employees upon request.

The Workforce Group, LLC shall maintain records of the radiation exposure of all employees for whom personnel monitoring is required and advise each of his employees in writing of his individual exposure on at least an annual basis.

Job Competency

Purpose

The purpose of this program is to establish general job competency requirements.

Scope

This procedure applies to all The Workforce Group, LLC operations.

Responsibilities

The Workforce Group, LLC Safety Manager

- Identifies, updates and monitors minimum qualification requirements, job titles and training documentation
- Supplies training reports to clients and The Workforce Group, LLC management.

Site Manager and Supervisors

- Shall ensure all employees assigned to their project meet job competency requirements and complete training identified in the training matrix.
- Shall ensure that any work that may endanger an employee must be completed by an employee who is competent to do the work.
- Shall ensure all employees have sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

Employees

- Attend and follow requirements of safety and health management training.

General

Competence is a combination of knowledge, understanding and skill, and the appropriate level of competence cannot be acquired simply by attending a training session. The understanding and skill are acquired by experience. For individuals involved in exposure to HSE hazards and risks experience and training are essential. The following components are to be considered for each worksite's delivery team for competency assurance:

Experience

Level of Knowledge

Capability to Perform

At The Workforce Group, LLC our view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities and critical activities. This process enables the continuous improvement loop that feeds back into

Safety Management Plan

Job Competency

training and development activities that ensure competency assurance is an ongoing career cycle process.

1. Job Description Identified → Candidate Selection and Hiring Process (Reference and Background Check, Drug Screen, Physical Assessment) → Person Assessed and Hired for Open Position
2. Experience, Qualifications Assessed for Initial Training ↔ Initial Induction Training Completion
3. Further Training Required? If no → Ready for Work → On the Job Training → Competency Continually Assessed
4. Annual Performance Appraisal → Ready to Promote? → Employee Promoted → Further Training Required?

Competency is verified before employees are permitted to perform tasks independently. A competent person (supervisor, lead hand, instructor, etc.) must verify that an employee is competent to perform their roles and responsibilities before being allowed to work independently. If there is a site Short Service Employee (SSE) program established the new or transferred employee will fall under the SSE requirements as well.

Identification of Documentation

Documentation is obtained from employees to demonstrate they meet the qualifications of their job. Based on the job description requirements documentation may include educational, certifications, licenses, prior acceptable training course completion, etc. Documentation is reviewed and confirmed as actual during the employee hiring process.

Identification of Positions

An organizational chart and list of job titles has been established by The Workforce Group, LLC. Based on the positions and their exposure to risk their required training is entered into each worksite's training matrix. Job descriptions are prepared for each job title.

Identification of Qualifications

Minimum qualification requirements for each job title have been established by The Workforce Group, LLC. Qualifications may include a combination of education, certifications and work experience. Safety training completion for the indicated job title is required before full qualifications are met to allow an employee to begin work.

Identification of Training and Competency Needs

Employees (new or transferred) are provided job specific training related to their roles and responsibilities and trained on the tasks they perform on a regular basis. Training is identified in our training matrix which specifies safety and health training needs by job title. Our training matrix is updated based on changing risks.

Safety Management Plan

Job Competency

Training Records

All training records are maintained on site either by the The Workforce Group, LLC Safety Manager or senior representative of management or their designee.

Delivery of Induction, Transfer & Refresher Training

Employees receive initial induction training. No work by any employee is allowed to begin until the orientation is completed.

Training requirements are tracked by the The Workforce Group, LLC Safety Manager and formal training sessions are conducted either on or off site by the Safety Manager or competent/qualified instructor for the required subject matter.

Supervisor Safety Management Training

Supervisors and managers receive annual, documented safety management system training.

The Workforce Group, LLC Training Matrix

Additional training for identified hazards must be completed prior to employee exposure based upon a hazard assessment. **Sample shown as each site must develop its own training matrix.**

	LOCATION	FREQUENCY	Admin	Management	Craft
Bloodborne Pathogens	All	A	PRN	X	X
Confined Spaces	All	I		X	X
Defensive Driver Awareness Driving Safety	All	I	X	X	X
Electrical Safety - Unqualified	All	I		X	X
Emergency Response Plan	All	I	X	X	X
Fall Protection	All	I		X	X
Fire Extinguishers	All	A	X	X	X
First Aid/CPR	PRN	2	PRN	PRN	PRN
H2S	All	I		X	X
Hand and Power Tools	All	I		X	X
HAZCOM	All	I	X	X	X
Hearing Conservation	All	A	X	X	X
Isolation of Energy LOTO	All	I		X	X
JHA	All	I	X	X	X
Ladder Safety	All	I		X	X
Personal Protective Equipment	All	I		X	X
Rigging Awareness	All	I		X	X
Scaffolding	All	I		X	X
Site Specific HSE Plan	All	I	X	X	X
Supervisor Safety Training	All	PRN	PRN	X	PRN

PRN = As Required

Frequency: I = Initial A = Annual 2 = 2 Years 3 = 3 years

Safety Management Plan

Job Competency

Training Documentation

All training must be documented with: date; employee name, employee signature; instructor name; instructor signature and title of course.

Each new employee shall receive an orientation prior to beginning any work.

Ladder Safety Program

Purpose

The purpose of the program is to prescribe rules and establish minimum requirements for the construction, care, and use of the common types of ladders.

All ladders that are purchased and placed into service; or, any ladders that are engineered, manufactured and installed on any of The Workforce Group, LLC's equipment shall follow the requirements set forth by this program.

Scope

This program is applicable to all employees who may utilize ladders. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Ladder - an appliance usually consisting of two side rails joined at regular intervals by cross-pieces called steps, rungs, or cleats, on which a person may step in ascending or descending.

Stepladder - a self-supporting portable ladder, nonadjustable in length, having flat steps and a hinged back. Its size is designated by the overall length of the ladder measured along the front edge of the side rails.

Single ladder - a non-self-supporting portable ladder, nonadjustable in length, consisting of but one section. The overall length of the side rail designates its size.

Extension ladder - a non-self-supporting portable ladder adjustable in length. It consists of two or more sections traveling in guides or brackets so arranged as to permit length adjustment. Its size is designated by the sum of the lengths of the sections measured along the side rails.

Fixed ladder - a ladder permanently attached to a structure, building, or equipment.

Individual-rung ladder - a fixed ladder each rung of which is individually attached to a structure, building, or equipment.

Cage - a guard that may be referred to as a cage or basket guard, which is an enclosure that is fastened to the side rails of the fixed ladder or to the structure to encircle the climbing space of the ladder for the safety of the person who must climb the ladder.

Safety Management Plan

Ladder Safety Program

Key Responsibilities

Managers and Supervisors

- Managers and supervisors are responsible for ensuring that all employees, and/or contractors have been trained in the use and inspection of ladders in accordance to the manufactures guidelines.
- Managers and supervisors are responsible for ensuring that all employees and contractors are aware that if an inspection discovers a defect, the ladder shall not be used and taken out of service.

Employees

- Employees shall inspect ladders prior, during and at the completion of each use to ensure the condition of the ladder and the safety of its occupants.
- Employees are responsible for following this program and reporting any damage or repairs that may be needed to their supervisor.

Procedure

Inspection, Care and Safe Work Practices of Ladders

Inspection

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.

- 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.
- 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, or be tagged with "Do Not Use" or similar language, and shall be withdrawn from service until repaired
- If a ladder is tipped over, it shall be inspected by a competent person for side rail dents or bends, or excessively dented rungs; check all rung to side rail connections; check hardware connections; check rivets for shears.
- Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment shall not be used; improvised repairs shall not be made.

Safety Management Plan

Ladder Safety Program

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- All wood parts shall be free from sharp edges and splinters; sound and free from accepted visual inspection from shake, or other irregularities.

Care

Ladders shall be maintained in good condition at all times, the joint between the steps and side rails shall be tight, all hardware and fittings securely attached, and the movable parts shall operate freely without binding or undue play.

Metal bearings of locks, wheels, pulleys, etc., shall be frequently lubricated.

Frayed or badly worn rope shall be replaced. Safety feet and other auxiliary equipment shall be kept in good condition to ensure proper performance.

Rungs shall be kept free of grease and oil.

Ladders shall be stored in a well-ventilated area in a manner to prevent sagging and warping.

Ladder Safe Work Practices

Ladders shall be used only for the intended purpose for which they were designed.

The ladder shall be secured at the top or held by another person at the base.

The footing of the ladder shall be placed on a stable and level surface.

Extension ladders shall be placed at a 4:1 ratio. Ladders shall be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder (the distance along the ladder between the foot and the top support).

When ladders are not able to be extended then the ladder shall be secured at its top to a rigid support that will not deflect.

Ladders shall not be placed on boxes, barrels, or other unstable bases to obtain additional height.

Ladders shall not be used in a horizontal position as platforms, runways, or scaffolds.

Ladders shall not be used by more than one man at a time.

Ladders shall not be placed in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded.

Safety Management Plan

Ladder Safety Program

If a ladder is used in a high traffic area, barricades shall be placed to avoid accidental displacement due to collisions.

Do not stand on the top two rungs or top of step ladders.

On two-section extension ladders the minimum overlap for the two sections in use shall be as follows:

Size of Ladder (feet)	Overlap (feet)
Up to and including 36'	3
Over 36 up to and including 48'	4
Over 48 up to and including 60'	5

Ladders shall extend a minimum of 3 feet above top of upper landing surface. The ladder side rails shall extend at least 3 feet (.9m) above the upper landing surface. When ladders are not able to be extended then the ladder shall be secured at its top to a rigid support that will not deflect.

The employee shall maintain a three (3)-point grip on the ladder at all times and carry tools/equipment on a belt or hoist up. Do not carry anything in the hands that could cause injury in case of fall.

The employee shall face the ladder while ascending or descending.

The bracing on the back legs of stepladders is designed solely for increasing stability and not for climbing.

The ladder shall not be moved while occupied.

Portable Ladders

Stepladders shall not be longer than 20 feet. Single ladders shall not be longer than 30 feet.

A two-section extension ladders shall not be longer than 60 feet. All ladders of this type shall consist of two sections, one to fit within the side rails of the other, and arranged in such a manner that the upper section can be raised and lowered.

Keep all ladders at least ten (10) feet away from power lines.

Ladders shall have the correct load capacity for the task and not be loaded beyond the maximum intended load for which they were built nor in excess of the manufacturer's rated capacity. Weight includes the combined weight of the climber and his tools/equipment. Ladders are rated as the following:

Safety Management Plan

Ladder Safety Program

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- I (holds 250 lbs)
 - I-A (holds 300 lbs)
 - II (holds 225 lbs)
 - III (holds 200 lbs)

Fixed Metal Ladders

Ladders shall be constructed to withstand a minimum of 200 pounds.

All metal rungs shall have a minimum diameter of $\frac{3}{4}$ inches and wooden rungs shall have a minimum diameter of 1 $\frac{1}{8}$ inches.

Rungs shall not be more than 12 inches apart and shall be uniform throughout the length of the ladder.

Rungs shall be a minimum length of 16 inches and provide protection so a foot cannot slip off the end.

Rungs shall have a minimum of 7 inches between itself and the structure behind it.

A fall restraint system must be provided for all fixed ladders greater than six feet in length.

- A Cage is required when the fixed ladder is at least twenty feet tall.
- Cages on fixed ladders shall not begin at a point less than 7 feet nor greater than 8 feet from the walking surface below the cage.
- Cages shall provide a clear width of 15 inches in each direction of the rung's centerline.
- Cages shall not extend less than 27 inches, but not greater than 28 inches from the centerline of the rung.
- A climbing fall restraint system may be substituted for a ladder cage.

Lead Awareness Program

Purpose

The purpose of this procedure is to advise employees in areas where lead is suspected on an awareness level basis about the properties and dangers of lead, general guidelines and training requirements. For more information refer to the Lead safety procedure for The Workforce Group, LLC.

Scope

This procedure applies to The Workforce Group, LLC operations where employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

Managers and Supervisors

- In coordination with the Safety Manager, develop and implement annual lead awareness training.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Identify possible locations where lead in the workplace may be found.
- Inform the Safety Manager of upcoming work involving known or suspected lead-containing materials, allowing the Safety Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the lead awareness requirements.

Safety Manager:

- Coordinate annual lead awareness training activities.

Employees:

- Comply with the lead awareness requirements and direct any questions or concerns to the Safety Manager.
- Attend required annual training.
- Review material safety data sheets or consult with the supervisor to identify any container with lead-containing material.

Safety Management Plan

Lead Awareness Program

Procedure**Health Effects of Lead**

Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache, joint or muscle aches, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

Locations

Each worksite shall create a list of possible locations of lead containing materials such as leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.

The list is to be provided to the Safety Manager on a quarterly basis and revised as lead containing materials are added or eliminated from the previous list.

General Requirements

Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials and will not disturb the lead containing material. Appropriate work practices shall be followed to ensure the lead containing materials are not disturbed. Regulated access signs are to demarcate the lead exposure regulated work areas. The signs should read as follows:

**WARNING
LEAD WORK AREA
POISON
NO SMOKING OR EATING**

General Work Practices

When working on multi-contractor worksites The Workforce Group, LLC employees shall be protected from exposure. If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, The Workforce Group, LLC shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

Employees will wash hands and face if lead materials are contacted. Employees' hands and faces shall be washed if lead containing materials are contacted. Any possible contact with lead containing material must be reported immediately to the supervisor or Safety Manager.

If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed.

Safety Management Plan

Lead Awareness Program

When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system.

Whenever possible, use a wet system to reduce airborne dust.

Whenever possible, substitute lead material with non-leaded material.

Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.

If respirators are required, they will be NIOSH certified and all employees will follow the The Workforce Group, LLC Respiratory Protection Program.

Training

Lead awareness training is required at time of hire, during orientation or before initial assignment in areas where lead is suspected and annual refresher training is conducted. Lead awareness training is required for employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. Lead awareness training is required at time of hire, during orientation, or before assignment to areas containing lead.

Refresher training must be given annually.

Documentation of training - Lead awareness training shall be documented including dates of training, location of training, employee name and trainer name.

Training will include the health effects of lead, how to report suspected locations of lead containing material and not to disturb any possible lead containing material.

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

Lead

Purpose

The purpose of this procedure is to identify the controls and actions necessary to prevent adverse health effects to employees from occupational exposure to lead, and to ensure that The Workforce Group, LLC. lead exposure management practices meet regulatory requirements.

Scope

This procedure applies to The Workforce Group, LLC. operations where employees may be exposed to lead while working with lead containing materials during routine maintenance or emergency situations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

Managers and Supervisors

- In coordination with the Safety Manager, develop and implement written project/task specific lead exposure management procedures prior to the start of activities to reduce exposure to or below the permissible limits.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Ensure individuals responsible for monitoring areas of exposure are properly trained.
- Ensure personnel receive documented medical surveillance.
- Ensure that all affected employees receive initial and annual lead management training.
- Inform the Safety Manager of upcoming work involving lead-containing materials, allowing the Safety Manager to provide any necessary monitoring.
- Ensure employees have the appropriate personal protective equipment (PPE) and are properly trained in its use and care, including respiratory protection, full body disposable clothing and gloves, when the Action Level is expected to be met or exceeded.
- Ensure employees comply with the lead exposure management procedure.

Safety Manager

- Coordinate air sampling and monitoring activities, ensuring monitoring equipment is in proper working order and, as necessary, modifying the lead exposure management procedures to reflect exposure monitoring data.

Safety Management Plan

Lead

-
- Maintain the lead exposure management procedure, notifying management of any regulatory changes and ensuring compliance with federal and state requirements.
 - Coordinate initial and annual refresher training activities.
 - Coordinate the medical surveillance program for employees exposed to lead above the Action Level for more than 30 days per year.
 - Coordinate waste management and disposal activities; ensuring waste with lead containing materials is disposed of only at an approved facility.

Affected Employees

- Comply with the lead exposure management procedure, consulting with the supervisor or Safety Manager to ensure the proper PPE is used when required.
- Comply with the medical surveillance program.
- Attend initial and annual refresher training.
- Wear respiratory protection equipment and other specified PPE as required by the project/task specific control program.
- Maintain respiratory protection equipment in good working order, notifying the supervisor or Safety Manager of any problems prior to starting work.
- Review material safety data sheets or consult with the supervisor to identify any container with lead-containing material.
- Leave the work area to wash if skin irritation is noted or if PPE has been compromised.

Procedure**Written Compliance Program**

- Each worksite shall develop and implement written project/task site specific lead exposure management procedures prior to the start of activities to reduce exposure to or below the permissible limits if exposure is possible.
- The procedure shall include engineering controls, work practices, PPE, documentation of air sampling, including the source of lead, a description of each lead related task in which lead is emitted should be outlined and all employees shall be trained prior to work beginning.
- The program shall be revised and updated at least every 6 months.

Permissible Exposure Limits

- Per OSHA regulation, employees shall not be exposed to greater than 50 micrograms per cubic meter of air (50 $\mu\text{g}/\text{m}^3$), time-weighted average, during an 8-hour workday. This permissible exposure limit (PEL) includes the use of respiratory protection. If an employee is exposed more than 8 hours in any one workday, the maximum PEL ($\mu\text{g}/\text{m}^3$) shall be calculated by using the following formula:
 - $400/\text{hours worked in the day}$
 - For example: $400/12 \text{ hours} = 33.33 \mu\text{g}/\text{m}^3$

Safety Management Plan

Lead

-
- If respirators are used to supplement engineering and/or work practice controls, the respirator's protection factor may be used to determine compliance with the PEL.

Exposure (Air) Monitoring

- Exposure is defined in this section to be any employee who is not wearing a respirator to meet the Action Level and monitoring requirements in this section
- Initial air samples shall be representative of the employee's regular, daily activities.
- Initial breathing air sampling results:
 - If the initial monitoring is less than the Action Level, monitoring need not be repeated unless there has been a production, process, control, or personnel change which may result in new or additional exposure to lead
 - If the initial determination or subsequent monitoring reveals employee exposure to be at or above the Action Level but below the PEL, monitoring must be performed at least every six (6) months, with the cycle continuing until two (2) samples taken at least seven (7) days apart are below the action level
 - If the initial determination exceeds the PEL, monitoring will be performed quarterly until two (2) samples taken at least seven (7) days apart are below the PEL but above the Action Level, and the monitoring frequency described above will be used
 - Within 15 working days after the receipt of the results of any monitoring The Workforce Group, LLC. shall notify all affected employees of these results either individually in writing or by posting the results in an appropriate location that is accessible to affected employees.
 - Whenever the results indicate that the exposure, without regard to respirators, exceeds the permissible exposure limit, The Workforce Group, LLC. shall include in the written notice a statement that the permissible exposure limit was exceeded and a description of the corrective action taken or to be taken to reduce exposure to or below the permissible exposure limit.

Control MeasuresEngineering Controls

- If an employee is exposed to lead above the PEL for 30 or more days in a year, engineering controls, including administrative controls, will be implemented to reduce the exposure to or below the permissible exposure. If such controls are not feasible The Workforce Group, LLC must demonstrate and document the reasons.
- Respiratory protection will be used if engineering and administrative controls are not effective in reducing the exposure to or below the PEL
- If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed

Safety Management Plan

Lead

-
- When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system
 - Whenever possible, use a wet system to reduce airborne dust
 - Whenever possible, substitute lead material with non-lead material

Administrative Controls

- Administrative controls will include job rotation schedules to reduce employee PEL exposure.
- When exposure to lead is at or above the PEL The Workforce Group, LLC shall provide lunch rooms, decontamination, changing, shower and hygiene facilities.
- Regulated access signs will demarcate the lead exposure regulated work areas. Signs should not be removed or defaced. The signs will read as follows:

**WARNING
LEAD WORK AREA
POISON
NO SMOKING OR EATING**

Personal Protective Equipment

- Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.
- PPE will be selected on the basis of its ability to prevent absorption, inhalation and ingestion and will be provided to employees at no cost.
- PPE will reflect the needs of the employee based on work conditions, amount and duration of exposure and other known environmental factors.
- If respirators are required, they will be NIOSH certified and all employees will follow the The Workforce Group, LLC. Respiratory Protection Program.
- An employee may choose a NIOSH certified powered, air purifying respirator (PAPR) at no extra cost to the employee. The respirator shall be used during the time period necessary to install or implement engineering or work practice controls.
- Gloves, hats, vented goggles, shoes or disposable shoe covers shall be provided at no cost. Protective clothing shall be clean and dry. Protective clothing shall be cleaned, laundered, repair and replaced as necessary and disposable clothing shall be identified and handled properly.

Medical Surveillance

- A baseline blood sample shall be obtained prior to any lead exposure.
- Employees who are or may be exposed above the Action Level for more than 30 days per year will be included in a medical surveillance program which is performed by or under the supervision of a licensed physician at no cost to the employee.
- Any employee with elevated blood levels shall be temporarily removed.

Safety Management Plan

Lead

-
- Blood sampling and monitoring will occur at least every 6 months to each affected employee until two consecutive blood samples and analysis are acceptable.
 - Employees shall be notified in writing within 5 days of blood sampling results when lead levels are not acceptable.
 - Blood sampling shall occur on a monthly during a removal period of each employee removed from exposure to lead due to an elevated blood lead level.
 - Whenever the results of a blood lead level test indicate that an employee's blood lead level exceeds the level for medical removal The Workforce Group, LLC shall provide a second (follow-up) blood sampling test within two weeks after The Workforce Group, LLC receives the results of the first blood sampling test.

Medical Removal

- Employees will be removed from exposure to lead when an exposure meets or exceeds the Action Level on each occasion that a periodic and follow-up blood sampling test indicates that blood lead level is at or above 60 µg/100 g of whole blood.
- An employee will be removed from exposure to lead when the average of the last three (3) blood sampling tests indicates the employee's blood level is at or above 50 µg/100 g of whole blood (the employee need not be removed if the last blood sampling test shows blood lead level to be at or below 40 µg/100 g of whole blood).
- If the employee's blood lead level does not decline adequately with 18 months of removal, the employee will be offered a medical examination to determine if the employee may be returned to his or her former job status.
- Medical Removal Protection requirements of 1910.1025(k)(2) shall be followed.

Recordkeeping

- Medical surveillance records shall be maintained for 30 years after termination of employment.
- Exposure monitoring records shall be maintained for 30 years after completion of the project.
- Exposure and medical monitoring records shall be made available to affected employees or their representatives and to regulatory agencies upon request.

Training

Training shall be provided to employees who have the potential to exposure of lead prior to the time of initial assignment and annually thereafter. All affected employees are required to attend training programs. Training will include the following:

- Distribute a copy of the content of the lead standard and Appendices A and B of the regulation and it's readily availability for employees
- Content of any compliance plan in effect
- Access to information and training records

Safety Management Plan

Lead

-
- Specific operations where lead exposure is or could result in being above the action level
 - Engineering controls and work practices associated with the job
 - Purpose, proper selection, fitting, use, and limitations of respirators
 - Purpose and description of the medical surveillance program, which will include potential health effects, (including there could be adverse effects on reproductive systems) and the medical removal program
 - Instructions to employees that chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician;

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

Lockout / Tagout Program

Purpose

The purpose of this program is to establish procedures for affixing appropriate lockout/tagout equipment to energy isolating devices and to otherwise disable machines or equipment to prevent unexpected energization, start up or release of stored energy to prevent injury or incident.

Scope

This program covers the servicing and maintenance of machines and equipment where the unexpected energization or start up of the machine or equipment, or the release of stored energy could cause an incident. This program establishes minimum performance requirements for the control of such hazardous energy. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected employee - An employee whose job requires them to operate or use a machine or equipment on which servicing and maintenance is being performed under lockout/tagout, or whose job requires the employee to work in an area in which such servicing or maintenance is being performed.

Authorized employee - A person that performs lockout/tagout procedures on machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes authorized when that employee's duties include performing servicing or maintenance covered under this program.

Capable of being locked out - An energy isolating device is capable of being locked out if it has a hasp or other means of attachment to which, or through which, a lock can be affixed, or it has a locking mechanism built into it. Other energy isolating devices are capable of being locked out if lockout can be achieved without the need to dismantle, rebuild or replace the energy isolating device or permanently alter its energy control capability.

Energized - Connected to an energy source or containing residual or stored energy.

Energy isolating device - A mechanical device that physically prevents the transmission or release of energy including, but not limited to, the following:

Safety Management Plan

Lockout/Tagout Program

- A manually operated electrical circuit breaker, a disconnect switch, a manually operated switch by which the conductors and no pole can be operated independently, a line valve, a block and any similar device used to block or isolate energy.
- Push buttons, selector switches and other control circuit type devices are not isolating devices.

Energy source - Any source of gas, electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy sources.

Hot tap - A procedure used in the repair, maintenance and service activities that involves welding on a piece of equipment (pipelines, vessels or tanks) under pressure, in order to install connections or other appurtenances.

Lockout - The placement of a lockout device on an energy isolating device in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Lockout device - A device that utilizes a positive means, such as either a key or combination type lock, to hold an energy isolating device in the safe position and prevent the energizing of a machine or equipment. Included are blank flanges and bolted slip blinds.

Normal operation - The utilization of a machine or equipment to perform its intended operation.

Servicing and/or maintenance - Workplace activities such as constructing, setting up, adjusting, inspecting, modifying and maintaining and/or servicing machines and equipment, where the employee may be exposed to an unexpected energization or startup of the equipment or release of a hazardous energy source.

Setting up - Any work performed to prepare a machine or equipment for performing its normal operation.

Tagout - The placement of a tagout device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout device - A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until tagout device is removed.

Safety Management Plan

Lockout/Tagout Program

Key Responsibilities**Managers and Supervisors**

- Responsible to control and enforce this plan and to see that all their employees and contractors that are affected by lockout/tagout procedures, have the knowledge and understanding required for safe application, usage, and removal of all energy controls and devices.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Employees who are affected by this program are required to attend training on an annual basis.
- Are required to follow the provisions of this program.

Procedure**General**

Only an authorized employee or employees performing the servicing or maintenance shall perform lockout or tagout.

Devices

Lockout Device - If an energy source can be locked out a device that utilizes a lock to hold an energy isolating device in a safe position shall be used. Each site shall have the same type of lock as specified by The Workforce Group, LLC.

Tagout Device – If an energy source cannot be locked out with a lockout device then a tagout device shall be used. Tagout devices are a warning only level of protection and shall be weather and chemical resistant, standardized in color with clear written warning of hazardous energy; i.e. Do Not Operate, Do Not Start, Do Not Energize, etc. Each site shall have the same style of tags specified by The Workforce Group, LLC.

Specific Energy Control Procedures

Each manager or supervisor is responsible for developing specific step-by-step shutdown and startup procedures for a particular machine or piece of equipment in their respective area.

- A written, step-by-step isolation procedure for shutdown and startup shall be prepared for each type of machine or piece of equipment.
- This procedure shall include:

Safety Management Plan

Lockout/Tagout Program

- Equipment number if assigned.
- Equipment location.
- Energy Source(s) (i.e. electrical, hydraulic, gas pressure, etc.)
- Location of isolating controls (i.e. breaker switches, valves, etc.)
- Quantity of isolating controls
- Quantity of locks required to isolate the equipment
- Other hardware required to isolate the equipment (i.e. chains, valve covers, blocks, etc.)
- List any residual energy required to be dissipated before work begins.

Specific Sequence for Application of Energy Control**1. Notification**

Authorized employees must notify all other affected employees of the application and removal of lockout/tagout devices. Notification shall be given before the controls are applied and before they are removed from the machine or equipment.

2. Preparation for Shutdown

Before an authorized or affected employee shuts down a machine or equipment, the authorized employee shall have the knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means (locks) to control the energy sources.

3. Machine or Equipment Shutdown

The machine or equipment shall be shut down using the procedures established for that machine or piece of equipment. The shutdown shall be orderly to avoid any additional hazards to employees as a result of the stoppage.

4. Machine or Equipment Isolation

All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

5. Lockout/Tagout Devices and Application

- Each authorized employee shall have the proper number of locks and devices to be able to perform proper lockout/tagout procedures for machines or equipment that they may be working on.
- Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
- Each lockout and tagout devices shall include the name of the individual placing the device.

Safety Management Plan

Lockout/Tagout Program

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- Lockout devices shall be affixed in a manner to hold the energy isolating devices in a safe or off position.
 - Tagout devices shall be affixed in a manner that will clearly indicate that the operation or movement of isolating devices from the safe or off position.
 - Tagout devices used with energy isolating devices with the capability of being locked out shall be fastened at the same point at which the lock would have been attached. If a tag cannot be directly attached to the energy isolation device it shall be located as close as safely as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device.
 - Each energy source shall be locked out completely isolating the equipment.
 - Isolating machines or equipment shall include, but are not limited to:
 - Pumps, compressors, generators, electric distribution, storage tanks, etc.
 - Each type of equipment to be isolated shall have specific procedures for isolation, i.e. for compressors: suction, discharge, power, starting, fuel, dumps shall be closed, locked and tagged out properly. The blow-down valve shall be opened, locked and tagged out properly. (NOTE): If compressor has a side stream hooked up, the side stream shall be closed, locked and tagged out properly.

6. Stored Energy and the Possibility of Reaccumulation

Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained and otherwise rendered safe.

If there is a possibility of re-accumulation of stored energy, verification of isolation shall be continued until the servicing or maintenance operation is completed, or until the possibility of such accumulation no longer exists.

7. Verification of Isolation

The authorized employees performing the lockout procedure verifies/ensures that the equipment is isolated or disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the machine or equipment by operating the control(s) or by testing to make certain the equipment will not operate.

Multiple Workers

A crew of authorized employees may use a group lockout or tagout device. This will afford the group of employees a level of protection equal to that provided by a personal lockout or tagout device.

Safety Management Plan

Lockout/Tagout Program

- A tailgate meeting shall be conducted to review the lockout procedures and other information as required for safe work to continue – all crafts and effected departments shall be involved.
- An authorized employee will isolate the equipment and ascertain the exposure status of individual group members.
- All workers will then place their individual locks on the device's group lockout or tagout device after they have verified the procedure.
- The crew leader or an assigned authorized employee shall be responsible of assuring the continuity of the lockout procedures including documenting lockout information passed along during a shift or personnel changes.

Release from Lockout/Tagout

When servicing or maintenance is completed or when Lockout / Tagout devices must be temporarily removed, the equipment requires testing and the machine or equipment is ready for testing or to return to normal operating conditions, the following steps shall be taken, in this order:

- Check the machine or equipment and the immediate area surrounding the machine or equipment to ensure that all nonessential items such as tools have been removed and that the machine or equipment components are operationally intact.
- Check the work area to ensure that all personnel have been safely positioned or removed from the area.
- Remove the Lockout/Tagout device
- Energize and proceed with testing
- Deenergize and reapply control methods including Lockout / Tagout devices
- Document the procedure by use of the completed isolation log and provide to supervisor for filing.

Removal of Locks

The authorized employee who applied the lock shall be the one to remove their lock. However, after all work has been completed, certain conditions may arise which prohibit this person from being present to remove the lock.

The following procedures shall be followed to allow for the removal of a lock that another person has applied:

- Every effort shall be made to contact the authorized employee who applied the lock to obtain the key(s).
- If the key(s) cannot be made available, the employee who requests removal of the lock shall contact their supervisor.

Safety Management Plan

Lockout/Tagout Program

- The supervisor shall verify that every effort was made to contact the original authorized employee who applied the lock and to obtain the key(s).
- The employee removing the lock shall note on the Service Report that the lock(s) were removed with permission by supervisor.
- All reasonable efforts will be made by supervisor to notify that employee their lock has been removed, ensuring that the authorized employee has this knowledge before they return to work.
- If the equipment is client owned, the supervisor or employee requesting to remove the lock(s) shall contact the client to get the lock removed. Clients must remove their lock(s).
- NOTE: The Workforce Group, LLC employees shall not remove any client locks.

Shift or Personnel Changes

In the event shift or personnel changes occur during maintenance and/or repair activities, the designated The Workforce Group, LLC employee in charge shall take the necessary steps to maintain the continuity of the lockout/tagout protection. This includes maintaining that all provisions in this procedure are adhered to and the transfer of lockout/tagout devices between authorized employees is accomplished.

Contractors

Contractors performing lockout procedures on The Workforce Group, LLC property shall comply with this procedure. Contractors shall supply their own locks.

The Workforce Group, LLC shall initially lockout The Workforce Group, LLC machines and equipment before the contractor will be allowed to apply their own lock in addition to the The Workforce Group, LLC's.

Annual Audits

Each year the manager or supervisor, or his representative, will perform an inspection of the Lockout Program in their respective areas to verify the effectiveness of the program. An authorized employee other than the one(s) utilizing the energy control procedure being inspected shall perform the audit and shall verify that:

- Each authorized and/or affected employee has been trained as required.
- Any new equipment added has specific lockout procedures developed and documented.
- Current procedures are adequate for performing complete isolation of equipment and resulting in a zero energy state.
- The annual audit will be certified in writing include the date, equipment, employees and the inspector and a copy of the audit maintained on file at the managers/supervisors office.

Safety Management Plan

Lockout/Tagout Program

Training

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

- The recognition of applicable hazardous energy (lockout/tagout) sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.
- The purpose and use of energy control procedures.
- When tagout systems are used, employees shall also be trained in the following limitations of tags:
 - Tags are essentially warning devices affixed to energy isolating devices, and do not provide the physical restraint on those devices that is provided by a lock.
 - When a tag is attached to an energy isolating means, it is not to be removed without authorization of the authorized person responsible for it, and it is never to be bypassed, ignored, or otherwise defeated.
 - Tags must be legible and understandable by all authorized employees, affected employees, and all other employees whose work operations are or may be in the area, in order to be effective.
 - Tags and their means of attachment must be made of materials which will withstand the environmental conditions encountered in the workplace.
 - Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.
 - Tags may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program.

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

Retraining

Retraining shall be conducted whenever a periodic inspection reveals, or whenever The Workforce Group, LLC has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

Safety Management Plan

Lockout/Tagout Program

Retraining is also required when there is a change in job assignments, in machines, a change in the energy control procedures or a new hazard is introduced.

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

Training Documentation

The Workforce Group, LLC shall certify that employee training has been accomplished and is being kept up to date. All training and/or retraining must be documented, signed and certified.

Safety Management Plan

Lockout/Tagout Program

SPECIFIC EQUIPMENT LOCKOUT PROCEDURES

Department_____

Equipment No._____

Energy Source_____

Procedure for Shutdown and Isolation:

(List number of steps required to isolate machine or equipment - write N/A on lines not used or add additional steps if necessary)

STEP NO.

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

Additional Information:_____

Prepared By:_____ Date:_____

(This procedure to be communicated to all authorized and affected employees and kept on file at location of machine or equipment)

SAMPLE TAG

WARNING

MINIMUM LOCK/OUT – TAG/OUT PROCEDURES

Inlet Suction Block Valve Discharge Block Valve
Fuel Gas Valve Start Gas Valve
Liquid Dump Line Blow Down (Lock Open)

When working on this compressor package the following items must be **LOCKED OUT & TAGGED OUT**. Residual pressure must be blown down. Open all valves on surge bottles and piping to relieve any pressure that may be trapped.

Side Stream (For Units Set up with Side Streams)

When working on the compressor each person must lock and tag the compressor package!

Safety Management Plan

Lockout/Tagout Program

ISOLATION LOG

Date of Isolation:

Description of Work:

List of Equipment out of Service:

Necessary Requirements of Clear Isolation:

Authorized Employee Signature: _____

Person Continuing Work Signature: _____

Locks/Tags for GROUP LOCKOUT or Multiple Locks/Tags

Lock # or Tag	Date Installed	Date Removed	Print Name (for Group Lockout)	Signature

(If additional space is needed, please attach an additional page)

ANNUAL AUDIT OF THE CONTROL OF HAZARDOUS ENERGY PROGRAM

I certify that an audit of the The Workforce Group, LLC “Control of Hazardous Energy” Program was conducted and that each employee has been trained in the recognition and procedures to lockout equipment they may be required to work on or may be affected by.

I further acknowledge that the current procedure is adequate to safely lockout equipment in this department for servicing and maintenance.

Department: _____

Manager (or representative): _____

Date: _____

Original to file: _____

Management of Change Program

Purpose

The purpose of this standard is to assure appropriate review occurs before process and structural changes are made to The Workforce Group, LLC facilities, processes and equipment.

A thorough review of the change should improve the operability and reliability of the change, control the introduction of hazards into the workplace, improve decision-making through collaboration, promote effective communications and teamwork, and ensure conformance with policy, standards, codes and regulations as they apply to The Workforce Group, LLC operations.

Scope

This document is applicable to all employees.

General Requirements

- Prior to any change within the scope of this policy, a safety review is to be completed using the form Management of Change Procedure Form.
- It is the responsibility of the individual or team proposing the change to follow this procedure and complete the safety review prior to making any changes.
- Once the review has been completed by the individual or team, it must be approved by the Project Manager, as well as senior overseeing The Workforce Group, LLC manager and Safety Manager.
- At the completion of the change, the Project Manager and Safety Manager shall audit the changes against the approved plan.

Procedure

Describe in detail all proposed changes to the following areas on the Management of Change Procedure Form. Examples include:

Utility and Energy Requirements: electrical, hydraulic, compressed air, steam, etc., piping pressures and sizes for liquid and gas supplies, all means for de-energizing utilities provided and identified.

Hazardous Materials: names and descriptions, MSDSs, concentrations, size and type of packaging, flash point, flammable limits, storage requirements, temperatures, etc.

Waste Disposal: waste generated, containers to be used and locations, amounts, flammability, toxicity, reactivity, ingredients, associated wastes such as gloves and rags, disposal locations, etc.

Safety Management Plan

Management of
Change Program

Personal Protective Equipment: types required for hazards present or anticipated.

Personnel: types of training required for hazard communication, waste disposal, PPE, work permits, confined space, moving vehicles, cranes, fire protection, lockout/tagout, new equipment, shifts to be involved, use of temporary employees, qualifications of operators, testing of operators.

Material Handling: lifting devices required, cranes required, weights to be handled mechanically and manually, forklift requirements, rack storage requirements, access to racks by forklifts, power requirements for lifting aids.

Fire Protection: access to existing fire extinguishers and fire hoses, sprinklers protected and not obstructed, emergency response procedures.

Walking Surfaces: Access to aisles, aisles not used for working, aisles designated, clean and smooth surfaces, floor mats, trip hazards.

Machinery and Equipment: guarding requirements, power transmission guarding, nip points, sharp edges, foot treadles, energy sources, new equipment and tools, maintenance requirements, equipment bolted to the floor, energy isolating requirements (lockout/tagout), special tools required, automatic start or intermittent operations.

Ergonomics: illumination, noise, worker position and posture, vibration, floor space, machine controls, repetition, force, tool use, heat and cold, emergency stop location.

Ventilation: airborne contaminants (vapor, gas, dusts, fumes, mists, smoke, vehicle exhaust, etc.), control, methods, amounts of emissions, local and general (dilution) ventilation, CFM, permits required.

Radiation Sources: ultra-violet radiation from arc welding, laser, light energy from cutting, plasma, microwave, radio frequency, etc.

Safety Management Plan

Management of
Change Program**MANAGEMENT OF CHANGE PROCEDURE FORM**

Purpose of Form: To verify the orderly and comprehensive review of any new operations, processes, construction, equipment, machinery, demolition, remodeling, etc. prior to the actual change taking place. We must make sure that changes to the way we perform work do not create safety nor environmental hazards and that we have considered how changes in one area of work will affect other areas.

Project Location: _____ Requestor: _____

	YES	NO
Utility and Energy Requirements: routing and type of electrical, hydraulic, compressed air, steam, etc., piping pressures and sizes for liquid and gas supplies, all means for de-energizing utilities provided and identified, other.		
Hazardous Materials: names and descriptions, MSDSs, concentrations, size and type of packaging, flash point, flammable limits, storage requirements, temperatures, other.		
Waste Disposal: wastes generated, containers to be used and locations, amounts, drains used, flammability, toxicity, reactivity, ingredients, associated wastes such as gloves and rags, disposal locations such as compactor or strategic dumpster or hazardous waste drums, other.		
Personal Protective Equipment: types required other.		
Personnel: types of training required for hazard communication, waste disposal, PPE, confined space, moving vehicles, cranes, fire protection, lockout/tagout, new equipment, work shifts to be involved, use of temporary employees, qualifications of operators, testing of operators, other.		
Material Handling: lifting devices required, cranes required, weights to be handled mechanically and manually, forklift requirements, rack storage requirements, access to racks by forklifts, power requirements for lifting aids, other.		
Fire Protection: access to existing fire extinguishers and fire hoses, sprinklers protected and not obstructed, emergency response, other.		
Walking and Working Surfaces: access to aisles, aisles not used for working, aisles designated, clean and smooth surfaces, floor mats, trip hazards, other.		
Machinery and Equipment: point of operation guarding, power transmission guarding, nip points, sharp edges, foot treadles, energy sources, new equipment and tools, maintenance requirements, equipment bolted to the floor, energy isolating requirements (lockout/tagout), special tools required, automatic start or		

Safety Management Plan

Management of
Change Program

	YES	NO
intermittent operations, other.		
Ergonomics: illumination, noise, worker position and posture, vibration, floor space, machine controls, repetition, force, tool use, heat and cold, emergency stop location, other.		
Ventilation: airborne contaminants (vapor, gas, dust, fume, mists, smoke, vehicle exhaust, etc.), control methods, amounts of emissions, local and general (dilution) ventilation, CFM, permits required, other.		
Radiation: ultra-violet radiation from arc welding, laser, light energy from cutting, plasma, microwave, radio frequency, other.		
If you answered 'Yes' to any of the issues above, explain the proposed changes below:		

Submitted by: _____

Date: _____

Review/Approval:

Supervisor: _____

Date: _____

Project Manager: _____

Date: _____

Safety Manager: _____

Date: _____

Client (If Needed): _____

Date: _____

Audits:

Project Manager: _____

Date: _____

Safety Manager: _____

Date: _____

Manual Lifting

Purpose

The Workforce Group, LLC is committed to providing a safe and healthy working environment for all employees. Musculoskeletal disorders (MSD) account for a majority of reported injuries and we must minimize the risk and incidence of MSDs. To achieve this goal, The Workforce Group, LLC requires each worksite to establish and maintain a MSD, Lifting and Handling Loads Program with the following elements:

- Ongoing training of management, supervisors, and employees (including new hires) on MSD awareness hazards and control measures
- Training of specialized staff (designated The Workforce Group, LLC Representative, JHSC members) on MSD hazard assessment and control measures
- Tracking of MSD statistics
- MSD hazard identification and assessment (see MSD Hazard Identification form)
- Control of MSD hazards through the application of engineering and/or administrative controls
- Proactively integrating ergonomics principles into workplace design and work techniques
- A realization that personal protective equipment may only be used as a substitute for engineering or administrative controls if it is used in circumstances in which those controls are not practicable.

Key Responsibilities

The Workforce Group, LLC Safety Manager

Develops local Lifting and Handling Loads Programs for all worksites in accordance with this procedure and ensures all employees are aware of the requirements of the local Lifting and Handling Loads Program.

- Communicate, promote and support the MSD, Lifting and Handling Loads Program.
- Conduct MSD training sessions and/or provide MSD training materials.
- Maintain records of MSD training that they provide in a manner that supports accuracy and ease of access for monitoring purposes.
- Monitor corrective actions taken as identified on incident reports.
- Support supervisors and the worksite JHSC in the Lifting and Handling Loads Program process.
- Assist in the investigation of MSD incidents to address injury hazards.
- Bring to the attention of The Workforce Group, LLC management any MSD hazards identified during their investigations, audits or inspections.

Safety Management Plan

Manual Lifting

- Ensure distribution and awareness of MSD Hazard Identification Forms.
- Provide input into purchasing specifications for new tools, equipment and furniture as needed to reduce MSD hazards.
- Provide input into the development of safe work procedures to reduce MSD hazards.

Worksite Manager

Responsible for the implementation and maintenance of the Lifting and Handling Loads Program for their facility and ensuring all assets are made available for compliance with the procedure. He or she will also:

- Ensure that all worksite departments implement and maintain the provisions of the Lifting and Handling Loads Program.
- Seek regular reports to ensure that their worksite is in compliance with the Lifting and Handling Loads Program.
- Manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists must be provided for employees. Other engineering controls such as conveyors, lift tables, and work station design should be considered.
- Use of provided manual lifting equipment by employees must be enforced.

Employees

- Shall attend all MSD related training for the task they are performing.
- Practice MSD prevention strategies as per MSD training.
- Comply with safe work procedures.
- Correctly use the equipment provided by The Workforce Group, LLC, according to manufacturers' recommendations.
- Report to the supervisor any unsafe acts, unsafe tasks, unsafe conditions or equipment problems that create MSD hazards.
- Report any MSD incidents to the supervisor and cooperate in the investigation process.

Procedure**Worksite Assessment**

Before manual lifting is performed, a hazard assessment must be completed. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if two-man lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried. The assessment shall also include:

- Use of the MSD Hazard Identification form contained within this procedure
- Physical Demands
 - Neck Back Shoulder Wrist

Safety Management Plan

Manual Lifting

-
- Hand
 - Knee Ankle/
 - Feet
 - Force Required and Working Distance
 - Do employees push, pull, lift, lower, or carry objects that are too heavy or require too much force; away from the center of the body or in a jerky or twisting manner?
 - Work Postures
 - Is the back is curved too much or in a stooped position?
 - Is the back is twisted during movements?
 - Is the neck bent or twisted?
 - Are the arms away from the body?
 - Are the wrists flexed, extended or pinched positions?
 - Repetitive Use of Similar Muscles
 - Do employees perform movements over and over in the same way
 - Static Muscle Use and Duration
 - Do employees hold any of the above work postures for > 20 sec.?
 - Stand for long periods with their knees locked?
 - Stand in one position without moving or stretching?
 - Contact Stress
 - Do employees put localized pressure on any part of their body?
 - Work Space Layout and Conditions
 - Are there working heights, reaches in workspace, equipment, tool design, storage conditions, etc., that cause or contribute to employees experiencing any of the physical demands risk factors?
 - Also consider seating, floor surfaces, the characteristics of objects handled, including size and shape, load condition and weight distribution, and container as well as tool and equipment handles.
 - Organization of Work
 - Are there work processes, monotonous job tasks, work recovery cycles, task variability, work rate, machine paced tasks or peak activity demands that cause or contribute to rushing, frustration, fatigue or other visible signs of stress?
 - Environmental Conditions
 - Are employees exposed to poor lighting, vibration, cold or hot air/wind/water?

Work Controls

The Workforce Group, LLC must ensure based on the assessment, implement control measures to eliminate, minimize or reduce, so far as is reasonably practicable, the risk of musculoskeletal injury to the worker.

Handling Heavy or Awkward Loads

The Workforce Group, LLC will take all practicable means to adapt the heavy or awkward loads to facilitate lifting, holding or transporting by workers or to otherwise minimize the manual handling required. Those include:

- Where use of lifting equipment is impractical or not possible, two man lifts must be used.
- All loads carried on handcarts shall be secured.
- All awkward type loads shall be secured to prevent tippage.
- Additional methods include:
 - reducing the weight of the load by dividing it into two or more manageable loads
 - increasing the weight of the load so that no worker can handle it and therefore mechanical assistance is required
 - reducing the capacity of the container
 - reducing the distance the load must be held away from the body by reducing the size of the packaging
 - providing hand holds
 - team lift the object with two or more workers
 - improve the layout of the work process to minimize the need to move materials
 - reorganize the work method(s) to eliminate or reduce repeated handling of the same object
 - rotate workers to jobs with light or no manual handling
 - use mobile storage racks to avoid unnecessary loading and unloading.

Incidents and Injuries

If an employee reports symptoms of a MSI, The Workforce Group, LLC will:

- Musculoskeletal injuries caused by improper lifting must be investigated and documented. Incorporation of investigation findings into work procedures must be accomplished to prevent future injuries.
- Injuries must be recorded and reported as required by 29 CFR Part 1904.

Review & Updating Lifting and Handling Loads Program

- Supervision must periodically evaluate work areas and employees' work techniques to assess the potential for and prevention of injuries. New operations should be evaluated to engineer out hazards before work processes are implemented.

Training

The Workforce Group, LLC shall ensure that a worker who may be exposed to the possibility of musculoskeletal injury is trained in specific measures to eliminate or reduce that possibility. Our training shall include:

- General principles of ergonomics,
- Recognition of hazards and injuries,
- Procedures for reporting hazardous conditions, and
- Methods and procedures for early reporting of injuries.

Additionally, job specific training will be given on safe lifting and work practices, hazards, and controls.

Safety Management Plan

Manual Lifting

MSD Hazard Identification Form

Job Title:

Location of Assessment:

Task Assignment:

Hazard Identification applies to the following locations:

Job Code (if used):



Date:

WWCS Location:

Completed by (Name/Title):


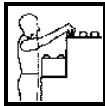



In Consultation with:

Status: Draft ☐ Final ☐

1. Awkward Postures			Mark if required	<ul style="list-style-type: none"> List task(s) requiring this posture What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Neck	Working with the neck bent forward or to the side more than 30° for more than 2 hours total per day.	 Side	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
		 Forward	<input type="checkbox"/>			



Safety Management Plan

Manual Lifting

1. Awkward Postures			Mark if required	<ul style="list-style-type: none"> List task(s) requiring this posture What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Neck	Working with the neck rotated more than 45° in either direction for more than 4 hours total per day or working with the neck bent back /up more than 10° for more than 2 hours total per day		<input type="checkbox"/>			<input type="checkbox"/> Date: _____
Neck	Working with the elbow(s) at or above the shoulder for more than 2 hours total per day		<input type="checkbox"/>			<input type="checkbox"/> Date: _____
Shoulder	Working while sitting or standing with the back bent forward, sideways, or twisted more than 30° for more than 2 hours total per day	 Side	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
		 Twisted	<input type="checkbox"/>			
		 Forward	<input type="checkbox"/>			

Safety Management Plan

Manual Lifting

1. Awkward Postures			Mark if required	<ul style="list-style-type: none"> List task(s) requiring this posture What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back	Working while sitting or standing with the back bent back more than 10°, and with no support for the back, for more than 2 hours total per day	 Backward	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
Knees	Employee squats/ kneels for more than 2 hours total per day	 Kneel	<input type="checkbox"/>			<input type="checkbox"/> Date: _____

2. Static Whole Body Postures		Mark if required	<ul style="list-style-type: none"> List task(s) requiring this posture What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Prolonged Sitting	Employee sits for more than 6 hours total per day	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
Prolonged Standing	Employee stands on hard surface more than 4 hours total per day (standing in one location without taking > 2 steps in any direction)	<input type="checkbox"/>			<input type="checkbox"/> Date: _____

Safety Management Plan

Manual Lifting

3a. Lift/Lower Forces (manual labor)		Mark if required	<ul style="list-style-type: none"> • List task(s) requiring this posture • What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/ Shoulder	Lift/lower objects up to 2 times an hour Object close to the body: 35 lb or more Object away from the body: 17 lb or more	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Lift/lower objects 3 to 60 times an hour Object close to the body: 30 lb or more Object away from the body: 15 lb or more	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Lift/lower objects 61 to 240 times an hour Object close to the body: 25 lb or more Object away from the body: 15 lb or more	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Lift/lower objects >5 lb more than 240 times an hour (more than 4 times a minute)	<input type="checkbox"/>			<input type="checkbox"/> Date: _____

Safety Management Plan

Manual Lifting

3b. Lift/Lower Forces (office work)		Mark if required	<ul style="list-style-type: none"> • List task(s) requiring this posture • What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/ Shoulder	Lift/lower objects up to 2 times an hour - Object close to the body: 30 lb or more - Object away from the body: 15 lb or more	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Lift/lower objects 3 to 60 times an hour - Object close to the body: 25 lb or more - Object away from the body: 15 lb or more	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Lift/lower objects 61 to 240 times an hour - Object close to the body: 25 lb or more - Object away from the body: 10 lb or more	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Lift/lower objects >5 lb more than 240 times an hour (more than 4 times a minute)	<input type="checkbox"/>			<input type="checkbox"/> Date: _____

Safety Management Plan

Manual Lifting

4a. Push/Pull Forces (manual labor) (Carts, trolleys, rolls, cables, etc.)		Mark if required	<ul style="list-style-type: none"> • List task(s) requiring this posture • What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
<i>NOTE: Push/Pull force is the force required to move the object, not the weight of the object itself.</i>					
Back/ Shoulder	Pushing/pulling up to 2 times an hour with initial push/pull force of more than 50 lb	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Pushing/pulling 3 to 120 times an hour, with initial push/pull force of more than 25 lb	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Pushing/pulling forces >5 lb more than 120 times an hour (more than twice a minute)	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
4b. Push/Pull Forces (office work) (Carts, trolleys, rolls, cables, etc.)		Mark if required	<ul style="list-style-type: none"> • List task(s) requiring this posture • What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
<i>NOTE: Push/Pull force is the force required to move the object, not the weight of the object itself.</i>					
Back/ Shoulder	Pushing/pulling up to 2 times an hour with initial push/pull force of more than 50 lb	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Pushing/pulling 3 to 120 times an hour , with initial push/pull force of more than 25 lb	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
	Pushing/pulling forces >5 lb more than 120 times an hour (more than twice a minute)	<input type="checkbox"/>			<input type="checkbox"/> Date: _____

Safety Management Plan

Manual Lifting

5. Repetition		Mark if required	<ul style="list-style-type: none"> • List task(s) requiring this posture • What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Neck, shoulders, elbows, wrists or hands	employee repeats the same motion with the neck, shoulders, elbows, wrists, or hands every few seconds with little or no variation for more than 2 hours total per day excluding computer use. Check body part(s) that apply: <input type="checkbox"/> Neck <input type="checkbox"/> Shoulder(s) <input type="checkbox"/> Elbow(s) <input type="checkbox"/> Wrist(s) <input type="checkbox"/> Hand(s)	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
Computer Use	Employee uses computer more than 3 hours total per day	<input type="checkbox"/>			<input type="checkbox"/> Date: _____

6. Hand/Arm Vibration		Mark if required	<ul style="list-style-type: none"> • List task(s) requiring this posture • What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Hands Arms	Use high vibration tools (impact wrenches, chain saws, jack hammers, riveting hammers) for more than 30 minutes total per day	<input type="checkbox"/>			<input type="checkbox"/> Date: _____

Safety Management Plan

Manual Lifting

	Use moderate vibration hand tools (grinders, sanders, jig saws) that typically have moderate vibration levels more than 2 hours total per day	<input type="checkbox"/>			<input type="checkbox"/> Date: _____
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7. Repeated Impacts		Mark if required	<ul style="list-style-type: none"> • List task(s) requiring this posture • What is the possible cause of the posture? 	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Hands Knees	Employee uses one of the following as a hammer more than 10 times per hour and for more than 2 hours total per day. (Check the body part(s) that apply) <input type="checkbox"/> Hand (heel/base of palm), or <input type="checkbox"/> Knee	<input type="checkbox"/>			<input type="checkbox"/> Date: _____

Safety Management Plan

Manual Lifting

Complete this section only if potential hazards have been identified in the “Mark if required” column:

1. How many employees are exposed to the hazards identified above and how often?

	# of employees Exposed	How often? (describe in hours per day or week, as appropriate)
Awkward postures		
Static whole body postures		
Lift/lower forces		
Push/pull forces		
Repetition		
Hand/arm vibration		
Repeated impacts		

2. In the past two years, how many MSD incidents been reported among employees who are exposed to the identified hazards?
State the number of incidents and their nature (e.g., Lost Time, Medical Aid, First Aid, Incident only)

Marine Transportation Program

Purpose

The purpose of this program is to provide general safety guidelines for transport, tug and barge operations.

References

- Life Preservers and Other Lifesaving Equipment [46 CFR 25.25]
- Fire Extinguishing Equipment [46 CFR 25.30]
- Backfire Flame Control [46 CFR 25.35]
- Ventilation [46 CFR 25.40]
- For ship repair, shipbuilding, and ship breaking, 29 CFR Part 1915 standards apply.
- For longshoring and cargo handling operations, 29 CFR Parts 1918 and 1919 standards apply.
- For marine construction activities, 29 CFR Part 1926 standards apply.

Captain Qualifications and Authority

All vessel captains shall possess current licenses as issued by the property authority to navigate any vessel.

The vessel captain has full authority during boarding, loading, when underway, and disembarking procedures. The vessel captain has the authority to refuse passage to anyone considered an unsafe passenger. The captain has the authority to require that seatbelts be worn when available.

The vessel captain of the vessel shall refuse to allow persons not adhering to the Personal Flotation Device rules to board the vessel.

Any hazardous materials must be properly identified, classified, named, packaged, marked, labeled, and manifested. If these requirements are not met the vessel captain has the full authority to refuse transportation of hazardous materials.

Slips, Trips and Falls

Minimizing Hazards on Deck

- Keep all walking and working surfaces clean, dry, and unobstructed.
- Keep all areas free of debris.
- Clean up and/or report any spill immediately.
- Stack materials in a stable manner.
- Secure gear and equipment that is not in use.
- Keep stairs, doorways, walkways, and gangways free of equipment and stowed materials.
- Secure ramps during loading and offloading operations.

Safety Management Plan

Marine Transportation Program

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- Repair leaks from hoses, pipelines, and valves immediately.
 - Use non-skid protective deck compound and do not paint over the non-skid compound with standard paint.
 - Have de-icing procedures in place when necessary.
 - Paint the perimeter and tripping hazards in a contrasting color.

Precautions in Walking

- Walk at a normal rate, keeping your hands out of your pockets.
- Slow down when moving between different surfaces.
- Do not run.
- Minimize short stops.
- Avoid sharp turns.
- Modify your way of walking to match the surface, such as an icy deck.
- Do not jump from one vessel to another.
- Do not climb on cargo, supplies, or equipment instead of using a ladder.
- Do not step on hatch covers.
- Avoid walking along the unguarded edge of a vessel.
- Watch out for reduced visibility due to poor lighting and weather conditions. If working at night, be sure there is adequate illumination (e.g., flashlight, headlight, light tower).

Wearing Appropriate Footgear

- Wear safety shoes or boots with slip-resistant soles as appropriate.
- Keep shoes clean of mud, snow, ice, spilled liquids, and debris.

Preventing Elevated Falls

- Always maintain three-points of contact on a ladder—two hands and a foot, or two feet and a hand—so that only one limb is in motion at any one time.
- Avoid overextending the body when performing tasks such as checking sounders, checking lights, and wiring rigging, which can lead to falls from ladders.
- Falls from portable ladders are one of the leading causes of occupational fatalities and injuries. Use the following safe work practices when using ladders:
 - Use ladders only for their designed purpose (i.e., step ladders should not be used as portable rung ladders).
 - Position the ladder so that for every four feet in height, the ladder extends out from the vertical surface at the base approximately one foot.
 - Make sure that the ladder is long enough for the job—if used for access to an upper landing surface the side rails must extend at least three feet above that surface.
 - Make sure that there is proper footing to keep the ladder from slipping or sliding.
 - Tie the ladder to a secure object. Remember that the vessel(s) that the ladder is secured to can move. Use the buddy system, if possible, so that one person can hold the ladder to stop it from moving.
 - Never use portable metal ladders near energized electrical equipment (such as conductors or electric arc welding machines).

Safety Management Plan

Marine Transportation Program

-
- Keep your body near the middle of the step and always face the ladder while climbing.
 - Do not move, shift, or extend ladders while in use. Move the ladder instead of stretching or leaning to the side to reach your work.
 - Use hand lines or a tool bag/belt to keep hands free when using a ladder.
 - Fully enclosed slip-resistant footwear should always be worn when using ladders.
-
- An adequate guard rail should be installed or employees should wear Personal Fall Arrest Systems when work is being performed above a solid surface (e.g., to prevent falls from the deck to the dock).
 - Use gangplanks with guardrails to prevent falls on the dock or pilings.
 - All deck holes, openings, and hatches should be covered or guarded.
 - Pigeon holes should not be used to access vessel walking or working surfaces.

Man Overboard & Personal Flotation Devices

See Man Overboard Procedure.

Machinery and Equipment Hazards

Hazards related to the use of machinery and equipment can result in injuries to hands, feet, or limbs that become caught in moving machinery; head and other injuries from being struck by falling objects or moving equipment; and burns. Other potential hazards include getting pinned under a load; falling off equipment; and electric shock.

To reduce hazards from machinery and equipment:

- Inspect all equipment before use.
- Maintain equipment properly. Always shut down and lockout the power source before repairing mechanical systems. Make repairs according to the manufacturer's guidelines.
- Ensure that the person using the equipment is trained in its proper use and maintenance.
- Install appropriate rails, temporary or permanent, to avoid equipment being driven off the vessel or dock.
- Ensure retaining pins are properly installed and positively secured with a keeper or locking device.
- Emergency shut-offs must be easily accessible, and sufficient guarding should be used for equipment controls.

Materials, equipment, tools, containers, and other items used in the OCS that are of such shape or configuration that they are likely to snag or damage fishing devices shall be handled and marked as follows:

- All loose materials, small tools, and other small objects shall be kept in a suitable storage area or a marked container when not in use,
- All cable, chain, or wire segments shall be recovered after use and securely stored until suitable disposal is accomplished,

Safety Management Plan

Marine Transportation Program

-
- Skid-mounted equipment, portable containers, spools, reels, and drums shall be marked with the owner's name before use or transport over offshore waters,
 - All markings must clearly identify the owner and must be durable enough to resist the effects of the environmental conditions to which they may be exposed, and
 - MMS PINC G-252 stipulates that the above markings cannot be made with chalk, grease pencil or crayon, parking pens, non-waterproof decals, or water based paints.

Hoists, Cranes and Derricks

Hazards of hoists include being struck by a heavy object, such as the boom or the load being moved. To reduce these hazards:

- Stay clear when a hoist is being used unless you are part of the procedure and, in which case, never stand under a load or boom with a suspended load.
- Wear personal protective equipment, such as head, foot, eye, and hand protection at all times.
- Assess the hoisting systems for structural soundness by inspecting regularly for problems with welds, rivets, chains, pulleys, lines, blocks, hooks, etc.
- Secure power blocks with a safety chain.
- Ensure that cranes in use are secured to the vessel.
- Do not try to help lift a load being hoisted.

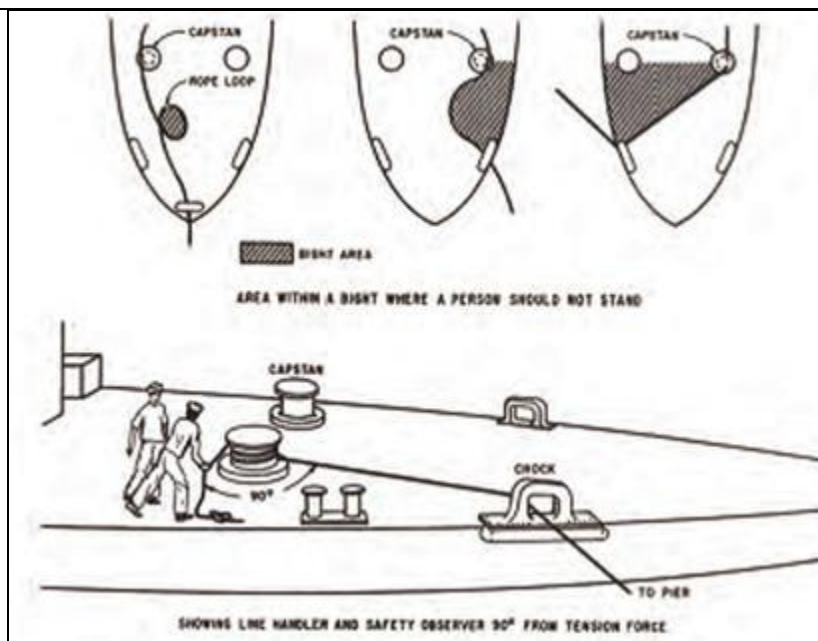
Winches

Operating or working near winches may potentially expose employees to hazards such as body parts caught in a winch drum, being struck by a broken line or cable, and tripping over a line or cable. To reduce hazards:

- Use a device or tool, never your hand, to keep the winch line spooling properly.
- Enclose the winch drum in a cage if practical.
- Stay off the deck unless you are part of the operation.
- Never stand in, on, over, or in line with lines or cables connected to winches when they are under tension. The danger zone lies within 15 degrees of either side of a line under tension.
- Never step on or walk over the winch drum.
- Inspect the winch system regularly for problems associated with general or localized deterioration, cracked welds, and other structural, mechanical, or electrical deficiencies.
- Inspect lines and cable systems regularly, including blocks, hooks, and associated components, for signs of damage or deterioration.
- A guard should be installed between the winch operator and the connected cables to protect the operator from potential whiplash.
- Never stand in the bight of a line.

Safety Management Plan

Marine Transportation Program



Fire Hazards

Steps that can be taken to prevent fires on board a vessel include the following:

- Store engine fuel tanks and compressed gas tanks properly, away from sources of ignition. Only keep onboard quantities of flammable and combustible materials that are necessary for operations and maintenance. Post appropriate danger signs.
- When dealing with work that is capable of providing a source of ignition through a flame or spark (hotwork), such as welding, cutting, burning, drilling, grinding, etc., follow these precautions:
 - Ensure the space is properly tested by a qualified or shipyard-competent person and deemed safe before work is begun. (See 29 CFR 1915.7 and 1915.15.).
 - Make sure that proper fire extinguishing equipment is near the work area and that it is maintained in a state of readiness for emergency use.
- Do not leave oxygen or acetylene hoses unattended.
- Consider where sparks will fall when doing hotwork and employ a fire watch.
- Shield fuel sources to protect them from ignition sources.
- Cover openings to prevent sparks from entering.
- Stop any hotwork if you smell fuel or gas until the source has been identified and the problem fixed.
- When welding or burning on the deck of a vessel, the space below should be inspected to ensure that no flammable atmosphere or combustible materials are present.
- Use good housekeeping practices to limit the amount of clutter, debris and combustible/flammable material.

Follow these safety measures to help prevent electrical fires:

Safety Management Plan

Marine Transportation Program

- Make sure that electrical systems are installed by a qualified marine electrician and that electrical systems are inspected regularly.
- Regularly conduct visual inspections of connections, switches and wiring, which may be subject to corrosion from saltwater and damage from use.

Fire Extinguishing Equipment

- Hand-portable fire extinguishers and semi-portable fire extinguishing systems must be of the "B" type (i.e., suitable for extinguishing fires involving flammable liquids, greases, etc.).
- Hand-portable fire extinguishers and semi-portable fire extinguishing systems must have a metal name plate listing the name of the item, rated capacity (gallons, quarts or pounds), name and address of person/firm for whom approved, and the manufacturer's identifying mark.
- Portable fire extinguishers must be inspected and weighed every six months.
- Minimum number of B-II hand-portable fire extinguishers required to be on board motor vessels: one if less than 50 tons, two if 50-100 tons, three if 100-500 tons, six if 500-1,000 tons and eight if over 1,000 tons.
- Fixed fire extinguishing systems must be an approved carbon dioxide type and must meet U.S. Coast

Backfire Flame Control

Every gasoline engine installed after April 25, 1940, except outboard motors, shall be equipped with an acceptable means of backfire flame control.

Ventilation

Fuel tanks and engine spaces, using fuel with a flashpoint of 110 degrees Fahrenheit or less, must be provided with adequate ventilation to remove explosive or flammable gases from the fuel tank compartment and bilges.

Naturally Occurring Radioactive Material (NORM)

Purpose

To prevent exposure to naturally occurring radioactive materials (NORM) when NORM is present.

Scope

The operator's program shall take precedence, however, this document covers employees and contractors who enter contaminated vessels or work on contaminated equipment which has been determined to contain levels of technologically enhanced naturally occurring radioactive material (TENORM) and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

NORM – Naturally Occurring Radioactive Material – radioactive isotopes that occur naturally in the environment.

TENORM – Technologically Enhanced Naturally Occurring Radioactive Material - naturally occurring radioactive materials that have been concentrated or exposed to the environment through human activity.

Responsibilities

The NORM program shall be administered by the Safety Manager. The responsibilities of the NORM program administrator shall be:

- To inform the organization of changes in NORM requirements.
- Administer and maintain the written NORM program.
- To ensure the safety of operating personnel by providing guidance and direction.

Supervision shall obtain information regarding presence of TENORM in the work place; ensure employees are fully trained in the hazards present, work procedure, safety precautions, and PPE.

Employees shall understand the hazards, work procedure, safety precautions, use of PPE and be able to perform required actions safely.

Requirement

General

General Statement regarding the origination of NORM

Safety Management Plan

NORM Program

Radiation naturally occurs in our environment from mainly two sources: cosmic rays external to the earth and radioactive materials found in the earth's crust. Low level radioactive scale can be produced in the course of some oil and gas operations. Oil and gas production moves NORM to the surface where it accumulates and is classified as technologically enhanced naturally occurring radioactive material (TENORM). TENORM deposits may be found in piping, brine and sand filters, salt water disposal injection wells and equipment, headers, vessels, pumps and to a lesser extent compressor cylinders, bottles and piping. Produced water can contain radium 226 and 228 that may precipitate as scale in knockouts and scrubbers. In the gas stream, Radon gas decays to Lead-210, then to Bismuth-210, Polonium-210, and finally to stable Lead-206. Radon decay elements may occur as a film on the inner surface of inlet lines and compressor components.

Supervision shall receive information from the client regarding TENORM contamination in the facility where work shall commence.

If TENORM is detected and the quantity is sufficient to cause exposure, the work group and the safety department shall develop a specific work-site procedure to control exposure. Work procedures shall contain applicable requirements for time, distance, shielding and decontamination. In addition, the elements and safety precautions listed below shall be contained and followed:

- Where exposures may occur.
- Different types of radionuclides that may be present.
- Contaminated equipment that is to be opened will be removed from service, vented and left idle for a minimum of four hours before work begins.
- Personnel must use time, distance and shielding protection methods.
- Personnel must use proper personal protective equipment (PPE) when entering contaminated vessels or when direct contact with TENORM contamination is possible. If the work will create contaminated dusts, respiratory protection consisting of a half-mask respirator with radioactive particle, or HEPA cartridges, or self contained breathing apparatus (SCBA).
- Personnel must thoroughly wash their hands and face upon work completion and before eating, drinking chewing gum/tobacco, or smoking. These activities are prohibited within the work area when TENORM work is being performed.
- The number of personnel working in the TENORM areas shall be restricted.
- Contaminated surfaces shall be handled in a wet state.
- Contaminated equipment and personal protection must be disposed of in accordance with approved waste disposal procedures.

Testing

When the presence of TENORM is suspected and the client has not tested, the safety department shall be contacted to arrange testing through a third party Industrial Hygienist. Analysis of exposure shall be made through the Safety Department in conjunction with an Occupational

Safety Management Plan

NORM Program

Health Physicist. Levels will be compared against known existing rates as provided by the host client or owner of the equipment.

Training

Each employee who will work in a TENORM area shall be trained before exposure to TENORM contamination and shall receive refresher training at least annually. Training in TENORM shall follow the lesson plan below:

- Section 1: Introduction: Radioactive Matter
- Objective: To provide information about particles of matter and the relationship to radioactive isotopes.
 - Radiation and Radioactivity Hazards
 - Types of Radiation
 - Alpha and beta (origin/hazard/protection from)
 - Gamma and x-ray (origin/hazard/protection from)
- Section 2: How To Protect Yourself and Others
- Objective: To relate time, distance, and shielding as methods of reducing radiation exposure.
 - Control of Radiation Exposure
 - External exposure - time, distance, and shielding
 - Internal exposure - modes of entry into the body
 - Biological Effects of Exposure to the Human Body
 - Direct effect
 - Indirect effect
 - Factors that determine what a given dose will cause
 - Exposure risks to plant/field personnel
- Section 3: Naturally Occurring Radioactive Material (N.O.R.M.) and Technologically Enhanced Naturally Occurring Radioactive Material (TENORM)
- Objectives:
 - To help the student understand NORM and TENORM
 - To learn Isolation procedures
 - Naturally Occurring Radioactive Material and locations where it can be found
 - The decay scheme of Uranium
 - Discussion on U-238 and its daughter isotopes
 - Technologically Enhanced Naturally Occurring Radioactive Material
 - Where and how TENORM occurs
 - Hazard identification and protection
 - Isolation Procedures
 - Radiation Areas
 - Contaminated Equipment

Safety Management Plan

NORM Program

Storage, Transport and Disposal

- Section 4: Safe Worksite Procedures
- Objective: To teach proper safe protocol before, during, and after the job.
 - Pre-job procedures
 - Safety Equipment
 - Pre-job safety meeting
 - Pre-job checklists
 - During Work
 - Safety Procedures (HEPA filters on respirators and limitations)
 - Post-job safety
 - Safety Procedures
 - Personal/Worker Surveys
 - Decontaminating articles - How to properly clean
 - Survey and cleaning of the worksite
 - Normal and Emergency Actions and Situations
 - Safety Procedures
 - Isolation and notification

Safety Management Plan

New Employee Safety Orientation
Checklist

New Employee Safety Orientation Checklist

File this form in the Employee's Personnel Record

Name: _____ Date: _____

Job/Dept Assigned: _____

Safety Topics presented during General New Employee Orientation – (Please check all that apply)

- ☐ General Safety Rules & Policies
- ☐ Hazard Communication & Chemical Safety Procedures
- ☐ Personal Protective Equipment
- ☐ Control of blood borne pathogens
- ☐ Electrical Safety & Lockout/Tagout
- ☐ Emergency Plans: Routes & Assembly Locations
- ☐ Procedures for safety violations, accidents, near-miss
- ☐ Proper lifting & ergonomic techniques
- ☐ Tool & Equipment Safety
- ☐ Safety Signs and their meanings
- ☐ Material handling and Forklift rules
- ☐ Substance Abuse Policy
- ☐ Office Safety Controls

Employee Name: _____

Trainer Name: _____

NFPA 70E Program

Purpose

The purpose of this program is to set forth procedures for the safe use of electrical equipment, tools, and to comply with NFPA 70E requirements.

Scope

This program applies to all The Workforce Group, LLC employees, temporary employees, and contractors. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

The Workforce Group, LLC shall advise the host employer of:

- Any unique hazards presented by the contract employer's work,
- Any unanticipated hazards found during work by The Workforce Group, LLC that the host employer did not mention, and
- The measures The Workforce Group, LLC took to correct any hazards reported by the host employer to prevent such hazards from recurring in the future.

Responsibilities

Managers/Supervisor

The HSE Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations. Unqualified persons shall not be permitted to enter spaces that are required to be accessible to qualified employees only, unless the electric conductors and equipment involved are in an electrically safe work condition.

Operations Managers and Supervisors shall ensure a documented job briefing is held before starting each job and will include all employees involved. The briefing will cover hazards associated with the job, work procedures involved, special precautions, energy source controls and PPE requirements.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Safety Management Plan

NFPA 70E Program

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees shall be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

Safe Work Practices

Prior to any work being done within the Limited Approach Boundary a hazard risk analysis shall be performed. The analysis shall contain event severity, frequency, probability and avoidance to determine the level of safe practices employed.

Safe Work Practices for Working within the Limited Approach Boundary

The limited approach boundary is the distance from an exposed live part within which a shock hazard exists.

The restricted approach boundary is the closest distance to exposed live parts a qualified person can approach without proper PPE and tools. Inside this boundary, accidental movement can put a part of the body or conductive tools in contact with live parts or inside the prohibited approach boundary. To cross the restricted approach boundary, the qualified person must:

- Have an energized work permit that is approved by the supervisor or manager responsible or the safety plan.
- Use PPE suitable for working near exposed live parts and rated for the voltage and energy level involved.
- Be certain that no part of the body enters the prohibited space.
- Minimize the risk from unintended movement, by keeping as much of the body as possible out of the restricted space; body parts in the restricted space should be protected.

The prohibited approach boundary is the minimum approach distance to exposed live parts to prevent flashover or arcing. Approaching any closer is comparable to making direct contact with a live part. To cross the prohibited approach boundary, the qualified person must:

- Have specified training to work on exposed live parts.
- Have a permit with proper written work procedures and justifying the need to work that close.
- Do a risk analysis.
- Have (2) and (3) approved by the appropriate supervisor.
- Use PPE appropriate for working near exposed live parts and rated for the voltage and energy level involved.

Safety Management Plan

NFPA 70E Program

Only qualified persons shall perform tasks such as testing, troubleshooting, and voltage measuring within the limited approach boundary of energized electrical conductors or circuit parts operating at 50 volts or more or where an electrical hazard exists.

The Flash Protection Boundary is the approach limit at a distance from exposed live parts within which a person could receive a second degree burn if an electrical arc flash were to occur.

- Use PPE appropriate for working near exposed live parts and rated for the voltage and energy level involved.
- For systems of 600 volts and less, the flash protection boundary is 4 feet, based on an available bolted fault current of 50 kA and a clearing time of 6 cycles for the circuit breaker to act, or any combination of fault currents and clearing times not exceeding 300 kA cycles.
- When working on de-energized parts and inside the flash protection boundary for nearby live exposed parts - If the parts cannot be de-energized, use barriers such as insulated blankets to protect against accidental contact or wear proper PPE.

Arc Flash Hazard Analysis

An arc flash hazard analysis includes the following:

- Collect data on the facility's power distribution system.
 - Arrangement of components on a one-line drawing with nameplate specifications of every device.
 - Lengths and cross-section area of all cables.
- Contact the electric utility for information including the minimum and maximum fault currents that can be expected at the entrance to the facility.
- Conduct a short circuit analysis followed by a coordination study is performed.
- Feed the resultant data into the NFPA 70E equations.
 - These equations produce the necessary flash protection boundary distances and incident energy to determine the minimum PPE requirement.
 - The flash protection boundary is the distance at which PPE is needed to prevent incurable burns (2nd degree or worse) if an arc flash occurs. (It is still possible to suffer 1st or 2nd degree burns.)
- For systems of 600 volts and less, the flash protection boundary is 4 feet, based on an available bolted fault current of 50 kA (kiloamps) and a clearing time of 6 cycles (0.1 seconds) for the circuit breaker to act, or any combination of fault currents and clearing times not exceeding 300 kA cycles (5000 ampere seconds).

When working on de-energized parts, but still inside the flash protection boundary for nearby live exposed parts:

- If the parts cannot be de-energized, barriers such as insulated blankets must be used to protect against accidental contact or PPE must be worn.
- Employees shall not reach blindly into areas that might contain exposed live parts.
- Employees shall not enter spaces containing live parts unless illumination is provided that allows the work to be performed safely.

Safety Management Plan

NFPA 70E Program

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- Conductive articles of jewelry and clothing (such as watchbands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread, metal headgear, or metal frame glasses) shall not be worn where they present an electrical contact hazard with exposed live parts.
 - Conductive materials, tools, and equipment that are in contact with any part of an employee's body shall be handled in a manner that prevents accidental contact with live parts. Such materials and equipment include, but are not limited to long conductive objects such as ducts, pipes, tubes, conductive hose and rope, metal-lined rules and scales, steel tapes, pulling lines, metal scaffold parts, structural members, and chains.
 - When an employee works in a confined space or enclosed spaces (such as a manhole or vault) that contains exposed live parts, the employee shall use protective shields, barriers or insulating materials as necessary to avoid contact with these parts. Doors, hinged panels, and the like shall be secured to prevent them from swinging into employees. Refer to the confined space entry program.

Inspections

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.
- Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

Equipment

Test instruments, equipment, and their accessories shall meet the requirements of ANSI/ISA-61010-1-Safety Requirements for Electrical Equipment for Measurement, Control, and Laboratory Use Part 1 General Requirements, for rating and design requirements for voltage measurement and test instruments intended for use on electrical systems 1000 Volts and below.

When test instruments are used for the testing for the absence of voltage on conductors or circuit parts operating at 50 volts or more, the operation of the test instrument shall be verified before and after an absence of voltage test is performed.

Personal Protective Equipment

All insulating PPE must be inspected before each day's use and immediately following any incident that can reasonably be suspected of having caused damage. Insulating gloves shall be given an air test, along with the inspection.

Maximum test intervals for rubber insulating personal protective equipment shall include:

- Blankets-before first issue/every 12 months thereafter
- Gloves-before first issue and every 6 months
- Sleevs before first issue and every 12 months
- Covers and line hose shall be testing if insulating value is suspect.

Energized Electrical Work Permit

Work on energized electrical conductors or circuit parts that are not placed in an electrically safe work condition shall be considered energized electrical work and shall be performed by written permit only.

Lighting

Employees shall not enter spaces containing electrical hazards unless illumination is provided that enables the employees to perform the work safely. Where lack of illumination or an obstruction precludes observation of the work to be performed employees shall not perform any task within the Limited Approach Boundary of energized electrical conductors or circuit parts operating at 50 volts or more or where an electrical hazard exists.

Extension Cords

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug and the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - All extension cords shall be plugged into one of the following:
 - A GFCI outlet;
 - A GFCI built into the cord;
 - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage.

Safety Management Plan

NFPA 70E Program

If damage is found, the extension cord or electrical cord shall be removed from service and repaired or replaced.

- Extension cords shall not be used on compressor skid to operate heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment shall be hard wired per applicable electrical codes.

Outlets

- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

Multiple Outlet Boxes

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffee pots, or other high-current loads.

Double Insulated Tools

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

Switches, circuit breakers, and disconnects

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labelled with the voltage rating.
- Each breaker within a breaker panel must be labelled for the service it provides.
- Disconnect switches providing power for individual equipment must be labelled accordingly.

Ladders

- Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.
- Wood ladders should not be painted, which can hide defects, except with clear lacquer.
- When using ladders they shall be free from any moisture, oils, and greases.

Energized and Overhead High Voltage Power Lines & Equipment

- A minimum clearance of 10 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines shall be de-energized and grounded or other protective measures shall be provided before work is started.

Safety Management Plan

NFPA 70E Program

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- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.
 - Minimum approach distance for qualified employees shall be followed per 29 CFR 1910.333(c)(3)(i) Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current).

Confined or Enclosed Work Spaces

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee shall isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

Enclosures, Breaker Panels, and Distribution Rooms

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures shall be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have “Danger: High Voltage – Authorized Personnel Only” posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

Lock Out/Tag Out

- No work shall be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with the live parts) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out shall be treated as live parts.
- Per The Workforce Group, LLC policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using The Workforce Group, LLC’s Control of Hazardous Energy – Lock Out/Tag Out Program.

Safety Management Plan

NFPA 70E Program

Lockouts are performed by the HSE Manager, Shop Foreman or Branch Manager. Designated employees in some branches

may be trained by local management to lock out equipment. If live sources are to be worked it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.

- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow The Workforce Group, LLC's Control of Hazardous Energy – Lock out/Tag Out Program.
- Authorized personnel will be trained in lock out/tag out procedures.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

Contractors

- Only approved, certified, electrical contractors may perform construction and service work on The Workforce Group, LLC or client property.
- It is the Manager/Supervisors responsibility to verify the contractor's certification.

Fire Extinguishers

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

Electric Shock-CPR:

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

Electric Welders

- A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.
- A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

Equipment Grounding

- All gas compressors, air compressors, separators, vessels, etc. shall be grounded by means of using a lug and ground strap, nominal in size to a ½" bolt or larger, attached to a ground rod six feet or longer.

Safety Management Plan

NFPA 70E Program

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- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
 - The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

Training

Employees are trained to understand the specific hazards associated with electrical energy. Employees shall be trained in safety-related work practices and procedural requirements as necessary to provide protection from the electrical hazards associated with their respective jobs. Employees shall be trained to identify and understand the relationship between electrical hazards and possible injury.

Employees shall be trained in the skills and techniques to distinguish exposed energized electrical conductors and circuit parts from other parts of electrical equipment, to determine the nominal voltage of exposed energized electrical conductors and circuit parts, the approach distances specified in Table 130.2 (below), and the decision making process necessary to determine the degree and extent of the hazard and the personal protective equipment and job planning necessary to perform the task safely.

Limited Approach Boundary				
Nominal system voltage range, phase to phase	Exposed movable conductor	Exposed fixed-circuit part	Restricted approach boundary (allowing for accidental movement)	Prohibited approach boundary
0 to 50 volts	Not specified	Not specified	Not specified	Not specified
51 to 300 volts	10 ft. 0 in.	3 ft. 6 in.	Avoid contact	Avoid contact
301 to 750 volts	10 ft. 0 in.	3 ft. 6 in.	1 ft. 0 in.	0 ft. 1 in.
751 to 15 KV	10 ft. 0 in.	5 ft. 0 in.	2 ft. 2 in.	0 ft. 7 in.
15.1 kV to 36 KV	10 ft. 0 in.	6 ft. 0 in.	2 ft. 7 in.	0 ft. 10 in.
36.1 KV to 46 kV	10 ft. 0 in.	8 ft. 0 in.	2 ft. 9 in.	1 ft. 5 in.
46.1 KV to 72.5 KV	10 ft. 0 in.	8 ft. 0 in.	3 ft. 2 in.	2 ft. 1 in.
72.6 KV to 121 KV	10 ft. 8 in.	8 ft. 0 in.	3 ft. 3 in.	2 ft. 8 in.
138 to 145	11 ft. 0 in.	10 ft. 0 in.	3 ft. 7 in.	3 ft. 1 in.
161 KV to 169 KV	11 ft. 8 in.	11 ft. 8 in.	4 ft. 0 in.	3 ft. 6 in.
230 KV to 242 KV	13 ft. 0 in.	13 ft. 0 in.	5 ft. 3 in.	4 ft. 9 in.
345 KV to 262 KV	15 ft. 4 in.	15 ft. 4 in.	8 ft. 6 in.	8 ft. 0 in.

Employees shall be trained in safety related work practices that pertain to their respective job assignments.

Safe work practices shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

Training shall be documented and maintained for the duration of the employee's employment. Documentation shall be made when the employee demonstrates proficiency, be maintained for the duration of the employee's employment, and contain each employee's name and date of training.

Retraining

An employee shall receive additional training (or retraining) under any of the following conditions:

- If the supervision or annual inspections indicate that the employee is not complying with the safety-related work practices.
- If new technology, new types of equipment, or changes in procedures necessitate the use of safety-related work practices that are different from those that the employee would normally use.
- If he or she must employ safety-related work practices that are not normally used during his or her regular job duties.
- Retraining shall be performed at intervals not to exceed 3 years.

Nitrogen Awareness Program

Purpose

The purpose of this procedure is to advise employees in areas where nitrogen is being used and to supply on an awareness level basis about the properties and hazards of nitrogen, general guidelines and training requirements.

Scope

This procedure applies to The Workforce Group, LLC operations where employees whose work activities may involve working with or around nitrogen. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

Managers and Supervisors

- In coordination with the Safety Manager, develop and implement nitrogen awareness training.
- Ensure personnel are aware of work that has the potential of exposure to nitrogen.
- Identify possible locations where nitrogen in the workplace may be used.
- Inform the Safety Manager of upcoming work involving nitrogen, allowing the Safety Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the nitrogen awareness requirements.

Safety Manager:

- Coordinate annual nitrogen awareness training activities.

Employees:

- Comply with the nitrogen awareness requirements and direct any questions or concerns to the Safety Manager.
- Attend required annual training.

Procedure

Hazards of Nitrogen

Nitrogen is an inert gas, which means that it does not react with other chemicals under most normal circumstances. Nitrogen is often used in industrial settings to displace other gases that are toxic, corrosive, reactive or prevent fire or explosion hazards, making processes safer. Using nitrogen to remove oxygen from process equipment decreases the chances of a fire or explosion, but it also can make the atmosphere in and around the equipment hazardous for humans to breathe.

Hazard Identification

- Oxygen-deficient atmospheres in confined spaces can be deadly in only a few breaths. An oxygen-deficient atmosphere rapidly overcomes the victim. There is no warning before being overcome.
- An oxygen-deficient atmosphere might exist outside a confined space opening.
- Entering oxygen-deficient atmospheres should never be attempted under any circumstances without training and proper air-supplied breathing equipment.
- Pre-job planning and walk downs with the entire work team should emphasize confined space entry restrictions, especially when unsecured confined space access points are in the work area.
- Confined space hazard warnings must be maintained at all times while the access opening is not secured.
- Pre-job walk downs should accurately identify all equipment where inert gas purging may be venting into the work area.
- Barriers and warnings should be maintained around open purge vents at all times during purging activities.
- Rescuers must strictly follow safe rescue procedures.

Pre-Job Planning for Nitrogen Related Work

Pre-job planning or a site assessment will be conducted prior to starting work and that the assessment will be documented. Documented planning will be conducted for those operations involving potential nitrogen exposure and this includes anytime an active purge is being applied to a system in or around equipment associated with work. Some planning or assessment elements include:

- All proposed work requires a jobsite visit by the requestor and a unit operator to identify special precautions, equipment status, and personal safety equipment requirements.
- The conditions for marking a “nitrogen purge or inerted” (Yes/No/NA) status box.
- The permit must clearly identify all hazards and special personal protective equipment requirements.

- “Fresh Air” work restrictions apply to “Set up only” permits whenever an IDLH atmosphere is suspected or known to be present in the work area.
- The requirements to maintain posted warnings at all access points to confined space temporary openings.
- Appropriate barricades will be utilized if determined by the site assessment. As determined by the hazard assessment, nitrogen vent / purge points will be labeled and barricaded. Barricades will provide a safe zone of 3' in diameter or greater if determined by oxygen monitoring results. As determined by the hazard assessment, nitrogen vent / purge points will be labeled and barricaded with a 3' diameter or as determined by oxygen monitoring (must be greater than 19.5% outside of the barrier.)
- Appropriate signage will be utilized and adhered to. Appropriate signage will include adequate warning by stating Danger, Inert Gas Present or Possible Oxygen Deficient Environment.

Safe Rescue Awareness

- The powerful human instinct to help someone in distress, especially a friend or co-worker, all too frequently results in multiple confined space incident victims.
- Workers suddenly involved in emergency activities must not allow emotions to override safe work procedures and training. Only qualified and trained personnel equipped with the necessary safety equipment should attempt a rescue.

Cylinder Handling and Storage

- All nitrogen cylinders shall contain an identifying label. Nitrogen cylinders shall contain an identifying label UN1066. See below as an example:



- Proper handling and storage of nitrogen cylinders includes the requirements that the cylinder(s) shall be upright, properly supported and stored outdoors or in a well-ventilated area. Cylinder(s) shall be chained or otherwise secured to prevent movement.
- Data sheets must be available for nitrogen.
- A protective cap must be in place when the cylinder is not in use.
- The correct size and type of trolley or cart should always be used for the safe transportation of gas cylinders.
- Nitrogen must not be used to power pneumatic tools or blowers. Nitrogen must not be used to power pneumatic tools or blowers except when they are used in an inert atmosphere.

Training

Employees will be trained in nitrogen hazards. The Workforce Group, LLC shall provide training for all affected employees including any The Workforce Group, LLC employee working with or near nitrogen and the training shall emphasize:

- An oxygen-deficient atmosphere rapidly overcomes the victim.
- There is no warning before being overcome.
- An oxygen-deficient atmosphere might exist outside a confined space opening.
- Rescuers must strictly follow safe rescue procedures.

Documentation of training - Nitrogen awareness training shall be documented including dates of training, location of training, employee name and trainer name.

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

Noise Awareness Program

Purpose

The purpose of this program is to provide a process to minimize employee-hearing loss caused by excessive occupational exposure to noise. This program is applicable to all employees who may be exposed to noise in excess of 85 decibels (decibels). When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Audiometric testing - means detection by the person being tested of a series of pure tones. For each tone, the person indicates the lowest level of intensity that they are able to perceive.

Decibels – means the sound energy measured by a sound level meter using the “A” scale. The “A” scale is electronically weighted to simulate the response of the human ear to high and low frequency noise.

Slow Response – means the setting on the sound level meter that averages out impulses of brief duration that would cause wide fluctuation in the sound level meter reading.

Standard Threshold Shift – means a change in hearing threshold relative to the baseline audiogram of an average of 10 dB (corrected for age) at 2000, 3000 and 4000 Hz in either ear.

Key Responsibilities

Managers and Supervisors

- Ensure requirements of this program are established and maintained.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Wear hearing protection when required, attend the training, and cooperate with testing and sampling.

Procedure

Occupational hearing loss is a cumulative result of repeated or continued absorption of sound energy by the ear; employee protection is based on reduction of the noise level at the ear or limiting the employee's exposure time. The Workforce Group, LLC shall offer hearing

Safety Management Plan

Noise Awareness Program

protection to all employees exposed to potential high noise levels in working areas and to those employees requesting hearing protection.

Hearing Conservation Program

The Workforce Group, LLC shall administer a continuing effective hearing conservation program when employees, who work in areas where the exposure to noise levels are 85 decibels or greater for the 8 hour time-weighted average of 85 decibels, must wear hearing protection and The Workforce Group, LLC shall implement a monitoring program to identify employees to be included in the hearing conservation program. Employees will wear hearing protection in signed areas while on an owner client facility.

Surveys

Surveys will be conducted by a qualified employee or third party.

To evaluate noise exposure in terms of possible hearing damage, it is necessary to know the overall sound level ("A" scale measurement), the exposure time of the individual in hours per day and the length of time the individual has worked in the area being surveyed. This data shall be supplemented by the following:

- Name of area and location
- Date and time of survey
- Name of person conducting survey
- Description of instrument used, model and serial number
- Environmental conditions
- Description of people exposed

The Workforce Group, LLC shall notify each employee of their monitoring results, or, if their job is exposed to noise 85 decibels or greater.

A plot of noise levels must be made for owned facilities. The plot must be filed or posted at the facility.

The Workforce Group, LLC shall evaluate hearing protector attenuation for the specific noise environments in which the protector will be used. The adequacy of hearing PPE shall be reevaluated whenever noise exposures increase to the point that the PPE provided may no longer provide adequate protection. The Workforce Group, LLC shall then provide more effective PPE where necessary.

All sound measuring equipment must be calibrated before and after each survey. Records of sound measuring equipment calibration and noise level surveys shall be kept for 20 years.

Safety Management Plan

Noise Awareness Program

Noise Surveys must be repeated whenever changes in the workplace may expose additional personnel to high noise or hearing protection being used by employees may not be adequate to reduce the noise exposure to a level below 85 decibels.

Sound Level Surveys

- All owned facilities that are suspected of having noise levels exceeding 85 decibels must be screened.

Exposure Surveys:

- A representative sampling of employees shall be conducted to determine the exposure to noise over a period of time.
- Noise dosimeters must be capable of integrating all continuous, intermittent and impulsive sound levels from 80 dB to 130 dB and must be calibrated so a dose of 50% corresponds to a time weighted average of 85 dB.

Signage

Clearly worded signs shall be posted at entrances to, or on the periphery of, areas where employees may be exposed to noise levels in excess of 85 decibels. These signs shall describe the hazards involved and the required protective actions.

Audiometric Testing

The Workforce Group, LLC shall establish and maintain an audiometric testing program by making audiometric testing available to all employees whose exposure to noise 85 decibels (8 hr TWA) or greater and employees should take an audiogram annually. The program shall be provided at no cost to employees.

- The Workforce Group, LLC shall establish a valid baseline audiogram against which future audiograms can be compared. An employee must receive a baseline audiogram within six months of their first exposure to 85 decibels or greater for an eight hour period.
- When a mobile van is used the baseline shall be established within one year.
- An employee shall receive an annual audiogram every year they work in a position that is exposed to noise 85 decibels or greater.
- A qualified third party shall perform all audiometric testing, evaluation, reporting and retesting.
- Audiometric testing shall be preceded by a period of at least 14 hours during which there is no exposure to workplace sound levels in excess of 80 decibels. This requirement may be met by the use of hearing protectors that reduce the employee noise exposure level below 80 decibels and employees shall also be notified to avoid high levels of noise.
- An otoscopic exam is required before an audiogram is initiated. A qualified person shall examine the ear canal for any ear infections or canal irregularities that might affect the audiogram or rule out the use of earplugs.

Safety Management Plan

Noise Awareness Program

At least annually after obtaining the baseline audiogram, The Workforce Group, LLC shall obtain a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels. Annual audiograms shall be evaluated as follows:

- Each audiogram shall be compared to the employees' baseline audiogram to ensure the test was valid and to determine if a standard threshold shift has occurred.
- If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift, the employee shall be informed of this fact in writing, within 21 days of the determination.
- If a standard threshold shift is determined, the employee will be retested within 30 days.
- The retest results will be considered as the annual audiogram.
- Employees shall be informed of their audiometric test results in writing within 21 days of determination.
- If the employee has sustained a standard threshold shift, after retesting, that employee shall be retrained and refitted for appropriate hearing protection.
- The employee shall be referred for additional medical evaluation if indicated.

Records

The Workforce Group, LLC shall maintain accurate record of all employee exposure measurements and that all records are maintained as required by CFR 1910.95 (Occupational Noise Exposure).

Employee audiograms are considered medical/exposure records. These records must be kept for the length of employment plus 30 years.

Hearing Protection Devices

Earmuffs and earplugs shall be made available to employees in sizes and configurations that will be comfortable to the employee. Hearing protection devices shall be made available to all employees exposed to an 8 hour time-weighted average of 85 db or greater at no cost to employees. Hearing protectors shall be replaced as necessary. Employees shall be instructed how to obtain the proper fit. The Workforce Group, LLC shall ensure that hearing protectors are worn.

Employees will be given an opportunity to select their hearing protection from The Workforce Group, LLC provided selection. Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by The Workforce Group, LLC.

Training

A training program shall be instituted for all employees who are exposed to a noise action level or work in high noise areas. Noise awareness training for employees shall be provided before

Safety Management Plan

Noise Awareness Program

initial assignment and on an annual basis. The training shall be repeated annually for each employee.

The training shall address the effect of noise on hearing; the purpose of hearing protectors, including the advantages, disadvantages and alternatives of various types, including instructions on selection, fitting, use and care of and the purpose of audiometric testing and an explanation of test procedures.

Training shall be updated to be consistent with changes in the work process, PPE requirements and the proper techniques of wearing hearing protection.

All staff shall have a copy of this program, noise exposure procedures and it shall be posted at the worksite and a copy made available to all employees, their representatives and regulatory agencies (Assistant Secretary and the Director will have access to records).

The training must be documented.

Office Safety Program

Purpose

The purpose of this program is to provide guidance to office managers and office staff on the elements of safe office work. The office is like any other work environment in that it may present potential health and safety hazards. Most of these, however, may be minimized or eliminated by designing jobs and workplaces properly, and by taking into account differences among tasks and individuals. Inadequate environmental conditions, such as noise, temperature, and humidity, may cause temporary discomforts. Environmental pollutants such as chemical vapors released from new carpeting and furniture may also induce discomforts.

Responsibilities

Management:

- Provide training for all office staff in:
 - Emergency Procedures
 - Electrical Safety
 - Office Ergonomics
- Ensure office equipment is in safe working order
- Provide proper storage for office supplies

Office Staff:

- Report all safety problems immediately
- Do not attempt to repair any office equipment or systems
- Maintain a neat and sanitary office environment

Noise Hazards

Noise can be defined very simply as unwanted sound. Whether a sound is classified as noise or not depends mostly on personal preferences. For noise levels in offices, the most common effects are interference with speech communication, annoyance, and distraction from mental activities. Noise in the office can interfere with communications. For example, it may be difficult to talk on the telephone when other people are talking nearby. Speech is likely to interfere with communications especially if the speakers have similar voices.

The annoying effect of noise can decrease performance or increase errors in some task situations. If the task requires a great deal of mental concentration, noise can be detrimental to performance. Also, there is some indication that unexpected or unpredictable noise can have more of an effect than continuous or periodic noise. The annoyance caused by noise also depends on the individual. Noise can also be distracting. A sudden noise can interrupt activity temporarily, such as when someone drops a heavy object.

Safety Management Plan

Office Safety Program

Reducing Noise

Many unexpected noises cannot be controlled, as when someone accidentally drops something. For many of the annoying sounds in the office environment, the following measures are useful for reducing the level of noise or its effects:

- Select the quietest equipment if possible. When there is a choice between two or more products, sound levels should be included as a consideration for purchase and use.
- Provide proper maintenance of equipment, such as lubrication and tightening of loose parts that can cause noise.
- Locate loud equipment in areas where its effects are less detrimental. For example, place impact printers away from areas where people must use the phone.
- Use barriers walls or dividers to isolate noise sources. Use of buffers or acoustically treated materials can absorb noise that might otherwise travel further. Rubber pads to insulate vibrating equipment can also help to reduce noise.
- Enclose equipment, such as printers, with acoustical covers or housings.
- Schedule noisy tasks at times when it will have less of an effect on the other tasks in the office.

Electrical Safety

Electric cords should be examined on a routine basis for fraying and exposed wiring. Particular attention should be paid to connections behind furniture, since files and bookcases may be pushed tightly against electric outlets, severely bending the cord at the plug. Electrical appliances must be designed and used in accordance with UL requirements.

Use of Extension Cords:

- Extension cords shall only be used in situations where fixed wiring is not feasible.
- Extension cords shall be kept in good repair, free from defects in their insulation. They will not be kinked, knotted, abraded, or cut.
- Extension cords shall be placed so they do not present a tripping or slipping hazard.
- Extension cords shall not be placed through doorways having doors that can be closed, and thereby damage the cord.
- All extension cords shall be of the grounding type (three conductors).

Housekeeping

Good housekeeping is an important element of accident prevention in offices.

Poor housekeeping may lead to fires, injuries to personnel, or unhealthful working conditions. Mishaps caused by dropping heavy cartons and other related office equipment and supplies could also be a source of serious injuries to personnel.

Safety Management Plan

Office Safety Program

Passageways in offices should be free and clear of obstructions. Proper layout, spacing, and arrangement of equipment, furniture, and machinery are essential. All aisles within the office should be clearly defined and kept free of obstructions. Chairs, files, bookcases and desks must be replaced or repaired if they become damaged. Damaged chairs can be especially hazardous. Filing cabinet drawers should always be kept closed when not in use. Heavy files should be placed in the bottom file drawers.

Materials stored within supply rooms must be neatly stacked and readily reached by adequate aisles. Care should be taken to stack materials so they will not topple over. Under no circumstances will materials be stacked within 18 inches of ceiling fire sprinkler heads or Halon nozzles. Materials shall not be stored so that they project into aisles or passageways in a manner that could cause persons to trip or could hinder emergency evacuation.

Computer Work Stations

Complaints concerning musculoskeletal problems are frequently heard from computer operators. Most common are complaints relating to the neck, shoulders, and back. Others concern the arms and hands and occasionally the legs. Certain common characteristics of VDT (Video Display Terminal) jobs have been identified and associated with increased risk of musculoskeletal problems. These include:

- Design of the workstation.
- Nature of the task.
- Repetitiveness of the job.
- Degree of postural constraint.
- Work pace.
- Work/rest schedules.
- Personal attributes of individual workers.

The key to comfort is in maintaining the body in a relaxed, natural position. The ideal work position is to have the arms hanging relaxed from the shoulders. If a keyboard is used, arms should be bent at right angles at the elbow, with the hands held in a straight line with forearms and elbows close to the body. The head should be in line with the body and slightly forward.

Display Screens

When work is conducted at a computer, the top of the display screen should be at, or just slightly below, eye level. This allows the eyes to view the screen at a comfortable level, without having to tilt the head or move the back muscles.

Control glare at the source whenever possible; place VDTs so that they are parallel to direct sources of light such as windows and overhead lights, and use window treatments if necessary. When glare sources cannot be removed, seek appropriate screen treatments such as glare filters. Keep the screen clean.

Safety Management Plan

Office Safety Program

Your Chair

The chair is usually the most important piece of furniture that affects user comfort in the office. The chair should be adjusted for comfort, making sure the back is supported and that the seat pan is at a height so that the thighs are horizontal and feet are flat on the floor. An ergonomically sound chair requires four degrees of freedom - seat pan tilt, backrest angle, seat height, and backrest height. Operators can then vary the chair adjustments according to the task. In general, chairs with the most easily adjustable dimensions permit the most flexibility to support people's preferred sitting postures.

Armrests on chairs are recommended for most office work except where they interfere with the task. Resting arms on armrests is a very effective way to reduce arm discomforts. Armrests should be sufficiently short and low to allow workers to get close enough to their work surfaces, especially for tasks that require fixed arm postures above the work surface.

Working Height

The work surface height should fit the task. The principle is to place the surface height where the work may be performed in such a manner as to keep arms low and close to the body in relation to the task. If the working height is too high, the shoulders or the upper arms have to be lifted to compensate, which may lead to painful symptoms and cramps at the level of the neck and shoulders. If, on the other hand, the working height is too low, the back must be excessively bowed, which may cause backache. Generally, work should be done at about elbow height, whether sitting or standing. Adjustable work stations should be provided so that individuals may change the stations to meet their needs. A VDT workstation without an adjustable keyboard height and without an adjustable height and distance of the screen is not suitable for continuous work.

Work/Rest Schedules

One solution for stress and fatigue is to design the computer operator's work so that tasks requiring concentrated work at the terminal are alternated with non-computer based tasks throughout the workday. Also, a short break (5-10 minutes) should be taken at least once each hour when involved in continuous work at the computer.

Other Solutions

Additional measures that will aid in reducing discomfort while working with VDTs include:

- Change position, stand up or stretch whenever you start to feel tired.
- Use a soft touch on the keyboard and keep your shoulders, hands, and fingers relaxed.
- Use a document holder, positioned at about the same plane and distance as the display screen.
- Rest your eyes by occasionally looking off into the distance.

Office Lighting

Different tasks require different levels of lighting. Areas, in which intricate work is performed, for example, require greater illumination than warehouses. Lighting needs vary from time to time and person to person as well. One approach is to use adjustable task lighting that can provide needed illumination without increasing general lighting.

Task lamps are very effective to supplement the general office light levels for those who require or prefer additional light. Some task lamps permit several light levels. Since task lamps are controlled by the individual, they can accommodate personal preferences.

Indoor Air Quality

Indoor air quality (IAQ) is an increasingly important issue in the work environment. The study of indoor air quality and pollutant levels within office environments is a complex problem. The complexity of studying and measuring the quality of office environments arises from various factors including:

- Office building floor plans are frequently changing to accommodate increasingly more employees and reorganization.
- Office buildings frequently undergo building renovations such as installation of new carpet, modular office partitions and free-standing offices, and painting.
- Many of the health symptoms appearing are vague and common both to the office and home environment.
- In general, very little data on pollutant levels within office environments is available.
- Guidelines or standards for permissible personal exposure limits to pollutants within office buildings are very limited.

Many times odors are associated with chemical contaminants from inside or outside the office space, or from the building fabric. This is particularly noticeable following building renovation or installation of new carpeting. Out gassing from such things as paints, adhesives, sealants, office furniture, carpeting, and vinyl wall coverings is the source of a variety of irritant compounds. In most cases, these chemical contaminants can be measured at levels above ambient (normal background) but far below any existing occupational evaluation criteria.

Waste Disposal

Office personnel should carefully handle and properly dispose of hazardous materials, such as broken glass. A waste receptacle containing broken glass or other hazardous material should be labeled to warn maintenance personnel of the potential hazard.

Safety Management Plan

Office Safety Program

Chemical Safety

Each office employee must be made aware of all hazardous materials they may contact in their work area. The *Hazard Communication Program* includes:

1. Written Program
2. Material Safety Data Sheets for each hazardous substance used
3. Specific safe handling, use and disposal
4. Employee Training

Emergency Action Plans

Emergency Action Plans are designed to control events and minimize the effects. Through careful pre-planning, establishment of Emergency Action Teams, training and drills, employees can be safeguarded and potential for damage to Company assets minimized.

Emergency Action Plans include:

1. Exits routes, meeting areas and employee accounting
2. Emergency evacuation, incident command and notification to emergency services
3. Personal injury and property damage
4. Protection of Company information, both hard copy and electronic media
5. Bomb threats and facility security
6. First Aid Response
7. Use of fire extinguishers

Emergency Action Team Members (for example, Supervisors, Receptionist/Telephone Operators, and key assigned members) should be trained with quarterly reviews and drills. Semiannual drills with all employees should be conducted to assure effectiveness. First Aid Kits or First Aid supplies should be available with trained First Aid Providers available.

Overhead Crane Program

Purpose

Overhead cranes, hoists, and rigging equipment are used by The Workforce Group, LLC employees for lifting and moving materials. In order to maintain a safe workplace for its employees, only qualified individuals shall operate these devices. This program outlines the procedures for safe operations and the training requirements regarding overhead cranes, hoists and rigging equipment.

Scope

Applies to all The Workforce Group, LLC employees who operate overhead cranes, hoists, and rigging equipment in the scope of their job duties and assignments. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

ANSI - the American National Standards Institute.

Appointed - assigned specific responsibilities by the employer or the employer's representative.

Auxiliary hoist - a supplemental hoisting unit of lighter capacity and usually higher speed than provided for the main hoist.

Brake - a device used for retarding or stopping motion by friction or power means.

Bridge - that part of a crane consisting of girders, trucks, end ties, foot-walks, and drive mechanism that carries the trolley or trolleys.

Bridge travel - the crane movement in a direction parallel to the crane runway.

Bumper [buffer] - an energy absorbing device for reducing impact when a moving crane or trolley reaches the end of its permitted travel; or when two moving cranes or trolleys come in contact.

Crane - a machine for lifting and lowering a load and moving it horizontally, with the hoisting mechanism an integral part of the machine. Cranes, whether fixed or mobile, are driven manually or by power.

Safety Management Plan

Overhead Crane Program

Designated - selected or assigned by the employer or the employer's representative as being qualified to perform specific duties.

Drum - the cylindrical member around which the ropes are wound for raising or lowering the load.

Emergency stop switch - a manually or automatically operated electric switch to cut off electric power independently of the regular operating controls.

Floor-operated crane - a crane which is pendant or nonconductive rope controlled by an operator on the floor or an independent platform.

Hoist - an apparatus that may be a part of a crane, exerting a force for lifting or lowering.

Holding brake - a brake that automatically prevents motion when power is off.

Limit switch - a switch that is operated by some part or motion of a power-driven machine or equipment to alter the electric circuit associated with the machine or equipment.

Load - the total superimposed weight on the load block or hook.

Load block - the assembly of hook or shackle, swivel, bearing, sheaves, pins, and frame suspended by the hoisting rope.

Main hoist - the hoist mechanism provided for lifting the maximum rated load.

Main switch - a switch controlling the entire power supply to the crane.

Overhead crane - a crane with a movable bridge carrying a movable or fixed hoisting mechanism and traveling on an overhead fixed runway structure.

Rated load - the maximum load for which a crane or individual hoist is designed and built by the manufacturer and shown on the equipment nameplate(s).

Rope - refers to wire rope, unless otherwise specified.

Runway - an assembly of rails, beams, girders, brackets, and framework on which the crane or trolley travels.

Side pull - that portion of the hoist pull acting horizontally when the hoist lines are not operated vertically.

Safety Management Plan

Overhead Crane Program

Span - the horizontal distance center to center of runway rails.

Standby crane - a crane which is not in regular service but which is used occasionally or intermittently as required.

Stop - a device to limit travel of a trolley or crane bridge. This device normally is attached to a fixed structure and normally does not have energy absorbing ability.

Trolley - the unit that travels on the bridge rails and carries the hoisting mechanism.

Trolley travel - the trolley movement at right angles to the crane runway.

Wall crane - a crane having a jib with or without trolley and supported from a sidewall or line of columns of a building. It is a traveling type and operates on a runway attached to the sidewall or columns.

Key Responsibilities

Managers and Supervisors

- Are responsible to ensure that employees and contractors are trained and qualified on the proper operations and have been trained in safe work standards. Modifications or additions which affect the safe operation of the equipment may only be made with the manufacturer's written approval.
- Are responsible to see that all provisions of this program are followed and that crane inspections are performed and the equipment is in safe operating condition.
- Are responsible for establishing a preventive maintenance program based upon the crane manufacturer's recommendations at each site.

Employees

- Employee operators are responsible to follow the requirements of this program and report any damage or needed repairs immediately to their supervisor.
- Operators must meet the physical qualifications, pass a physical, a written examination, understand and be able to use a load chart as well as calculate loads for the crane type operated.
- Employees designated as crane operators are responsible for the entire lift. In addition, crane operators are responsible to:
 - Make the required inspections,
 - Ensure that the crane is maintained,
 - Ensure that all personnel working in the area around the crane are kept clear of all hazards related to crane operations.

Safety Management Plan

Overhead Crane Program

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- Determine the weights, and correct rigging required for loads to be lifted.

Procedure**General**

The Workforce Group, LLC shall comply with the manufacturer's specifications and limitations applicable to the operation of any and all cranes. Where manufacturer's specifications are not available, the limitations assigned to the equipment shall be based on the determination of a qualified engineer competent in this field and such determinations will be appropriately documented and recorded. Attachments used with cranes shall not exceed the capacity, rating, or scope recommended by the manufacturer.

- This program applies to all cranes including overhead cranes, wall cranes, (jib cranes) and others having the same fundamental characteristics.
- Only designated employees trained in crane and hoist safety shall operate cranes covered by this program. Manufacturer rated load capacities and operating speeds shall be followed.
- All cranes in service and utilized by The Workforce Group, LLC shall meet, as a minimum, the design specifications of the American National Standard Safety Code for Overhead and Gantry Cranes, ANSI B30.2.0-1967.
- Load Rating Chart - A substantial and durable chart with clearly legible letters and figures shall be provided with each crane and securely fixed in and onto the crane cab in a location easily visible to the operator while seated at this control station.
- All cranes shall be locked and tagged out while repairs are in progress to them or any other equipment or building structure that may have personnel or equipment in their path.
- Whenever internal combustion engine powered equipment exhausts in enclosed spaces, test shall be made and recorded to see that employees are not exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres.

Inspections

Cranes and hoists that have been overloaded shall be inspected prior to being returned to service. The inspection and testing requirements are included.

Initial inspection and test shall be performed by a qualified third party.

Prior to initial use all new and altered cranes shall be inspected and tested to ensure compliance with the provisions of 29 CFR1910.179 and ABSI B30.2.

Only after determining, by this inspection, testing and proper documentation, that the crane is in safe operating condition, shall it be put into service.

Safety Management Plan

Overhead Crane Program

Daily pre-use inspections shall be performed by the crane operator (designated as The Workforce Group, LLC's designated competent person) prior to beginning shift and through observation during normal operation. Daily inspections shall include:

- Any deficiencies shall be repaired, or defective parts replaced, before continued use.
- All functional operating mechanisms for maladjustment interfering with proper operation.
- Deterioration or leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems.
- Hooks, if deformations or cracks are found the hook shall be tagged out of service until repaired and tested by qualified personnel.
- Hoist chains, including end connections, for excessive wear, twist, distorted links interfering with proper function, or stretch beyond manufacturer's recommendations.

The Workforce Group, LLC shall make and keep monthly inspection records on critical items in use such as brakes, crane hooks, and ropes.

The Workforce Group, LLC shall once a month perform rope inspection and certify the date and signature of person performing inspection.

All rope which has been idle for a period of month or more due to shut down or storage of a crane on which it is installed shall be given a thorough inspection before it is used. This inspection shall be for all types of deterioration and shall be performed by an appointed or authorized person whose approval shall be required for further use of the rope.

The Workforce Group, LLC must make a monthly inspection and keep a record of hoist chains (including end connections) for excessive wear, twist, distorted links interfering with proper function and stretch beyond manufacturer's recommendation. The certification records must include date of inspection, signature of person performing inspection and identifier of chain inspected.

The Workforce Group, LLC must make monthly inspection and keep a record of all hooks with deformation or cracks. The certification records must include date of inspection, signature of person performing inspection and the serial number of other identifier of hook inspected.

Quarterly and annual inspections shall be documented with a certification record which includes the signature of the qualified third party (person or agency) who performed the inspection, the date, and identifier (serial number, unit number, etc.) for each piece of equipment. If safety hazards are found during inspections, the equipment in question shall be tagged out and not used until repairs are made. Any deficiencies constituting a safety hazard shall cause the equipment to be tagged out of service until repairs are made.

Safety Management Plan

Overhead Crane Program

All crawler, truck, or locomotive cranes in use shall meet the applicable requirements for design, inspection, construction, testing, maintenance and operation as prescribed in the ANSI B30.5-1968, Safety Code for Crawler, Locomotive and Truck Cranes. However, the written, dated, and signed inspection reports and records of the monthly inspection of critical item prescribed in section 5-2.1.5 of the ANSI B30 5-1968 standard are not required. Instead, The Workforce Group, LLC shall prepare a certification record which includes the date the crane items were inspected; the signature of the person who inspected the crane items; and a serial number, or other identifier, for the crane inspected.

Precautions must be taken before repairs are started. If any unsafe condition is found or repairs are necessary, Warning or Out of Order signs shall be placed on any crane or other hoisting equipment. Any key that allow operation of the equipment will be secured to prevent unsafe starting of equipment being serviced.

Operational Procedures

Only qualified personnel shall operate cranes and equipment covered by this program. Operators shall comply with the following safety rules while operating cranes and hoists:

- Employees shall not be exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres when internal combustion engine powered equipment is used. Tests shall be conducted and documented.
- Do not engage in any practice that will divert your attention while operating the crane.
- Respond to signals only from the person who is directing the lift or any appointed signal person.
- Obey a stop signal at all times, no matter who gives it.
- Do not move a load over people.
- People shall not be placed in jeopardy by being under a suspended load.
- Do not work under a suspended load unless the load is supported by blocks, jacks, or a solid footing that will safely support the entire weight.
- Have a crane or hoist operator remain at the controls or lock open and tag the main electrical disconnect switch.
- Ensure that the rated load capacity of a crane's bridge, individual hoist, or any sling or fitting is not exceeded.
- Know the weight of the object being lifted.
- Check that all controls are in the OFF position before closing the main line disconnect switch.
- If spring-loaded reels are provided to lift pendants clear off the work area, ease the pendant up into the stop to prevent damaging the wire.
- Avoid side pulls. These can cause the hoist rope to slip out of the drum groove, damaging the rope or destabilizing the crane or hoist.

Safety Management Plan

Overhead Crane Program

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- To prevent shock loading, avoid sudden stops or starts. Shock loading can occur when a suspended load is accelerated or decelerated, and can overload the crane or hoist. When completing an upward or downward motion, ease the load slowly to a stop.

At the start of each work shift, the designated competent person operator shall do the following steps before making lifts with any crane or hoist:

- For ropes that have not been used during shutdown or storage - all ropes must be thoroughly inspected before crane is used, certified by record of date of inspection, ID of the rope inspected and signature of person performing inspection.
- Using guidelines of 1910.333(c)(3) lines shall be deenergized or grounded or other protective measures shall be provided before work is started.
- Test the upper-limit switch and slowly raise the unloaded hook block until the limit switch trips.
- Visually inspect the hook, load lines, trolley, and bridge as much as possible from the operator's station; in most instances, this will be the floor of the building.
- If provided, test the lower-limit switch.
- Test all direction and speed controls for both bridge and trolley travel.
- Test all bridge and trolley limit switches, where provided, if operation will bring the equipment in close proximity to the limit switches
- Test the pendant emergency stop.
- Test the hoist brake to verify there is no drift without a load.
- If provided, test the bridge movement alarm.
- Lock out and tag for repair any crane or hoist that fails any of the above tests.
- Any deficiencies shall be repaired, or defective parts replaced, before continued use.

Moving a Load

- Center the hook over the load to keep the cables from slipping out of the drum grooves and overlapping, and to prevent the load from swinging when it is lifted.
- Inspect the drum to verify that the cable is in the grooves.
- Use a tag line when loads must traverse long distances or must otherwise be controlled.
- Manila rope may be used for tag lines.
- Plan and check the travel path to avoid personnel and obstructions.
- Lift the load only high enough to clear the tallest obstruction in the travel path.
- Start and stop slowly.
- Land the load when the move is finished.
- Choose a safe landing area.
- Never leave suspended loads unattended
- In an emergency where the crane or hoist has become inoperative, if a load must be left suspended, barricade and post signs in the surrounding area, under the load, and on all four sides.

Safety Management Plan

Overhead Crane Program

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- Lock open and tag the crane or hoist's main electrical disconnect switch.

Parking a Crane or Hoist

- Remove all slings and accessories from the hook.
- Return the rigging device to the designated storage racks.
- Place the emergency stop switch (or push button) in the OFF position.

Rigging and Sling Inspections and Safety Requirements

- Only select rigging equipment that is in good condition.
- Each sling shall be inspected before being used. Each sling, fastenings and all attachments shall be inspected by a designated competent person by The Workforce Group, LLC.
- All rigging equipment shall also be inspected annually.
- Defective equipment is to be removed from service and destroyed to prevent inadvertent reuse.
- The load capacity limits shall be stamped or affixed to all rigging components.
- All devices shall be visually inspected prior to use and removed from service for any of the following conditions and to ensure the proper use and care:
 - Synthetic slings with:
 - Abnormal wear.
 - Torn stitching.
 - Broken or cut fibers.
 - Discoloration or deterioration.
 - Wire rope slings with:
 - Kinking, crushing, bird caging, or other distortions.
 - Evidence of heat damage.
 - Cracks, deformation, or worn end attachments.
 - Six randomly broken wires in a single rope lay.
 - Three broken wires in one strand of rope.
 - Hooks opened more than 15% at the throat.
 - Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.
 - Alloy steel chain slings with:
 - Cracked, bent, or elongated links or components.
 - Cracked hooks.
 - Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

Rigging a Load

- Whenever any sling is used specific safety practices shall be observed.

Safety Management Plan

Overhead Crane Program

-
- Determine the weight of the load - do not guess.
 - Determine the proper size for slings and components.
 - Do not use manila rope for rigging.
 - Ensure that shackle pins and shouldered eyebolts are installed in accordance with the manufacturer's recommendations.
 - Ensure that ordinary (shoulderless) eyebolts are threaded in at least 1.5 times the bolt diameter.
 - Use safety hoist rings (swivel eyes) as a preferred substitute for eye bolts wherever possible.
 - Pad sharp edges to protect slings.
 - Remember that machinery foundations or angle-iron edges may not feel sharp to the touch but could cut into rigging when under several tons of load.
 - Wood, tire rubber, or other pliable materials may be suitable for padding.
 - Do not use slings, eyebolts, shackles, or hooks that have been cut, welded, or brazed.
 - Install wire-rope clips with the base only on the live end and the U-bolt only on the dead end.
 - Follow the manufacturer's recommendations for the spacing for each specific wire size.
 - Determine the center of gravity and balance the load before moving it.
 - Initially lift the load only a few inches to test the rigging and balance.

Cranes or hoists shall not be loaded beyond their rated capacity for normal operations.

Any crane or hoist suspected of having been overloaded shall be removed from service by locking open and tagging the main disconnect switch.

Overloaded cranes shall be inspected, repaired, load tested, and approved for use before being returned to service.

Working at heights on cranes or hoists:

- Anyone conducting maintenance or repair on cranes or hoists at heights greater than 6 ft (1.8 m) shall use fall protection.
- Fall protection includes safety harnesses that are fitted with a lifeline and securely attached to a structural member of the crane or building.
- Properly secured safety nets are another option for fall protection.
- Use, of a crane, as a work platform should only be considered when conventional means of reaching an elevated worksite are hazardous or not possible.
- Workers shall not ride a moving bridge crane.
- Personnel shall not board any bridge crane unless the main disconnect switch is locked and tagged out of service.

Safety Management Plan

Overhead Crane Program

Signals to the operator shall be in accordance with the standard hand signals prescribed by the applicable ANSI standard for the type of crane in use unless voice communications equipment (telephone, radio, or equivalent) is used.

- Signals shall be discernible or audible at all times.
- Some special operations may require addition to or modification of the basic signals.
- For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator, and shall not be in conflict with the standard signals.

All maintenance, tests and inspections shall be conducted in accordance with the manufacturer's recommendations.

The Workforce Group, LLC shall keep and maintain written reports on rated load tests showing the test procedures and confirming the adequacy of any repairs or alterations. All maintenance and repair records shall be retained for the life of the equipment.

The Workforce Group, LLC shall keep and maintain certification record(s) on running ropes which will include the date(s) of inspection and the signature of person(s) who performed inspection. The same records must be kept on inspections of all other ropes.

The use and operation of client owned cranes, hoists and rigging equipment by qualified The Workforce Group, LLC personnel will occur only at the express permission of the designated client representative.

A CO2 or dry chemical fire extinguisher shall be kept in the crane cab or vicinity of the crane.

When operating cranes near power lines rated 50 KV or below, minimum clearance between the power line and any part of the crane or load shall be 10 feet.

Training

Training shall include:

- Operators will be trained in safe work standards including use of fire extinguishers.
- Documentation of employee, date of training and subject matter, including method used to test knowledge of material.
- No employee shall operate cranes or equipment covered by this program until training has been complete and management has approved and designated him or her as a qualified operator.

Safety Management Plan

Overhead Crane Program

DAILY GUIDE FOR OVERHEAD CRANE INSPECTIONS

Yes	No	All functional operating mechanisms for maladjustment interfering with proper operation
Yes	No	Leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems
Yes	No	Hooks for deformation, chemical damage, or cracks. Hooks having more than 15% in excess of normal throat opening or more than 10 degrees twist from the plane of the unbent hook.
Yes	No	Hooks. Dye penetrant, magnetic particle, or other suitable crack-detecting inspection performed at least once a year.
Yes	No	All functional operating mechanisms for excessive wear of components
Yes	No	Rope reeving for noncompliance with manufacturer's recommendations
Yes	No	Condition of wire rope.
Yes	No	Deformed, cracked, or corroded members
Yes	No	Cracked or worn sheaves or drums.
Yes	No	Loose bolts, nuts, or rivets
Yes	No	Worn, cracked, or distorted parts such as pins, bearings, shafts, gears, rollers, locking and clamping devices
Yes	No	Excessive wear in brake system parts, linings, pawls, and ratchets
Yes	No	Load, wind and other indicators over their full range, for any significant inaccuracies
Yes	No	Gasoline, diesel, electric, or other power plants for improper performance or noncompliance with applicable safety requirements.
Yes	No	Electrical apparatus, for signs of pitting or any deterioration of controller, master-switches, and push button stations.
Yes	No	Required warning labels absent or illegible.
Yes	No	Supporting structure, trolley and bridge for alignment and continued ability to support the imposed loads.

Personal Protective Equipment Program

Purpose

The purpose of the Personal Protective Equipment section is to set forth the procedures for the use, care, and maintenance of personal protective equipment required to be used by employees for the prevention of injuries.

Scope

Applies to all The Workforce Group, LLC employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

HSE Manager

- Assists in the selection of appropriate PPE. If a task exposes an employee to hazards which cannot be eliminated through engineering or administrative controls, the HSE Manager assists the supervisor and project manager to identify and select PPE suitable for the specific task performed, conditions present, and frequency and duration of exposure. Employees need to give feedback to the supervisor about the fit, comfort, and suitability of the PPE being selected. Employees are provided reasons for selection of PPE.
- Assists supervisor and site managers in assuring all PPE obtained meets regulatory and this procedure's requirements.
- Performs Worksite Hazard Assessments - The hazard assessment must indicate a determination if hazards are present or are likely to be present, which necessitate the use of PPE. Sources of hazards include, but are not limited to: hazards from impact/motion, high/low temperatures, chemicals, materials, radiation, falling objects, sharp objects, rolling or pinching objects, electrical hazards, and workplace layout. Certifies in writing the tasks evaluated, hazards found and PPE required to protect employees against hazards and ensures exposed employees are made aware of hazards and required PPE before they are assigned to the hazardous task. Certificate shall include certifier's name, signature, dates and identification of assessment documents.

Managers and Supervisors

- Supervisors and managers shall regularly monitor employees for correct use and care of PPE, and obtain follow-up training if required to ensure each employee has adequate skill, knowledge, and ability to use PPE.

Safety Management Plan

Personal Protective
Equipment Program

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- Supervisors and managers shall enforce PPE safety rules following the guidance of the The Workforce Group, LLC progressive disciplinary procedures and ensure Required PPE Poster is posted properly.

Employees

- Complying with the correct use and care of PPE.
- Reporting changes in exposure to hazardous conditions that might require a follow-up assessment of the task for PPE.
- Reporting and replacing defective or damaged PPE, which shall not be used.
- Wearing of required PPE is a condition of employment.

Procedure**General**

Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

Employee owned equipment is NOT permitted, except for safety toe footwear and prescription safety glasses. The Workforce Group, LLC is still responsible for the assurance of its adequacy, maintenance and sanitation of those two items.

All PPE issued shall be at no cost to the employee. All employees will know and follow the procedures outlined in this Program.

Eye Protection

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids or chemical gases or vapours. Eye and Face PPE must comply with ANSI Standard Z87.1-2003 (Z87+), *Occupational and Educational Personal Eye and Face Protective Devices*.

Safety Glasses

Safety glasses, with side shields, that meet ANSI Z-87.1-2003 standards with “high Impact lenses” are required to be worn by all employees, subcontractors, and visitors while on The Workforce Group, LLC property, at all times, as described below:

- At field locations, in shops and warehouses, except in approved, designated, striped safety zones.

Safety Management Plan

Personal Protective
Equipment Program

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- In all yard work zones or by everyone when in the vicinity of loading or unloading equipment, performing mechanic or maintenance work, test stand operations, operating equipment such as forklifts, welding, or any type of work which has the potential to inflict an eye injury.
 - In any office, restroom, or any other building while performing any type of work where a potential eye injury may be present.
 - Visitors will be provided with visitor glasses. In the absence of approved prescription safety glasses, “Over the glass” type safety glasses or goggles, must be worn over the nonsafety glasses until approved prescription safety glasses are obtained.
 - Workers assisting welders must wear absorbent safety glasses that protect the wearer from ultra-violet (UV) and/or infrared rays (IR).
 - Dark shaded lens (sunglasses) darker than a # 1 shade is prohibited to be worn indoors unless welding or assisting a welder.
 - A doctor must support “exceptions for medical reasons” in writing to exempt safety eyewear requirements.
 - Safety glasses are not required:
 - Inside offices.
 - Parking lots when traveling from vehicles to and from office buildings by way of main doors that do not pass through shops.

Goggles

- Chemical splash proof goggles shall be worn when handling or mixing liquid chemicals, solvents, paints, etc., and/or as recommended on the Material Safety Data Sheet of the material being handled.
- Dust proof goggles shall be worn when blowing equipment down with air or while performing other jobs where safety glasses are not adequate to prevent airborne particles from entering the openings around the lenses and side shields.

Face Shields

- Full face shields shall be worn over safety glasses when operating hand held or stationery grinders with abrasive or wire wheels, while chipping paint or concrete or, performing jobs where there is the potential for flying objects striking the face and safety glasses or goggles would not provide adequate protection.

Head Protection

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from employee initiated impact or impact from falling or other moving objects. Helmets must comply with ANSI Standard Z89.1-1997 Class E, *American National Standard for Industrial Head Protection* for Type II head protection or be equally effective.

Safety Management Plan

Personal Protective
Equipment Program

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- Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects.
 - Hardhats are to be worn at all field, shop and warehouse locations, or where deemed necessary as per each location's PPE Hazard Assessment.
 - Hardhats will not be altered in any way.
 - Do not paint or apply unauthorized stickers, name plates, etc.
 - Do not drill, cut, bend, or apply heat.
 - Do not alter the suspension system. H
 - Hardhats will be inspected by the employee regularly for cracks, chips, scratches, signs of heat exposure (sun cracks), etc.
 - Defective hardhats will be replaced immediately.
 - Hardhats shall not be placed in rear windows of vehicles where they will be exposed to the sun or become projectiles during an accident.
 - A supply of hardhats must be made available to visitors.
 - The Workforce Group, LLC shall provide hardhats.
 - Employees will be trained in the use, care and maintenance of head protection equipment.

Hearing Protection

Hearing protection is required to be worn by all employees, subcontractors, and visitors while in posted "High Noise" areas. Refer to the The Workforce Group, LLC Hearing Conservation Program for more information.

Warning signs will be posted in areas known or suspected to have noise levels exceeding 85 dBA either constantly or intermittently.

When signs are not posted, employees shall wear hearing protection when noise caused by machinery, tools, etc., prevents normal conversations to be heard clearly.

Rule of thumb: If you have to yell to be heard, hearing protection is required

Types

- Molded Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hard hat mounted Earmuffs and earplugs shall be provided to the employee in sizes and configurations that will be comfortable to the employee.

Care and Maintenance

- Inspect hearing protection prior to each use.
- Hearing protection must be kept clean to prevent ear infections.

Safety Management Plan

Personal Protective
Equipment Program

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- Most earplugs used today are disposable and must be discarded when they become dirty, greasy, or cracked.
 - Earmuffs that have deteriorated foam inserts, cracked seals or are defective must be replaced.

Fit

- Due to individual differences, not everyone can wear the same type of hearing protection. A variety of styles may have to be tried before one is found to be comfortable and provide adequate protection.
- Employees shall be instructed how to obtain the proper fit.

Hand ProtectionGloves

- Gloves are required to be worn when performing work, which may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals.
- Welding: Welding gloves made of leather or other heat resistant materials shall be worn when performing arc welding or oxy/gas cutting.
- Chemical: Impervious (chemical resistant) gloves shall be worn when handling chemicals that specify gloves as personal protection equipment when handling.
- Refer to the specific chemical's Material Safety Data Sheet for the correct glove type.
- Persons assigned to working with chemicals, i.e., solvent vats, shall be issued their own individual gloves for hygiene purposes.
- Leather: Leather gloves should be worn when working with sharp materials or when handling rigging equipment.
- Cloth: Cloth gloves should be worn when handling objects or materials, which could cause blisters, splinters, cuts, etc.
- Heat Resistant: Heat resistant gloves shall be worn when handling hot bearings, races, or other materials or objects that have been heated beyond ambient temperatures.
- Insulated: Insulated gloves shall be worn to prevent frostbite in extreme cold climates.
- Glove Inspections
 - Gloves shall be inspected before each use for holes, tears, and worn areas.
 - Chemical gloves shall be periodically air tested for pinholes by twisting the cuff tightly, apply low air pressure to expand the glove, and then submersing in water to check for bubbles.
 - Defective gloves shall be discarded immediately. Exception: machinists are exempted from wearing gloves while working with rotating machinery.

Foot Protection

Safety footwear shall be worn by all employees with regularly assigned duties at field locations, in shops and warehouses.

Safety Management Plan

Personal Protective
Equipment Program

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- Office workers and visitors who enter these areas on an infrequent basis will not be required to wear foot protection provided they stay clear of the work being performed.
 - If required to be in the close proximity of the work, the work will be stopped while visiting the area or safety footwear will be worn.
 - Shops, Field Locations, Warehouses and Parts Departments: Leather or equivalent boots, either lace up or pull up, shall be worn.
 - The boot must provide ankle protection and have soles designed to protect from punctures with defined heels for climbing ladders.
 - Metatarsal guards will be worn when duties present a hazard of equipment or material crushing the foot.
 - All safety footwear must meet ANSI Z41-1999 standards.
 - Client locations may require safety footwear to be worn by everyone; check with the local supervisor for client requirements before visiting field locations.

Fall Protection

Personal fall protection is required when performing certain elevated jobs in excess of six feet. Consult the The Workforce Group, LLC Fall Protection Program.

Electrical Protection

Consult the The Workforce Group, LLC Electrical Safety Program.

Worksite Hazard Assessment

A written hazard assessment shall be performed. During the hazard assessment a determination if hazards are present or are likely to be present, this necessitates the use of PPE. The following sample hazard sources will be identified:

- High or low temperatures; Chemical exposures (use MSDS for guidance)
- Flying particles, molten metal or other eye, face, or skin hazards
- Falling objects or potential for dropping objects; employee falling from a height of 6' or more
- Sharp objects; Rolling or pinching that could crush the hands or feet;
- Electrical hazards

Where these hazards could cause injury to employees, personal protective equipment must be selected to substantially eliminate the injury potential. Employees will be notified for the selection and reason.

The results of this assessment shall be communicated to each affected employee and kept at the local office.

Safety Management Plan

Personal Protective
Equipment Program

Selected/identified PPE shall be fitted to each affected employee. Fitting, including proper donning, doffing, clean and maintenance of PPE is addressed in the Training section. Exemptions for use of PPE must be supported by the PPE hazard assessment.

Monitoring

Supervisors and site managers monitor worksite tasks for changes in, or the introduction of new hazards. If new hazards are discovered, they advise the HSE Manager who then conducts a hazard assessment for appropriate PPE. The HSE Manager monitors the effectiveness of the PPE Procedure and makes recommendations to management to improve the procedure and will include the Certifier's name, signature, date(s) and identification of assessment documents.

Training

Employees who require or may need to wear PPE shall be properly trained and PPE must be fitted to each affected employee. Training shall include:

- When PPE is necessary.
- What PPE is necessary.
- How to properly don, doff, adjust and wear PPE.
- The limitations of PPE.
- Useful life and disposal of PPE.
- How to clean and maintain PPE in a sanitary and reliable condition.
- Reporting and replacing defective or damaged PPE, which shall NOT be used.

Retraining

Retraining is required when:

- The workplace changes, making the previous training obsolete.
- The type of PPE changes.
- When the employee demonstrates lack of use, improper use, or insufficient skill or understanding in PPE selection, necessity, use and limitations.

Documentation

Training shall be documented and records kept at the local office. The training certification shall include:

- Name of employee(s) trained;
- The dates of training; and
- The certification subject.

Safety Management Plan

Personal Protective Equipment Program

PPE Matrix For The Workforce Group, LLC**Location/Work Site:**

D = Depends on situation M = Mandatory - = Not Mandatory unless hazards become present
 SUBJECT TO CHANGE BASED ON INDIVIDUAL WORKSITE HAZARD ASSESSMENT

CHANGE ALL AS NEEDED

PPE Matrix For The Workforce Group, LLC				Location/Work Site:		Job/Task	Field Tech	Housekeeping	Shop Work	Driving	Office	Winter Conditions
D = Depends on situation M = Mandatory - = Not Mandatory unless hazards become present												
SUBJECT TO CHANGE BASED ON INDIVIDUAL WORKSITE HAZARD ASSESSMENT												
CHANGE ALL AS NEEDED												
CATEGORY	EQUIPMENT	HAZARD	INSPECTION	MAINTENANCE								
Head Protection:												
	Hard Hat (Class G or E Only)	Striking Head or Falling Objects	Each use	Dispose	-	-	D	-	-	-		
Eye and Face Protection:												
	Safety Glasses w/shields	Objects Striking Eyes	Each use	Dispose	D	D	M	*	-	M		
	Impact Vented Goggles	Small Particles in Eyes	Each use	Dispose	-	-	D	-	-	D		
	Chemical Splash Goggles	Chemicals or Oil in Eyes	Each use	Dispose	D	D	D	-	-	-		
Hearing Protection:												
	Disposable Earplugs	Damage to Hearing (85 db)	Each use	Dispose	D	D	D	-	-	-		
	Ear Muffs (w/Disposables)	Damage to Hearing (105 db)	Each use	Dispose	D	D	D	-	-	-		
Personal Protective Clothing:												
	Cold Weather Clothing	Cold Temperature	Each use	Clean & Repair	D	D	D	D	-	D		
	Rainwear	Wet body	Each use	Dispose	-	-	D	-	-	-		
	Protective Sleeves	Biohazardous materials	Each use	Dispose	-	M	-	-	-	-		
Foot Protection:												

Safety Management Plan

Personal Protective Equipment Program

	Slip Resistant Footwear	Injury to Body	Each use	Replace	M	M	M	-	-	-
	Anti-Slip Cleats during Winter	Injury to Body	Each use	Dispose	M	M	M	-	-	M
Hand Protection:										
	Anti-cut Gloves	Cuts	Each use	Dispose	M	D	M	-	-	-
	Vinyl Disposable Gloves	Biohazardous materials	Each use	Dispose	-	M	-	-	-	-
	Heavy Duty Gloves	Injuries to Hands	Each use	Dispose	-	-	M	-	-	-
	Cold weather Gloves	Environmental Exposure	Each use	Dispose	-	-	-	-	-	M
	Rubber Gloves	Hot Water Burns	Each use	Dispose	M	-	-	-	-	-
Other: _____										

Safety Management Plan

Personal Protective Equipment Program

PPE Hazard Assessment Certification Form

Name of work place: _____ Conducted by Name/Signature: _____

Work place address: _____ Date of assessment: _____

Work area(s): _____ Job/Task(s): _____

(Use a separate sheet for each job/task or work area)

EYES		
<u>Work activities, such as:</u> <input type="checkbox"/> abrasive blasting <input type="checkbox"/> chopping <input type="checkbox"/> cutting <input type="checkbox"/> drilling <input type="checkbox"/> welding <input type="checkbox"/> soldering <input type="checkbox"/> torch brazing <input type="checkbox"/> working outdoors <input type="checkbox"/> computer work <input type="checkbox"/> punch press operations <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> airborne dust <input type="checkbox"/> dirt <input type="checkbox"/> UV <input type="checkbox"/> flying particles/objects <input type="checkbox"/> blood splashes <input type="checkbox"/> hazardous liquid chemicals mists <input type="checkbox"/> chemical splashes <input type="checkbox"/> molten metal splashes <input type="checkbox"/> glare/high intensity lights <input type="checkbox"/> laser operations <input type="checkbox"/> intense light <input type="checkbox"/> hot sparks <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Safety glasses <input type="checkbox"/> Safety goggles <input type="checkbox"/> Dust-tight goggles <input type="checkbox"/> Impact goggles <input type="checkbox"/> Welding helmet/shield <input type="checkbox"/> Chemical goggles <input type="checkbox"/> Chemical splash goggles <input type="checkbox"/> Laser goggles <input type="checkbox"/> Shading/Filter (# _____) <input type="checkbox"/> Welding shield <input type="checkbox"/> Other:
<u>With:</u> <input type="checkbox"/> Face shield		
Notes:		

Safety Management Plan

Personal Protective Equipment Program

FACE		
<u>Work activities, such as:</u> <input type="checkbox"/> cleaning <input type="checkbox"/> cooking <input type="checkbox"/> siphoning <input type="checkbox"/> painting <input type="checkbox"/> dip tank operations <input type="checkbox"/> metal pouring <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> hazardous liquid chemicals <input type="checkbox"/> extreme heat <input type="checkbox"/> extreme cold <input type="checkbox"/> potential irritants: <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Face shield <input type="checkbox"/> Shading/Filter (#_____) <input type="checkbox"/> Welding shield <input type="checkbox"/> Other:
<u>Notes:</u>		

Safety Management Plan

Personal Protective Equipment Program

HEAD		
<u>Work activities, such as:</u> <input type="checkbox"/> building maintenance <input type="checkbox"/> confined space operations <input type="checkbox"/> construction <input type="checkbox"/> electrical wiring <input type="checkbox"/> walking/working under catwalks <input type="checkbox"/> walking/working on catwalks <input type="checkbox"/> walking/working under conveyor belts <input type="checkbox"/> working with/around conveyor belts <input type="checkbox"/> walking/working under crane loads <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> beams <input type="checkbox"/> pipes <input type="checkbox"/> exposed electrical wiring or components <input type="checkbox"/> falling objects <input type="checkbox"/> fixed object <input type="checkbox"/> machine parts <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Protective Helmet <input type="checkbox"/> Type A (low voltage) <input type="checkbox"/> Type B (high voltage) <input type="checkbox"/> Type C <input type="checkbox"/> Bump cap (not ANSI-approved) <input type="checkbox"/> Hair net or soft cap <input type="checkbox"/> Other:
<u>Notes:</u>		

Safety Management Plan

Personal Protective Equipment Program

HANDS/ARMS		
<u>Work activities, such as:</u> <input type="checkbox"/> baking <input type="checkbox"/> cooking <input type="checkbox"/> grinding <input type="checkbox"/> welding <input type="checkbox"/> working with glass <input type="checkbox"/> using power tools <input type="checkbox"/> using computers <input type="checkbox"/> working outdoors <input type="checkbox"/> using knives <input type="checkbox"/> dental and health care services <input type="checkbox"/> garbage disposal <input type="checkbox"/> computer work <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> blood <input type="checkbox"/> irritating chemicals <input type="checkbox"/> tools or materials that could scrape or cut <input type="checkbox"/> extreme heat <input type="checkbox"/> extreme cold <input type="checkbox"/> animal bites <input type="checkbox"/> electric shock <input type="checkbox"/> vibration <input type="checkbox"/> musculoskeletal disorders <input type="checkbox"/> sharps injury <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Gloves <input type="checkbox"/> Chemical resistance <input type="checkbox"/> Liquid/leak resistance <input type="checkbox"/> Temperature resistance <input type="checkbox"/> Abrasion/cut resistance <input type="checkbox"/> Slip resistance <input type="checkbox"/> Latex or nitrile <input type="checkbox"/> Anti-vibration <input type="checkbox"/> Protective sleeves <input type="checkbox"/> Ergonomic equipment _____ <input type="checkbox"/> Other:
<u>Notes:</u>		

Safety Management Plan

Personal Protective Equipment Program

FEET/LEGS		
Work activities, such as: <input type="checkbox"/> building maintenance <input type="checkbox"/> construction <input type="checkbox"/> demolition <input type="checkbox"/> food processing <input type="checkbox"/> foundry work <input type="checkbox"/> working outdoors <input type="checkbox"/> logging <input type="checkbox"/> plumbing <input type="checkbox"/> trenching <input type="checkbox"/> use of highly flammable materials <input type="checkbox"/> welding <input type="checkbox"/> other:	Work-related exposure to: <input type="checkbox"/> explosive atmospheres <input type="checkbox"/> explosives <input type="checkbox"/> exposed electrical wiring or components <input type="checkbox"/> heavy equipment <input type="checkbox"/> slippery surfaces <input type="checkbox"/> impact from objects <input type="checkbox"/> pinch points <input type="checkbox"/> crushing <input type="checkbox"/> slippery/wet surface <input type="checkbox"/> sharps injury <input type="checkbox"/> blood <input type="checkbox"/> chemical splash <input type="checkbox"/> chemical penetration <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> fall <input type="checkbox"/> other:	Can hazard be eliminated without the use of PPE? Yes <input type="checkbox"/> No <input type="checkbox"/> If no, use: <input type="checkbox"/> Safety shoes or boots <input type="checkbox"/> Toe protection <input type="checkbox"/> Electrical protection <input type="checkbox"/> Heat/cold protection <input type="checkbox"/> Puncture resistance <input type="checkbox"/> Chemical resistance <input type="checkbox"/> Anti-slip soles <input type="checkbox"/> Leggings or chaps <input type="checkbox"/> Foot-Leg guards <input type="checkbox"/> Other:
Notes:		

Safety Management Plan

Personal Protective Equipment Program

BODY/SKIN		
<u>Work activities such as:</u> <input type="checkbox"/> baking or frying <input type="checkbox"/> battery charging <input type="checkbox"/> dip tank operations <input type="checkbox"/> fiberglass installation <input type="checkbox"/> sawing <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> chemical splashes <input type="checkbox"/> extreme heat <input type="checkbox"/> extreme cold <input type="checkbox"/> sharp or rough edges <input type="checkbox"/> irritating chemicals <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Vest, Jacket <input type="checkbox"/> Coveralls, Body suit <input type="checkbox"/> Raingear <input type="checkbox"/> Apron <input type="checkbox"/> Welding leathers <input type="checkbox"/> Abrasion/cut resistance <input type="checkbox"/> Other: <u>With:</u> <input type="checkbox"/> Long sleeves
<u>Notes:</u>		

Safety Management Plan

Personal Protective Equipment Program

BODY/WHOLE		
<u>Work activities such as:</u> <input type="checkbox"/> building maintenance <input type="checkbox"/> construction <input type="checkbox"/> logging <input type="checkbox"/> computer work <input type="checkbox"/> working outdoors <input type="checkbox"/> utility work <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> working from heights of 10 feet or more <input type="checkbox"/> impact from flying objects <input type="checkbox"/> impact from moving vehicles <input type="checkbox"/> sharps injury <input type="checkbox"/> blood <input type="checkbox"/> electrical/static discharge <input type="checkbox"/> hot metal <input type="checkbox"/> musculoskeletal disorders <input type="checkbox"/> sparks <input type="checkbox"/> chemicals <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> elevated walking/working surface <input type="checkbox"/> working near water <input type="checkbox"/> injury from slip/trip/fall <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <input type="checkbox"/> Fall Arrest/Restraint <input type="checkbox"/> Traffic vest <input type="checkbox"/> Static coats/overalls <input type="checkbox"/> Flame resistant jacket/pants <input type="checkbox"/> Insulated jacket <input type="checkbox"/> Cut resistant sleeves/wristlets <input type="checkbox"/> Hoists/lifts <input type="checkbox"/> Ergonomic equipment: _____ <input type="checkbox"/> Other:
<u>Notes:</u> 		

Safety Management Plan

Personal Protective Equipment Program

LUNGS/RESPIRATORY

<u>Work activities such as:</u> <input type="checkbox"/> cleaning <input type="checkbox"/> mixing <input type="checkbox"/> painting <input type="checkbox"/> fiberglass installation <input type="checkbox"/> compressed air or gas operations <input type="checkbox"/> confined space work <input type="checkbox"/> floor installation <input type="checkbox"/> ceiling repair <input type="checkbox"/> working outdoors <input type="checkbox"/> other:	<u>Work-related exposure to:</u> <input type="checkbox"/> dust or particulate <input type="checkbox"/> toxic gas/vapor <input type="checkbox"/> chemical irritants (acids) <input type="checkbox"/> welding fume <input type="checkbox"/> asbestos <input type="checkbox"/> pesticides <input type="checkbox"/> organic vapors <input type="checkbox"/> oxygen deficient environment <input type="checkbox"/> paint spray <input type="checkbox"/> extreme heat/cold <input type="checkbox"/> other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes <input type="checkbox"/> No <input type="checkbox"/> <u>If no, use:</u> <u>With/Type:</u> <input type="checkbox"/> Dust mask <input type="checkbox"/> Disposable particulate respirator <input type="checkbox"/> Replaceable filter particulate with cartridge _____ <input type="checkbox"/> half faced <input type="checkbox"/> full face <input type="checkbox"/> PAPR (Air recycle) <input type="checkbox"/> PPSA (Air supply)
<u>Notes:</u>		

Safety Management Plan

Personal Protective Equipment Program

EARS/HEARINGWork activities such as:

- | | |
|---|------------------------------------|
| <input type="checkbox"/> generator | <input type="checkbox"/> grinding |
| <input type="checkbox"/> ventilation fans | <input type="checkbox"/> machining |
| <input type="checkbox"/> motors | <input type="checkbox"/> routers |
| <input type="checkbox"/> sanding | <input type="checkbox"/> sawing |
| <input type="checkbox"/> pneumatic equipment | <input type="checkbox"/> sparks |
| <input type="checkbox"/> punch or brake presses | |
| <input type="checkbox"/> use of conveyors | |
| <input type="checkbox"/> other: | |

Work-related exposure to:

- | |
|---|
| <input type="checkbox"/> loud noises |
| <input type="checkbox"/> loud work environment |
| <input type="checkbox"/> noisy machines/tools |
| <input type="checkbox"/> punch or brake presses |
| <input type="checkbox"/> other: |

Can hazard be eliminated without the use of PPE?Yes ☐ No ☐If no, use:

- | |
|---|
| <input type="checkbox"/> ear muffs |
| <input type="checkbox"/> ear plugs |
| <input type="checkbox"/> leather welding hood |

Notes:

Preventative Maintenance Program

Purpose

The purpose of the Preventative Maintenance program is to set forth the procedures for the tracking, care, and maintenance of equipment.

Scope

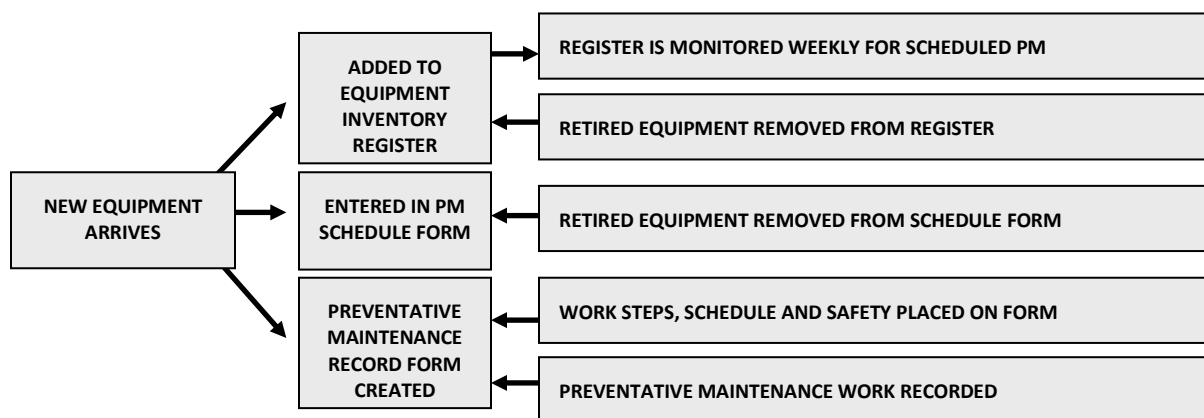
This program applies to all The Workforce Group, LLC employees and locations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Procedure

Process

As equipment arrives at the site a determination is made if the equipment should be placed on a preventative maintenance schedule based on the type of equipment, calibration requirements, etc.

To ensure equipment is tracked and preventative maintenance work is performed on a timely basis the following process is used. The site management representative is responsible for ensuring the process is followed.



All records must be legible, readily retrievable, protected and stored to prevent damage, deterioration or loss.

Safety Management Plan

Preventative Maintenance
Program

Equipment Inventory and Register

An equipment inventory is established and maintained. An inventory of The Workforce Group, LLC machinery/ equipment has been established and must be kept current. When new machinery or equipment is acquired, it must be added to the inventory via the Equipment Inventory Register. The Equipment Inventory Register includes all equipment at a site that requires calibration or routine preventative maintenance and is updated by the designated maintenance representative for the site.

The register contains information on equipment's:

- Description
- Make
- Model
- Serial Number
- Location
- Next Scheduled PM Date

As appropriate equipment is added to a site's inventory it is added to the register as well as equipment that is removed permanently from the site is removed from the register.

Each week the Equipment Register is reviewed for scheduled preventative maintenance for equipment at the site.

Each quarter a copy of the Equipment Register is sent to the appropriate management representative for the site.

Preventive Maintenance Inspection Schedule and Maintenance Record

A preventive maintenance and inspection schedule has been established to meet manufacturer and legislated requirements. A preventative maintenance schedule has been established based on manufacturer requirements and industry standards.

Each piece of relevant equipment on the Equipment Register is entered onto the Preventative Maintenance Schedule Form and assigned a Preventative Maintenance Record form. The maintenance schedule form contains the item name, required frequency of inspection and tracks the inspection dates and completion. The maintenance record form contains information on the equipment including:

- Equipment data
- Safety instructions for the specific equipment
- Description of preventative maintenance requirements for the specific equipment

Safety Management Plan

Preventative Maintenance
Program

-
- Preventative maintenance frequency and history for the specific equipment

Records of maintenance activities are kept. Preventive maintenance performed on machinery or equipment must be documented and retained for the life of the machinery or equipment. As scheduled preventative maintenance is performed on the equipment the Preventative Maintenance Record Form shall be completed and the Preventative Maintenance Schedule Form Updated. All forms are to be retained locally with a copy sent to the The Workforce Group, LLC main office.

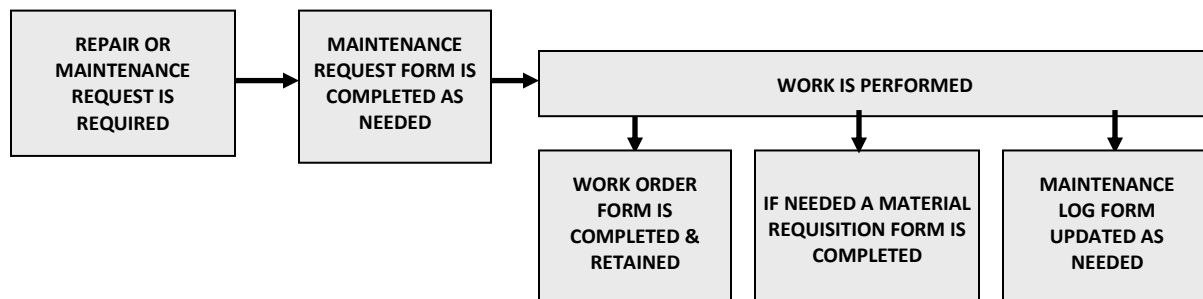
Repair Procedure

Process

Equipment found to be defective is removed from service until it is repaired. Defects observed in machinery or equipment shall be reported to a supervisor and must be repaired or replaced before being used again.

During preventative maintenance work or other requests repairs activity is tracked and documented by use of the following process.

This process ensures documented work performed, costs and management approval for material associated with the project activity.



All records must be legible, readily retrievable, protected and stored to prevent damage, deterioration or loss.

Maintenance Request Form

Maintenance requests are originated by the client or internal requestor completing a Maintenance Request Form and submitting the form to the designated maintenance representative for the site. The form contains information regarding:

- Originators Information
- Location of the problem

Safety Management Plan

Preventative Maintenance
Program

-
- Defective equipment details
 - Description of the problem or corrective action requested

Each Maintenance Request Form is to be retained in a file folder with all appropriate other documents, copies of invoices, etc. and retained locally at the site.

Work Order Form

The designated maintenance representative takes information from the Maintenance Request Form investigates the problem and documents work performed on the Work Order Form. Data contained on the Work Order Form includes:

- Maintenance Request input
- Corrective actions completed
- Manpower details
- Materials used or needed for repairs and cots

Each Work Order Form activity is then entered onto the Maintenance Log form. If equipment, parts, etc. are required the Material Requisition Form shall be completed and approved prior to purchasing.

Maintenance Log Form

The Maintenance Log contains in chronological order all Work Order activity with line item summaries of reported date, maintenance issue, location, costs and completion date.

Each quarter a copy of the Maintenance Log is sent to the appropriate management representative for the site.

Material Requisition Form

Material is requested for and approved via the Material Requisition Form.

A purchase order is assigned by the designated maintenance representative (which must appear on all invoices).

The form is submitted to the Project Manager for review and approval.

Any single Material Requisition Form representing a single value of \$1,000 or more requires approval from senior management prior to placing any orders.

The Material Requisition Form is to be kept with all Work Order Forms.

Safety Management Plan

Preventative Maintenance
Program

Process Safety Management Contractor Responsibilities (PSM)

The purpose of Process Safety Management is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries, etc.

The Workforce Group, LLC is required to recognize and participate as a contract employer at client locations with PSM Programs in place. The Workforce Group, LLC as a contractor has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows:

- The Workforce Group, LLC has a responsibility (as the contractor) to train all employees necessary to perform their job. The Workforce Group, LLC shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.
- The Workforce Group, LLC (the contract employer) shall assure that each contract employee is instructed in the known potential fire, explosion or toxic release hazards related to his/her job and the process and the applicable provisions of the emergency action plan. The Workforce Group, LLC shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.
- Training shall be documented. Records which contain the identity of the contract employee, the date of training and the means used to verify that the employee understood the training must be maintained.
- The Workforce Group, LLC shall assure that each contract employee follows the safety rules of the facility including the safe work practices required with 1910.119(f)(4).
- The Workforce Group, LLC (the contract employer) shall advise the host employer of any hazards found or unique hazards presented by the contract employer's work. The Workforce Group, LLC shall advise the host employer of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.
- Trade secret information and confidentiality of trade secret information - All contract employers must respect the confidentiality of trade secret information when the process safety information is released to them.

Safety Management Plan

Process Safety Management Contractor
Responsibilities (PSM)

Process Safety Information

The Workforce Group, LLC employees shall participate in all as directed client PSM requirements, including:

- | | |
|------------------------------------|----------------------------------|
| • Employee Participation; | Process Safety Information (PSI) |
| • Process Hazards Analysis (PHA) | Operating Procedures |
| • Training | Contractors |
| • Pre-Startup Safety Review (PSSR) | Mechanical Integrity |
| • Hot Work Permits | Management of Change (MOC) |
| • Incident Investigation | Emergency Planning and Response |
| • Compliance Audits | Trade Secrets |

The Workforce Group, LLC Duties

The host employer's safe work practices must be followed during operation such as lockout/tagout, confined space entry, opening process equipment or piping and control over entrance to facility. The Workforce Group, LLC employees shall abide by the host employers safe work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.

To comply with 1910.119(f)(4) The Workforce Group, LLC employees are required to complete all required documentation for any permit-required activities.

Hot work permits and hot work shall not be performed until hot work permit is obtained from the employer. Contract employees shall not perform hot work until a hot work permit is obtained from host employer. The permit shall document that the fire prevention and protection requirements in have been implemented prior to beginning the hot work operations.

In the event The Workforce Group, LLC becomes the sole operator of a facility, the existing PSM Program for that facility may be amended and adopted or, in the absence of a PSM Program, an assessment will be required prior to assuming operating responsibilities.

Reporting Incidents and Near Misses

The Workforce Group, LLC employees must immediately report all accidents, injuries and near misses. An incident investigation shall be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained 5 years.

Respiratory Protection Program

Purpose

It is the intention of The Workforce Group, LLC to provide a respirator protection program that meets or exceeds all federal standards. The Workforce Group, LLC will attempt to engineer potential harmful vapors and oxygen deficient atmosphere exposure hazards out of the work environment. If engineering control measures are not feasible or during emergency situations with high exposure then respirators shall be provided which are applicable and suitable for purpose intended.

Scope

This program applies to all The Workforce Group, LLC projects and operations.

Respiratory Program Administrator

Overall responsibility for the respiratory protection program is assigned to the The Workforce Group, LLC Safety Manager in order to ensure that specific requirements are followed.

The Administrator must be knowledgeable of the complexity of the program, able to conduct evaluations and have the proper training.

This assignment is made, however, with the understanding that individual supervisors will have to implement and enforce major portions of the program. It is understood that the Program Administrator will report performance problems to the appropriate manager for resolution. The person who will have responsibility for administering all the aspects of this program will be the Project Manager or their designee.

The responsibilities of the Program Administrator will include, but are not limited to:

- Conducting an annual written evaluation of the program. The program evaluation should be completed no later than December, 31, of each year.
- Ensuring an adequate supply of respirators, cartridges, and repair/replacement parts. The Program Administrator may delegate this duty but will retain overall responsibility. The person(s) to whom this duty has been delegated is the Project Manager and/or Field Supervisor.
- Identifying hazards and ensuring only NIOSH certified respirators must be selected and provided based on those hazards and factors affecting performance.
- Ensuring that all respirator users have been trained in the use, selection and limitations of the type of respirators they will be using prior to the first time the respirator must be used. While

Safety Management Plan

Respiratory Protection
Program

the duty of conducting the training may be delegated, the Program Administrator retains final responsibility for seeing that all employees are appropriately trained.

- Ensuring that all respirator users have been medically evaluated and found fit to use the type of respirators that will be required in their job. The medical evaluation must be completed prior to assigning any employee to a task that requires use of a respirator.
- Ensuring that all respirator users are fit-tested at least annually and more often if other federal requirements apply.
- Ensuring that respirators are individually issued, are cleaned and sanitized on a regular basis, and respirators are stored in a clean and accessible location. This duty may also be delegated but the Program Administrator retains final responsibility for seeing that it is done.
- Ensuring that respirators are selected based on the hazard that will be encountered. This program describes the basic respirators that will be used at this site and the tasks for which they will be required. In special circumstances, the Program Administrator will contact the corporate health and safety staff for guidance in selecting the correct respirator.
- Ensuring that employee exposure is monitored to assure correct respirator type is used. Exposure monitoring may be delegated to others; however, the Program Administrator has final responsibility of monitoring completion and to request assistance when necessary.
- Ensuring surveillance of employees who wear respirators shall leave the area to wash, change cartridges or if they detect break through or resistance.
- Ensuring that the elements of the Respiratory Protection Program for the selection, use, cleaning/maintenance, storage and fit-testing of respirators are followed.
- Ensuring that respirator parts are not exchanged between brands of respirators.
- Ensuring medical evaluations, respirators and required training are provided at no cost to the employee.

Medical Requirements

General

The Workforce Group, LLC shall provide a medical evaluation to determine the employee's ability to use a respirator, before the employee is fit tested or required to use the respirator in the workplace. The Workforce Group, LLC may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

Medical Evaluation Procedures

The Workforce Group, LLC shall identify a physician or other licensed health care professional (PLHCP) to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire. The medical evaluation shall obtain the information requested by the Medical Questionnaire in Forms section (or equivalent).

Safety Management Plan

Respiratory Protection
Program

The medical evaluation prior to fit-testing will be confidential, conducted during normal working hours, be at a convenient time and location, be understandable and the employee will be given a chance to discuss the results with the PLHCP.

Supplemental Information for the PLHCP

The following information must be provided to the PLHCP before the PLHCP makes a recommendation concerning an employee's ability to use a respirator:

- The type and weight of the respirator to be used by the employee;
- The duration and frequency of respirator use (including use for rescue and escape);
- The expected physical work effort;
- Additional protective clothing and equipment to be worn; and
- Temperature and humidity extremes that may be encountered.

The Workforce Group, LLC shall provide the PLHCP with a copy of the The Workforce Group, LLC Respiratory Protection Program.

Note: When The Workforce Group, LLC replaces a PLHCP, The Workforce Group, LLC must ensure that the new PLHCP obtains this information, either by providing the documents directly to the PLHCP or having the documents transferred from the former PLHCP to the new PLHCP. However, OSHA does not expect employers to have employees medically re-evaluated solely because a new PLHCP has been selected.

Medical Determination

In determining the employee's ability to use a respirator, The Workforce Group, LLC shall obtain a written recommendation regarding the employee's ability to use the respirator from the PLHCP. The recommendation shall provide only the following information:

- Any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

All recommendations are to be sent to The Workforce Group, LLC's Safety Manager.

Additional Medical Evaluations

At a minimum, The Workforce Group, LLC shall provide additional medical evaluations that comply with the requirements of this program if:

Safety Management Plan

Respiratory Protection
Program

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- An employee reports medical signs or symptoms that are related to ability to use a respirator;
 - A PLHCP, supervisor, or the respirator Program Administrator informs The Workforce Group, LLC that an employee needs to be re-evaluated;
 - Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation; or
 - A change occurs in workplace conditions (e.g., physical work effort, protective clothing, and temperature) that may result in a substantial increase in the physiological burden placed on an employee.

Work Site Procedures

Each work site where respirators are required to protect the health of the worker shall have work site procedures that follow the guidelines of this program. Specific procedures may also be required by our client which will be followed. The following areas shall be included:

- Identification of specific hazard requiring respiratory protection
- The selection of the appropriate respiratory protection equipment based on the specific hazard and concentration levels, characteristics, etc. Specific brand and models of respiratory equipment to be used shall be identified in the procedures.
- Verification that each user of respiratory protection is qualified (medical approval, current fit test, annual training and demonstrates competency).

Respirator Selection Criteria

The selection of the respiratory equipment is based on the hazards the employee is exposed to. The Workforce Group, LLC shall:

- Perform hazard identification,
- Select and provide respirators based on those hazards and factors affecting performance,
- Establish brands and models to be used, and
- Estimate exposures and contaminant information.

Hazard Identification

Due to the many varied work locations The Workforce Group, LLC's identification of respiratory hazards will be contained in the various work site specific safety plans. However, common respiratory hazards that will be encountered include:

- Dust
- Fumes
- Gases
- Chemical particles
- Oxygen Deficiency

Safety Management Plan

Respiratory Protection
Program

Characteristics of Hazardous Operation or Process

- Hot operations: welding, chemical reactions, soldering, melting, melding and burning
- Liquid operations: painting, degreasing, dipping, spraying, brushing, coating, etching, cleaning, pickling, plating, mixing, galvanizing and chemical reactions
- Solid operations: pouring, mixing, separations, extraction, crushing, conveying, loading, bagging and demolition.
- Pressurized spraying: cleaning parts, applying pesticides, degreasing, sand blasting and painting
- Shaping operations: cutting, grinding, filing, milling, melding, sawing and drilling

Gaseous Contaminants

- Inert gases (helium, argon, etc.), which do not metabolize in the body but displace air to produce an oxygen deficiency.
- Acid gases (SO₂, H₂S, HCl, etc.) which are acids or produce acids by reaction with water.
- Alkaline gases (NH₃, etc.), which are alkalies or produce alkalies by reaction with water.
- Organic gases (butane, acetone, etc.), which exist as true gases or vapours from organic liquids.
- Organometallic gases (tetraethyl lead, organo-phosphates, etc.), which have metals attached to organic groups.

Particulate contaminants

- Dusts are mechanically generated solid particulates (0.5 to 10µm)
- Fumes are solid condensation particles of small diameter (0.1 to 1.0 µm)
- Mists are liquid particulate matter (5 to 100 µm)
- Smoke is chemically generated particulates (solid and liquid) of organic origins (0.01 to 0.3 µm)

Selection of Respirator

The following factors shall be taken into account when selecting the proper respirator:

Concentration and Type of Contaminant

The concentration and type of contaminant will determine the model and type of respirator and cartridges/filters or filters to be used. The concentration is based on a sampling of the atmosphere.

Location of Hazardous Area

(Confined Space, nearby contaminants, etc)

Worker Activity

(Extreme heat, cold, welding hood requirement, etc.)

Safety Management Plan

Respiratory Protection
Program

Types of Respirators

Air-purifying respirators can be either full-face or half masks with mechanical or chemical cartridges to filter dusts, mists, fumes, vapours or gases.

Powered air-purifying respirators use a blower to pass the contaminated air through a filter. The purified air is then delivered into a mask or hood. They filter dusts, mists, fumes, vapours and gases, just like ordinary air-purifying respirators.

Air-purifying respirators cannot be used in oxygen-deficient atmospheres, which can result when another gas displaces the oxygen or consumption of oxygen by a chemical reaction occurs. Oxygen levels below 19.5% require either a source of supplied air or supplied-air respirator protection. Levels below 16% are considered to be unsafe and could cause death. To determine the proper cartridge for air-purifying respirators contact the The Workforce Group, LLC Safety Manager or a qualified on-site safety representative of the client. You should also consult the Material Safety Data Sheet of the substance that needs to be filtered.

All cartridges are assigned a color designating the type of contaminant they will filter:

White:	Acid gas
Black:	Organic vapours
Green:	Ammonia gas
Yellow:	Acid gas and organic vapours
Purple:	Radioactive materials
Orange:	Dust, fumes and mists
Olive:	Other gases and vapours

Once the wearer of the respirator can detect an odour, irritation, or taste of the contaminant, the cartridge should be replaced. All cartridges and/or filters shall be changed at the beginning of each shift.

Supplied-air respirators provide the highest level of protection against highly toxic and unknown materials. Supplied air refers to self-contained breathing apparatuses (SCBAs) and air-line respirators. SCBAs have a limited air supply that is carried by the user, allowing for good mobility and fewer restrictions than air-line respirators.

Air-line respirators have an air hose that is connected to a fresh air supply from a central source. The source can be from a compressed air cylinder or air compressor that provides at least Grade D breathing air.

Safety Management Plan

Respiratory Protection
Program

Emergency Escape Breathing Apparatuses (EEBAs) provide oxygen for 5, 10 or 15 minutes depending on the unit. These are for emergency situations in which an employee must escape from environments immediately dangerous to life or health (IDLH).

SCBA (Self Contained Breathing Apparatus)

The Workforce Group, LLC does NOT allow employees to work in an Immediately Dangerous to Life and Health (IDLH) environment.

In order to maintain the NIOSH/MSHA approval of any respirator, mixing parts from other respirator manufacturers is prohibited. This includes airline hoses, valves, gaskets, cartridges, etc. For example, do not use North cartridges or valve gaskets with an MSA product.

Brand and Models

The Workforce Group, LLC has selected North Safety as its NIOSH-certified respirator. Only this brand of respirator shall be used in compliance with the conditions of the certification of its Respiratory Protection Program (fit testing model, no mixing of different manufacturer parts, cartridges, filters, etc.).

The specific model will be based on the hazard, concentration of contaminant, oxygen level, work environment and type of work being performed. To aid in the selection process the following will be used to identify the proper North respiratory equipment for the work being performed and hazard that is present.

- NIOSH Pocket Guide to Chemicals
- North Cartridge Selection Guide
- North Respirator Selection Guide

Estimate of Exposures and Contaminant Information

- No employee shall enter an IDLH environment.
- Normal oxygen levels shall be maintained.
- No employee shall be exposed to an atmosphere containing concentrations that would exceed the STEL or PEL for the identified atmospheric hazard.

Respirator Fit Testing

Before an employee may be required to use any respirator with a negative or positive pressure tight-fitting face piece, the employee must be fit tested with the same make, model, style, and size of respirator that will be used. This section specifies the kinds of fit tests allowed, the procedures for conducting them, and how the results of the fit tests must be used.

All respirator users are fit-tested at least annually and more often if other federal requirements apply.

Safety Management Plan

Respiratory Protection
Program

Supplied Air Respirators are required to be fit tested as well.

The Workforce Group, LLC shall ensure that employees using a tight-fitting face piece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT) as stated in this program.

The Workforce Group, LLC shall ensure that an employee using a tight-fitting face piece respirator is fit tested prior to initial use of the respirator, whenever a different respirator face piece (size, style, model or make) is used, and at least annually thereafter.

The Workforce Group, LLC shall conduct an additional fit test whenever the employee reports, or The Workforce Group, LLC's PLHCP, supervisor, or Program Administrator makes visual observations of, changes in the employee's 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.

If after passing a QLFT or QNFT, the employee subsequently notifies The Workforce Group, LLC, Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable, the employee shall be given a reasonable opportunity to select a different respirator face piece and to be retested.

The fit test shall be administered using an OSHA-accepted QLFT or QNFT protocol. The OSHA-accepted QLFT and QNFT protocols and procedures are contained in this section.

QLFT may only be used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less. Half face air filtering respirators may be fit tested with irritant smoke while full face air filtering respirators require Portacount fit testing.

If the fit factor, as determined through an OSHA-accepted QNFT protocol, is equal to or greater than 100 for tight-fitting half face pieces, or equal to or greater than 500 for tight-fitting full face pieces, the QNFT has been passed with that respirator.

Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators shall be accomplished by performing quantitative or qualitative fit testing in the negative pressure mode, regardless of the mode of operation (negative or positive pressure) that is used for respiratory protection.

Qualitative fit testing of these respirators shall be accomplished by temporarily converting the respirator user's actual face piece into a negative pressure respirator with appropriate filters, or by using an identical negative pressure air-purifying respirator face piece with the same sealing surfaces as a surrogate for the atmosphere-supplying or powered air-purifying respirator face piece.

Safety Management Plan

Respiratory Protection
Program

Quantitative fit testing of these respirators shall be accomplished by modifying the face piece to allow sampling inside the face piece in the breathing zone of the user, midway between the nose and mouth. This requirement shall be accomplished by installing a permanent sampling probe onto a surrogate face piece, or by using a sampling adapter designed to temporarily provide a means of sampling air from inside the face piece.

Any modifications to the respirator face piece for fit testing shall be completely removed, and the face piece restored to NIOSH-approved configuration, before that face piece can be used in the workplace.

Fit Test Procedures

The requirements in this section apply to all OSHA-accepted fit test methods, both QLFT and QNFT.

The test subject shall be allowed to pick the most acceptable respirator from a sufficient number of respirator sizes so that the respirator is acceptable to, and correctly fits, the user.

Prior to the selection process, the test subject shall be shown how to put on a respirator, how it should be positioned on the face, how to set strap tension and how to determine an acceptable fit. A mirror shall be available to assist the subject in evaluating the fit and positioning of the respirator. This instruction may not constitute the subject's formal training on respirator use, because it is only a review.

The test subject shall be informed that he/she is being asked to select the respirator that provides the most acceptable fit. Each respirator represents a different size and shape, and if fitted and used properly, will provide adequate protection.

The test subject shall be instructed to hold each chosen face piece up to the face and eliminate those that obviously do not give an acceptable fit.

The more acceptable face pieces are noted in case the one selected proves unacceptable; the most comfortable mask is donned and worn at least five minutes to assess comfort. Assistance in assessing comfort can be given by discussing the following points:

- If the test subject is not familiar with using a particular respirator, the test subject shall be directed to don the mask several times and to adjust the straps each time to become adept at setting proper tension on the straps.
- Position of the mask on the nose
- Room for eye protection
- Room to talk

Safety Management Plan

Respiratory Protection
Program

-
- Position of mask on face and cheeks

The following criteria shall be used to help determine the adequacy of the respirator fit:

- Chin properly placed;
- Adequate strap tension, not overly tightened;
- Fit across nose bridge;
- Respirator of proper size to span distance from nose to chin;
- Tendency of respirator to slip;
- Self-observation in mirror to evaluate fit and respirator position.

Use the Fit Test form.

User Seal Check

Before conducting the negative and positive pressure checks, the subject shall be told to seat the mask on the face by moving the head from side-to-side and up and down slowly while taking in a few slow deep breaths. The test subject shall conduct a user seal check, either the negative or positive pressure seal checks described below:

Positive Pressure Check

Close off the exhalation valve and exhale gently into the face piece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the face piece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve and then carefully replacing it after the test.

Negative Pressure Check

Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the face piece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the face piece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

The test shall not be conducted if there is any hair growth between the skin and the face piece sealing surface, such as stubble beard growth, beard, moustache or sideburns which cross the respirator sealing surface. Any type of apparel which interferes with a satisfactory fit shall be altered or removed, including glasses.

If a test subject exhibits difficulty in breathing during the tests, she or he shall be referred to a physician or other licensed health care professional, as appropriate, to determine whether the test subject can wear a respirator while performing her or his duties. If the employee finds the fit of the

Safety Management Plan

Respiratory Protection
Program

respirator unacceptable, the test subject shall be given the opportunity to select a different respirator and to be retested.

Prior to the commencement of the fit test, the test subject shall be given a description of the fit test and the test subject's responsibilities during the test procedure. The description of the process shall include a description of the test exercises that the subject will be performing. The respirator to be tested shall be worn for at least 5 minutes before the start of the fit test.

The fit test shall be performed while the test subject is wearing any applicable safety equipment that may be worn during actual respirator use which could interfere with respirator fit.

Test Exercises

Each test exercise shall be performed for one minute except for the grimace exercise which shall be performed for 15 seconds. The test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried. If due to medical or health conditions the employee cannot perform the test exercises the fit test shall not be performed and the employee not allowed to use a respirator until all elements of the fit test can be achieved.

The respirator shall not be adjusted once the fit test exercises begin. Any adjustment voids the test, and the fit test must be repeated.

The following test exercises are to be performed for all fit testing methods prescribed in this procedure:

- Normal breathing. In a normal standing position, without talking, the subject shall breathe normally.
- Deep breathing. In a normal standing position, the subject shall breathe slowly and deeply, taking caution so as not to hyperventilate.
- Turning head side to side. Standing in place, the subject shall slowly turn his/her head from side to side between the extreme positions on each side. The head shall be held at each extreme momentarily so the subject can inhale at each side.
- Moving head up and down. Standing in place, the subject shall slowly move his/her head up and down. The subject shall be instructed to inhale in the up position (i.e., when looking toward the ceiling).
- Talking. The subject shall talk out loud slowly and loud enough so as to be heard clearly by the test conductor. The subject shall read from the Rainbow Passage

Rainbow Passage

Safety Management Plan

Respiratory Protection
Program

“When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond reach, his friends say he is looking for the pot of gold at the end of the rainbow.” Continue to read for one minute.

- Grimace. The test subject shall grimace by smiling or frowning. (This applies only to QNFT testing; it is not performed for QLFT)
- Jogging in place. The test subject shall jog in place being careful to be aware of their surroundings.
- Normal breathing. Same as exercise (1).

Qualitative Fit Test (QLFT) ProtocolsGeneral

The Workforce Group, LLC shall ensure that persons administering QLFT are able to prepare test solutions, calibrate equipment and perform tests properly, recognize invalid tests, and ensure that test equipment is in proper working order. The Workforce Group, LLC shall ensure that QLFT equipment is kept clean and well maintained so as to operate within the parameters for which it was designed.

Irritant Smoke (Stannic Chloride) Protocol

This qualitative fit test uses a person's response to the irritating chemicals released in the “smoke” produced by a stannic chloride ventilation smoke tube to detect leakage into the respirator.

General Requirements and Precautions. The respirator to be tested shall be equipped with high efficiency particulate air (HEPA) or P100 series filter(s).

Only stannic chloride smoke tubes shall be used for this protocol. No form of test enclosure or hood for the test subject shall be used.

The smoke can be irritating to the eyes, lungs, and nasal passages. The test conductor shall take precautions to minimize the test subject's exposure to irritant smoke. Sensitivity varies, and certain individuals may respond to a greater degree to irritant smoke. Care shall be taken when performing the sensitivity screening checks that determine whether the test subject can detect irritant smoke to use only the minimum amount of smoke necessary to elicit a response from the test subject.

The fit test shall be performed in an area with adequate ventilation to prevent exposure of the person conducting the fit test or the build-up of irritant smoke in the general atmosphere.

Safety Management Plan

Respiratory Protection
Program

The person to be tested must demonstrate his or her ability to detect a weak concentration of the irritant smoke.

- The test operator shall break both ends of a ventilation smoke tube containing stannic chloride, and attach one end of the smoke tube to a low flow air pump set to deliver 200 millilitres per minute, or an aspirator squeeze bulb. The test operator shall cover the other end of the smoke tube with a short piece of tubing to prevent potential injury from the jagged end of the smoke tube.
- The test operator shall advise the test subject that the smoke can be irritating to the eyes, lungs, and nasal passages and instruct the subject to keep his/her eyes closed while the test is performed.
- The test subject shall be allowed to smell a weak concentration of the irritant smoke before the respirator is donned to become familiar with its irritating properties and to determine if he/she can detect the irritating properties of the smoke. The test operator shall carefully direct a small amount of the irritant smoke in the test subject's direction to determine that he/she can detect it.

Irritant Smoke Fit Test Procedure

- The person being fit tested shall don the respirator without assistance, and perform the required user seal check(s).
- The test subject shall be instructed to keep his/her eyes closed if wearing a half face respirator.
- The test operator shall direct the stream of irritant smoke from the smoke tube toward the face seal area of the test subject, using the low flow pump or the squeeze bulb. The test operator shall begin at least 12 inches from the face piece and move the smoke stream around the whole perimeter of the mask. The operator shall gradually make two more passes around the perimeter of the mask, moving to within six inches of the respirator.
- If the person being tested has not had an involuntary response and/or detected the irritant smoke, proceed with the test exercises.
- The exercises identified in the Test Exercises of this procedure shall be performed by the test subject while the respirator seal is being continually challenged by the smoke, directed around the perimeter of the respirator at a distance of six inches.
- If the person being fit tested reports detecting the irritant smoke at any time, the test is failed. The person being retested must repeat the entire sensitivity check and fit test procedure.
- Each test subject passing the irritant smoke test without evidence of a response (involuntary cough, irritation) shall be given a second sensitivity screening check, with the smoke from the same smoke tube used during the fit test, once the respirator has been removed, to determine whether he/she still reacts to the smoke. Failure to evoke a response shall void the fit test.
- If a response is produced during this second sensitivity check, then the fit test is passed. The glass tube shall be disposed of properly.

Safety Management Plan

Respiratory Protection
Program

Quantitative Fit Test (QNFT) Protocols

Using controlled negative pressure and appropriate instrumentation to measure the volumetric leak rate of a face piece to quantify the respirator have been demonstrated to be acceptable to OSHA.

The Workforce Group, LLC shall ensure that persons administering QNFT are able to calibrate equipment and perform tests properly, recognize invalid tests, calculate fit factors properly and ensure that test equipment is in proper working order.

The Workforce Group, LLC shall ensure that QNFT equipment is kept clean, and is maintained and calibrated according to the manufacturer's instructions so as to operate at the parameters for which it was designed.

Portacount Fit Test Requirements

- Check the respirator to make sure the respirator is fitted with a high-efficiency filter and that the sampling probe and line are properly attached to the face piece.
- Instruct the person to be tested to don the respirator for five minutes before the fit test starts. This purges the ambient particles trapped inside the respirator and permits the wearer to make certain the respirator is comfortable. This individual shall already have been trained on how to wear the respirator properly.
- Check the following conditions for the adequacy of the respirator fit: Chin properly placed; Adequate strap tension, not overly tightened; Fit across nose bridge; Respirator of proper size to span distance from nose to chin; Tendency of the respirator to slip; Self-observation in a mirror to evaluate fit and respirator position.
- Have the person wearing the respirator do a user seal check. If leakage is detected, determine the cause. If leakage is from a poorly fitting face piece, try another size of the same model respirator, or another model of respirator.
- Follow the manufacturer's instructions for operating the Portacount and proceed with the test.
- The test subject shall be instructed to perform the exercises in Test Exercises section of this procedure.
- After the test exercises, the test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried.

Portacount Test Instrument

The Portacount will automatically stop and calculate the overall fit factor for the entire set of exercises. The overall fit factor is what counts. The Pass or Fail message will indicate whether or not the test was successful. If the test was a Pass, the fit test is over. Since the pass or fail criterion of the Portacount is user programmable, the test operator shall ensure that the pass or fail criterion meet the requirements for minimum respirator performance.

Safety Management Plan

Respiratory Protection
Program

A record of the test needs to be sent to the Safety Manager and kept on file, assuming the fit test was successful. The record must contain the test subject's name; overall fit factor; make, model, style, and size of respirator used; and date tested.

Use, Maintenance and Care of Respirators

This section requires The Workforce Group, LLC to provide for the use, cleaning and disinfecting, storage, inspection, and repair of respirators used by employees. Appendix B - Respirator Cleaning Procedures (Mandatory) shall be followed.

Use

- Items that can affect the face to mask seal are prohibited. This includes facial hair, glasses, clothing, etc.
- Each time a respirator is put on a positive and negative pressure check shall be performed.

Cleaning and Disinfecting Requirements

The Workforce Group, LLC shall provide each respirator user with a respirator that is clean, sanitary, and in good working order. The Workforce Group, LLC shall ensure that respirators are cleaned and disinfected using the procedures in this Respiratory Protection Program, or procedures recommended by the respirator manufacturer, provided that such procedures are of equivalent effectiveness. The respirators shall be cleaned and disinfected at the following intervals:

- Respirators issued for the exclusive use of an employee shall be cleaned and disinfected by the employee as often as necessary to be maintained in a sanitary condition,
- Respirators used in fit testing and training shall be cleaned and disinfected after each use by the Safety Manager or designated person.
- Each individual who is assigned a cartridge respirator is responsible for seeing that the respirator is cleaned, inspected and properly stored.

Cleaning Procedures

- Remove filters, cartridges, or canisters. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.
- Wash components in warm water with a mild detergent or with a cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.
- Rinse components thoroughly in clean, warm, preferably running water. Drain.
- When the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in commercially available cleansers of equivalent disinfectant quality. Another alternative is to use wipes containing alcohol that are intended for use with respirators.
- Rinse components thoroughly in clean, warm, preferably running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on face

Safety Management Plan

Respiratory Protection
Program

pieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.

- Components should be hand-dried with a clean lint-free cloth or air dried. Reassemble face piece, replacing filters, cartridges, and canisters where necessary. Test the respirator to ensure that all components work properly.

Storage and Inspection

- Respiratory equipment shall be stored in a manner to protect it from damage, contamination, temperature extreme, etc.
- Respiratory equipment intended for emergency use shall be stored in an area that is readily accessible and be clearly marked.

The Workforce Group, LLC shall ensure that respirators are inspected as follows:

- All respirators used in routine situations shall be inspected by the employee before each use and during cleaning;
- A check by the employee 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
- A check of elastomeric parts for pliability and signs of deterioration.
- Emergency respiratory equipment will be inspected at least monthly, and before and after each use.
- Escape only respiratory equipment will be inspected before being carried into workplace.

Breathing Air Quality and Use

The Workforce Group, LLC shall ensure that compressed air accords with the following specifications:

- Compressed breathing air shall meet at least the requirements for Type 1-Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:
 - Oxygen content (v/v) of 19.5-23.5%;
 - Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;
 - Carbon monoxide (CO) content of 10 ppm or less;
 - Carbon dioxide content of 1,000 ppm or less; and
 - Lack of noticeable odour.
- The Workforce Group, LLC shall ensure that oxygen is not used in compressed air units.
- The Workforce Group, LLC shall ensure that oxygen concentrations greater than 23.5% are used only in equipment designed for oxygen service or distribution.

Safety Management Plan

Respiratory Protection
Program

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- The Workforce Group, LLC shall ensure that cylinders used to supply breathing air to respirators meet DOT requirements and that:
 - Cylinders are tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 and part 178);
 - Cylinders of purchased breathing air have a certificate of analysis from the supplier that the breathing air meets the requirements for Type 1--Grade D breathing air; and
 - The moisture content in the cylinder does not exceed a dew point of -50 deg. F (-45.6 deg. C) at 1 atmosphere pressure.
 - The Workforce Group, LLC shall ensure that compressors used to supply breathing air to respirators are constructed and situated so as to:
 - Prevent entry of contaminated air into the air-supply system;
 - Minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (5.56 deg. C) below the ambient temperature;
 - Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions.
 - Have a tag containing the most recent change date and the signature of the person authorized by The Workforce Group, LLC to perform the change. The tag shall be maintained at the compressor.
 - For compressors that are not oil-lubricated, The Workforce Group, LLC shall ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.
 - For oil-lubricated compressors, The Workforce Group, LLC shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.
 - The Workforce Group, LLC shall ensure that breathing air couplings are incompatible with outlets for nonrespirable worksite air or other gas systems. No asphyxiating substance shall be introduced into breathing air lines.

Repairs

The Workforce Group, LLC shall ensure that respirators that fail an inspection or are otherwise found to be defective are immediately removed from service, and are discarded or repaired or adjusted in accordance with the following procedures:

- Repairs or adjustments to respirators are to be made only by persons appropriately trained to perform such operations and shall use only the respirator manufacturer's NIOSH-approved parts designed for the respirator;

Safety Management Plan

Respiratory Protection
Program

-
- Repairs shall be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed; and

Voluntary Use

If an employee chooses to voluntarily wear a respirator when not required by this Program (contaminants do not meet protection standards, odours, etc.) they will be advised of the following in their training:

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for employees.

However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the employee. Sometimes, employees may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

- Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
- Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapours, or very small solid particles of fumes or smoke.
- Keep track of your respirator so that you do not mistakenly use someone else's respirator.

Workplace Monitoring

A program of monitoring potential employee exposures has been implemented through the corporate health and safety department. Project personnel may also be assigned with the task of conducting air monitoring. Direct-reading instruments will also be used in the characterization of potential exposures. All the data collected is used to determine the appropriateness of the respiratory equipment.

Recordkeeping

Safety Management Plan

Respiratory Protection
Program

The Workforce Group, LLC will establish and retain written information regarding medical evaluations, fit testing and the respirator program. Records of medical evaluations required by this section must be retained and made available in accordance with 29 CFR 1910.1020. The Workforce Group, LLC shall provide the employee with an opportunity to discuss the questionnaire and examination results with the PLHCP.

Records will be treated confidentially and maintained on file in the The Workforce Group, LLC corporate office by the Safety Manager.

Program Evaluation

The Workforce Group, LLC shall conduct evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.

The Workforce Group, LLC shall regularly consult employees required to use respirators to assess the employees' views on this program's effectiveness and to identify any problems. Any problems that are identified during this assessment shall be corrected. Factors to be assessed and verified include, but are not limited to:

- Respirator fit (including the ability to use the respirator without interfering with effective workplace performance); Appropriate respirator selection for the hazards to which the employee is exposed;
- Proper respirator use under the workplace conditions the employee encounters; and
- Proper respirator maintenance.

Training

All employees will receive respirator training during their initial health and safety training class and on at least an annual basis, if required for their job classification. Training shall address employee knowledge of respirators, fit, use, limitations, emergency situations, wearing, fit checks, maintenance & storage, medical signs and symptoms of effective use and general requirements of the OSHA standard. The training must be provided before requiring the employee to use the respirator.

Retraining

Retraining shall be administered annually, and when the following situations occur:

- Changes in the workplace or the type of respirator render previous training obsolete;
- Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill; or
- Any other situation arises in which retraining appears necessary to ensure safe respirator use.

Safety Management Plan

Respiratory Protection
Program

The Workforce Group, LLC Qualitative Respiratory Fit Test Record Sheet

**Note: Employee Must Have Completed Respiratory Protection Training and Passed Airway Exam
Prior To Fit Testing**

Test Date: _____**Employee Name:** _____ **SS#** _____**Test Agent:** Irritant Smoke (Stannic Chloride)**Respirator Identification:**

Model: _____

Size (circle one): Small Medium Large

Manufacturer: _____

Approval No: _____

Additional Information: (ex type of respirators) _____

Fit Test Protocol (Test Subject Initials indicate steps were performed):**___ TOLD TO KEEP EYES CLOSED DURING SMOKE EXPOSURE**

___ Test subject smelled irritant smoke before fit test ___ Wore respirator 5 minutes before fit test
___ Protocol reviewed before fit test ___ Test subject did not have hair in fitting area
___ Shown how to wear respirator ___ Performed positive pressure & negative fit
___ Mirror available for use by subject check successfully after seating respirator
___ Must wear PPE (hard hat, etc.) if needed

Fit Test Steps (1 minute each except Grimace = 15 seconds)

___ Breath normally ___ Breathe deeply ___ Turned head side to side
___ Nod up and down ___ Talking (Read Rainbow Passage below)
___ Jog in place ___ Breath normally ___ Grimace

“When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond his reach, his friends say he is looking for the pot of gold at the end of the rainbow”.

Safety Management Plan

Respiratory Protection
Program

Fit Test Results: _____ Pass _____ Fail

Test Subject Signature: _____ Print Name: _____

Date: _____

Examiner's Name: _____ Examiner's Signature: _____

Date: _____

Distribution: Employee Local File –
The Workforce Group, LLC Safety & Training Dept

Rigging Material Handling Program

Purpose

The purpose of this training program is to ensure a safe and incident free lifting operation in the onshore and offshore environment.

Scope

All The Workforce Group, LLC employees that work onshore or in the Outer Continental Shelf (OCS) are to receive training in “rigging”. When work is performed on a non-owned or operated site, the operator’s program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator’s program doesn’t exist or is less stringent.

Definitions

Rigging - the art or process of safely attaching a load to a hook by means of adequately rated and properly applied slings and related hardware.

Qualified Rigger - any person who attaches or detaches lifting equipment that has successfully completed training meeting the requirements set forth by American Petroleum Institute’s Recommended Practice 2D 5th Edition (API RP-2D 5th Edition).

Outer Continental Shelf - means all submerged lands lying seaward and outside of the area of lands beneath navigable waters beginning three (3) miles from the coastline extending outwards and of which the subsoil and seabed appertain to the United States and are subject to its jurisdiction and control.

Key Responsibilities

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her region is required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Supervisors shall assist the managers in the tasks described above. The supervisor shall verify that each of their employees have the proper training before those employees report to duty onshore or on an OCS facility.

Safety Management Plan

Rigging Material Handling
Program

Employees shall assist their supervisors in tracking required training and follow safe rigging practices. The employee shall monitor all expiration dates pertaining to his/her required training and notify his/her supervisor in advance of any nearing expiration dates.

Only qualified rigger trained personnel can attach or detach lifting equipment to loads or lifting loads. The Workforce Group, LLC personnel DO NOT neither inspect nor operate offshore cranes.

Procedure**General**

Only “qualified riggers” are allowed to attach any loads to a lifting hook and only “qualified operators” are allowed to operate a crane while engaged in lifting operations onshore or on the Outer Continental Shelf.

API RP-2D has established a three-tiered classification. Employees will be certified in the applicable classifications as required before starting job assignments requiring rigging and lift operations offshore:

- Qualified rigger.
- Qualified inspector.
- Qualified operator. (The Workforce Group, LLC personnel DO NOT operate offshore cranes.)

Material Handling

- Rigging equipment shall be inspected to ensure it is safe. Rigging equipment for material handling shall be inspected prior to use and on each shift and as necessary during its use to ensure that equipment is safe.
- Defective rigging equipment shall not be used and removed from service.
- Rigging equipment shall not be loaded beyond its recommended safe working load and load identification shall be attached to the rigging.
- Rigging equipment not in use shall be removed from the immediate work area so as not to present a hazard to employees.
- Tag lines shall be used unless their use creates an unsafe condition.

Safety Management Plan

Rigging Material Handling
Program

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- Hooks on overhaul ball assemblies, lower load blocks, or other attachment assemblies shall be a type that can be closed and locked, eliminating the hook throat opening. Alternatively, an alloy anchor type shackle with a bolt, nut and retaining pin may be used.
 - All employees shall be kept clear of loads about to be lifted and of suspended loads. No employee shall be allowed under a suspended load.

Training and Education

A “Qualified Offshore Rigger” shall successfully complete an approved “Rigger” course. To successfully complete an approved “API2D Rigger” course, the The Workforce Group, LLC employee must verify that they have gained knowledge through participating in classroom lectures, participating with hands-on training and then successfully passing a written exam. Once the employee successfully completes the course, a “Rigger” card will be issued to that individual. During the classroom lectures, hands-on training and written exam the The Workforce Group, LLC employee shall display their competency in the following topics:

- The selection of proper hardware (eye bolts, shackles, hooks, wire rope products, synthetic slings, chain slings, etc) for the correct application (weight, hitches, angles, temperatures, center of gravity, etc.).
- The inspection of the selected hardware before, during and after the lift.
- The proper methods of securing the load, attaching the load to the hook, lifting the load, handling of the load during the movement of the load, and lowering and placement of load.
- The proper storage of the rigging equipment. All The Workforce Group, LLC employees shall re-certify their “qualified rigger” training on a four (4) year basis.

INTRODUCTION

SCOPE

TERMS AND DEFINITIONS

SAFETY AND HEALTH MANAGEMENT SYSTEM ELEMENTS

1.0 GENERAL REQUIREMENTS

1.1 Leadership and Commitment

- 1.1.1 Management Commitment and Leadership
- 1.1.2 Management Representatives
- 1.1.3 Employee Participation
- 1.1.4 Commitment Statement

2.0 POLICY

2.1 Procedure

2.2 Health and Safety Policy Statement

2.3 Environmental Policy Statement

2.4 Drug and Alcohol Policy Statement

3.0 PLANNING

3.1 Hazard Identification

- 3.1.1 Defining Hazards
- 3.1.2 Identifying Hazards
- 3.1.3 Continued Hazard Identification
- 3.1.4 Recording Hazard Identification Data¹⁷
- 3.1.5 Certification of Hazard Assessment
- 3.1.6 Review of Hazard Assessment

3.2 Risk Assessment

- 3.2.1 Risk Assessment Procedure
- 3.2.2 Risk Assessment Matrix

3.3 Risk Control

- 3.3.1 Hierarchy of Controls^s
- 3.3.2 Risk Controls
- 3.3.3 Emergency Control of Hazards
- 3.3.4 Job Safety Analysis (JSA)
- 3.3.5 Field Level Risk Assessment (FLRA)
- 3.3.6 PPE Assessment & Matrix
- 3.3.7 Site Specific HSE Plan (SSHP)

3.4 Legal and Other Requirements

- 3.4.1 Legal Requirements

- 3.4.2 Other Requirements
- 3.4.3 Means of Tracking Requirements
- 3.4.4 Review of Requirements
- 3.4.5 The Workforce Group, LLC Safety and Health Compliance Matrix

3.5 Written Safety and Health Goals, Objectives and Programs

- 3.5.1 Safety and Health Goals
- 3.5.2 Objectives and Safety Programs
- 3.5.3 Written Annual Goals for 2010

4.0 IMPLEMENTATION & OPERATION

4.1 Overview

4.2 Structure and Assignment of Responsibilities

- 4.2.1 Safety and Health Management System Organization Chart
- 4.2.2 Documentation and Communication

4.3 Training, Awareness and Competency

- 4.3.1 HSE Competency Assurance Process
- 4.3.2 Identification of Training and Competency Needs
- 4.3.3 Training Records
- 4.3.4 Delivery of Induction, Transfer & Refresher Training
- 4.3.5 Training Documentation
- 4.3.6 Supervisor Safety Management Training
- 4.3.7 The Workforce Group, LLC Training Matrix
- 4.3.8 Short Service Employee Program

4.4 Consultation and Communication

- 4.4.1 Open Door Policy
- 4.4.2 Behavior Based Safety Program (BBS)
- 4.4.3 Incident Notice Form
- 4.4.4 Weekly Safety Meetings

4.5 Document and Data Control

- 4.5.1 Document Format
- 4.5.2 Reviewing
- 4.5.3 Control
- 4.5.4 Document Distribution

4.6 Operational Control

- 4.6.1 Compliance with Legal and Other Requirements
- 4.6.2 Identified Hazards and Risks
- 4.6.3 Management of Change (MOC)
- 4.6.4 Purchase of Goods and Services
- 4.6.5 Systems to Control Access or Exiting Customer's Premises
- 4.6.6 Background Checks Prior to Issuing Identification Cards
- 4.6.7 Company Employee Identification System

- 4.6.8 Hazardous Materials
- 4.6.9 Control of Hazardous Materials for Client Locations
- 4.6.10 Reporting of Hazardous Conditions, Security Incidents or Injuries
- 4.6.11 Fire Fighting - Incipient Policy
- 4.6.12 Disciplinary System
- 4.6.13 Impairment
- 4.6.14 General Safety Standards and Guidelines
- 4.6.15 Facility Equipment and Working Conditions
- 4.6.16 Lone Workers Policy
- 4.6.17 Lifting and Handling Loads
- 4.6.18 Fatigue Management
- 4.6.19 Safe Journey Management (SJM) Policy
- 4.6.20 Driving Safety
- 4.6.21 Vehicle Requirements
- 4.6.22 PPE
- 4.6.23 Preventative Maintenance Program for Tools and Equipment

4.7 Emergency Preparedness

- 4.7.1 Preparedness Requirements

5.0 CHECKING & CORRECTIVE ACTIONS

5.1 Key Performance Indicator Measuring and Monitoring

- 5.1.1 Health and Safety Key Performance Indicators (KPI)
- 5.1.2 Monitoring

5.2 Incidents, Reporting, Non-Conformance and Corrective Actions

5.2.1 Reporting Policy

- 5.2.2 Investigations of Incidents & Non-conformances
- 5.2.3 Incident Reporting Matrix
- 5.2.4 Incident Review Team and Incident Investigation Report
- 5.2.5 Field Incident Report Form
- 5.2.6 Incident Notice Form
- 5.2.7 Corrective Actions
- 5.2.8 Accompanying Employees to Medical Treatment
- 5.2.9 Incident Classifications
- 5.2.10 Injury Classifications
- 5.2.11 Return to Work - Light/Restricted Duty Procedure

5.3 Records and Records Management

- 5.3.1 Access to Medical Records
- 5.3.2 Records Filing and Accessibility
- 5.3.3 Key Records Retention

5.4 Inspections

- 5.4.1 Formal Annual Inspection

- 5.4.2 Routine Site Inspection
- 5.4.3 Conducting Inspection
- 5.4.4 Corrective and Preventive Actions

6.0 MANAGEMENT REVIEW

- 6.1.1 Safety Management System Review
- 6.1.2 Management Meetings

Introduction

The The Workforce Group, LLC Safety and Health Management System has been developed to provide a systematic approach to safety and health in order to have an incident free culture of safety.

Scope

The The Workforce Group, LLC Safety & Health Management System applies to all operations conducted by The Workforce Group, LLC. Any new acquisition, project, joint venture or contract controlled by The Workforce Group, LLC shall follow its requirements.

Terms and Definitions

Audit — the systematic and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

Audit program — a set of one or more audits planned for a specific time frame and directed towards a specific purpose. Note: An audit program includes all activities necessary for planning, organizing, and conducting the audits.

Competence — demonstrated ability to apply safety and health management system knowledge and skills.

Continual improvement — the process of enhancing the safety and health management system to achieve ongoing improvement in overall safety management performance.

Contractor — an organization or individual providing services to another organization in accordance with agreed-upon specifications, terms, and conditions.

Document — a medium containing information related to the safety and health management system.

Employee — a person employed by the organization or a person under the day-to-day control of the organization.

Employee representative — a non-managerial employee who is:

- (a) a representative of other employees according to the requirements of law or collective agreements; or

(b) selected by non-managerial employees for other reasons.

Ergonomics — integrated knowledge derived from the social and technical sciences, used to match jobs, systems, products, and environments with the physical and mental attributes of the people involved.

Hazard — a source of potential harm to an employee.

Incident — an occurrence, arising in the course of work, that could result in an injury or illness (includes near misses).

Legal requirements — requirements of applicable OHS federal, provincial/territorial, and municipal laws, regulations, and bylaws, and where applicable, provisions of the organization's collective agreements that relate to health and safety.

Organization — a company, operation, undertaking, establishment, enterprise, institution, or association, or a part or combination thereof, that has its own management. An organization may be incorporated or unincorporated, public or private.

Other requirements — other occupational health and safety provisions to which the organization subscribes.

Procedure — a documented method to carry out an activity.

Process — a set of interrelated or interacting activities, that transforms inputs into outputs.

Record — a document that states results achieved or provides evidence of activities performed.

Risk — a combination of the likelihood of the occurrence of a hazardous event and the severity of harm caused by the event.

Safety health and safety management system (SHMS) — part of the overall management of the organization that addresses occupational, health and safety hazards and risks associated with its activities.

System — a set of interrelated or interacting elements.

Workplace parties — managers (including supervisors), employees, and employee representatives.

Safety and Health Management System Elements

The following is a general listing and description of the The Workforce Group, LLC Safety and Health Management System (SHMS) elements and their application.



1.0 General Requirements

1.1 Leadership and Commitment

1.1.1 Management Commitment and Leadership

Senior management of The Workforce Group, LLC shall provide leadership for safety and health activities and assume overall responsibility for the SHMS. This responsibility includes:

- Establishing, actively promoting, and maintaining the SHMS;
- Providing appropriate financial, human, and organizational resources to plan, implement, check, review, and correct the SHMS;
- Defining roles, assigning responsibilities, establishing accountability, and delegating authority to implement an effective SHMS;
- Establishing and implementing an safety and health policy and measurable objectives;
- Reviewing the organization's SHMS at planned intervals;
- Ensuring that employees and employee representatives are consulted; and

- Encouraging active participation on the part of employees and contractors in the establishment and maintenance of the SHMS.

1.1.2 Management Representatives

The The Workforce Group, LLC senior management shall, if warranted due to company workforce size, designate one or more representatives of management who, irrespective of other responsibilities, shall have defined roles, responsibilities and authority for ensuring that this SHMS is established, maintained and reviewed to support:

- Effective processes to identify and eliminate or control work-related hazards and risks;
- Reporting on the performance of the SHMS to senior management, employees, and employee representatives (if present) as appropriate for review and as the basis for improvement.

1.1.3 Employee Participation

Employee participation is an essential aspect of the SHMS. The Workforce Group, LLC shall provide employees and employee representatives, if warranted due to company workforce size, with time and resources to participate effectively in the development of the safety and health policy and in the process of SHMS planning, implementation, training, evaluation, and corrective action; and encourage employee participation by providing mechanisms that:

- Support employee participation, such as identifying and removing barriers to participation;
- Establish workplace health and safety committees or employee representatives where required by legislation and, where applicable, collective agreements or other requirements; and
- Ensure that employees and employee representatives are trained in, and consulted on, all aspects of SHMS associated with their work.

1.1.4 Commitment Statement

The The Workforce Group, LLC Safety and Health Management System (SHMS) is driven by leadership and commitment from senior management and its readiness to provide resources for HSE matters. The Workforce Group, LLC is committed to providing a productive, safe and healthy work environment for our employees, contractors, clients, customers and visitors.

Our commitments are communicated to all employees, contractors and suppliers and include:

- To instill a corporate culture where harm to our staff through work is totally unacceptable;

- To be proactive in assessing health, safety and environmental hazards for new business, new and existing work systems, practices and equipment;
- To encourage team problem solving at all levels of the organization to implement work practices that continually improve safety, environmental standards and productivity;
- To report and investigate incidents and implement systems and practices that prevent reoccurrence;
- To ensure compliance with legal requirements and industry standards;
- To train managers and employees to competently perform work described in safe work procedures;
- To provide information to all employees, contractors and customers that inform them of health safety and environmental issues relevant to The Workforce Group, LLC operations;
- To ensure products are safe and without adverse environmental impact.
- All The Workforce Group, LLC staff have a responsibility for implementing this safety and health management system by striving to achieve a zero tolerance towards hazards, incidents and injuries.
- We continuously improve safety and health management by setting objectives, plans and performance measures and regularly reviewing progress against the targets set.
- We involve our staff in safety and health management through training and by contributing in identifying, assessing and controlling hazards.

2.0 Policy

OBJECTIVE

The objective of the The Workforce Group, LLC Safety & Health Policy is to state its commitments to provide safe and healthy working conditions. It outlines the steps that are taken to meet these commitments and provides the framework for the The Workforce Group, LLC Safety & Health Management System.

RESPONSIBILITIES

Corporate Management

- Adopts the The Workforce Group, LLC Health & Safety Policy and all legal requirements;
- Requires that the policy be distributed to all operations for display;
- Supports the implementation of the policy throughout all operations.

Managers and Supervisors

- Discusses the policy during induction orientation;
- Communicates the requirements of the policy to all employees through safety & tailgate meetings;
- Ensures the posted policy is current and easily visible.

All Employees

- Comply with the requirements of the policy and support implementation of the policy.

2.1 Procedure

In consultation with employees and employee representatives, The Workforce Group, LLC shall establish and maintain the safety and health policy and shall ensure that the policy:

- Is appropriate to the nature, scale, and safety and health hazards and risks associated with The Workforce Group, LLC activities;
- Includes a commitment to comply with applicable safety and health legal requirements and other requirements;
- Includes a commitment to protect employees and to ensure continual improvement;
- Provides the framework for setting and reviewing safety and health objectives and targets;
- Is documented, implemented, and maintained;
- Is posted and communicated to all employees;
- Is available to external interested parties, as appropriate;

- Is discussed during safety meetings on an as-needed basis and is included in all site specific HSE plans which are received by employees; and
- Every year the policy is reviewed for relevance and appropriateness to our company and amended as appropriate and disseminated again.

2.2 Health and Safety Policy Statement

We are committed to comply with all applicable safety and health legal requirements. We are committed to our guiding principles which include ensuring that Safety, Health and Environment is First – never compromise on the health and safety of our customers and our people and to manage responsibly the impact that our business has on the environment. The following points summarize our employee’s commitments to Health and Safety:

- Comply with Health and Safety regulations and related The Workforce Group, LLC policy and procedures.
- Use all required personal protective equipment where indicated.
- Decline to operate any machinery or equipment without proper instruction regarding safety and general operation.
- All employees shall report unsafe conditions and/or hazards to their supervisors promptly.
- Follow all The Workforce Group, LLC Safety Procedures and Practices.
- Promptly report all injuries/incidents and work related diseases and actively participate in the Return to Work process in accordance with our Return to Work Policy.
- Attend all required health and safety training.
- Follow safe work instructions and assist in prevention.

All The Workforce Group, LLC Managers and Supervisors are committed to take ownership of their areas of responsibility by ensuring that the following important activities occur:

- Accept direct responsibility and accountability for all matters relating to Health and Safety for the employees and/or contractors they supervise directly and/or indirectly.
- Deal promptly with employees’ Health and Safety concerns and advise employees of actual and potential hazards that are known by the manager or supervisor.
- Maintain and ensure transfer of knowledge of all duties and obligations under all relevant legislation, client requirements and The Workforce Group, LLC policies and procedures.
- Ensure that employees use Personal Protective Equipment as prescribed in addition to following all safety procedure and practices.
- Provide appropriate training in use of equipment, safe work practices and procedures and handling of hazardous materials.
- Ensure that all contractors, suppliers, vendors and other visitors adhere to all The Workforce Group, LLC policies and procedures.
- Investigate accidents/incidents and perform workplace inspections.
- Review any accident investigation and facilitate the corresponding corrective action plan.

- Assist any injured employee to the fullest possible extent including facilitating the Return to Work process in accordance to our Corporate Return to Work policy.
- Continue to improve our safety and health management system and operational standards in all sites.
- Take every other reasonable precaution to protect employees.
- Implement and enforce Health and Safety rules, regulations, policies, procedures and prescribed instructions.

This policy is to be posted in all The Workforce Group, LLC facilities by the site supervisor.

2.3 Environmental Policy Statement

The Workforce Group, LLC recognizes that environmental concerns are of critical importance. The Workforce Group, LLC encourages its employees to join with the company in full acceptance of and compliance with this policy. We will create procedures that fully comply with federal, state and local regulations. We will provide adequate training to our employees to ensure our workers are aware of these procedures and are capable of following them.

Protection of the Environment

We will employ practical measures to protect the environment. We will conserve and protect the water, air, and land resources we use. We will strive to eliminate any releases to land, air or water that may harm human health or the environment. Continuous improvement in our environmental performance will be a principal objective.

Waste Management Policy Statement

We will work to prevent waste and pollution at the source whenever possible. New facilities and improvements of existing operations will use processes designed to minimize the environmental effects of our operations and will incorporate functional pollution control equipment.

Recycling and Waste Disposal

We will support recycling programs where practical and will use environmentally safe treatment and disposal practices for waste that is not eliminated at the source or recycled.

Compliance

We will manage existing facilities so that we meet or exceed legal requirements. We will implement programs and procedures to satisfy compliance. We will conduct compliance audits and monitor procedures and practices to evaluate our performance.

Disclosure

We will inform our employees of our progress in environmental issues. We will cooperate with the authorities and regulatory agencies in responding to inquiries. We will encourage our

employees to report to the Company conditions that they reasonably believe could be harmful to the environment or pose health or safety hazards so the Company can initiate prompt corrective actions.

Commitment

Management will consider the environmental and cultural implications of its decisions.

This policy is to be posted in all The Workforce Group, LLC facilities by the site supervisor.

2.4 Drug and Alcohol Policy Statement

Any employee or contractor on duty or on company property who possesses, sells, receives, is impaired or is determined to have measurable levels of any alcohol or illegal drug in their blood or urine (no matter the amount), post drug/alcohol screen, will be subject to immediate disciplinary action or contract dismissal.

Any employee or contractor involved in a job related incident while on duty or involving company equipment will be subject to a post-incident drug/alcohol screen.

If an employee or contractor returns to work following an absence of more than 90 days a return to work screening shall occur. Follow up drug screening shall be applied when appropriate as determined by management.

We reserve the right to conduct random drug and alcohol screenings on employees and contractors who perform safety-sensitive functions, such as driving company property or entering any worksite. Additionally, we also reserve the right to conduct unannounced random drug and alcohol screening on employees or contractors entering any worksite. We will require an employee or contractor to submit to a drug/alcohol screen if we have reasonable suspicion to believe that he/she has violated the prohibitions concerning alcohol and/or controlled substances based on observations concerning the appearance, behavior, speech or body odors of that person.

Contractors or employees maintaining or using prescribed medications shall report the circumstances and effects to their supervisor. Some types of medications could have undesirable effects, and these can create a safety risk and endanger other contractors.

Periodically, unannounced inspections will be made of persons entering or leaving company work sites by authorized company representatives. Entry onto company or client property is deemed to have provided consent to an inspection of a person, locker, vehicle, or any other personal effects.

Any refusals to submit to a drug/alcohol screen will be treated as a positive test, resulting in immediate contract dismissal or disciplinary action, up to and employment termination. The contractor or employee refusing to submit to the test will be asked to sign a refusal document. If they refuse to sign the document, it will be noted and kept on file.

Drug and alcohol screening will be performed by an approved and qualified medical clinic with a medical review officer authorized to perform the tests. All results are treated with confidentiality.

If another contractor or employee comes to management with concern regarding another contractor or employee in reference to alcohol or substance abuse, we will treat that with discretion and confidentiality. We will pursue investigation and decide accordingly whether a drug and or alcohol screen is the appropriate step to take.

All contractors and employees are subject to the policies explained above.

This policy is to be posted in all The Workforce Group, LLC facilities by the site supervisor.

3.0 Planning

OBJECTIVES

- To identify, assess, record and control risks in the workplace for routine and non-routine activities while ensuring employees are involved during risk management processes;
- To eliminate, as far as is practicable, the risk of human injury, illness or damage to property;
- To promote planning as a means of achieving continuous improvement in our safety and health performance by utilizing risk management procedures when establishing our annual safety and health objectives.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

- Introduces planning and risk management procedures and assists site managers with implementation;
- Determines risk levels for identified hazards and continually reviews legal and other requirements;
- Utilizes risk management procedure results when establishing annual safety and health objectives.

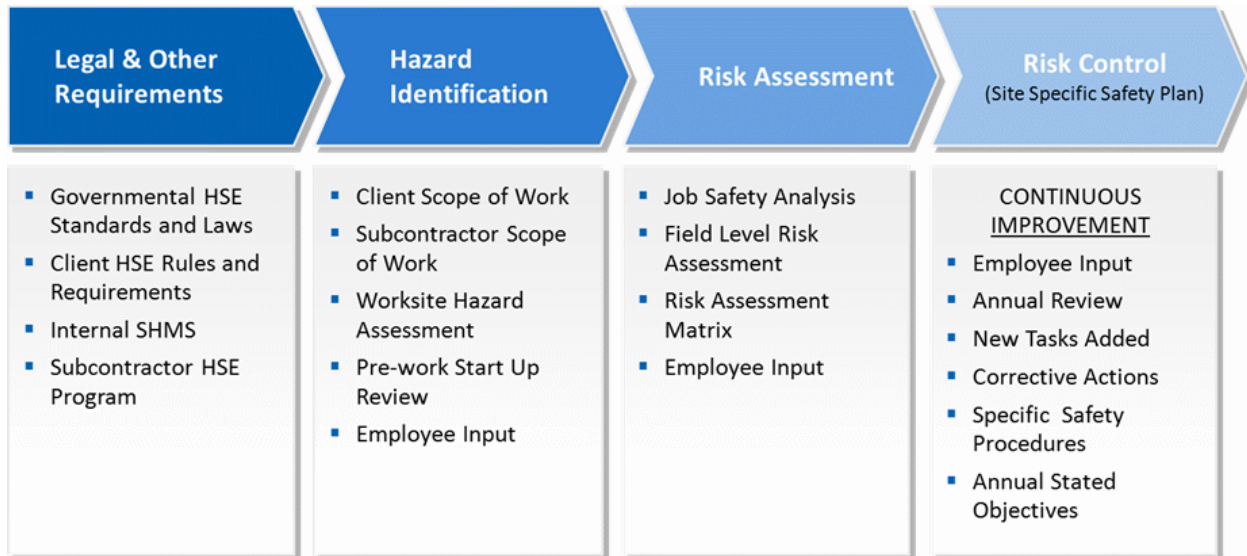
Managers and Supervisors

Implements planning and risk management procedures and ensures employees are involved.

Employees

Provide input to risk identification and assessment and follow risk control procedures.

HSE PLANNING PROCESS OVERVIEW



3.1 Hazard Identification

OBJECTIVES

- To provide guidelines for identifying workplace hazards;
- To ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace;
- To identify the jobs/tasks which require risk assessment.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager, site managers, supervisors and employees as identified specific reference procedures and safety programs.

HAZARD IDENTIFICATION PROCEDURE

The Workforce Group, LLC operations personnel notify the The Workforce Group, LLC Safety Manager if a new project is to begin. The The Workforce Group, LLC Safety Manager then conducts a baseline worksite hazard assessment which identifies the various tasks that are to be performed and the accompanying identified hazards. Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work
- Legal and other requirements
- Previous incidents and non-conformances
- Sources of energy, contaminants and other environmental conditions that can cause injury
- Walk through of work environment

3.1.1 Defining Hazards

A hazard is anything with the potential to harm life, health or property. Classifications of workplace hazards are divided into six groups:

- Physical hazards such as noise, electricity, heat and cold
- Chemical hazards such as toxic gases, noxious fumes and corrosive liquids
- Ergonomic hazards such as the height of a workbench, the shape of a vehicle seat
- Radiation hazards, for example, from x-ray machines, high powered lasers, radioactive materials
- Biological hazards such as syringes containing potentially infected blood, etc.

Hazards identifications (as examples) are to include:

- Working Alone
- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Musculoskeletal Disorders
- Bloodborne Pathogens
- Confined Spaces
- Driving
- General Safety Precautions

3.1.2 Identifying Hazards

A complete inspection of all work site tasks will be carried out by the Safety Manager in conjunction with employees. This will develop an inventory of all of the tasks conducted throughout the work site. Examples of types of tasks: grinding metal samples; transporting material from one area to another; decanting and mixing paints and solvents; operating machinery such as cranes, hoists and fork lift trucks; undertaking repair work inside confined spaces (such as holding tanks); undertaking cleaning and housekeeping work or spraying chemicals.

Additional areas for hazard identification include:

- Activities of all persons having access to the workplace including contractors and visitors.
- Infrastructure, equipment and materials at the workplace
- Changes or proposed changes in The Workforce Group, LLC, its activities or materials
- Modifications to the SHMS including temporary changes and their impacts on operations, processes and activities.
- The design of work areas, processes, installations, machinery, operating procedures including their adaption to staff capabilities.

3.1.3 Continued Hazard Identification

At existing locations employees shall be continually involved in the identification of hazards. Unidentified hazards are to be reported immediately and assessed for risk. Additional sources for ongoing hazard identification shall include:

Routine Activities

- Job Hazard Analyses
- Field Level Risk Assessments
- Ergonomic assessments
- Industrial hygiene surveys
- Workplace Inspections
- Purchasing and procuring
- Job observations
- Audits
- Document review

Non-routine Activities

- Accident/incident investigations
- Following emergency situations

It is also necessary to consider future tasks or situations that involve a change to the existing premises or process, or those which are non-routine.

3.1.4 Recording Hazard Identification Data

Once gathered, the hazard identification data will be recorded by the Safety Manager on the Worksite Hazard Assessment form. It shall be dated and signed.

3.1.5 Certification of Hazard Assessment

The The Workforce Group, LLC Safety Manager signs the certification portion of Worksite Hazard Assessment Form and includes it within the site specific HSE plan.

3.1.6 Review of Hazard Assessment

Hazard assessments are formally reviewed annually.

3.2 Risk Assessment

OBJECTIVES

- To assess the risk posed by each identified hazard
- To prioritize the risks so recommended risk controls can be assigned

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager, site managers, supervisors and employees as identified specific reference procedures and safety programs.

3.2.1 Risk Assessment Procedure

Each identified hazard is assessed for risk based on potential consequences of effecting injury to people, damage to assets, the environment or reputation of The Workforce Group, LLC. The frequency of risk exposure is then considered.

Following risk assessment steps each risk assessed becomes classified as low, medium or high in accordance with the The Workforce Group, LLC Risk Assessment Matrix shown below.

3.2.2 Risk Assessment Matrix

The risk level of the hazard is recorded with the associated task on the worksite hazard assessment portion within the site specific HSE plan for the job site.

RISK ASSESSMENT MATRIX

FREQUENCY	CONSEQUENCES				
	Insignificant Severity 0 (no injuries; no issue for environment)	Minor Severity 1 (slight health; minor env effect; slight impact)	Moderate Severity 2 (moderate health; localized env effect; work delay)	Major Severity 3 (extensive injuries; majef env effect; loss of production)	Catastrophic Severity 4 (multiple fatalities; extensive damage, massive effect)
Almost certain – multiple times a day	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Intolerable (High Risk)	Intolerable (High Risk)
Likely – several times in a week	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Intolerable (High Risk)	Intolerable (High Risk)
Possible – once a week possibly	Review for Improvement (Low)	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Intolerable (High Risk)	Intolerable (High Risk)
Unlikely – could occur at some time	Review for Improvement (Low)	Review for Improvement (Low)	Use Risk Controls (Medium)	Use Risk Controls (Medium)	Intolerable (High Risk)
Not Performed – work is not performed	Review for Improvement (Low)	Review for Improvement (Low)	Review for Improvement (Low)	Use Risk Controls (Medium)	Use Risk Controls (Medium)

3.3 Risk Control**OBJECTIVES**

- To provide guidelines to control identified and assessed risks;
- To emphasize the importance of understanding the hierarchy of controls for the effective elimination of identified risks within our workplaces.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager, site managers, supervisors and employees as identified specific reference procedures and safety programs.

3.3.1 Hierarchy of Controls

The Workforce Group, LLC shall use the following priorities when determining controls to identified hazards:

- Elimination
- Substitution
- Engineering controls
- Signage/Warning and or administrative controls
- Personal Protective Equipment

3.3.2 Risk Controls

Risk assessed hazards are compiled with risk control methods including engineering or administrative controls and PPE required into the Worksite Hazard Assessment of the site specific HSE plan. No work will begin before the worksite hazard assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.

3.3.3 Emergency Control of Hazards

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those competent personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. The Workforce Group, LLC will make every possible effort to control the hazard or under the supervision of client emergency response personnel in every emergency.

3.3.4 Job Safety Analysis (JSA)

For those jobs with the highest injury or illness rates, jobs that are new to our operation, jobs that have undergone major changes in processes and procedures or jobs complex enough to require written instructions will have a Job Safety Analysis performed. JSAs are to be maintained in the Safety Manager's office for reference.

3.3.5 Field Level Risk Assessment (FLRA)

Prior to beginning any work task a Field Level Risk Assessment shall be conducted. The senior or designated person of the work team will conduct the FLRA with the participation of other employees. The FLRA shall be documented and submitted to the designated supervisor after the task is completed.

3.3.6 PPE Assessment & Matrix

Personal Protective Equipment shall be identified via the The Workforce Group, LLC PPE Hazard Assessment Certification Form which shall be signed and dated by the Safety Manager.

3.3.7 Site Specific HSE Plan (SSHP)

Each work location has a site specific HSE plan.

Each employee reporting to a location shall receive a documented orientation from a The Workforce Group, LLC supervisor that includes the SSHP for that site.

The SSHP contains the The Workforce Group, LLC Health and Safety Policy, site specific safety requirements as well as a PPE matrix and a signed site specific worksite hazard assessment for that location, which the The Workforce Group, LLC has a responsibility to provide.

3.4 Legal and Other Requirements

OBJECTIVES

- To describe the process developed to identify and have access to legal and other requirements;
- To keep the information up to date and to communicate these requirements to those with compliance responsibilities.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

- Identify and ensure access to legal and other requirements.
- Identifies, tracks and monitors legal and other requirements for work performed;
- Provides updates and ensure accuracy and completeness of the The Workforce Group, LLC Safety & Health Compliance Matrix and communicates requirement changes to the site manager and supervisors.

Site Manager and Supervisors

- Notifies the The Workforce Group, LLC Safety Manager of new projects and communicates responsibilities to our employees;
- Communicates facility and operational changes to the The Workforce Group, LLC Safety Manager.

Employees

- Follows all legal and other requirements.

PROCEDURE

The Workforce Group, LLC operations personnel notify the The Workforce Group, LLC Safety Manager if a new project is to begin.

The The Workforce Group, LLC Safety Manager then conducts an analysis which identifies the legal and other requirements that apply to the scope of work being performed.

Employees are to have ready access to the current safety and applicable legislation as required. The bulletin board shall be utilized for this purpose.

3.4.1 Legal Requirements

- Regulatory statutes applicable to the jurisdiction
- Hazard or industry specific statutes and regulations
- Municipal laws/regulations/by-laws
- Collective Agreements (e.g. those containing provisions for personal protective equipment)

3.4.2 Other Requirements

- Client requirements
- Agreements with contractors
- Industry and trade association codes
- Standards that must be adhered to in the organization – e.g. ACGIH Threshold Limit Values

Identified legal and other requirements are listed on the The Workforce Group, LLC Safety & Health Compliance Matrix.

Legal and other requirements are incorporated into the Worksite Hazard Assessment which is included in the site specific HSE plan for the project.

3.4.3 Means of Tracking Requirements

Establish means of tracking all of the above (through internet, e-mail, safety bulletin boards etc)

- The Workforce Group, LLC subscribes to those identified information services as required to be continually informed of regulatory scope changes.
- The Workforce Group, LLC uses the internet to check on safety and health new or revised legislation for the scope of work being conducted.

3.4.4 Review of Requirements

Legal and other requirements are reviewed annually.

3.4.5 The Workforce Group, LLC Safety and Health Compliance Matrix

ASPECT	LOCATI ON	CITATION OR STANDARD	COMPLIANCE OBLIGATION OR TASK	FREQUE NCY	RESPONSI BLE PARTY	OPERATIO NAL CONTROL	RECORDS
Overall Health & Safety	All Operations	29 CFR 1910	U.S. Occupational Safety and Health Standards	Continuous	Entire Organization	Inspections	Training Inspections
Bloodborne Pathogens	All Operations	29 CFR 1910.1030	Employer shall establish a written Exposure Control Procedure.	Continuous	Safety Mgr Supervisor Employee	Bloodborne Pathogens Program	Training SSHP Receipt
Permit Confined Spaces	All Operations	29 CFR 1910.146	Requirements to protect employees from the hazards of permit-required confined spaces.	None Precaution ary	Supervisor Employee	Confined Spaces Program	SSHP Receipt
Hazard Communication	All Operations	29 CFR 1910.1200	Ensure that hazards of all chemicals are transmitted to employees.	As new chemicals are introduced	All employees	HAZCOM Program	Training SSHP Receipt
HAZWOPER	All Operations	29 CFR 1910.120	Emergency response operations for releases of hazardous substances.	Precaution ary	Supervisor Employee	HAZWOPE R Program SSHP	Training SSHP Receipt

PS Safety 1

Safety Management Plan

Safety and Health Management Systems

ASPECT	LOCATI ON	CITATION OR STANDARD	COMPLIANCE OBLIGATION OR TASK	FREQUE NCY	RESPONSI BLE PARTY	OPERATIO NAL CONTROL	RECORDS
Personal Protective Equipment	All Operations	29 CFR Subpart I	Protective equipment shall be provided, used, and maintained whenever hazards are capable of causing injury or impairment to any part of the body.	As Required	Safety Mgr Project Mgr Supervisor Employee	PPE Program SSHP Training	Training SSHP Receipt
Respiratory Protection	All Operations	29 CFR 1910.134	The employer shall be responsible for the establishment and maintenance of a respiratory protection program.	Precaution ary	Supervisor Employee	Respiratory Protection Program	SSHP Receipt
Emergency Response Plan	All Operations	29 CFR 1910.38	An emergency action plan must be established and in writing.	As Required	Safety Manager	Emergency Response Program	SSHP Receipt
Fall Protection	All Operations	29 CFR 1926.503	Protection for working over 6' above lower working surface.	Precaution ary	Project Mgr Supervisor Employee	Fall Protection Program	SSHP Receipt

PS Safety 1

Safety Management Plan

Safety and Health Management Systems

ASPECT	LOCATI ON	CITATION OR STANDARD	COMPLIANCE OBLIGATION OR TASK	FREQUE NCY	RESPONSI BLE PARTY	OPERATIO NAL CONTROL	RECORDS
Environmental Compliance (Federal)	All Operations	CFR Title 40: Protection of Environment	U.S. Environmental Protection Agency Protection of Environment	As Required	Safety Manager Project Manager	The Workforce Group, LLC EMS	As per The Workforce Group, LLC EMS
Client HSE Compliance	Client Specific	As specified by client	Follow individual client safety and environmental requirements	Continuous	All Employees	SSHP Inspections	SSHP Inspections
Vehicle Operation Compliance	All Operations	Federal, state and community driving laws and regulations	Follow all provincial and local vehicle operating laws and regulations	Continuous	Manager	Training License Verification	Human Resources

3.5 Written Safety and Health Goals, Objectives and Programs

OBJECTIVES

- To establish and maintain proactive documented safety and health objectives within The Workforce Group, LLC;
- To have objectives consistent with our safety policy and our commitment to continual improvement.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

- Develops the safety and health objectives for The Workforce Group, LLC on an annual basis.
- Occupational health and safety objectives and targets

Site Manager and Supervisors

Train employees on objectives.

Employees

Provide input into objectives planning through involvement.

3.5.1 Safety and Health Goals

The The Workforce Group, LLC Safety Manager identifies goals by:

- Aligning objectives with The Workforce Group, LLC policy, legal and other requirements, hazard abatement procedures
- Making objectives specific, measurable and achievable
- Gathering input from employees and interested parties
- Incorporating Management Review procedure results

Examples of goals include:

- Reduction of risk levels
- Elimination or reduction in frequency of undesired incidents
- Implementing additional features of the The Workforce Group, LLC Safety & Health Management System

After goals are identified the The Workforce Group, LLC Safety Manager prioritizes them and establishes a scope, objective, time scale, and target, responsibilities and resources requirements for each identified objective and provides a safety management program.

Performance against developed goals is measured by and communicated to employees in memos, safety meetings and other as-needed methods.

Developed goals are reviewed and modified on a quarterly basis. If circumstances have changed since the original formation of goals adjustments may be made and documented.

Progress on achieving goals is reviewed as part of the Key Performance Indicator procedure and Management Review procedure.

3.5.2 Objectives and Safety Programs

To establish and maintain management programs to achieve identified safety and health goals.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

- Develops, documents and communicates the safety and health management programs to achieve identified safety and health objectives;
- Monitors progress towards objectives;
- Updates and revises safety and health management programs accordingly.

Site Manager and Supervisors

Implement safety management programs.

EMPLOYEES

Follow requirements of safety and health management programs.

PROCEDURE

The The Workforce Group, LLC Safety Manager establishes safety and health management programs based on objectives and responsible parties are notified of their requirements.

Where significant modifications in working practices, processes or equipment are expected the management program will provide for new hazard identification and risk assessments.

Progress for safety and health management programs is reviewed as part of the Key Performance Indicator procedure and Management Review procedure and shall be evaluated quarterly.

3.5.3 Written Annual Goals for 2011

SCOPE	PROGRAM OBJECTIVE	TARGET & TIME SCALE	RESPONSIBLE PARTIES	RESOURCES
All Operations	Training Compliance	100% Training Compliance by 12/32/11	President	Time Training
All Operations	SHMS Implementation	Implement SHMS Documentation by 12/31/11	President	Time Administrative

4.0 IMPLEMENTATION & OPERATION

OBJECTIVES

- To define and communicate roles, responsibilities, and authorities necessary to establish, implement, and maintain the SHMS
- To communicate the safety and health policy, objectives and targets, and other elements of the SHMS to employees and contractors
- To ensure employees are appropriately trained
- To establish procedures to handle safety and health inquiries from interested parties
- To identify and describe the core elements of the SHMS
- To control safety and health documents and procedures
- To maintain documented procedures to control operations that could impact safety and health
- To have an effective emergency preparedness and response plan

RESPONSIBILITIES

All responsibilities are identified within each of the Implementation and Operation procedures.

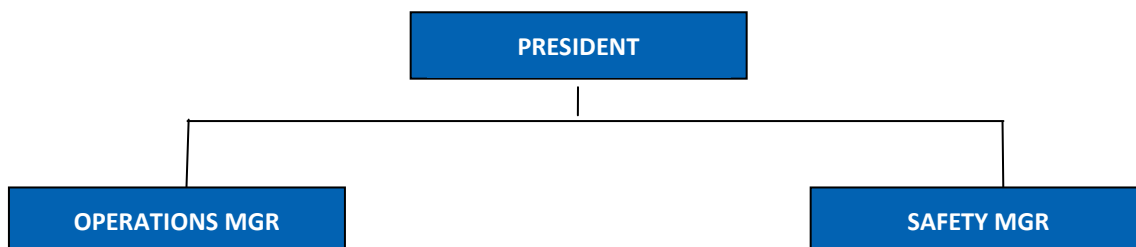
4.1 Overview

Through effective implementation and operational controls The Workforce Group, LLC benefits by:

- Providing a framework for a systematic and integrated approach for safety and health management which allows the SHMS to become part of the fabric of our business
- Making the SHMS "system" dependent and not "person" dependent
- Promoting sound safety and health management which becomes a means of doing business and not an end in and of itself
- Positioning The Workforce Group, LLC as a safety and health leader.

4.2 Structure and Assignment of Responsibilities

4.2.1 Safety and Health Management System Organization Chart



OBJECTIVES

- To define roles, responsibilities and authorities are documented and communicated;
- To ensure adequate resources are provided to enable safety and health tasks to be performed.

RESPONSIBILITIESPresident

Ultimate authority and responsibility for the SHMS lies with the President. The President ensures that adequate resources are available to accomplish the goals of the The Workforce Group, LLC SHMS and that the system is incorporated in the day-to-day conduct of business.

Safety Manager

The The Workforce Group, LLC Safety Manager is responsible for ensuring development, implementation and maintenance of the safety and health management system within The Workforce Group, LLC operations. This position reports to the The Workforce Group, LLC President for responsibility of performance. Responsibilities include, but are not limited to:

- Sets an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all The Workforce Group, LLC and client safety policies and procedures
- Conducts incident analysis to identify incident trends
- Ensures that investigations are conducted and conducting site inspections
- Acts as a liaison between management and outside agencies
- Assures training programs are established and tracked for employees and supervisors
- Develops technical guidance and programs to identify worksite hazards
- Ensures corporate compliance with legal and other requirements.
- Monitors health and safety, environment and quality assurance policies, procedures, protocols and legal requirements and assists site management in implementation
- Liaison with client's Health and Safety dept, governmental agencies (i.e. Public Health, etc.).
- Ensures due diligence records are maintained incl. audits are conducted
- Monitors and address all program shortcomings
- Performs all risk management requirements including workers compensation procedures are followed
- Prepares reports including key performance indicators to management and to the client as needed
- Monitors corrective actions determined from audits, inspections, etc.
- Central point of contact for units in regards safety concerns

Operations Management Members

These positions reports to the The Workforce Group, LLC President.

- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all The Workforce Group, LLC and client safety policies and procedures;
- Investigating (or assisting in) incidents;
- Enforcing all The Workforce Group, LLC and client safety rules, policies or procedures in a consistent manner;
- Ensuring weekly safety meetings are conducted and documented;
- Incorporating safety performance in the personnel evaluation/appraisal process;
- Assuring that adequate resources are available to incorporate safety into their operations;
- Monitoring and ensuring those supervisors within their responsible area are performing their duties in accordance with this safety management system.

Supervisors

Supervisors report to the operations management.

- Setting an example for employees to follow by incorporating safe work practices in all aspects of their activities and following all The Workforce Group, LLC and client safety policies and procedures;
- Enforcing all The Workforce Group, LLC and client safety rules, policies or procedures in a consistent manner;
- Assuring that safety devices and PPE are available and properly utilized;
- Promptly addressing safety concerns and issues brought to their attention by employees;
- Assuring that injuries/illnesses are treated promptly and management being notified immediately;
- Assisting in investigating all incidents and near misses;
- Assuring that no unsafe condition exists in their area of responsibility;
- Assuring that employees are properly oriented and trained for hazards and equipment at their location;
- Performing safety orientations and documenting the orientation before allowing any employee to begin work at their location.

All Employees

Working safely is a condition of employment. Each employee has personal responsibility and accountability for safety on the job. All employees are responsible for:

- Following all The Workforce Group, LLC and client safety policies and procedures and to perform assigned work duties in a safe manner;

- Stopping work immediately if they consider conditions or work methods to be unsafe and notifying their supervisor of the problem;
- Immediately reporting any injury, suspected injury, job related illness, spill or damage to any property to their immediate supervisor. If their immediate supervisor is not available the employee is then to immediately notify the project manager.

PROCEDURE

4.2.2 Documentation and Communication

Responsibilities are defined and documented within the Responsibilities section of each SHMS procedure. The responsibilities are clearly communicated to employees through various means such as job descriptions, meetings, site specific HSE plans, training, SHMS Manual, etc. SHMS responsibilities are reviewed and revised through inspections, assessments, and management reviews.

4.3 Training, Awareness and Competency

OBJECTIVES

- To ensure the competence of personnel to carry out their designated function.
- A competent employee means adequately qualified suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

Identifies updates and monitors training for employees.

Site Manager and Supervisors

- Shall ensure all employees assigned to their project complete training identified in the training matrix.
- Shall ensure that any work that may endanger an employee must be completed by an employee who is competent to do the work.
- Shall ensure all employees assigned to their project are trained in procedures until they are competent.
- Shall ensure all employees have sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

Employees

Attend and follow requirements of safety and health management training.

PROCEDURE

4.3.1 HSE Competency Assurance Process

Competence is a combination of knowledge, understanding and skill, and the appropriate level of competence cannot be acquired simply by attending a training session. The understanding and skill are acquired by experience. For individuals managing HSE hazards and risks experience and training are essential. The following components are to be considered for each worksite's delivery team for competency assurance:

Experience Level of Knowledge Capability to Perform

Upon hire with The Workforce Group, LLC every employee will participate in the Competency Assurance Process. This process begins with the selection of personnel and enters a continuous

improvement loop that will stay with the employee during his career with The Workforce Group, LLC. At The Workforce Group, LLC our view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities and critical activities. Not only will employees gather evidence of competence, they will also participate in an annual appraisal to assess their performance, behaviors and personal development. This process enables the continuous improvement loop that feeds back into training and development activities that ensure competency assurance is an ongoing career cycle process.

1. Job Description Identified → Candidate Selection and Hiring Process (Reference and Background Check, Drug Screen, Physical Assessment) → Person Assessed and Hired for Open Position
2. Experience, Qualifications Assessed for Initial Training ↔ Initial Induction Training Completion
3. Further Training Required? If no → Ready for Work → On the Job Training → Competency Continually Assessed
4. Annual Performance Appraisal → Ready to Promote? → Employee Promoted → Further Training Required?

Additional competency regarding health and safety is demonstrated during inspections employees are interviewed for knowledge to determine competency to work safely and be knowledgeable of their responsibilities within the The Workforce Group, LLC Safety and Health Management System.

For individual directly managing risk the specific requirements will be matrixed with training for areas such as legislative requirements, client HSE requirements and recognized certification and licensing.

4.3.2 Identification of Training and Competency Needs

Training is identified in our training matrix which specifies safety and health training needs by job title. Our training matrix is updated based on changing risks.

4.3.3 Training Records

All training records are maintained on site either by the The Workforce Group, LLC Safety Manager or senior representative of management or their designee.

4.3.4 Delivery of Induction, Transfer & Refresher Training

Employees receive initial induction training. No work by any employee is allowed to begin until the orientation is completed.

Training requirements are tracked by the The Workforce Group, LLC Safety Manager and formal training sessions are conducted either on or off site by the Safety Manager or competent/qualified instructor for the required subject matter.

4.3.5 Training Documentation

All training must be documented with: date; employee name, employee signature; instructor name; instructor signature and title of course.

Each new employee shall receive an orientation prior to beginning any work.

4.3.6 Supervisor Safety Management Training

Supervisors and managers receive annual, documented safety management system training.

4.3.7 The Workforce Group, LLC Training Matrix

Additional training for identified hazards must be completed prior to employee exposure based upon a hazard assessment. Sample shown.

	LOCATION	FREQUENCY	Admin	Management	Craft
Bloodborne Pathogens	All	A	PRN	X	X
Confined Spaces	All	I		X	X
Defensive Driver Awareness Driving Safety	All	I	X	X	X
Electrical Safety - Unqualified	All	I		X	X
Emergency Response Plan	All	I	X	X	X
Fall Protection					X
Fire Extinguishers					X
First Aid/CPR					PRN
H2S	All	I		X	X
Hand and Power Tools	All	I		X	X
HAZCOM	All	I	X	X	X
Hearing Conservation	All	A	X	X	X

Modify the table to reflect your actual training needs

PS Safety 1

Safety Management Plan

Safety and Health
Management Systems

Isolation of Energy LOTO	All	I		X	X
JHA	All	I	X	X	X
Ladder Safety	All	I		X	X
Personal Protective Equipment	All	I		X	X
Rigging Awareness	All	I		X	X
Scaffolding	All	I		X	X
Site Specific HSE Plan	All	I	X	X	X
Supervisor Safety Training	All	PRN	PRN	X	PRN

PRN = As Required

Frequency: I = Initial A = Annual 2 = 2 Years 3 = 3 years

4.3.8 Short Service Employee Program

The purpose of the Short Service Employee (SSE) Management program is to prevent work related injuries and illnesses to new hires and temporary workers. The Supervisors and co-workers must be able to readily identify Short Service Employee participants. The Workforce Group, LLC will assign experienced employees to oversee the daily activities of those assigned to the SSE program. Refer to the The Workforce Group, LLC Short Service Employee Procedure.

Short Service Employee – An employee or sub-contractor employee with less than six months experience in the same job or with his/her present employer.

- Supervisors will assure that all new, transferred and temporary employees have been through The Workforce Group, LLC Safety Orientation and have a complete knowledge of the expectations for their job function.
- Short Service Employee participants will wear orange hard hats or another approved method of identification. The The Workforce Group, LLC shall comply with client designated hardhat color for SSE.
- Mentors will set the proper safety example for any Short Service Employee assigned them.
- Mentors will be assigned one short service employee. Exception: in shop environments, a maximum of 3 Short Service Employee, participants may be assigned per mentor.
- Short Service employees on client locations shall make up no more than 50% of a crew.

4.4 Consultation and Communication**OBJECTIVES**

To encourage participation in good safety and health practices and support for our policy and objectives by consulting and communicating with all employees.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

- Establishes procedure to ensure that pertinent safety and health information is communicated to and from employees and other interested parties
- Ensures employees are involved in the development and review of procedures to manage risks

Site Manager and Supervisors

- Encourages all employees to participate in safety matters and provide input into the safety process
- Immediately forwards any question, concern or suggestion any employee has regarding safety and health

Employees

- Provide input into the safety process and participate in all levels of safety they choose to

PROCEDURE

Methods used to involve employees in hazard identification, risk assessment and risk control and to encourage employee involvement in the safety and health process include:

4.4.1 Open Door Policy

It is preferred that the immediate supervisor and/or project management be consulted for resolution of the concern; however, The Workforce Group, LLC maintains a strong open door policy to report problems or concerns to any level of management without fear of reprisal of any employee.

4.4.2 Behavior Based Safety Program (BBS)

- Employees may report any suggestions, unsafe act, unsafe condition or recognition, even anonymously, via the The Workforce Group, LLC BBS Safety Observation Form). The name of the employee being observed is never used. The form is to be immediately forwarded to the The Workforce Group, LLC Safety Manager. Refer to the The Workforce Group, LLC Behavior Based Safety (BBS) Procedure.
- Employees may use other observation forms if another safety observation program is present. Observations by fellow employees are to be performed in a positive, non-judgmental manner and the observing employee must give permission prior to the observation.
- No disciplinary action may result from safety observations by fellow employees. Supervisors will always allow time for safety observations to be made based on operational scheduling. Supervisors do not conduct observations.

4.4.3 Incident Notice Form

This communicates lessons learned from incidents, is posted on employee bulletin boards and shall be discussed in weekly safety meetings.

4.4.4 Weekly Safety Meetings

Employees are required to attend safety meetings and the meetings shall be documented. Management is to attend all safety meetings if present on site.

4.5 Document and Data Control

OBJECTIVES

To document and maintain up-to-date sufficient documentation to ensure that our health and safety management system is adequately understood and effectively and efficiently operated.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager (Preparation and Custodian Duties)

- Responsible for validating and approving all documents and revisions to existing documents
- Responsible for assuring documents included in an SHMS are in the proper format
- Ensures documents can be located, current versions are available, and obsolete documents are removed and determine the routing path for review of a controlled document
- Updates The Workforce Group, LLC SHMS Document Control List

PROCEDURE

The authority initiates document development. The authority seeks input from appropriate personnel to create the document. The draft document is submitted to the appropriate individuals for review.

4.5.1 Document Format

SHMS documents shall be consistent in format and include a document number, issue date, authority, preparer and revision history.

4.5.2 Reviewing

Reviews of controlled documents are performed annually. Revisions to controlled documents are performed on an as needed basis.

4.5.3 Control

The The Workforce Group, LLC Safety Manager prepares a Document Control List. The list defines the document retention period and other requirements.

4.5.4 Document Distribution

This manual is maintained on the The Workforce Group, LLC server and is available to the following personnel:

The Workforce Group, LLC President	Operational Management	Human Resources
Site Managers	Safety Department	Clients upon request

Only PDF versions of this manual are available to non-authorized persons. The master documents are maintained under a secure access configuration. No controlled copies will be issued. Only PDF documents will be distributed with a self expiring footer showing as uncontrolled after 24 hours from time of printing.

SHMS DOCUMENT CONTROL LIST

		Retention				
Document Title	On Site	Off Site	Driver	Method	Authority	Date Last
SAFETY & HEALTH MANAGEMENT SYSTEM						
Safety & Health Management System	As Updated	5 Years	Policy	Electronic	President	INSERT
SAFETY & HEALTH MANAGEMENT SYSTEM FORMS						
Worksite Hazard Assessment Form	As Updated	5 Years	Policy	Electronic	President	INSERT
Job Safety Analysis (JSA)	As Updated	5 Years	Policy	Electronic	President	INSERT
Field Level Risk Assessment (FLRA)	As Updated	5 Years	Policy	Electronic	President	INSERT
Safety Observation Form	As Updated	5 Years	Policy	Electronic	President	INSERT
Incident Notice Form	As Updated	5 Years	Policy	Electronic	President	INSERT
Field Incident Report Form	As Updated	5 Years	Policy	Electronic	President	INSERT
PROGRAMS						
Assured Equipment Grounding	As Updated	5 Years	Policy	Electronic	President	INSERT
Bloodborne Pathogens	As Updated	5 Years	Policy	Electronic	President	INSERT
Disciplinary Program	As Updated	5 Years	Policy	Electronic	President	INSERT
Confined Spaces	As Updated	5 Years	Policy	Electronic	President	INSERT
Electrical Safety	As Updated	5 Years	Policy	Electronic	President	INSERT
Fall Protection	As Updated	5 Years	Policy	Electronic	President	INSERT
Fire Safety	As Updated	5 Years	Modify the table to reflect your required safety programs			
Fire Safety - Extinguishers	As Updated	5 Years				

PS Safety 1

Safety Management Plan

Safety and Health
Management Systems

Document Title	On Site	Retention			Authority	Date Last
		Off Site	Driver	Method		
First Aid Program	As Updated	5 Years	Policy	Electronic	President	INSERT
Hand & Power Tools	As Updated	5 Years	Policy	Electronic	President	INSERT
HAZCOM	As Updated	5 Years	Policy	Electronic	President	INSERT
H2S	As Updated	5 Years	Policy	Electronic	President	INSERT
Ladder Safety Program	As Updated	5 Years	Policy	Electronic	President	INSERT
Managing Hazardous Energy	As Updated	5 Years	Policy	Electronic	President	INSERT
Noise/Hearing Conservation	As Updated	5 Years	Policy	Electronic	President	INSERT
PPE Program	As Updated	5 Years	Policy	Electronic	President	INSERT
PSM	As Updated	5 Years	Policy	Electronic	President	INSERT
Rigging	As Updated	5 Years	Policy	Electronic	President	INSERT

4.6 Operational Control

OBJECTIVES

To establish and maintain arrangements to ensure effective measures are used to control risk, to follow our safety and health policy, meet objectives and conform to legal and other requirements.

Refer to specific The Workforce Group, LLC safety program document external to this document.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

Responsible for development of operational controls and reviewing to confirm the appropriate legal and other requirement are identified in the operational controls.

Site Manager and Supervisors

- Responsible for the implementation of operational controls at the operational level of the SHMS
- Identifies the roles and responsibilities of operations personnel

Employees

- Follow all safety and health procedures
- Provide suggestions and other input to improve procedures

PROCEDURE

4.6.1 Compliance with Legal and Other Requirements

The Manager, with assistance from the The Workforce Group, LLC Safety Manager, leads the development, documentation, and maintenance of applicable operational controls. Operational controls are developed for safety and health requirements identified in the Safety and Health Compliance Matrix.

4.6.2 Identified Hazards and Risks

Operations and activities associated with hazards and identified risks are addressed within the SHMS through the worksite hazard assessment.

4.6.3 Management of Change (MOC)

The Manager identifies facility and operational changes for review. The The Workforce Group, LLC Safety Manager determines whether the changes have a potential impact the operational

controls and, if so, updates the operational controls in conjunction with the Manager. Modifications and revisions to operational controls are communicated to relevant personnel via the site specific HSE plan. Refer to the The Workforce Group, LLC Management of Change Procedure.

4.6.4 Purchase of Goods and Services

- Only approved suppliers are used when purchasing personal protective equipment to ensure the equipment meets regulatory requirements.
- No hazardous chemical may be purchased without proper MSDS documentation.

4.6.5 Systems to Control Access or Exiting Customer's Premises

- All vehicles will be properly insured and equipped with all client vehicle required safety equipment.
- All staff will have proper client required training and identification prior to entering a client location.
- All staff will log in and log out per client requirements.
- No material will be brought onto or leave client property without permission from the client in accordance with their requirements.

4.6.6 Background Checks Prior to Issuing Identification Cards

- All individuals shall provide proof of identity prior to being issued a badge or access to company or client property. The proof must be issued by a governmental agency and have a photo (driver's license, passport, etc.).
- All visitors shall log in and out of our or client facilities.
- Further background investigation may be required based on the sensitivity of the employee's position.

4.6.7 Company Employee Identification System

- All employees shall be issued an ISNetworld identification badge with photo included. Temporary badges can be downloaded from ISNetworld prior to the final badge arriving. Employees are required to carry at least the ISNetworld badge in addition to any client or The Workforce Group, LLC issued identification badge.

4.6.8 Hazardous Materials

- No controlled products or materials will be allowed to be used unless there is a valid Material Safety Data Sheet available on-site and there is a supplier or workplace label on the container for any controlled product that is produced, manufactured or used at any work site.
- The Workforce Group, LLC will ensure the MSDS is obtained from the supplier when receiving a controlled product on each job site.

- The Workforce Group, LLC will ensure that MSDS are filed at the work site where they will be readily accessible to employees. MSDS must be updated every three years.
- The Workforce Group, LLC will ensure that MSDS are available and posted near the work site where controlled products are used.
- Managers will ensure that employees are notified if a controlled product is to be used in an open area or where fumes may migrate.
- A Controlled Product Inventory List and Material Safety Data Sheets shall be kept at a main location and will be made available to employees for review.
- Any work site generated waste classified as hazardous shall be stored and handled safely and properly using a combination of any and all means of identification and instruction of employees on the safe handling of the hazardous waste.

4.6.9 Control of Hazardous Materials for Client Locations

- No hazardous material will be brought onto client property unless all client approval processes have been met. This may involve a needs analysis review and MSDS submittal and approval. All client procedures must be followed.

4.6.10 Reporting of Hazardous Conditions, Security Incidents or Injuries

- All employees have a responsibility for reporting hazardous work conditions or acts that are encountered on the job site.
- Employees shall not perform any work they feel is unsafe. Each employee is required to immediately report any unsafe condition or act to their immediate supervisor. Any employee may report hazardous work conditions without fear of reprisal.
- Employees shall immediately report any injury, near miss and incidence of fire, property damage, theft or other security related matter and environmental non-conformance or, before reporting for work, and any non-work injuries or prescriptions that could affect their ability to safely perform their normal job.
- Failure to report incidents, hazardous work conditions or near misses shall result in disciplinary action.
- Additional methods for reporting hazardous conditions include: Weekly safety meetings; The Workforce Group, LLC BBS Safety Observation Form to the The Workforce Group, LLC Safety Manager/ Supervisor or JHSC
- Direct communications with any member of The Workforce Group, LLC supervision or management;
- Client hazard reporting methods.

4.6.11 Fire Fighting - Incipient Policy

Employees shall only use fire extinguishers if trained. No employee will risk their own or others personal safety in attempting to put out a fire in its initial (incipient) stage. Employees will

evacuate and use the appropriate alarm and allow qualified individuals attempt to extinguish the fire.

4.6.12 Disciplinary System

Management is committed to the safety excellence of its employees by providing an injury and incident free workplace. All employees are to abide by the regulations, safety rules and the use of safe work practices and procedures. Refer to the The Workforce Group, LLC Disciplinary Action Procedure.

Safety violations will be handled in an objective but firm manner. The enforcement progression follows the steps outlined below with documentation at each stage:

- Verbal Warning
- Written Warning
- Dismissal

Violation of any of the below rules will not be tolerated on the job and are additional grounds for immediate discipline up to and including dismissal:

- Consuming or being in possession of alcohol or illegal drugs on company premises, or on any company job-site, is prohibited.
- No weapons or firearms of any type are allowed on the worksite.
- Fighting, horseplay, practical jokes or otherwise interfering with other workers is prohibited.
- Theft, vandalism or any other abuse or misuse of company property is prohibited.
- All unsafe acts and conditions, including “near miss” incidents, are to be reported to appropriate supervision promptly.
- Hard hats, safety boots and safety glasses are to be worn at all times on all job-sites.
- All work shall be carried out in accordance with appropriate safe work practices and your supervisor’s direction.
- Only those tools that are in good repair, with all guards and safety devices in place, shall be used.
- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.

4.6.13 Impairment

The Workforce Group, LLC has a ZERO tolerance and prohibits any employee from possessing or being under the influence from alcohol, drugs and other substances at any The Workforce Group, LLC work location. Refer to the The Workforce Group, LLC Drug and Alcohol Policy Statement.

4.6.14 General Safety Standards and Guidelines

The below applies to all The Workforce Group, LLC worksites. Additional work practices are contained in the site specific HSE plans based on local operating requirements as well as specific The Workforce Group, LLC safety programs associated with this safety and health management system.

Training

- All work that may endanger an employee must be completed by an employee who is or is working under the supervision of an employee who is competent to do the work. All employees must be trained until they are competent.

Housekeeping

- The Workforce Group, LLC is responsible for making sure that the work site, and in particular entry and exit routes at a work site, are free of waste, materials and equipment.
- Obstructed entry and exit routes can pose a serious hazard to workers having to leave a work site quickly, as might be required during an emergency and shall be kept clear at all times.
- Obstructions may reduce visibility at a work site and may also present a tripping hazard and shall be removed as observed.

Lighting

- The Workforce Group, LLC is responsible for ensuring adequate lighting is available for tasks requiring the ability to distinguish detail, such as an electrician working on live circuits at a panel board or a sewing machine operator stitching a product.
- The Workforce Group, LLC is responsible for protecting light sources above a working or walking surface against damage.
- Emergency lighting must be available if employees are in danger if the normal lighting system fails. Natural daytime lighting cannot be relied upon as a dependable source of emergency lighting.
- The Workforce Group, LLC is responsible for ensuring that an emergency lighting system provides sufficient light to allow workers to safely leave the work site, start any necessary emergency shutdown procedures or restore normal lighting.

Pallets and Storage Racks

- All goods, materials and equipment at work sites must be stacked, stored, and secured in such a way that they do not flow, move, roll or collapse. Employees responsible for stacking, storing, or securing goods, materials, and equipment must be trained in the safe methods for doing so.
- Stacks, shelving and other fixtures for holding or storing materials shall be laid out and designed so that there is sufficient access for safe loading and unloading.

- Storage areas shall be specifically designated and be clearly marked. Aisles should be wide enough for the type of storage, and be kept free of obstacles and waste materials.
- Suitable racks will be provided for materials capable of rolling such as steel tubes, bars and piping. Large diameter tubes or pipes can be stored on their sides as drums might be stored.
- Wedges, chocks, stakes or other means shall be used to restrain the bottom tier of round objects that are stacked or tiered and that could cause the stack to collapse by rolling or moving.
- Racks, shelving, fixtures, etc. shall be regularly inspected for damage and other defects that might cause loss of strength or result in injury or damage.
- Employees must report to their employer any damage to storage racks as soon as is practical.

Restraining Hoses and Piping

- In those cases where failure or disconnection could cause movement that endangers employees, the hoses or piping and their connections must be restrained.
- Methods of restraint include wiring together hose connections, clamping or bracketing pipe sections, and securing restraint cables at the ends of hoses or pipe that function as loading spouts.

Securing Equipment and materials

- Bags, containers, bundles, etc. stored in tiers must be stacked, blocked, interlocked and limited in height to prevent sliding or collapse.
- Loads must be secured by tie-downs, bulkheads, or blocking. Rolling equipment, when parked, shall have wheels chocked to prevent unintentional movement.

Vehicle Traffic Control

- Employees on foot and exposed to the hazards of moving vehicles are required to wear highly visible apparel that is clearly distinguishable.

Apparel

- Apparel should be kept clean and worn as intended – done up properly around the body with no loose or dangling parts, there is to be no wearing of jewelry while working on site to ensure no entanglement and no other clothing or equipment shall obscure high visibility clothing.

4.6.15 Facility Equipment and Working Conditions

- Damaged and faulty equipment reporting procedures must be in place.
- No The Workforce Group, LLC employee is allowed service vehicle tires or wheel assemblies. This work shall only be performed by a qualified contractor.

- No equipment shall be operated unless the employee has received proper training by the supervisor.
- Tools and equipment damaged during use must be replaced or repaired only by a qualified person or company.
- Floors, platforms, ramps, stairs and all walking surfaces for employees must be maintained in a state of safe repair and kept free of slipping and tripping hazards. If such areas are taken out of service The Workforce Group, LLC will take reasonable means for preventing entry or use.
- The Workforce Group, LLC shall ensure that worksite traffic is controlled to protect our employees. This will be accomplished through engineering controls or administrative controls either by The Workforce Group, LLC or via our customers if they maintain control of the traffic on the worksite. Each worksite must have a designated safe way of entering and exiting.
- The Workforce Group, LLC will ensure that housekeeping issues such as keeping the work site clean and free from materials or equipment that could cause employees to slip or trip.
- The Workforce Group, LLC will ensure all equipment is maintained, safe to perform adequate strength for its purpose and free from obvious defects. As with our statement that if it isn't safe doesn't do it – this also applies to equipment; if it isn't safe don't use it.
- Any equipment being found to be defective or in need of repair shall be tagged out, isolated from service by being turned into an employee's direct supervisor and not used until repaired by a qualified repair person.

4.6.16 Lone Workers Policy

Each worksite shall develop a Working Alone Plan and must provide effective radio, telephone, cellular phone or other electronic communication between an employee who works alone and persons capable of assisting the worked in an emergency or if the employee is injured or ill.

Each worksite's Working Alone Plan shall address having an established contact person. A person must be designated to establish contact with the employee at predetermined intervals and the results must be recorded by the person.

If electronic communication is not practicable or readily available at the worksite, The Workforce Group, LLC must ensure that a representative of The Workforce Group, LLC or another competent employee visits the employee, or the employee contacts The Workforce Group, LLC or another competent employee.

These visits or contacts shall be at intervals of time appropriate to the nature of the hazards associated with the employee's work. As a minimum contact shall occur no less than every four hours.

The hazard assessment and Working Alone Plan at each The Workforce Group, LLC worksite must be reviewed on an annual basis or when work processes or arrangements which could affect an employee's well-being are introduced or changed.

4.6.17 Lifting and Handling Loads

- No employee will manually lift, lower, push, pull, carry, handle or transports a load that could injure them. All employees shall receive ergonomic training addressed in the MSD procedure in this safety management system.
- The Workforce Group, LLC has a responsibility to provide, where reasonably practicable, appropriate equipment for lifting, lowering, pushing, pulling, carrying, handling or transporting heavy or awkward loads.
- Within each worksite's site specific safety plan is a hazard assessment that all employees receive. Included within that document that all employees receive and are tested on is an area addressing how to handle heavy and awkward loads to minimize manual handling by the employee. Examples include: not lifting over a set amount, being required to ask for help, being required to utilize mechanical means for lifting and transport, etc.
- Material and equipment must be placed, stacked or stored in a stable and secure manner. Stacked material or containers must be stabilized as necessary by interlocking, strapping or other effective means of restraint to protect the safety of employees.
- An area in which material may be dropped, dumped or spilled must be guarded to prevent inadvertent entry by employees, or protected by adequate covers and guarding.

4.6.18 Fatigue Management

Refer to the The Workforce Group, LLC Fatigue Management Procedure. The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:

- Employees must be in a fit state to undertake work
- Employees must be fit to complete work
- Employees must take minimum periods of rest to safely perform their work

The following work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and to increase mental fitness. If local legislated requirements are higher they shall be followed.

1. Every Employee shall have necessary work breaks in order to avoid fatigue. These scheduled breaks will apply to both driving and on site hours. The following shall be a minimum (or reflect local legislated requirements):
 - 15 Minutes each 2.5 hours
 - 30 Minutes after 5 Hours
 - 30 Minutes after 10 Hours

2. No Workers shall work more than:

- 12 hours per day
- 24 Days Continuous

3. Unfamiliar or irregular work should be avoided.

The Workforce Group, LLC will provide equipment such as anti-fatigue mats for standing, lift assist devices for repetitive lifting and other ergonomic devices as deemed appropriate, chairs for workers to sit periodically and will provide periodic rest breaks for personnel. The Workforce Group, LLC will also periodically evaluate and improve work tasks to control fatigue.

4.6.19 Safe Journey Management (SJM) Policy

Each journey exceeding 10 miles outside of base operational areas, shall be planned, executed, monitored, controlled and reviewed in a manner that the purpose of the journey is accomplished without any incident. A written request and report shall be completed and the site manager make a monthly report to the Safety Manager for SJM trips completed. This journey management plan must be performed in such a way as to:

- To minimize risks and incidents during transport or travel operations
- To reduce non-planned events inherent in transportation
- To increase the effectiveness of suitable emergency response planning

Potential journeys involving driving and/or road transport should be screened and assessed relative to hazards, risks and costs with the following type of questions:

- Is the journey really necessary or will phone calls, e-mail, or video-conferences, etc. achieve acceptable results?
- Must you drive, or is suitable public/commercial transportation available?
- Can the business requirement for a potential journey be delayed and possibly combined with a later trip?
- Can the journey be combined with other people to share a vehicle?
- Is a fit-for-purpose vehicle for the expected route and conditions available (for example, a four-wheel drive vehicle, etc.)?

4.6.20 Driving Safety

Operators of The Workforce Group, LLC or client on or off road vehicles shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.

No passengers shall be on trucks used to deliver goods.

Drivers shall have 3 years of driving experience on the vehicle he/she is licensed to drive & regularly drives.

Passenger compartments are to be free from loose objects that might endanger passengers in the event of an incident. Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.

Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer.

Signs, stickers or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

The Workforce Group, LLC requires drivers and all passengers to wear seat belts anytime the vehicle is in motion. All The Workforce Group, LLC vehicles capable of more than 10 mph/15 kph shall have seat belts installed and they shall be used.

Employees driving vehicles are required to:

- Obey all local and provincial driving laws or regulations as well as requirements of clients;
- Immediately report any citation, warning, vehicle damage or near miss associated with company or client vehicle operation to the supervisor;
- Immediately report any restriction or change to their driving privileges to the supervisor.
- Seat belts shall always be worn by all occupants during the operation of any vehicle; only seats fitted with three-point inertia-reel type seatbelts be used. All vehicles capable of more than 10 mph/15 kph shall have seat belts installed.
- Defensive drivers continually assess conditions and hazards and remain prepared for any challenge that may approach them;
- When speaking with a passenger, always keep your eyes on the road;
- Both hands on the wheel;
- Our policy prohibits backing whenever practicable. Where backing is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward. The vehicle must either have a reversing alarm, or the driver shall use a spotter or walk around the truck/trailer prior to backing;
- No use of cell phones, radios or other electronic devices while driving any vehicle - vehicle must be safely parked prior to using a mobile phone or 2-way radio;
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving;
- Drive for conditions, not just the speed limit;
- Alcohol or illegal drugs are not allowed to be in a company, client or leased vehicle at any time and all vehicles are subject to random inspections.

Drivers are to be prepared before leaving:

- Perform 360 walk around – report new damage;
- Check windshield for cracks that could interfere with vision;
- Inspect for vehicle damage and immediately report any damage to the supervisor if not previously observed;
- Make sure dirt or snow is removed from lights on all sides of the vehicle;
- Brush or clean off snow or ice on all windows to ensure complete vision;
- Check fuel level to be certain the destination can be reached;
- Check to ensure the license plates and inspection tag on vehicle are current;
- Ensure that there is a first aid kit and inspected fire extinguisher in the company vehicle;
- Ensure driver is rested and alert for driving;
- Secure all loads;
- Employees are not to perform repairs or maintenance other than routine fluid additions unless qualified.
- Assess the risk of a journey before driving and plan their driving route based on a journey risk assessment.

4.6.21 Vehicle Requirements

- All company vehicles shall be outfitted with an adjustable steering column.
- All company vehicles shall be outfitted with an independently adjustable driver's seat (at a minimum, moveable forward and rearward).
- All company vehicles will be outfitted with a functional air conditioning/heating system that is able to maintain an in-cab temperature range of 5°C/41°F to 30°C/86°F under all local climatic and driving conditions and the air conditioning unit will use a non ozone-depleting refrigerant.
- All drivers of light vehicles shall carry a high visibility jacket for use in case of emergency stops.
- All instrumentation will be in the local unit of measurement (e.g. speedometer, fuel gauge).
- All light duty vehicles (including buses) are to be equipped with an adjustable left, right and central rear view mirrors
- All light duty vehicles carry a minimum of one collapsible hazard warning triangle.
- All light equipment vehicles shall be outfitted with two red high-intensity lights located as high, as far apart, and as far back as practical, wired to the headlight switch, but also with an override switch, if permitted by local regulations.
- All light vehicles registered after July 1, 2006 will be equipped with Anti-Lock Braking Systems (ABS).
- All light vehicles shall be equipped with a securely stowed first aid kit.
- All seats are to be fitted with headrests. Where practical all company vehicles will be outfitted with a radio, cassette or cd player (or equivalent) to help reduce driver fatigue.

- All vehicle door locking systems will be equipped with an override in order that occupants can open the doors after the vehicle has been locked externally.
- All vehicles are to be equipped with a multipurpose fire extinguisher with a capacity of at least 0.9 kg/2 lb. The fire extinguisher shall be securely mounted on a bracket and located so that it is easily accessible in an emergency without becoming a hazard in case of an incident.
- All vehicles shall have a mobile phone, 2-way radio, or other such communication device that allows communication with emergency response personnel or The Workforce Group, LLC managers.
- All vehicles will be outfitted with an adjustable steering column and the vehicle steering wheel will be located on the left hand side of the vehicle.
- Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.
- Driver shall ensure that passenger compartments are free from loose objects that might endanger passengers in the event of an incident.
- Drivers are prohibited from backing whenever practicable.
- Drivers must have a reversing alarm, use a spotter or walk around the truck/trailer prior to backing.
- Drivers shall have 3 years of driving experience on the vehicle he/she is licensed to drive & regularly drives. All vehicles will be equipped with a mobile phone, 2-way radio, or other such communication device that allows communication with emergency response personnel or company managers.
- No passengers are allowed on trucks used to deliver goods.
- No vehicle less than 1000 kg is to be used on public roads. All company vehicles (light, heavy and trailers) shall be suitable for operation in local climate conditions
- Only seats fitted with three-pointed inertia-reel type seatbelts shall be used.
- Rollover protection will be installed in any vehicle to address high risk environments. The rollover protection engineered will conform to recognized regulatory standard and industry preferred practices.
- Tire type and pattern is to be recommended by the vehicle or tire manufacturer for use on the vehicle in the area of operation.
- Tires are to be radial with a minimum tread depth of 1.6mm [1/16 inch], 2.0mm across 75% of the tire width and tread-pattern visible across 100% of the tire.
- Tires, including spares if full size, are to be of same type, profile and tread pattern, except when the vehicle or tire manufacturer recommends a different type for certain axles.
- Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer.
- Vehicles are to be fitted with a spare wheel and changing equipment to safely change a wheel, or a suitable alternative.

- Vehicles longer than 6 meters/20 feet or with restricted rear view (i.e. pickup trucks that are fully loaded) are to be fitted with an audible reversing alarm.
- Vehicles must be safety parked prior to using a mobile phone or 2-way radio.
- Vehicles shall be outfitted with an independently adjustable driver's seat (at a minimum, moveable forward and rearward).
- Where backing is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.

4.6.22 PPE

- The use and care of personal protective equipment is the responsibility of the employee. The Workforce Group, LLC provides basic safety equipment such as safety glasses; gloves and other as-required PPE.
- PPE must be inspected by the employee for defects prior to each use. Where defective or damaged PPE is found during inspection, it is disposed of. PPE must be kept clean and in good repair at all times. The The Workforce Group, LLC PPE Procedure and SSHP detail the PPE Matrix as well as the selection, use, care and training for PPE.
- The Workforce Group, LLC may require that other companies with employees to work on our site. They shall have a comprehensive health and safety program and comply with The Workforce Group, LLC safety and environmental policies.
- We allow no other company's employee to be on The Workforce Group, LLC jobs until documentation is provided demonstrating the employees meets all required training based on the worksite hazard assessment.

4.6.23 Preventative Maintenance Program for Tools and Equipment

All tools, equipment and vehicles must be properly maintained so that workers are not endangered. Preventive maintenance is the systematic care and protection of tools, equipment, machines and vehicles in order to keep them in a safe, usable condition limit downtime and extend productivity. Maintenance tasks themselves are potentially hazardous and can result in injury. This maintenance program must be prepared at a site level and:

- Be well organized and scheduled
- Controls hazards
- Defines operational procedures, and
- Trains key personnel

General requirements for equipment maintenance include:

- Obtaining a copy of the maintenance schedule recommended by the manufacturer.
- Ensuring that maintenance is performed as required.
- Ensuring that the person(s) performing the maintenance are competent (e.g. licensed mechanic).

- Retaining records of maintenance/service conducted.
- Specifying who is responsible for overseeing equipment maintenance and where the records are kept.
- Set up a system for removal and tagging of damaged or defective tools and equipment.

Tools and Equipment Maintenance Program

- Only properly trained workers are to use tools, equipment and vehicles.
- Inspect all tools, equipment and vehicles before using.
- For vehicles, inspection will consist of doing a circle check.
- If applicable, maintenance schedules for all tools, equipment and vehicles are to be respected.
- Each jobsite supervisor is to conduct a bi-weekly inspection of all tools, equipment and vehicles on the site. This inspection is recorded bi-weekly using an inspection checklist based on the type of equipment and vehicles at that site.
- If at any time a worker judges that a tool, equipment or vehicle is unsafe for use, they are to properly tag the item and inform the supervisor immediately.
- Tools, equipment or vehicles that are tagged unsafe shall be either repaired or replaced - The Workforce Group, LLC management shall be informed.

REMINDERS: Always use Hand and Power Tools Safely

- Select the right tool for the job.
- Keep tools in good condition.
- Use tools the correct way.
- Keep tools in a safe place.

Maintenance Personnel Qualifications - All individuals who perform maintenance work on company tools shall have the appropriate skills, accreditation and/or certification. This certification applies both to company employees and to contracted maintenance services.

Mobile Equipment Maintenance Program - Maintenance Personnel Qualifications - All individuals who perform maintenance work on company mobile equipment will have the appropriate skills, accreditation and/or certification. This certification applies both to company employees and to contracted maintenance services.

Operator Qualifications and Training - All individuals who operate mobile equipment, cranes, vehicles etc. will have the appropriate skills, accreditation and/or certification. This applies to both company employees and contracted equipment services. The approval process includes the following:

- Possession of a valid driver's license appropriate to the type of equipment
- Successful completion of a practical operating exam administered by competent and authorized personnel

- Vision test to meet the appropriate standard - Vision tests must be conducted by competent and authorized personnel
- Hearing test with or without a hearing aid must be adequate for the specific operation. Hearing tests will be conducted by competent and authorized medical personnel.
- No history of epilepsy or of a disabling heart condition or any other physical disability or impairment.
- The operator shall be trained in the following:
 - Their responsibilities to operate the equipment in a safe manner
 - Familiarity and comprehension of safety requirements for the piece of mobile equipment which they intend to operate
 - Manufacturer's operating and maintenance procedures;
 - Hand signals and/or other requirements set by The Workforce Group, LLC.

Records - The maintenance program must contain a recording system. Part of this system should be made up of inventories and schedules. In addition, the recording system should document what maintenance work was done, when, and by whom.

Monitoring - The monitoring functions in a maintenance program fall into two areas. First, the staff responsible for operating and/or maintaining equipment must monitor that equipment to ensure that appropriate checks and maintenance are done. Secondly, management must monitor the entire program to ensure that it is functioning in accordance with company policy.

Scheduled Inspections and Maintenance - All mobile equipment is to be inspected and maintained according to the following Equipment Inspection Schedule as a minimum. Records of all inspections and maintenance are completed and maintained for review and approval.

Maintenance of equipment, release of lubrication fluids, etc., is performed only in approved areas. Spills and leaks from equipment are cleaned up promptly.

EQUIPMENT INSPECTION SCHEDULE

TYPE OF EQUIPMENT	TYPE OF INSPECTION	SCHEDULE
Cranes - Crawler, Truck, Hydraulic, etc.	Complete inspection and certification	Before put to work and annually
	Critical items, controls, overall functioning	Daily
	Safety device, hooks, cables, electrical	Monthly
	Complete inspection	Every 3 months
	Repair	When failure occurs

PS Safety 1

Safety Management Plan

Safety and Health
Management Systems

	Preventative maintenance	Manufacturer's recommendation
Heavy Equipment	Complete inspection	Before put to work
Dozers, Backhoes	Complete inspection	Every 3 months
Compactors, Trucks	Repair	When failure occurs
	Preventative maintenance	Manufacturer's recommendation
	Operator's checklist	Daily
Miscellaneous	Complete inspection	Before put to work
Compressors, Welding Machines, Generators	Complete inspection	Every 3 months
	Repair	When failure occurs
	Preventative maintenance	Manufacturer's recommendation
Slings, Shackles, Chokers, Lifting Devices	Deformation, cracks, corrosion, etc.	Daily or before each use
	Regular inspections of all devices	Every 3 months

Pre-Operation Checks

- Walk around checks on all pieces of mobile equipment are necessary to ensure the unit is safe to operate both from the personnel standpoint and for the equipment; that is, all fluids must be at the correct level and all components must be intact.
- Check for personnel in the cab area and around the equipment. Before the operator commences the pre-start checks, the operator should check the cab area for other operators and others who may be working around the equipment.
- Visual check - The operator should walk completely around the equipment looking underneath the equipment, in the engine compartment, and in the cab.
- Brake Lines - Visually check the brake lines for leaks. Check for moisture on the brake line. Report any leaks to maintenance for repair as soon as possible. DO NOT operate equipment with brake leaks.
- Steering Assembly - Check the tie rod ends, pins and keepers, drag links, ball joints, steering rams and hoses; Check that all the joints are tight; Report any faulty conditions to your supervisor. Note: Never operate a truck with faulty steering.

4.7 Emergency Preparedness

OBJECTIVES

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

- Develop, review and implement contingency response plans and procedures
- Ensure employees are aware of contingency plans through training
- Monitor effectiveness of contingency plans

Site Manager and Supervisors

- Responsible for ensuring necessary assets are made available for all contingency procedures
- The implementation of the contingency procedures or plans for their facility.

Employees

- Follow all contingency procedures or plans
- Through the Joint Health and Safety Committee reviewing and revising as required the emergency response plans.

4.7.1 Preparedness Requirements

Each The Workforce Group, LLC worksite shall have contingency plans that identify the potential for incidents and emergency situations. Refer to the The Workforce Group, LLC Emergency Response Program.

These shall include, as a minimum:

- Plans for responding to an emergency that may require a need for rescue or evacuation is found.
- Plans to address thermal exposure of heat and cold
- Plans to address workplace violence
- Plans to address working alone
- Plans to address severe weather
- Plans to address medical emergencies
- Plans to address any other known or potential emergency

Each facility shall conduct an annual routine emergency evacuation drill.

5.0 CHECKING & CORRECTIVE ACTIONS

OBJECTIVES

- To identify key performance indicators (KPIs) for safety and health performance
- To have effective procedures for reporting and evaluating/investigating incidents and non-conformance to requirements
- To establish and maintain procedures for the identification and maintenance of safety and health records
- To allow our company to review our own conformity to the The Workforce Group, LLC Safety and Health Management System by conducting inspections

RESPONSIBILITIES

All responsibilities are identified with each of the SHMS Checking and Corrective Actions procedures.

Through effective checking and corrective actions The Workforce Group, LLC benefits by:

- Measuring success and areas for improvement within the safety and health processes
- Learning from problems and making sure we follow our own procedures
- Maintaining clear and consistent documentation

5.1 Key Performance Indicator Measuring and Monitoring

OBJECTIVES

To identify key performance indicators for safety and health performance.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

Reports to senior management monthly measured results of identified objectives and annual safety programs goals.

PROCEDURE

5.1.1 Health and Safety Key Performance Indicators (KPI)

KPIs are used to determine what changes need to be made, to review individual project management success towards compliance and to track progress towards published goals and objectives. KPI results are supplied to The Workforce Group, LLC management on a monthly basis. Safety and health KPIs are tracked for each project manager's responsible area and include:

- Injuries
- Days Away From Work Cases
- Restricted Work Cases; Recordable Medical Cases
- Total Recordable Injuries/Illness and Incident Rate
- First Aid Cases
- Hours Worked
- Vehicle incidents and property damage or loss
- Reportable spills
- Workers compensation data

5.1.2 Monitoring

Monitoring is conducted to confirm and check compliance with safety and health requirements and to ensure the use and effectiveness of operational controls. Activities include:

- Annual Management Review
- Monthly Key Performance Reports
- As needed facility inspections
- Employee observations
- Incident investigations

5.2 Incidents, Reporting, Non-Conformance and Corrective Actions

OBJECTIVES

To have effective procedures for reporting and evaluating/investigating incidents and non-conformances in order to prevent further occurrences.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

Ensures investigations are conducted and assists in identifying corrective actions.

Site Manager and Supervisors

- Investigates (or assists in) incident investigations
- Corrects non-conformances
- Accompanies injured employees to the medical provider for initial treatment.
- All Incident investigations will be reviewed by senior management

Employees

Immediately report any injury, job related illness, spill or damage to any property to their immediate supervisor. If their immediate supervisor is not available the employee is then to immediately notify the project manager.

PROCEDURE

5.2.1 Reporting Policy

This policy shall be communicated so all employees understand our position. The following must be reported to the employee's supervisor immediately. If that person is not available then the The Workforce Group, LLC Safety Manager shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment or assets
- Work related injuries or illnesses; Property damage including vehicle incidents
- Hazardous chemical spillage, loss of containment and contamination
- Non-conformance to safety or environmental rules, policies or standards
- Fires, explosions, motor vehicle crashes, etc.
- Security concerns such as theft, suspicious activity, etc.

The supervisor makes the necessary notifications and begin the incident investigation process.

In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

An authorized individual shall accompany injured employees to the medical provider for initial treatment.

5.2.2 Investigations of Incidents & Non-conformances

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformances.

Incident investigation occurs as soon as possible, while the facts are still fresh within the minds of those involved (i.e. witnesses). Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

5.2.3 Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY	WHEN	INCIDENT
Minor First Aid	Safety Manager	24 hrs	Yes
Clinic or Doctor Visit	Safety Manager	ASAP	Yes
Hospitalization/Fatality	President then Safety Manager	ASAP	Yes
Reportable Spill	Safety Manager	ASAP	Yes
More than \$500	Safety Manager	ASAP	Yes
Non-conformance	Safety Manager	24 hrs	Verbally Initially

5.2.4 Incident Review Team and Incident Investigation Report

When deemed necessary, the The Workforce Group, LLC Safety Manager forms an Incident Review Team that participates in the determination of a final root cause investigative incident report. The team consists of representatives of management or other designees as assigned by the The Workforce Group, LLC Safety Manager.

The team will utilize a Root Cause Analysis (RCA) model of incident investigation. The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Results of incident investigations are communicated to employees via the Incident Notice form.

5.2.5 Field Incident Report Form

The supervisor completes the The Workforce Group, LLC Field Incident Report and takes the below steps when beginning an incident investigation.

- Provide emergency assistance, as needed and qualified for
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident
- Notify management by phone according to the Incident Notification Matrix
- Identify potential witnesses
- Use investigation tools, as needed (camera, drawings, video, etc.)
- Tag out for evidence any equipment that was involved
- Interview witnesses (including the effected employee) and obtain written, signed statements and fax to the The Workforce Group, LLC Safety Manager
- Prepare The Workforce Group, LLC Field Incident Report, sign the form, fax it to the The Workforce Group, LLC Safety Manager
- Implement any immediate corrective actions needed;

5.2.6 Incident Notice Form

In order to communicate incident information and lessons learned from incidents the The Workforce Group, LLC Safety Manager shall send the Incident Notice to all work sites. The form shall be posted on employee bulletin boards and shall be discussed in weekly safety meetings until all employees at the job site have been informed of the incident.

5.2.7 Corrective Actions

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by the The Workforce Group, LLC Safety Manager to ensure timely follow up and completion.

Corrective actions are also used as needed for revisions to site specific safety plans and the The Workforce Group, LLC Safety and Health Management System.

All incident investigations will be brought to closure.

5.2.8 Accompanying Employees to Medical Treatment

Whenever possible an authorized individual shall accompany any injured employees to the medical provider for initial treatment. This is to ensure the medial provider has all required information regarding the administration of workers compensation, availability of return to work job functions available and to ensure the employee receives the best possible medical attention.

5.2.9 Incident Classifications

Damage – Damage to personal, business or client owned property occurred.

Environmental – Damage to the environment or animal interaction occurred.

Injury – An injury to staff, contractor or client staff occurred.

Near Miss – An incident occurred that had the potential of becoming a higher level incident of actual injury, damage, etc.

Non-conformance – An incident occurred because a safety, environmental or quality rule, policy or procedure was not followed.

5.2.10 Injury Classifications

Injuries shall be classified per the following:

First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.

Number of Lost or Restricted Work Days – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

Occupational Injury – An injury which results from a work related activity.

Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition, poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.

Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include an injured associate is kept at work but not performing within the essential functions of their regular job.

Work or Work Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in flu shot, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of an employee doing personal tasks

(unrelated to their employment) at the establishment outside of the employee's assigned working hours.

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

5.2.11 Return to Work - Light/Restricted Duty Procedure

Objectives

It is the goal of The Workforce Group, LLC to return employees to meaningful, productive temporary employment following injury or illness until their health care provider releases them to full duty.

The return to work program provides opportunities for any employee who sustains a compensable injury during the course and scope of employment to safely return to work. If the employee is not capable of returning to full duty, the return to work program provides opportunities for the employee to perform a temporary assignment, either modified or alternative duty as defined below.

Definitions

Lost Time - Time spent away from work beyond the day of injury at the direction of the treating health care provider as a result of a compensable injury sustained in the course and scope of employment. The term does not include time worked in a temporary assignment.

Full Duty - Performance of all duties and tasks of the position for which the employee is employed. Full duty entails performing all essential and non-essential functions of the employee's regular job.

Temporary Assignment - Performance of a temporary job assignment intended to return an injured employee to work at less than his or her full duties when a serious injury or serious medical condition prevents the employee from working full duty. Temporary assignments are limited to six months at the same pay, beyond six months; the program will be reviewed in assistance of The Workforce Group, LLC management to determine the next best course of action. Temporary assignments are modified duty and alternative duty.

Modified Duty - Modified duty allows the employee to return to employment in his/her regular job and perform all of the essential functions of the position and those nonessential duties and tasks that are within the capabilities of the employee, given the restrictions imposed by the treating health care provider. Modified duty is a temporary arrangement until the injured employee can resume full duty. If during the course of the modified duty assignment or after six (6) months, whichever is sooner, it is determined that the employee has permanent restrictions,

the program will be reviewed in assistance of The Workforce Group, LLC management to determine the next best course of action.

Alternative Duty - Alternative duty allows the employee to temporarily perform the essential functions of a job and other nonessential duties and tasks, within the restrictions prescribed by the treating health care provider, other than the position for which the individual is employed (regular full-time position). Such alternative duty may be physically located in the same employing department or in a hosting department. Alternative duty is a temporary arrangement until the injured employee can resume full activities of his/her regular job or until an alternate duty position is no longer needed.

Hosting Department – This is the department that has a temporary assignment position available but not necessarily the employee's department.

Employing Department - Department that the employee is permanently assigned to for his/her full duty regular job.

Prohibited Actions

This return to work program shall not be applied to any situation or circumstance in a manner that retaliates or discriminates on the basis of race, color, sex, age, national origin, religion, or disability.

Authorization for Leave and Lost Time

An employee who must miss work due to an injury or illness must be certified by a health care provider to be off work. It is the employee's responsibility to obtain such documentation from the health care provider and to return it to the supervisor within one working day upon receipt. Employees will be reimbursed for any costs in obtaining written documentation from a health care provider with a valid receipt of payment.

If the health care provider states that the employee cannot perform any temporary assignments/ modified duties, The Workforce Group, LLC may challenge the decision depending on the injury and request independent medical information. Some The Workforce Group, LLC sites have a local health care provider that employees may be requested to visit; employees can decline without any reprisal.

Return to Work Coordination

The The Workforce Group, LLC Safety Manager will assist Site Managers/ supervisors with return to work activities/ plans for individuals who have sustained a compensable injury or illness during the course and scope of employment.

Temporary Assignment/ Modified Work Procedures

An employee who is absent due to an injury or illness is required to submit written verification of the injury or illness from a qualified health care provider. Such verification must be submitted to the supervisor within one working day upon receipt of the documentation and in compliance the appropriate local Workers Compensation Act and The Workforce Group, LLC policy.

A copy of the employee's regular job description must be supplied to the health care provider.

If the employee is unable to perform the essential functions of his/her regular job, a temporary Modified Work Plan is developed by the HSE Manager in consultation with operations management. The Modified Work Plan must be completed in writing and accepted or declined by employee. The accepted or declined plan must be forwarded to the Safety Manager which will forward a copy to the local effective Worker's Compensation administrator.

The employee must obtain the appropriate forms from their supervisor or the Safety Manager to be completed by his/her health care provider at each visit or every rotation, whichever is sooner, for assessment of the employee's ability to perform the functions of the temporary assignment/ Modified Work position offered and accepted.

An employee who chooses not to continue a temporary assignment/ modified job must notify the employing/hosting department and/ or Safety Manager immediately in writing. An employee who fails to accept a local workers compensation administrator's approved temporary assignment/ modified work job and abandons his/her job may be subject to disciplinary action including termination.

The period of temporary assignment is limited to a maximum period of six (6) months from the beginning date of the temporary assignment, or the duration of the medical condition, whichever ends first. The employee shall perform the duties of the temporary assignment for the term of the assignment or until the employee is able to return to full duty, whichever is sooner. The employing department is expected to provide temporary assignment/modified work jobs.

Employee Reporting Responsibilities

An employee who is a candidate or participant in a modified or alternative duty temporary job assignment under the Return to Work program is responsible for reporting to Workers Compensation carrier any employment or income earned while performing modified or alternative duty if required by the Workers Compensation carrier.

An employee participating in the Return to Work program must provide his/her supervisor with medical documentation accounting for all absences due to the injury/illness within one day of any absence from work, or face disciplinary action, up to and including termination.

Non-Retaliation

Retaliation against an individual for in good faith filing a request or making a claim under this or related policies, for instituting or causing to be instituted any proceeding under local regulatory guidelines or federal anti-discrimination or anti-retaliation laws, for testifying in an investigation or proceeding, or for otherwise opposing discriminatory or retaliatory actions or practices will not be tolerated. Retaliation by any The Workforce Group, LLC employee is a violation of this policy. Individuals who believe they are the victim of discrimination or retaliation and those who suspect discrimination or retaliation should report the matter to their immediate supervisor, the head of their department or the Human Resources Department.

Nothing in this procedure should be interpreted as requiring an individual to report suspected acts of discrimination or retaliation to the individual he or she believes is engaging in discriminatory or retaliatory conduct.

5.3 Records and Records Management

OBJECTIVES

- To ensure key records are properly filed and readily accessible
- To ensure regulatory records are retained for the applicable regulatory requirement periods
- To ensure key records are removed from files and destroyed when the applicable retention period is reached

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

Identifies safety and health records; identifies record storage location and retention requirements and identifies records to be destroyed.

PROCEDURE

5.3.1 Access to Medical Records

Safety and health records will be identified by the The Workforce Group, LLC Safety Manager and are maintained based on legal, regulatory and business requirements.

The Safety Manager will maintain applicable medical and exposure records for all employees. All requests to access medical and exposure records and analysis based on those records must be submitted to using the forms provided for that purpose.

The Safety Manager will assure access of each employee and/or their designated representative, to all exposure and medical records concerning the employee's work conditions or workplace within 15 working days from the day request is made. If the records cannot be provided within

15 working days, the employee or designated representative requesting the record shall be informed with the reason(s) for the delay and the earliest date when the record(s) can be made available.

Except for a recognized collective bargaining agent, any designated representative must have the employee's written permission for access to exposure records and analyses. It is necessary however, for the union representative to specify the occupational need for access to records absent the employees consent. Union representatives must have the employee's written permission to access medical records.

Employees or their representatives will be provided with one copy of the records at no cost or free use of a copying machine. There will also be no charge for the first request for information by a recognized collective bargaining agent, even if the employee has previously received a copy of the same record. Additional copies will be provided at a cost of five cents per copy. Each copy provided will be stamped with the word COPY. At no time will original records and/or x-rays be loaned out to enable the requesting party to make a copy.

The authorized physician, nurse or other responsible health care personnel maintaining employee's medical records may delete the identity of anyone who has provided confidential information concerning the employee's health status but cannot withhold the information itself.

When an analysis of medical records identifies the employee, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

Copies of exposure records of other employees with past or present job duties or working conditions like or similar to those of the employee will also be provided upon request.

Any employee or designated representative is also permitted access to any record of exposure information which pertains to a new workplace or condition(s) to which the employee is being assigned or transferred.

5.3.2 Records Filing and Accessibility

Safety and health records shall be legible, identifiable and traceable to the activity, product or service involved. The records shall be stored in identified secured locations and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss.

5.3.3 Key Records Retention

The The Workforce Group, LLC Safety Manager reviews records files annually to determine which records are to be destroyed, considering safety and health records that have met their retention period.

KEY RECORDS RETENTION SCHEDULE

RECORD NAME	RETENTION	RECORD STORAGE LOCATION
Incident Investigation Documentation	10 years	Site/Safety Manager Office
Safety Inspection Checklist	5 years	Site/Safety Manager Office
Management Of Change Records	5 years	Site/Safety Manager Office
Corrective Actions Tracking Log	5 years	Site/Safety Manager Office
Training Records	5 years	Site/Safety Manager Office
Physical Exam & Medical Records	30 years	Human Resources & Storage
Incident Notices	5 years	Site/Safety Manager Office
Safety Observation Forms	2 years	Site/Safety Manager Office
Hazardous Chemicals Inventory List	5 years	Site/Safety Manager Office
Site Specific HSE Plans	5 years	Site/Safety Manager Office
Weekly Safety Meeting Form	2 years	Site/Safety Manager Office
Management Review Meeting Minutes	5 years	Site/Safety Manager Office

5.4 Inspections

OBJECTIVE

To provide a method to review and verify compliance with the The Workforce Group, LLC SHMS.

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

- Ensures inspections are conducted
- Develops the inspection schedule and scope
- Communicates inspection findings
- Verifies non-compliance and non-conformance areas are corrected
- Tracks inspection findings and communicates progress toward closure of findings

Site Manager and Supervisors

- Develops and implements corrective and preventive action for deficiencies
- Tracks inspection findings until the responsible party has corrected the deficiencies
- Conducts monthly site safety inspection

PROCEDURE

5.4.1 Formal Annual Inspection

The The Workforce Group, LLC Safety Manager or his designee conducts formal inspections (scheduled or unannounced) no less than once per year per location.

5.4.2 Routine Site Inspection

Every quarter the senior staff member at each job conducts a site safety inspection using the The Workforce Group, LLC Safety Inspection Checklist. The completed inspection checklist is sent to the The Workforce Group, LLC Safety Manager with a copy to the appropriate project manager.

5.4.3 Conducting Inspection

The inspector completes the The Workforce Group, LLC Safety Inspection Checklist form for each inspection by interviewing people, reviewing records and touring the site.

An inspection closeout meeting is held between the inspector and appropriate site personnel to review information and identify areas of non-conformance.

Findings are communicated to the appropriate project manager and The Workforce Group, LLC Safety Manager by sending a copy of the checklist to these positions.

5.4.4 Corrective and Preventive Actions

Non-conformances are corrected and are the primary responsibility of the appropriate project manager and will be monitored by the The Workforce Group, LLC Safety Manager.

6.0 MANAGEMENT REVIEW

OBJECTIVES

- To ensure continuing suitability, adequacy and effectiveness of the SHMS
- To address needs for changes to our policy, objectives and other elements of the SHMS
- To identify opportunities for continual improvement

RESPONSIBILITIES

The Workforce Group, LLC Safety Manager

- Reviews safety and health compliance status and SHMS effectiveness with top management
- Updates the SHMS where appropriate based on decisions made in the Management Review
- Implements changes identified in the management review process and resource assessment

PROCEDURE

6.1.1 Safety Management System Review

The The Workforce Group, LLC Safety & Health Management System is reviewed at least annually by the The Workforce Group, LLC Safety Manager to evaluate its success in meeting the goal and objectives for safety within The Workforce Group, LLC.

The The Workforce Group, LLC Safety Manager maintains a record of the review. Results of the annual review are incorporated into changes to the The Workforce Group, LLC Safety & Health Management System manual, site specific HSE plans or appropriate safety procedures.

6.1.2 Management Meetings

On a schedule, determined by the The Workforce Group, LLC President, senior The Workforce Group, LLC management must meet at least annually and address the following subjects:

- Review of Performance (Objectives & Safety Programs)
- Corrective Actions and Inspection Review
- Safety and Health Management Resources Adequacy
- Operational Controls
- Roles and Responsibilities
- Review of Safety and Health Policy

Meeting results are documented through meeting agendas and minutes that include an executive summary and a summary of post review action items.

Safety Committee

Safety Committee Organization

A safety committee has been established as a management tool to recommend improvements to our workplace safety program and to identify corrective measures needed to eliminate or control recognized safety and health hazards. The safety committee employer representatives will not exceed the amount of employee representatives.

Responsibilities

The safety committee will be responsible for assisting management in communicating procedures for evaluating the effectiveness of control measures used to protect employees from safety and health hazards in the work place.

The safety committee will be responsible for assisting management in reviewing and updating workplace safety rules based on accident investigation findings, any inspection findings, and employee reports of unsafe conditions or work practices; and accepting and addressing anonymous complaints and suggestions from employees.

The safety committee will be responsible for assisting management in updating the workplace safety program by evaluating employee injury and accident records, identifying trends and patterns, and formulating corrective measures to prevent recurrence.

The safety committee will be responsible for assisting management in evaluating employee accident and illness prevention programs, and promoting safety and health awareness and co-worker participation through continuous improvements to the workplace safety program.

Safety committee members will participate in safety training and be responsible for assisting management in monitoring workplace safety education and training to ensure that is in place, that it is effective, and that it is documented.

Meetings

Safety committee meetings are held monthly and more often if needed and each committee member will be compensated at his or her hourly wage when engaged in safety committee activities.

Management will post the minutes of each meeting in a conspicuous place and the minutes will be available to all employees.

All safety committee records will be maintained for not less than three calendar years.

Safety Management Plan

Safety Committee/ Safety
Meeting and Forms

SAFETY COMMITTEE MINUTES

Date of Committee Meeting: _____ Time: _____

Minutes Prepared By: _____ Location: _____

Members in Attendance

<u>Name</u>	<u>Name</u>	<u>Name</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Previous Action Items:

Review of Accidents since Previous Meeting:

Recommendations for Prevention:

Recommendations from Anonymous Employees:

Suggestions from Employees:

Recommended Updates To Safety Program:

Recommendations from Accident Investigation Reports:

Safety Training Recommendations:

Comments: _____

Safety Management Plan

Safety Committee/ Safety
Meeting and Forms

SAFETY MEETING RECORD

Date: _____ Presented By: _____

Topic: _____

Employee Name (Print)	Employee Signature
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____
8. _____	_____
9. _____	_____
10. _____	_____
11. _____	_____
12. _____	_____
13. _____	_____
14. _____	_____
15. _____	_____
16. _____	_____
17. _____	_____
18. _____	_____
19. _____	_____
20. _____	_____

Safety Management Plan

Safety Committee/ Safety
Meeting and Forms

DAILY TOOLBOX TALKS

Date: _____ Presented By: _____

Topic: _____

Employee Name (Print)	Employee Signature
1. _____	_____
2. _____	_____
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____
8. _____	_____
9. _____	_____
10. _____	_____
11. _____	_____
12. _____	_____
13. _____	_____
14. _____	_____
15. _____	_____
16. _____	_____
17. _____	_____
18. _____	_____
19. _____	_____
20. _____	_____

Safety Responsibilities

Management Responsibilities:

1. To determine and communicate safety policy to all employees,
2. Establish company goals and evaluate performance, and
3. Commit the resources necessary to accomplish these goals.

Supervisor Responsibilities:

1. Become thoroughly familiar with the The Workforce Group, LLC Safety Management Plan,
2. Train and coach employees in safety skills, safety rules, and safe work practices,
3. Require safe work activities of employees as a condition of employment,
4. Inspect to assure safe work conditions, and record the results,
5. Investigate injuries, accidents and report safety issues; record the results of the investigation and assure corrective actions are completed, and
6. Lead safety meetings and conduct or arrange safety training to address safety issues.

Employee Responsibilities:

1. Become thoroughly familiar with the The Workforce Group, LLC Safety Plan and specific safety rules that apply to their work,
2. Perform all work to standards, comply with safety policies, procedures and rules,
3. Actively participate in safety activities and cooperate with safety programs,
4. Identify, correct or isolate, and report hazards in the workplace, including unsafe actions and unsafe conditions,
5. Report all injuries as required by company policy and follow correct procedures for reporting both injuries and accidents, and
6. Be proactive in identifying the need for and using personal protective equipment.

Safety Training Program

Purpose

Training is one of the most important elements of any safety & health program. Training is designed to enable employees to learn their jobs properly, reinforce safety policies and procedures. Safety Training also provides an opportunity to communicate safety principles and commitment of management to a safe work place.

New Employee Safety Orientation

A New Employee Safety Orientation Class is a part of the overall orientation program that all new hires must attend. This orientation is conducted by the safety coordinator. The safety training in these classes consists of the below listed topics (as applicable):

1. General Safety Rules & Policies
2. Hazard Communication & Chemical Safety Procedures
3. Control of Bloodborne Pathogens
4. Electrical Safety & Lockout/Tagout
5. Emergency Plans: Routes & Assembly Locations
6. Procedures for safety violations, accidents and near misses.
7. Proper lifting & ergonomic techniques
8. Equipment Safety

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

1. Emergency plans, evacuation routes, assembly locations and emergency actions
2. Rules for reporting safety violations, accidents, and near misses
3. Safe Operating Procedures
4. Use of tools & equipment, lifting & material handling equipment
5. Machine & Tool Guards, Emergency Stop Control Locations & Use
6. Proper Ergonomic procedures & lifting techniques for the tasks assigned
7. Safety equipment & personal protective equipment
8. Hazard Communication: Specific hazards for work area chemicals

Record of this training will be recorded on the training record. This record will be filled out by the Employee's immediate supervisor and filed in the Employee's Personnel Record.

Safety Management Plan

Safety Training Program

Annual Training Topics

The list below details areas that may require annual retraining for Employees, Maintenance Personnel & Supervisors and Special Employees:

Topics

- a. Annual Review of Safety Policies and Rules
- b. Ergonomics
- c. Hazard Communication/Chemical Safety
- d. Emergency Action Procedures (including evacuation)
- e. Personal Protective Equipment
- f. Electrical Safe Work Practice
- g. Powered Industrial Truck Operation
- h. Bloodborne Pathogens
- i. Lockout / Tagout Procedures & Machine Guarding

Safety Management Plan

Safety Training Program

New Employee Safety Orientation Checklist

File this form in the Employee's Personnel Record

Name: _____

Job/Dept Assigned: _____

Safety Topics presented during General New Employee Orientation: (Check all that apply)

- | | |
|--|--------------------------|
| 1. General Safety Rules & Policies | <input type="checkbox"/> |
| 2. Hazard Communication & Chemical Safety Procedures | <input type="checkbox"/> |
| 3. Personal Protective Equipment | <input type="checkbox"/> |
| 4. Control of blood borne pathogens | <input type="checkbox"/> |
| 5. Electrical Safety & Lockout/Tagout | <input type="checkbox"/> |
| 6. Emergency Plans: Routes & Assembly Locations | <input type="checkbox"/> |
| 7. Procedures for safety violations, accidents, near-miss | <input type="checkbox"/> |
| 8. Proper lifting & ergonomic techniques | <input type="checkbox"/> |
| 9. Tool & Equipment Safety | <input type="checkbox"/> |
| 10. Safety Signs and their meanings | <input type="checkbox"/> |
| 11. Material handling and Forklift rules | <input type="checkbox"/> |
| 12. Substance Abuse Policy | <input type="checkbox"/> |
| 13. Office Safety Controls | <input type="checkbox"/> |

Employee Name: _____

Trainer Name: _____

Date: _____

Scaffolds Program

Purpose

The purpose of this program is to prevent injuries due to falls from elevated work areas and ensure employees and contractors are able to inspect scaffolding materials and erected scaffolds.

Scope

This program is applicable at every work area where scaffolding is erected. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Bearer - A horizontal member of a scaffold upon which the platform rests and which may be supported by ledgers.

Brace - A tie that holds one scaffold member in a fixed position with respect to another member.

Coupler - A device for locking together the components of a tubular metal scaffold which shall be designed and used to safely support the maximum intended loads.

Double pole or independent pole scaffold - A scaffold supported from the base by a double row of uprights, independent of support from the walls and constructed of uprights, ledgers, horizontal platform bearers, and diagonal bracing.

Guardrail - A rail secured to uprights and erected along the exposed sides and ends of platforms.

Heavy Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 75 pounds per square foot.

Ledger (stringer) - A horizontal scaffold member which extends from post to post and which supports the putlogs or bearer forming a tie between the posts.

Light Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 25 pounds per square foot.

Manually Propelled Mobile Scaffold - Manually propelled mobile scaffold.

Safety Management Plan

Scaffolds Program

Maximum intended load - The total of all loads including the working load, the weight of the scaffold, and such other loads as may be reasonably anticipated.

Medium duty scaffold - A scaffold designed and constructed to carry a working load not to exceed 50 pounds per square foot.

Mid-Rail - A rail approximately midway between the guardrail and platform, used when required, and secured to the uprights erected along the exposed sides and ends of platforms.

Putlog - A scaffold member upon which the platform rests.

Runner - The lengthwise horizontal bracing or bearing members or both.

Scaffold - Any temporary elevated platform and its supporting structure used for supporting workmen or materials or both.

Toe board - A barrier secured along the sides and ends of a platform, to guard against the falling of material.

Tube and coupler scaffold - An assembly consisting of tubing, which serves as posts, bearers, braces, ties, and runners, a base supporting the posts, and special couplers which serve to connect the uprights and to join the various members.

Tubular welded frame scaffold - A sectional, panel, or frame metal scaffold substantially built up of prefabricated welded sections that consist of posts and horizontal bearer with intermediate members. Panels or frames shall be braced with diagonal or cross braces.

Working Load - Load imposed by men, materials, and equipment.

Key Responsibilities

Managers and Supervisors

- Responsible for ensuring that scaffolds are erected by a qualified person, that set up inspections are performed, and all daily inspections are performed before work starts for the day.
- Responsible for ensuring that all employees, and/or contractors have been trained in the use and inspection methods for scaffolds.
- Responsible for ensuring that all employees and contractors are aware that if an inspection discovers a defect, the scaffold cannot be used until repairs are made.

Safety Management Plan

Scaffolds Program

Employees

- Responsible for following this program by inspecting the scaffolds daily and report any damages or repairs that may be needed to their supervisor.

Procedure**General Requirements**

Scaffolds shall be furnished and erected in accordance with applicable standards for persons engaged in work that cannot be done safely from the ground or from solid construction. Except that ladders used for such work shall conform to ladder safety standards.

Scaffolds shall only be erected by a qualified third party, who is competent to certify the scaffolding safe to use.

The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose boards shall not be used to support scaffolds or planks.

Scaffolds and their components shall be capable of supporting without failure at least four times the maximum intended loads. Scaffold components must meet OSHA requirements 29 CFR 1910.28 and 29 CFR 1926.451.

Wood scaffold planks must be cross-supported every 8 feet. Scaffold deck boards shall be cleated, wired or nailed into place.

All working levels of scaffolds will be floored completely except where internal ladders require space for ladder openings.

Scaffolds and other devices mentioned or described in this program shall be maintained in safe condition. Scaffolds shall not be altered or moved horizontally while they are occupied.

Any scaffold damaged or weakened from any cause shall be immediately repaired and shall not be used until repairs have been completed.

Scaffolds shall not be loaded in excess of the working loads for which they are intended.

Bolts used in the construction of scaffolds shall be of adequate size and in sufficient numbers at each connection to develop the designed strength of the scaffold.

All platforms shall be overlapped (minimum 12 inches) and secured from any movement.

An access ladder or equivalent safe access shall be provided.

Safety Management Plan

Scaffolds Program

Scaffold planks shall extend over their end supports not less than 6 inches or more than 18 inches.

The poles, legs, or uprights of scaffolds shall be plumb, and securely and rigidly braced to prevent swaying and displacement.

Materials being hoisted onto a scaffold shall have a tag line.

Overhead protection shall be provided for workers on a scaffold exposed to overhead hazards.

Toe boards and guardrails shall be installed if a scaffold or platform is erected to a height of 6 feet or more. Scaffolds shall be provided with a screen between the toe board and the guardrail, extending along the entire opening, consisting of No. 18 gauge wire one-half inch mesh or the equivalent, where workers are required to work or pass under the scaffolds.

Work shall not be performed on a scaffold during storms or high winds.

Work shall not be performed on scaffolds that are covered with snow or ice, unless all snow and ice has been removed and all planking has been sanded to prevent slipping.

Tools, material, and debris shall not be allowed to accumulate in quantities to cause a hazard.

Inspections

Scaffolding shall be inspected, by a qualified person, in conjunction with the manufactures required recommendations. The competent person must also insure scaffolds are safe prior to and during scaffold use.

- At a minimum, the following shall be inspected by the competent person after erection, before the start of the day or beginning of a shift change to ensure scaffolds are safe prior to and during use:
 - Ground or surface footing shall be inspected to ensure that there is no settling.
 - All main supports and cross braces shall be inspected for any signs of damage, missing pins, bolts and any locks and/or safety keepers.
 - All walking surfaces and/or planks shall be inspected for damage and proper placements and any possible movement.
 - All walkways and planks must be secure to prevent any movement.
- Inspection shall be made to ensure that the scaffold is stable and any movement is prevented.
- If during the inspection, a defect or damage to the scaffold is discovered, the scaffold shall be tagged out by the competent person, complied with and use prohibited until needed repairs are made.

Safety Management Plan

Scaffolds Program

Mandatory Signs and Tags

Signs and tags shall be visible at all times when work is being performed, and shall be removed or covered promptly when the hazards no longer exist.

Defective or unsafe equipment or conditions shall be tagged out by the competent person using a weather resistant tag secured to the scaffolding structure on all four sides and must be complied with. An example would be improper footing conditions were observed.

Danger signs shall be used only where an immediate hazard exists. Danger signs must be posted around the immediate area of the scaffold, to alert other workers of possible danger from falling objects from the scaffold.

Caution Signs and/or barricade tape shall be used to mark off a larger area around scaffolding warning other workers to use caution.

Modifications

Modification and repairs shall be performed by a qualified person, who is competent to certify the scaffolding safe to use to ensure non-qualified personnel do not create additional hazards.

Employees shall not perform any modifications or repairs, unless they have been trained and certified, and failure to comply may result in disciplinary action and or termination.

Training Requirements

The Workforce Group, LLC is required to train all employees that work on scaffolds regarding hazards by "qualified" persons. The supervisor shall have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training shall occur before use and include the following areas:

- Basic safety information.
- Hazards including fall protection, electrical safety, falling object protection.
- Tags – types and the requirement to comply with.
- The proper use of the scaffold, and the proper handling of materials on the scaffold.
- The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used.
- The maximum intended load capacity of the scaffolds used.

The supervisor shall have each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold trained by a competent person to recognize any hazards associated with the work in question.

Safety Management Plan

Scaffolds Program

-
- The training shall include the following topics, as applicable:
 - The nature of scaffold hazards.
 - The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in use.
 - The design criteria, maximum intended load-carrying capacity and intended use of the scaffold.

When the employer has reason to believe that an employee lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, the employer shall retrain each employee so that the requisite proficiency is regained. Retraining is also required in at least the following situations:

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

Safety Management Plan

Scaffolds Program

Tube And Coupler Scaffolds - Light Duty

Uniformly distributed load		Not to exceed 25 p.s.f.
Post Spacing (longitudinal)		10 ft. 0 in.
Post Spacing (transverse)		6 ft. 0 in.
Working Levels	Additional Planked Levels	Maximum Height
1	8	125 ft.
2	4	125 ft.
3	0	91 ft. 0 in.

Tube And Coupler Scaffolds - Medium Duty

Uniformly distributed load		Not to exceed 50 p.s.f
Post spacing (longitudinal)		8 ft. 0 in.
Post spacing (transverse)		6 ft. 0 in.
Working Levels	Additional Planked Levels	Maximum Height
1	6	125 ft.
2	0	78 ft. 0 in.

Short Service Employee Program

Purpose

The purpose of the Short Service Employee (SSE) Management program is to prevent work related injuries and illnesses to new hires and temporary workers. The Supervisors and co-workers must be able to readily identify Short Service Employee participants. The Workforce Group, LLC will assign experienced employees to oversee the daily activities of those assigned to the SSE program.

Scope

- Applies to all The Workforce Group, LLC employees in shop and field operations.
- Applies to all newly hired The Workforce Group, LLC employees (regardless of experience), temporary agency personnel or our independent contractors working on company or client locations/ facilities.

Definitions

Short Service Employee (Who is Covered Under the Short Service Employee Program) – An employee or sub-contractor employee with less than six months experience in the same job or with his/her present employer.

Mentor – An experienced employee, who has been assigned to help and work with a new Short Service Employee by his/her supervisor.

Key Responsibilities

- Managers and Supervisors shall ensure that this program is implemented and followed.
- Employees shall follow the requirements of this program.

Monitoring of Short Service Employees at the Job Site

The Workforce Group, LLC shall monitor its employees, including SSE personnel, for HES awareness. If, at the end of the six-month period, the SSE has worked safely, adhered to HES policies and has no recordable incident attributable to him/her, the SSE identifier may be removed at the discretion of The Workforce Group, LLC. The Workforce Group, LLC shall require any employee that does not complete the six-month period recordable free to get operator approval in writing prior to returning to operator property.

Processes for Managing Subcontractors

The Workforce Group, LLC will manage its sub-contractors in alignment with this process. Any sub-contractor employee reporting to work must document his or her experience within their company for the work they are performing.

Safety Management Plan

Short Service
Employee Program

Procedure**General**

Supervisors will assure that all new, transferred and temporary employees have been through The Workforce Group, LLC Safety Orientation and have a complete knowledge of the expectations for their job function.

Supervisors will identify all employees and temporary personnel with less than 180 days of service, or those employees they desire to return to a mentoring status for improvement in job and/or safety performance. Any Short Service Employee experiencing an OSHA Recordable injury during the initial 180 days will repeat the mentoring program or shall be dismissed for poor performance.

Managers and the Safety Department will randomly audit for process compliance. This will involve interviewing employees in the Short Service Employee program (documentation is not required).

Mentoring Provisions and Processes

Mentors will set the proper safety example for any Short Service Employee assigned them.

The Workforce Group, LLC must have in place some form of mentoring process, acceptable to the operator, designed to provide guidance and development for SSE personnel. A mentor can only be assigned one SSE per crew and the mentor must be onsite with the SSE to be able to monitor the SSE.

Short Service Employee Identification

Short Service Employee participants will wear high visibility orange hard hats or an SSE decal to help identify them. The The Workforce Group, LLC shall comply with client designated hardhat color for SSE if orange is not acceptable.

Crew Makeup and Restrictions

A single person crew cannot be an SSE and crew sizes of less than five shall have no more than one SSE.

Notification and Communication Processes

Prior to the job mobilization The Workforce Group, LLC will communicate/notify the client project coordinator, contractor contact or on-site supervisor for all jobs containing SSE personnel. The project coordinator, contractor contact or on-site supervisor will determine approval status of the crew makeup.

Mentors will converse daily with those persons assigned to them, preferably at the start of the day. This will be in addition to other tailgate or daily safety meetings held in the work area.

Safety Management Plan

Short Service
Employee Program

Silica Exposure Control Plan

Purpose

The purpose of an exposure control plan (ECP) is to set out our approach to protecting workers from harmful exposure to airborne silica dust.

A combination of control measures will be required to achieve this objective. We commit to being diligent in our efforts to select the most effective control technologies available, and to ensure that the best practices, as described in this ECP, are followed at our worksites.

The work procedures we establish will protect not only our workers but all workers on our worksites.

Key Responsibilities

Due to the significant risk posed by respirable silica, it is critical that all personnel involved in operations that could potentially create silica dust take specific action to ensure that, as much as possible, a hazard is not created.

The Workforce Group, LLC is responsible for:

- Substitution of less hazardous products for those that contain crystalline silica is required.
- Ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this exposure control plan (ECP) are readily available where and when they are required.
- Providing a job-specific ECP for each project, which outlines in detail the work methods and practices that will be followed on each site. Considerations will include
 - Availability and delivery of all required tools/equipment
 - Scope and nature of grinding work to be conducted
 - Control methods to be used and level of respiratory protection required
 - Coordination plan
- Conducting a periodic review of the effectiveness of the ECP. This would include a review of the available dust-control technologies to ensure these are selected and used when practical.
- Initiating sampling of worker exposure to concrete dust when there are non-standard work practices for which the control methods to be used have not been proven to be adequately protective.
- Ensuring that all required tools, equipment, and personal protective equipment are readily available and used as required by the ECP.
- Ensuring supervisors and workers are educated and trained to an acceptable level of competency.

Safety Management Plan

Silica Exposure Control Plan

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- Maintaining records of training, fit-test results, crew talks, and inspections (equipment, PPE, work methods/practices).
 - Coordinating the work with the prime contractor and other employers to ensure a safe work environment.

The supervisor (foreman and lead hand) is responsible for:

- Obtaining a copy of the ECP from the employer, and making it available at the worksite
- Selecting, implementing, and documenting the appropriate site-specific control measures
- Providing adequate instruction to workers on the hazards of working with silica-containing materials (e.g., concrete) and on the precautions specified in the job-specific plan covering hazards at the location
- Ensuring that workers are using the proper respirators and have been fit-tested, and that the results are recorded
- Directing the work in a manner that ensures the risk to workers is minimized and adequately controlled
- Communicating with the prime contractor and other sub-contractors to ensure a safe work environment

The worker is responsible for

- Knowing the hazards of silica dust exposure
- Using the assigned protective equipment in an effective and safe manner
- Setting up the operation in accordance with the site-specific plan
- Following established work procedures as directed by the supervisor
- Reporting any unsafe conditions or acts to the supervisor
- Knowing how and when to report exposure incidents

Silica Properties

Silica is the second most common mineral on earth and makes up nearly all of what we call “sand” and “rock.” Silica exists in many forms—one of these, “crystalline” silica (including quartz), is the most abundant and poses the greatest concern for human health. Some common materials that contain silica include:

- Rock and sand
- Topsoil and fill
- Concrete, cement, and mortar
- Masonry, brick, and tile
- Granite, sandstone, and slate
- Asphalt (containing rock and stone)
- Fibrous-cement board containing silica

Safety Management Plan

Silica Exposure Control Plan

Silica is a primary component of many common construction materials, and silica-containing dust can be generated during many construction activities, including:

- Abrasive blasting (e.g., of concrete structures)
- Jackhammering, chipping, or drilling rock or concrete
- Cutting brick or tiles
- Sawing or grinding concrete
- Tuck point grinding
- Road construction
- Loading, hauling, and dumping gravel
- Demolition of structures containing concrete
- Sweeping concrete dust

Unprotected workers performing these activities, or working in the vicinity, can be exposed to harmful levels of airborne silica. Workers in other industries can also be exposed to silica, for example in the manufacture of toothpaste or pottery, or when loading coal (which can contain quartz) into the hold of a ship.

Health Hazards

Exposure to silica has been shown to cause silicosis, lung cancer, pulmonary tuberculosis and other airway diseases. Crystalline silica dust can cause a disabling, sometimes fatal disease called silicosis. The fine particles are deposited in the lungs, causing thickening and scarring of the lung tissue. The scar tissue restricts the lungs' ability to extract oxygen from the air. This damage is permanent, but symptoms of the disease may not appear for many years.

A worker may develop any of three types of silicosis, depending on the concentrations of silica dust and the duration of exposure:

- Chronic silicosis—develops after 10 or more years of exposure to crystalline silica at relatively low concentrations
- Accelerated silicosis—develops 5 to 10 years after initial exposure to crystalline silica at high concentrations
- Acute silicosis—develops within a few weeks, or 4 to 5 years, after exposure to very high concentrations of crystalline silica

Initially, workers with silicosis may have no symptoms; however, as the disease progresses, a worker may experience:

- Shortness of breath
- Severe cough
- Weakness

Safety Management Plan

Silica Exposure Control Plan

These symptoms can worsen over time and lead to death. Exposure to silica has also been linked to other diseases, including bronchitis, tuberculosis, and lung cancer.

Code of Practice

The Workforce Group, LLC has a code of practice governing the storage, handling, use and disposal of silica if there is potential for exposure. The code of practice includes measures to be used to prevent the uncontrolled release of silica and the procedures to be followed if there is an uncontrolled release. Engineering controls such as ventilation or wet methods must be used to control silica-containing dusts.

Risk Identification, Assessment and Control

The potential for worker exposure to silica should be identified during the hazard assessment. A worker's exposure to silica is kept as low as reasonably achievable. Employees must not be exposed to airborne concentrations of silica in excess of 0.025 mg/cubic meter over an 8 hour time period. Atmospheric testing results should be assessed before a worker is exposed.

A key step in developing a silica exposure control plan is to identify the work activities that would put workers at risk of exposure.

- Work activities — that may generate airborne silica dust—For silica, the route of exposure is through the inhalation of airborne dust. The employer should have a qualified person review the planned work activities to identify those that may generate airborne silica.
- Identify workers at risk of exposure—For example, workers who finish concrete would be at greater risk of exposure than plumbers or electrical workers.
- Amount of exposure—Some work activities generate more dust than others, and the amount of exposure should be estimated. Published resources are available that provide air sampling data and compare silica dust levels from various construction activities.
- Duration of exposure—Workers who grind concrete for a full shift would be at greater risk than workers jackhammering for an hour.

Control Options

Effective control options must be used to eliminate or reduce the risk to workers from the hazards of silica dust exposure. The following hierarchy of control measures must be followed:

- Elimination/substitution (e.g., using products with less silica or using work methods that would eliminate the need for surface grinding)
- Engineering controls (e.g., water, local exhaust ventilation, enclosure)
- Administrative controls (e.g., coordination of tasks with subcontractors, signage)
- The use of proper PPE such as gloves, coveralls and eye protection when exposed to silica. Personal protective equipment such as gloves, coveralls and eye protection will be used to control silica exposures.

Safety Management Plan

Silica Exposure Control Plan

Our firm commits to developing knowledge and expertise about these controls, and to establishing policies/procedures to protect workers from harmful exposure and to minimize reliance on respirators. Effective engineering controls such as HEPA vacuum attachments and wetting methods, which control silica dust at its source, are readily available. These controls have been proven to reduce airborne dust levels significantly when selected and operated in accordance with best practices. We know that engineering controls alone do not reduce airborne silica to safe levels; so in most cases other control measures, including respiratory protection, will be necessary.

If we take on a job that could release an unusually high amount of dust, and we are unsure of the adequacy of our control measures, we will conduct air sampling in order to ensure that control methods are protective.

We will reduce or eliminate worker exposure to silica dust by selecting a combination of the following controls listed in order of preference:

- Elimination and substitution
- Engineering
- Administrative
- Personal protective equipment

Elimination and Substitution

We recognize the importance of planning the work in order to minimize the amount of silica dust generated. During the project planning phase, we will advocate for the use of methods that reduce the need for cutting, grinding, or drilling of concrete surfaces (e.g., formwork planning). Whenever possible, we will schedule work when concrete is still wet, because we know that much less dust is released at that time.

Engineering Control of Dust

Selecting an appropriate control measure depends on the specifics of the operation. In some cases, local exhaust ventilation (LEV) is more effective at controlling exposure (e.g., during grinding operations) than wetting methods. In a different application, wetting may be more effective (e.g., during cutting operations) than LEV. However, using LEV may reduce the amount of final cleaning required, as the silica dust is captured.

Our dust control systems may employ three well-established techniques:

- Local exhaust ventilation (LEV)
- Wet dust suppression (WDS)
- Restricting or isolating the work activity with barriers or full enclosures (this may be the only option where LEV or WDS is not practical or effective)

Safety Management Plan

Silica Exposure Control Plan

Local Exhaust Ventilation (LEV)

When LEV is used in our work, we will employ the following systems and safe work practices:

- Vacuum attachment systems to capture and control the dust at its source whenever possible.
- Dust control systems (used regularly and well maintained).
- Grinding wheels operated at the manufacturers' recommended rpm (operating in excess of this can generate significantly higher airborne dust levels).
- Retrofit shrouds or exhaust cowlings for corner grinding; use manufacturer-specified rpm speeds and a well-maintained HEPA vacuum.
- Diamond stone grinders, which allow for the use of a more efficient suction casing on the grinder, whenever practicable.
- HEPA or good quality, multi-stage vacuum units approved for use with silica dust. [The vacuum units should be capable of creating a target airflow of at least 70 cfm. This should achieve a face velocity at the shroud of about 1.3 m/s (260 fpm)—the higher the face velocity, the more dust captured at source.]
- Work planning, so that concrete grinding can be completed when wet (dust release can be significantly reduced).
- Good housekeeping work practices (for example, use vacuums with high-efficiency particulate air (HEPA) filters, or use wet sweeping).
- Train workers and supervisors on how to properly use and maintain the equipment.

Wet methods for Dust Control

When water spray systems are used in our work, we will follow these safe work practices:

- Pneumatic grinders will be used instead of electric-powered grinders if water is the method of control.
- Pressure and flow rate of water will be controlled in accordance with tool manufacturers' specifications (for cutting saws, a minimum of 0.5 litres of water per minute should be used).
- When sawing concrete or masonry, we will use only saws that provide water to the blade.
- Wet slurry will be cleaned from work surfaces when the work is completed, using a wet vacuum or wet sweeping.

Barriers and Enclosures

When barriers or enclosures are used in our work, we will follow these safe work practices:

- The site foreman will determine the type and design of barrier or enclosure (based on the work activity and the work area) and ensure it is constructed in accordance with the work plan. Barriers may be simple hazard-flagging ribbon or more restrictive hoarding.
- We will use commercially available negative air units when constructing a full enclosure.

Safety Management Plan

Silica Exposure Control Plan

Administrative Controls

We will follow these safe work practices:

- Exposure control plans and the site risk assessment/workplan will be submitted to the general contractor prior to the start of work.
- We will establish procedures for housekeeping, restricting work areas, personal hygiene, worker training, and supervision.
- As part of our project planning, we will assess when silica dust may be generated and plan ahead to eliminate or control the dust at the source. We recognize that awareness and planning are key factors in the prevention of silicosis.
- Warning signs will be posted to warn workers about the hazards of silica and to specify any protective equipment required (for example, respirators).
- Work schedules will be posted at the boundaries of work areas contaminated with silica dust.
- Work that generates silica dust will be conducted after hours, when access to other unprotected workers cannot be restricted.
- We will develop a site-specific exposure control plan to cover project-specific issues (e.g., scope of work, project location and site-specific hazards) and to be kept available at the worksite.

Personal Protective EquipmentRespiratory protection

- All workers who wear respirators will do so in adherence with our respirator program.
- Respirators must be selected based upon measured exposure levels and the assigned protection factor of respirators.
- Only approved respirators will be used.
- Workers who wear respirators will be clean-shaven. Filtering face piece respirators give little or no protection to workers with beards, and even a minor growth of stubble can severely reduce the effectiveness of respiratory protection.
- All workers who wear respirators will be fit-tested.
- Workers will be properly trained in the use of respirators, and a high standard of supervision, inspection, and maintenance will be followed.

Protective clothing

The Workforce Group, LLC will provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from silica contamination, ensure that workers' street clothing is not contaminated by silica, and ensure that a worker does not leave a restricted area until the worker has been decontaminated.

Health monitoring

Exposures to airborne concentrations of Silica must be kept below the permissible exposure limits shown in 29 CFR 1910.1000 Table Z-3.

Safety Management Plan

Silica Exposure Control Plan

Full shift personal samples shall be representative of the employees regular, daily exposure to silica.

Documentation

Records must be kept of the following:

- All workers who are exposed to respirable silica dust while on the job
- Worker education and training sessions
- Respirator fit-testing
- Equipment maintenance and repair
- Worksite inspections

The exposure control plan must be reviewed at least annually and updated as necessary by the employer, in consultation with the workplace health and safety committee or the worker health and safety representative.

Education and Training

A worker who may be exposed to silica is to be informed of the health hazards associated with exposure to that substance, is informed of measurements made of airborne concentrations of harmful substances at the work site, and is trained in procedures developed by The Workforce Group, LLC to minimize the worker's exposure.

Training is required prior to using silica-containing materials or working in an environment known to contain airborne concentrations of Silica. Periodic refresher training is also required. We will train all silica dust in the following:

- Hazards associated with exposure to silica dust
- The risks of exposure to silica
- Signs and symptoms of silica disease
- Safe work procedures to be followed (e.g., setup of enclosures, disposal of silica waste, personal decontamination)
- Use of respirators and other personal protective equipment (e.g., donning and doffing of personal protective equipment, and cleaning and maintenance of respirators)
- Use of control systems (e.g., LEV and wet methods)
- How to seek first aid (for example, the location and use of eyewash stations)
- How to report an exposure to silica dust

Safety Management Plan

Silica Exposure Control Plan

CONTROL PLAN

Date control plan completed:			
Prime contractor:		Superintendent:	
Project manager:		CSO/First aid attendant:	
Project:	Address:		
Company completing work:			
Address:		Contact:	
Contact phone:		Contact fax:	
On-site supervisor(s):			
Worker(s):			
Scope of work to be completed:			
Work start date:		Duration: <input type="checkbox"/> Days <input type="checkbox"/> Months <input type="checkbox"/> Years	
Employer responsible for:			
Supervisor responsible for:			
Worker responsible for:			
HAZARDS IDENTIFIED (other than silica)		CONTROL MEASURE(S)	
<input type="checkbox"/> Falls			
<input type="checkbox"/> Slipping			
<input type="checkbox"/> Confined space			
<input type="checkbox"/> Workers above			
<input type="checkbox"/> Workers below			
<input type="checkbox"/> Noise			
<input type="checkbox"/> Electrical			
Overview of work procedure (How are you going to work safely?):			
Workers trained in (training records must be available for review):			
Proper use of grinding equipment	Y <input type="checkbox"/> N <input type="checkbox"/>	Proper use of admin controls	Y <input type="checkbox"/> N <input type="checkbox"/>
Proper use of engineering controls	Y <input type="checkbox"/> N <input type="checkbox"/>	Proper use of PPE	Y <input type="checkbox"/> N <input type="checkbox"/>
Proper disposal methods	Y <input type="checkbox"/> N <input type="checkbox"/>	Other (fall protection, swing stages, etc)	Y <input type="checkbox"/> N <input type="checkbox"/>
Respirators (Refer to ECP for respirator requirements)			
Required: Y <input type="checkbox"/> N <input type="checkbox"/>	Available: Y <input type="checkbox"/> N <input type="checkbox"/>	Fit-tested: Y <input type="checkbox"/> N <input type="checkbox"/>	

Safety Management Plan

Silica Exposure Control Plan

[illegible]

Safety Management Plan

Silica Exposure Control Plan

Vacuum capacity maintained	Y <input type="checkbox"/> N <input type="checkbox"/>		
Pre-filters in place	Y <input type="checkbox"/> N <input type="checkbox"/>		
Vacuum attachments used	Y <input type="checkbox"/> N <input type="checkbox"/>		
Collection bags in place	Y <input type="checkbox"/> N <input type="checkbox"/>		
Waste properly disposed of	Y <input type="checkbox"/> N <input type="checkbox"/>		

TABLE 1 (Codes for task/risk management matrix)

Engineering controls		Administrative controls		PPE		Supplies/Equipment	
1	Exhaust fan	1	Signage	1	Respirator	1	Hand grinder
2	LEV	2	After hours work	2	Gloves	2	Ceiling grinder
3	Wetting	3	Scheduling	3	Coveralls	3	Floor grinder
4	Partial enclosure			4	Hearing protection	4	Disposal bags
5	Full enclosure			5	Eye protection	5	HEPA filter (vacuum)
6	Shroud			6	Reflective vest	6	HEPA filter (respirator)
7	Barriers			7	Rubber boots (CSA)	7	Shovel
				8	Fall arrest	8	Lifeline

Safety Management Plan

Silica Exposure Control Plan

SITE-SPECIFIC SILICA EXPOSURE CONTROL PLAN**Location:** _____ **Date:** _____**Work description:****Primary silica control options** (check those options used and explain use if needed)

- ◆ Substitution controls (using procedures or products that do not create silica; must review MSDSs)

Other means of demo: _____

Different products: _____

Other substitutions: _____

- ◆ Engineering controls (when using ventilation, draw air out and don't expose others to exhaust dusts)

Vacuuming: _____

Wetting: _____

Ventilation: _____

Isolation: _____

Other means: _____

- ◆ Administration controls (reducing exposure by work schedules, timing, or planning options)

Control points: _____

Work schedule: _____

Other means: _____

Secondary silica control options (check those options used and explain use if needed)

- ◆ Personal protective equipment

Half-mask

respirators: _____ Cartridge type: _____ Fit tests confirmed: _____

Full-face respirators: _____ Cartridge type: _____ Fit tests confirmed: _____

Supplied air units: _____

Coveralls required: _____

- ◆ Hygiene and decontamination options (reducing exposures after work has stopped or during breaks)

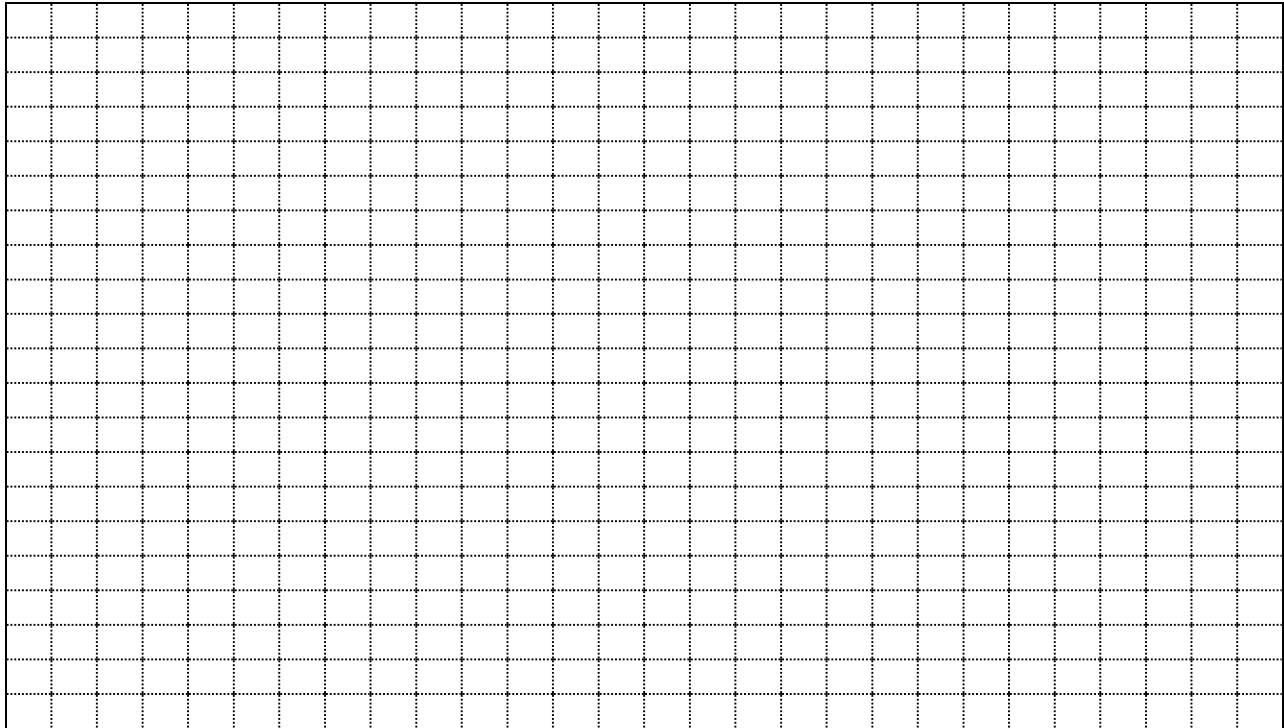
Water or washing facilities on site: _____

Vacuuming clothing/self: _____

Safe work procedures and other
details: _____

Safety Management Plan

Silica Exposure Control Plan

Ventilation plan (sketch)A large rectangular grid consisting of 20 columns and 20 rows of small squares, intended for sketching a ventilation plan.

← Show direction of airflow including makeup air locations and discharge air outlets

Area or location in building of ventilation plan (e.g., floor #, wing)

Date plan was reviewed by workers and posted for workers to see

Types of neg. air fans & no.'s *

* Indicate on plan by number the location of the negative air fans

Ventilation safety checklist

- | | |
|--|--|
| <input type="checkbox"/> Makeup air free of possible contaminants | <input type="checkbox"/> Workers not placed between contaminants created and exhaust inlet ports |
| <input type="checkbox"/> Exhaust fan operation has failure warning | <input type="checkbox"/> Discharge air not affecting others |
| <input type="checkbox"/> Dilution fans not stirring up dust | <input type="checkbox"/> All workers equipped with approved respirators |
| <input type="checkbox"/> Wetting of materials used to keep dust down | |

Note: Attach additional sheets if needed or other documents if required due to hazards or work conditions.

Print supervisor's name

Supervisor's signature

Slips, Trips and Falls

Slips, trips and falls are major contributors to injuries and lost time accidents. Be careful and observe the following rules.

1. The following situations should be avoided to help prevent slipping:
 - a) Wet floors/decks
 - b) Oily floors/decks
 - c) Highly waxed and polished floors
 - d) Throw rugs at the foot or top of a stairway and entrances to hallways.
3. Remove any spilled liquid from the floor immediately.
4. Keep items such as paper clips, thumbtacks, and rubber bands off the floor.
5. Good traction helps prevent slipping. The soles of some shoes may increase the chance of slipping; therefore, wear shoes that provide good traction.
6. Do not exert extreme force on wrenches and make sure that your footing is stable in case the wrench slips or releases quickly.
7. Good housekeeping helps prevent trips and falls.
8. In addition to tools used in day-to-day operations, many items can cause tripping. Be alert for tripping hazards such as garden hoses, shovels, "yo-yos", rakes, concrete bumpers in parking lots, broken sidewalks, shallow holes in streets and crosswalks, extension cords, loose shoe laces, pants that are too long, etc. Take action to eliminate tripping hazards where possible.
9. Never run unless the situation is life threatening.
10. Every opening in a deck, floor, the ground or a pit, which a person could accidentally step into, should be well marked. The openings should be constantly attended, protected by barricades or standard railings, or roped off before any grating or boards are removed, or before any holes are opened.
11. Avoid working in a location without handrails.
12. Employees must wear fall protection safety belts when working 6 feet or more above the ground, unless other adequate protection against falling is provided.
13. Employees must receive company approved training in proper use of fall protection equipment before use.

Safety Management Plan

Slips, Trips and Falls

Stairs and Walkways

1. When carrying tools or material, always keep one hand free to use the handrails as you go up and down stairways.
2. Stairs to attic areas must be equipped with adequate railings meeting OSHA standards. All stairways should be well illuminated.
3. All steps, walkways, and stairs must be kept free of obstructions and slippery materials such as oil and grease.
4. Tools, equipment, and material must not be left on walkways.
5. Use handrails when walking up/down stairways or steps.
6. Wooden walkways and handrails should be inspected frequently to determine their strength and integrity.
7. The use of colors to mark elevation changes is encouraged.
8. Secure hoses or electrical cords to the floor or ground whenever they are laid across walkways.
9. During winter, be careful of icy walkways. Keep hands free and out of the pockets while traversing them. Use de-icing material where possible.

Spill Prevention and Response

Purpose

The purpose of this plan is to document spill prevention and response requirements. Each The Workforce Group, LLC work site will develop a spill prevention and response plan based on the requirements and template provided.

Scope

This procedure applies to all The Workforce Group, LLC operations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Requirements

Each work site spill prevention and response plan shall contain the following requirements.

- Chemical substances should be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals should be kept in closed containers and stored so they are not exposed to stormwater.
- The program must identify chemicals used that may be potentially spilled or released. This will include both liquid chemicals used at our facilities or brought on to owner client sites.
- Spill kits must be adequate for any anticipated spills. A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials. The contents of spill response kits shall be periodically assessed to ensure the availability of adequate spill response supplies and adjust inventory as necessary.
- The Workforce Group, LLC shall ensure the availability of adequate spill response supplies by periodic inspection to assess their availability and adjust the inventory as necessary.
- Employees must be instructed on spill prevention and the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal and communication procedures.
- Areas where chemicals may be used or stored must be maintained using good housekeeping best management practices. This includes, but is not limited to clean and organized storage, labeling and secondary containment where necessary.

Safety Management Plan

Spill Prevention and Response

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- Proper communication measures for employees to initiate in the event of a spill will be created on a site by site basis. Communication procedures will be based on type and quantity of materials spilled.
 - Environmental spills shall be reported to environmental authorities when required. Reporting procedures will be based on type and quantity of materials spilled.

The following template shall be used for each work site.

Safety Management Plan

Spill Prevention and Response

Copies of this plan are located at the facility and are available to all employees.

Location(s) of plan(s): _____

Facility Information

Facility Name: _____

Mailing Address: _____

Physical address if different: _____

Owner Name: _____

Owner Address: _____

Primary Contact Name: _____

Work Phone Number: _____

Home Phone Number: _____

Mobile Phone Number: _____

Secondary Contact Name: _____

Work Phone Number: _____

Home Phone Number: _____

Mobile Phone Number: _____

Date of Initial Operation: _____

Site Assessment

Location - Describe where facility is located.

Safety Management Plan

Spill Prevention and Response

Facility DescriptionFacilities and Equipment (*examples are shown but complete per site description*):☐ Garage for vehicle processing☐ Parts storage☐ Manufacturing Building☐ Spill kit/emergency equipment☐ Refrigerant (Freon) extractor☐ Parts washer

Please list: _____

Services:

☐ Dismantler/Recycler☐ Equipment Repair☐ Moving Equipment☐ Painting/Sandblasting☐ Manufacturing

Please list: _____

Fixed Storage - List capacity and contents of each storage container. For example, "One 6,000 gallon above ground tank containing diesel fuel." Be sure to include diesel, gasoline, waste oil, heating oil, kerosene, paint thinner and other solvents. Also describe the construction of the containers, secondary containment for each, liquid level indicators, alarms and method of corrosion protection for each container. _____

Non-Fixed Storage - List capacity and contents of each storage container. For example, "One 55 gallon drum for recycled oil." Be sure to indicate what each container is used for, its condition and construction and how secondary containment is provided. _____

Total quantity of stored materials: - The combined quantity of the materials listed above:

_____ gallons

Safety Management Plan

Spill Prevention and Response

Oil spill history

Place an X on the appropriate line and proceed accordingly.

_____ There has never been a significant spill at the above named facility.

_____ There have been one or more significant spills at the above named facility. Details of such spill(s) are described below. For each spill that occurred, supply the following information:

- Type and amount of oil spilled
- Location, date and time of spill(s)
- Watercourse affected
- Description of physical damage
- Cost of damage
- Cost of clean-up
- Cause of spill
- Action taken to prevent recurrence

Potential Spill Volumes and Rates

Fill in all applicable blanks.

<u>Potential Event</u>	<u>Volume Released</u>	<u>Spill Rate</u>
Complete failure of a full tank*	_____ gallons	instantaneous
Partial failure of a full tank*	1 to _____ gallons	gradual to instantaneous
Tank overflow**	1 to _____ gallons	up to _____ gallons per minute
Leaking during unloading***	up to _____ gallons	up to _____ gallons per minute
Pipe failure****	up to _____ gallons	up to _____ gallons per minute
Leaking pipe or valve****	several ounces to gallons	up to _____ gallons per minute
Fueling operations****	several ounces to gallons	up to _____ gallons per minute
Oil and grease	several ounces to quarts	spotting

* Volume of largest tank

** Calculate using the rate at which fuel is dispensed from the delivery truck into your tank(s).

*** Calculate using the rate at which petroleum would be withdrawn from the tank if it should have to be emptied (*e.g.*, if it was being taken out of service).

**** Calculate based on the specifications of your equipment.

Safety Management Plan

Spill Prevention and Response

Spill Prevention and Control

Spill Prevention - Provide specific descriptions of containment facilities and practices. Include description of items such as double-walled tanks, containment berms, emergency shut-offs, drip pans, fueling procedures and spill response kits. Also, describe how and when employees are trained in proper handling procedures and spill prevention and response procedures.

Spill discharge and flow - For each potential spill source; describe where petroleum would flow in the event of a spill. For example, "The 6,000 gallon diesel tank has a pre-manufactured secondary containment system capable of holding 110 percent of the total volume of the tank" and, "A spill from engine repair would be contained inside the shop building and quickly cleaned up with oil absorbents." Incorporate site map by reference (see instructions under *Appendices*).

Spill response - Identify what equipment would be deployed by whom and in what situation. Also, include phone numbers for response agencies, *e.g.*, U.S. Coast Guard, fire department, spill response contractors, etc. A copy of your spill response plan may be attached as an appendix to this plan in lieu of completing this section.

Safety Management Plan

Spill Prevention and Response

Security - Provide a description of how all containers are protected when the facility is not in operation or unattended. Include a description of fencing, access control, gates, locks, etc. that prevent access by unauthorized individuals.

Facility Inspections

Routine Inspections - Name facilities and the frequency with which they are inspected. For example, "The fuel pumps are inspected daily. The materials storage area is inspected monthly." Describe all facility containers, piping, etc. that is to be inspected. Name the person who has responsibility to implement preventative maintenance programs, oversee on-site inspections, coordinate employee training, maintain records, update the plan as necessary, and ensure that reports are submitted to the proper authorities.

Annual Inspections - Include a description of annual comprehensive inspections. For example, "A site inspection is also conducted annually by appropriate responsible personnel to verify that the description of potential pollutant sources are accurate, that the map reflects current site conditions, and that the controls to reduce the pollutants identified in this plan are being implemented and are adequate. This annual inspection will be conducted above and beyond the routine inspections done focusing on designated equipment and areas where potential sources are located."

Safety Management Plan

Spill Prevention and Response

Record Keeping

Describe record keeping procedures. For example, “Record keeping procedures consist of maintaining all records a minimum of three years. The following items will be kept on file: current plan, internal site reviews, training records, and documentation of any spills or maintenance conducted in regards to these sites.” *Maintenance Inspection, Employee Training, and Record Keeping* logs are included in this template for your use.

Safety Management Plan

Spill Prevention and Response

Maintenance Inspections

Maintenance Coordinator Name:

Maintenance Coordinator responsibilities include implementation of preventative maintenance programs and oversight of on-site inspections.

Use this table to record inspections:

Facility Inspected	Date of Inspection	Name of Inspector	Result Pass/Fail	Comments

Safety Management Plan

Spill Prevention and Response

Employee Training

Employee Training Coordinator Name: _____

Use this table to record spill prevention and response training.

Name of Employee	Date of Training	Type of Training/Topics Addressed

Safety Management Plan

Spill Prevention and Response

Record Keeping of Incidental Spills

Record Keeper Name:

Record Keeper responsibilities include maintaining records of incidents, updating the plan as necessary and ensuring reports are submitted to the proper authorities when necessary.

Incident No.	Type of Incident	Date of Occurrence	How it was Cleaned Up

Appendices

Site map - Attach a site map as Appendix A to this plan. You may attach an existing site map or create your own. If you use an existing map, be sure that the items listed below are included. If you need to create a site map, use a large enough piece of paper so all site plan elements may be seen and try to keep the map to a scale (e.g. 1" = 20'. The following instructions should guide you step-by-step. Please use a straight edge (ruler) while creating the sketch.

- The sketch should be oriented as if you were in a plane looking down on your property (an aerial view), with North at the top (draw an arrow indicating north).
- Draw and label all roadways surrounding the work site.
- Draw and label all facilities within the work site as close proportionately as possible.
- Draw an arrow(s) pointing in the direction of downhill flow of water when it rains.
- Draw the location and general layout of all vehicles associated with the work site.
- Label any rivers or waterways surrounding the work site.
- Draw and label all methods of entry to the work site.
- Draw and label the location of all fuel containment facilities.
- Draw and label the location of all in-place spill prevention, control and countermeasure devices.

Safety Management Plan

Spill Prevention and Response

Other attachments - List any additional information to be attached as Appendix B, C, D, etc.
Label and staple the attachments to the end of this plan.

Appendix A: Site Map

Appendix B: Emergency Response Posting Locations

Appendix C: _____

Appendix D: _____

Management Approval

I certify that I have personally examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals responsible for obtaining this information, the information submitted is true, accurate and complete.

Signature

Title

Printed name

Date

Stop Work Authority Process

Purpose

The Stop Work Authority process involves a stop, notify, correct and resume approach for the resolution of a perceived unsafe condition, act, error, omission or lack of understanding that could result in an undesirable event. All The Workforce Group, LLC employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health, safety or environmental risks exist.

Scope

This program applies to all The Workforce Group, LLC projects and operations.

Key Responsibilities

- Employees are responsible to initiate a Stop Work Intervention when warranted and management is responsible to create a culture where SWA is exercised freely.
- Supervisors are responsible to ensure a culture is created where SWA is exercised and honored freely to resolve issues before operations resume and recognize proactive participation.
- Management must establish and support clear expectations to exercise SWA, create a culture where SWA is exercised freely and hold those accountable that chose not to comply with established SWA policies.

Stop Work Authority Procedure

- When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected personnel and supervision of the stop work issue, correct the issue and resume work when safe to do so.
- No work will resume until all stop work issues and concerns have been adequately addressed.
- Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated by the host nor by The Workforce Group, LLC.

Follow-Up

- All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.
- Stop Work reports shall be reviewed by supervision order to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learning.

Safety Management Plan

Stop Work Authority Process

-
- It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.

Training

Employees shall receive Stop Work Authority training before their initial assignment. The training will be documented including the employee name, the dates of training and subject matter.

Subcontractor Management Plan

Purpose

The purpose of this program is to ensure that The Workforce Group, LLC continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection, development of our subcontractors and annual re-evaluation.

Scope

This program applies to all subcontractors and all The Workforce Group, LLC locations.

General Requirements

All The Workforce Group, LLC subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by The Workforce Group, LLC. Approval requirements include:

- A formal safety review of the subcontractor being performed by The Workforce Group, LLC's Safety Consultant.
- The scope of the review was commensurate with the hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations and requirements of The Workforce Group, LLC.
- The subcontractor agrees to abide by our Drug and Alcohol policy and onsite safety rules throughout the duration of the work.

Any subcontractor that has a "Non-Approved" safety status will not be used on any The Workforce Group, LLC's project and will be noted on contractors list.

Procedure

Pre-Qualification of Subcontractors

Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics.

How Acceptable Safety Metrics Will be Used as a Criteria for Selecting Subcontractors

Acceptable safety metrics will be used as criteria for prequalifying and selecting subcontractors in the following manner. The safety metrics and scoring will consider:

- The Workforce Group, LLC Subcontractor Safety Pre-Qualification Form responses and subcontractor safety program documents review 40% (Rated from 0-40 total points)
- Subcontractor safety training documents review 30% (Rated from 0-30 total points)
- Subcontractor safety statistics review 30% (Rated from 0-30 total points)

Safety Management Plan

Subcontractor Management Plan

Evaluation Rating and Acceptance

The subcontractor rating system will have five designations:

- Equal to or Greater than 90 points = A – no restrictions.
- Between 85 and 89 points = B – Mitigation plan must be documented and approved by The Workforce Group, LLC's Safety Consultant.
- Between 81 and 84 points = C – Mitigation plan must be documented and approved by The Workforce Group, LLC Safety Consultant's and management's approval in writing.
- Between 71 and 80 points = D – Mandatory commitment meeting with senior subcontractor management present; mitigation plan documented and approved by The Workforce Group, LLC Safety Consultant's and management's approval in writing; trained subcontractor safety personnel on site during work regardless of number of workers.
- Less than 70 points = F – not to be used.

Once each subcontractor has been evaluated and scored, The Workforce Group, LLC safety will provide management the scores/ranking.

The Workforce Group, LLC reserves the right to change a subcontractor's status from "Approved" to "Non-Approved" if the subcontractor shows insufficient progress towards accepted mitigation plan or other agreed upon criteria.

Subcontractor Involvement

Contractors are required to follow or implement the work practices and systems described below while performing work at The Workforce Group, LLC worksites:

- Attend an safety orientation, pre-job meeting or kick-off meeting provided by The Workforce Group, LLC prior to any work beginning
- Monitor employees for substance abuse and report nonconformities to The Workforce Group, LLC
- Ensure personnel have the required training and competency for their work
- Participate in The Workforce Group, LLC tailgate safety meetings, job safety analysis or hazard assessments and on the job safety inspections.
- Perform a pre-job safety inspection that includes equipment
- Report all injuries, spills, property damage incidents and near misses
- Comply with onsite and Owner Client safety rules
- Implement The Workforce Group, LLC safety practices and processes as applicable
- Clean up and restore the worksite after the job is over
- Ensure compliance with regulations at all times
- Participate in post job safety performance review

Safety Management Plan

Subcontractor Management Plan

SUBCONTRACTOR SAFETY PRE-QUALIFICATION FORM**GENERAL INFORMATION**

1. Subcontractor Information:			
Subcontractor Name:		Telephone Number:	
Street Address:		Fax Number:	
City:		Website Address:	
Province/State:		Postal Code/Zip:	
2. Officers			
President:			
Vice President:			
Treasurer:			
3. How many years has your organization been in business under your present firm's name?			
4. Parent Firm Name:			
City:	Province/State:	Postal Code/Zip:	
Subsidiaries:			
5. Under current management since (Date): (please enter date as mm/dd/yyyy)			
6. Contact for Insurance Information:			
Title:	Telephone:	Fax:	Email:
7. Insurance Carrier(s):			
Name	Type of Coverage	Telephone	
8. Worker's Compensation Account Status (Please enclose a copy of your workers compensation insurance certificate.			
Account Number:		Industry Code:	
9. Contact for requesting bids:			
Title:	Telephone:	Fax:	Email:
10. Contractor Evaluation form completed by:			
Title:	Telephone:	Fax:	Email:

Safety Management Plan

Subcontractor Management Plan

HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE**Health, Safety and Environmental Performance**

Provide the following data for your firm using your record keeping forms from the past three (3) years.
If the data is not available please reply with Not Available - N/A.

Safety Performance Definitions and Guidance

- a. **Hours Worked** Employee hours worked last three years. Please report actual scheduled total hours worked and total overtime hours worked. If actual hours worked are not available for certain individuals hours worked may be estimated. A default of 2000 hours per individual per year can be used as an estimate.
- b. **Recordable Incidents** Recordable cases are those that involve any work-related injury or illness, including death but excluding first-aid injuries.
- c. **Lost Workday Cases** A Lost Workday Case is a medical case that involves fatalities, days away from work cases or restricted work activity cases.
- **Days Away from Work Case** Where the employee is away from scheduled work day one day or more after the day of a work related injury or illness. The day of the incident does not count as lost workday. Stop count when total days away and restricted duty days reach 180 or employee leaves the firm.
 - **Restricted Work Activity Case** Where the employee as result of work-related injury or illness:
 - ◊ Assigned to another job on a temporary or permanent basis or
 - ◊ Worked at their permanent job but less than a full day
 - ◊ Could not perform routine functions associated with their permanent job
 The day of the incident is not counted as a Restricted Duty day. Stop count when total days away or restricted duty days reach 180 or if employee leaves the firm.

Health and Safety Incidents	2011	2010	2009
a. Total Hours Worked			
b. Total Recordable Incidents # Fatalities # Medical Aids # Days Away from Work Cases # Restricted Work Activity Cases			
c. Total Recordable Incident Rate (TRIR) <u>Total # Recordable Incidents x 200,000</u> Total # Hours worked			
d. Lost Workday Cases (LWC) # Fatalities # Days Away from Work Case # Restricted Work Activity Case			

Safety Management Plan

Subcontractor Management Plan

e. Lost Workday Incident Rate (LWDR) Total # Lost Workday Incidents x 200,000 Total # Hours Worked			
f. EMR			

HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE			
Environmental Incidents	2011	2010	2009
<u>Total # Spills to Water</u> a. Petroleum Spills # spills Sheen (est. volume as 0.1 bbl. To < 1bbl. # spills 1 bbl. To < 100 bbls. # spills 100 bbls. or more b. Chemical Spills # spills 1 bbl./160 kg. to < 100 bbls./16,000 kg. # spills 100 bbls./16,000 or more			
<u>Total # Spills to Land</u> a. Petroleum spills # spills 1 bbl. To < 100 bbls. # spills 100 bbls. or more b. Chemical Spills # spills 1 bbl./160 kg. to < 50 bbls./8,000 kg # spills 50 bbls./8,000 kg. or more			
Enforcement Actions	2011	2010	2009
<u>Citations</u> # Health and Safety-State and Federal # Environmental (DEQ, EPA) Please provide details			
<u>Fines</u> Total # Fines Total \$\$ Paid Please provide details			

Safety Management Plan

Subcontractor Management Plan

HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT		
Highest ranking HSE professional in the firm:		
Name/Title:	Email:	Telephone Numbers
Do you have a written Basic Safety / HSE Program?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Does your Basic Safety/HSE Program include the following?		
a. HSE Policy statement signed by management	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. Management Involvement and Commitment	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c. Hazard Identification and Risk Control	Yes <input type="checkbox"/>	No <input type="checkbox"/>
d. Rules and Work Procedures	Yes <input type="checkbox"/>	No <input type="checkbox"/>
e. Training	Yes <input type="checkbox"/>	No <input type="checkbox"/>
f. Communications	Yes <input type="checkbox"/>	No <input type="checkbox"/>
g. Incident and Accident Reporting and Investigation	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Does the program include work practices and procedures such as?		
a. Permit to Work including Isolation of Energy	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. Confined Space Entry	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c. Injury and Illness Recording	Yes <input type="checkbox"/>	No <input type="checkbox"/>
d. Fall Protection	Yes <input type="checkbox"/>	No <input type="checkbox"/>
e. Personal Protective Equipment	Yes <input type="checkbox"/>	No <input type="checkbox"/>
f. Portable Electrical/Power Tools	Yes <input type="checkbox"/>	No <input type="checkbox"/>
g. Motor Vehicle/Driving Safety	Yes <input type="checkbox"/>	No <input type="checkbox"/>
h. Compressed Gas Cylinders	Yes <input type="checkbox"/>	No <input type="checkbox"/>
i. Electrical Equipment Grounding Assurance	Yes <input type="checkbox"/>	No <input type="checkbox"/>
j. Powered Industrial Vehicles (Cranes, Forklifts, Etc.)	Yes <input type="checkbox"/>	No <input type="checkbox"/>
k. Housekeeping	Yes <input type="checkbox"/>	No <input type="checkbox"/>
l. Accident/Incident Reporting and Investigations	Yes <input type="checkbox"/>	No <input type="checkbox"/>
m. Unsafe Condition Reporting	Yes <input type="checkbox"/>	No <input type="checkbox"/>
n. Emergency Preparedness, Including Evacuation Plan	Yes <input type="checkbox"/>	No <input type="checkbox"/>
o. Waste Disposal and Pollution Prevention	Yes <input type="checkbox"/>	No <input type="checkbox"/>
p. Regular Workplace Inspection / Audits	Yes <input type="checkbox"/>	No <input type="checkbox"/>
q. Journey Management	Yes <input type="checkbox"/>	No <input type="checkbox"/>
r. Stop Work Authority	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Safety Management Plan

Subcontractor Management Plan

Do you have a Drug and Alcohol program? a. Pre-employment Testing b. Reasonable Cause Testing c. Post-rehabilitation/Return to Work Testing d. Random Testing	Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/>	No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/>
Do you have a Job Safety Analysis (JSA) process in place?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is there a Root Cause Analysis process used for investigations, near misses, environmental spills?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is there a Management of Change (MOC) Process in place?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you have programs for the following? a. Respiratory Protection b. Where applicable, have employees been: <ul style="list-style-type: none"> • Trained • Fit tested • Medically approved c. Hazard communication/WHMIS d. Programs for potential high hazard work such as Highly Hazardous Chemicals; Explosives and Blasting Agents	Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/>	No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/>
Do you have a corrective action process for addressing individual/employee safety and health performance deficiencies? Medical a. Do you conduct medical examinations for: <ul style="list-style-type: none"> • Pre-placement Job Capability • Pulmonary • Respiratory b. Describe how you intend to provide first aid and other medical services while on-site.	Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/>	No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/>
Do you have personnel trained to perform first aid and CPR?	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Safety Management Plan

Subcontractor Management Plan

Personal Protective Equipment (PPE)			
a. Is applicable PPE provided for employees?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Do you have a program to assure that PPE is inspected and maintained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
HSE Meetings			Frequency
a. Do you hold site HSE meetings for?			
• Field Supervisors	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• Employees	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• New Hires	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• Subcontractors	Yes <input type="checkbox"/>	No <input type="checkbox"/>	

HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT			
Inspections and Audits			Frequency
a. Do you conduct internal HSE Inspections?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Do you conduct internal HSE program audits?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Are corrections or deficiencies to internal HSE program or equipment communicated and documented until closure?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Equipment and Materials:			
a. Do you own or lease Equipment and Materials? If yes, please complete the following questions:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Do you have a system for establishing applicable health, safety, and environmental specifications for acquisition of materials and equipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Do you conduct inspections on operating equipment (e.g., cranes, forklifts) in compliance with regulatory requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
d. Do you maintain operating equipment in compliance with regulatory requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
e. Do you maintain the applicable inspection and maintenance certification records for operating equipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
f. Do you document corrections or deficiencies from equipment inspections and maintenance?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Subcontractor Management			

Safety Management Plan

Subcontractor Management Plan

a. Do you subcontract any work? If the answer is yes, please complete the following questions:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. Do you have a written contractor safety management process?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c. Do you use HSE performance criteria in selection of subcontractors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
d. Do you evaluate the ability of subcontractors to comply with applicable HSE requirements as part of the selection process?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
e. Do your subcontractors have a written HSE Program?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
f. Do you include your subcontractors in:		
• HSE Orientation	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• HSE Meetings	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• HSE Equipment Inspections	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• HSE Program Audits	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Are corrections or deficiencies documented	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Safety Management Plan

Subcontractor Management Plan

HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT				
Employee and Trades Training				
a. Have employees been trained in appropriate job skills?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
b. Are employees' job skills certified where required by regulatory or industry consensus standards?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
c. List trades/crafts which have been certified:				
Health, Safety and Environmental Orientation	New Hires		Supervisors	
a. Do you have an HSE Orientation Program for new hires and newly hired or promoted supervisors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. Does the program provide instruction on the following:				
• New worker orientation	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Safe Work Practices	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Safety Supervision	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Toolbox meetings	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Emergency Procedures	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• First Aid Procedures	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Fire Protection and Prevention	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Safety Intervention	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Hazard Communication/WHMIS	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Health, Safety and Environmental Training				
a. Do you know the regulatory HSE training requirements for your employees?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
b. Have your employees received the required HSE training and re-training	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
c. Do you have a specific HSE training program for supervisors?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
Training Records				
a. Do you have HSE and training records for your Employee's?	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
b. Do the training records include the following:				
• Employee identification	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
• Date of training	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
• Name of trainer	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
• Method used to verify understanding	Yes <input type="checkbox"/>		No <input type="checkbox"/>	
c. How do you verify understanding of training? (Check all that apply)				
<input type="checkbox"/> Written test <input type="checkbox"/> Oral test <input type="checkbox"/> Performance test <input type="checkbox"/> Job Monitoring <input type="checkbox"/> Other (List)				

Safety Management Plan

Subcontractor Management Plan

INFORMATION SUBMITTAL

Please provide copies of checked items with the completed PQF:

- ☐ EMR documentation from your insurance carrier
- ☐ Insurance Certificate
- ☐ OSHA 300 Logs (Past 3 Years)
- ☐ Safety & Health Program
- ☐ Safety & Health Incentive Program
- ☐ Substance Abuse Program
- ☐ Accident/Incident/Near Miss Investigation Procedure & Form
- ☐ Safety & Health Inspection Form
- ☐ Safety & Health Orientation (Outline)
- ☐ Example of Employee Safety & Health Training Records
- ☐ Safety & Health Training for Supervisors (Outline)
- ☐ JSA Form

Note: Owner checks items to be provided with PQF.

This document must be signed by a company officer.

Title:	Signature:
Date:	Print Name:

Transportation of Hazardous Materials

Purpose

These guidelines and requirements are designed to promote public safety during the transportation of hazardous materials.

Scope

These guidelines apply to all The Workforce Group, LLC operations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Requirements

Prior to Transport and Loading

The Workforce Group, LLC (the consignor) is responsible for the classification of the hazardous materials. Before allowing a carrier to take possession of hazardous materials for transport, the consignor (The Workforce Group, LLC) must determine the classification of the hazardous materials.

The certificate of vehicle registration and proof of insurance documentation must be carried in all vehicles.

The Workforce Group, LLC (the consignor) is responsible for providing documentation to the carrier of hazardous materials. Before allowing a carrier to take possession of hazardous materials for transport, the consignor (The Workforce Group, LLC) must prepare and give to that carrier a shipping document or if the carrier agrees, an electronic copy of the shipping document.

The driver and passengers will follow all local, state and federal laws, including Department of Transportation regulations and codes (if applicable), while operating or riding in a The Workforce Group, LLC vehicle.

Hazardous materials placarding - The Workforce Group, LLC must not offer for transport, transport or import a means of containment that contains hazardous materials unless each hazardous materials placard is displayed on it. See chart at the end of this document.

Vehicles shall be driven with headlights on at all times.

Safety Management Plan

Transportation of
Hazardous Materials

Dangerous goods are to be adequately secured with a means of containment to prevent accidental release. The Workforce Group, LLC must not handle, offer for transport or transport hazardous materials in a means of containment unless the means of containment is designed, constructed, filled, closed, secured and maintained so that under normal conditions of transport, including handling, there will be no accidental release of hazardous materials that could endanger public safety.

Hazardous materials are to be loaded and covered to prevent accidental release of the hazardous materials. The Workforce Group, LLC must load and secure hazardous materials in a means of containment and must load and secure the means of containment on a means of transport in such a way as to prevent, under normal conditions of transport, damage to the means of containment or to the means of transport that could lead to an accidental release of the hazardous materials.

Inspection

Prior to operating a company vehicle a “walk around” and visual inspection is mandatory to ensure the vehicle is in safe operating condition and ensure the surrounding area is free of any unseen hazards.

The driver shall inspect the vehicle prior to operating it at the beginning of a work shift and after he ceases to operate it at the end of a work shift. An inspection carried out must include an inspection of the following equipment: lighting devices and reflectors, tires, coupling devices, wheels and rims, service brake, including the trailer brake connections, parking brake, steering mechanism, horn, windshield wipers, rear vision mirrors and all required emergency equipment.

The driver shall inform The Workforce Group, LLC of any defects or deficiency that would affect the safe operation of the vehicle. When The Workforce Group, LLC receives a notice of defect in respect to a The Workforce Group, LLC vehicle it shall be repaired or otherwise modified, or repaired or modified in accordance with instructions provided by the manufacturer. If instructions are not given by the manufacturer the vehicle will be repaired or otherwise modified until safe to operate.

Refueling Vehicles

Vehicle engines must be turned off before refueling begins. Smoking is not permitted during the refueling process. Note: Due to concerns surrounding the potential for cellular phones to cause the ignition of gas vapors, cellular phones must not be worn or used during refueling of gas powered vehicles.

Document Retention

The Workforce Group, LLC is responsible for keeping documentation information. A consignor (The Workforce Group, LLC) must be able to produce a copy of any shipping document for two years after the date the shipping document or an electronic copy of it was prepared or given to a

Safety Management Plan

Transportation of
Hazardous Materials

carrier by the consignor, for hazardous materials imported into the US, for two years after the date the consignor ensured that the carrier, on entry into the US, had a shipping document or was given an electronic copy of one, and within 15 days after the day on which the consignor receives a written request from an inspector.

Training Requirements

Any worker who handles, offers for transport or transports hazardous materials shall be adequately trained and hold a training certificate or perform those activities in the presence and under the direct supervision of a person who is adequately trained and who holds a training certificate.

All training shall be documented and certificates of training verified with the trainer by The Workforce Group, LLC.

The Workforce Group, LLC must not direct nor allow an employee to handle, offer for transport, or transport hazardous materials unless the employee is adequately trained and holds a training certificate or performs those activities in the presence and under the direct supervision of a person who is adequately trained and who holds a training certificate.

Response to Release of Hazardous Materials

The Workforce Group, LLC must protect the public safety after an accidental release of hazardous materials. Where an accidental release of hazardous materials in excess of a prescribed quantity or concentration occurs or is imminent from a means of containment being used to handle or transport hazardous materials, any person who at the time has the charge, management or control of the means of containment shall report the occurrence or imminence of the release. Every person required to make a report shall, as soon as possible in the circumstances, take all reasonable emergency measures to reduce or eliminate any danger to public safety that results or may reasonably be expected to result from the release.

Accidental releases or spills of hazardous materials must be reported immediately. In the event of an accidental release of hazardous materials from a means of containment, a person who has possession of the hazardous materials at the time of the accidental release must make an immediate report of the accidental release to appropriate authority, if the accidental release consists of a quantity of hazardous materials or an emission of radiation that exceed quantities set out for each Class of hazardous materials.

Safety Management Plan

Transportation of
Hazardous Materials

Hazardous Materials Warning Placards

Actual placard size: at least 273 mm (10.8 inches) on all sides

CLASS 1 Explosives	CLASS 2 Gases	CLASS 3 Flammable Liquid and Combustible Liquid	CLASS 4 Flammable Solid, Spontaneously Combustible, and Dangerous When Wet		
<p>§172.522 §172.523 §172.524 §172.525</p> <p>* For Divisions 1.1, 1.2, or 1.3, enter division number and compatibility group letter, when required; placard any quantity. For Divisions 1.4, 1.5, and 1.6, enter compatibility group letter, when required; placard 454 kg (1,001 lbs) or more.</p>	<p>§172.528 §172.530 §172.532 §172.540</p> <p>For NON-FLAMMABLE GAS, OXYGEN (compressed gas or refrigerated liquid), and FLAMMABLE GAS, placard 454 kg (1,001 lbs) or more gross weight. For POISON GAS (Division 2.3), placard any quantity.</p>	<p>§172.542 §172.544</p> <p>For FLAMMABLE, placard 454 kg (1,001 lbs) or more. GASOLINE may be used in place of FLAMMABLE placard displayed on a cargo tank or portable tank transporting gasoline by highway. Placard combustible liquid transported in bulk. See §172.504(a)(2) for use of FLAMMABLE placard in place of COMBUSTIBLE. FUEL OIL may be used in place of COMBUSTIBLE on a cargo or portable tank transporting fuel oil not classed as a flammable liquid by highway.</p>	<p>§172.546, §172.547, §172.548</p> <p>For FLAMMABLE SOLID and SPONTANEOUSLY COMBUSTIBLE, placard 454 kg (1,001 lbs) or more. For DANGEROUS WHEN WET (Division 4.3), placard any quantity.</p>		
CLASS 5 Oxidizer & Organic Peroxide <p>§172.550, §172.552</p> <p>Organic Peroxide, Transition-2011 (rail, vessel, and aircraft) 2014 (highway)</p> <p>For OXIDIZER and ORGANIC PEROXIDE (other than TYPE B, temperature controlled), placard 454 kg (1,001 lbs) or more. For ORGANIC PEROXIDE (Division 5.2), Type B, temperature controlled, placard any quantity.</p>	CLASS 6 Poison (Toxic) and Poison Inhalation Hazard <p>§172.504(a)(10), §172.554, §172.555</p> <p>For POISON (PGI or PGII, other than inhalation hazard) and POISON (PGIII), placard 454 kg (1,001 lbs) or more. For POISON-INHALATION HAZARD (Division 6.1), inhalation hazard only, placard any quantity.</p>	CLASS 7 Radioactive <p>§172.556</p> <p>Placard any quantity - packages bearing RADIOACTIVE YELLOW/WHITE labels only. Certain low specific activity radioactive materials in "exclusive use" will not bear the label, but the radioactive placard is required for exclusive use shipments of low specific activity material and surface contaminated objects transported in accordance with §172.504(a) Table 1 and §173.427(a)(6).</p>	CLASS 8 Corrosive <p>§172.558</p> <p>For CORROSIVE, placard 454 kg (1,001 lbs) or more.</p>	CLASS 9 Miscellaneous <p>§172.560</p> <p>Not required for domestic transportation. A bulk packaging containing a Class 9 material must be marked with the appropriate ID number displayed on a Class 9 placard, an orange panel, or a white square-on-point display.</p>	Dangerous <p>§172.521</p> <p>A freight container, unit load device, transport vehicle, or rail car which contains non-bulk packages with two or more categories of hazardous materials that require different placards specified in Table 2 may be placarded with DANGEROUS placards instead of the specific placards required for each of the materials in Table 2. However, when 1,000 kg (2,205 lbs) or more of one category of material is loaded at one loading facility, the placard specified in Table 2 must be applied.</p>

Trenching Shoring Excavation Program

Purpose

The purpose of this training program is to protect employees from safety hazards that may be encountered during work in trenches and excavations.

Scope

The Workforce Group, LLC is required to participate as a contract employer at client locations with trenching and excavation work; however The Workforce Group, LLC does not initiate trenching operations.

When work is performed on a non-owned or operated site, the operator's program shall take precedence; however, this document covers The Workforce Group, LLC employees for basic awareness purposes that addresses all items and shall be used when an operator's program doesn't exist.

Definitions

Accepted engineering practices means the standards of practice required by a registered professional engineer.

Aluminum Hydraulic Shoring means a manufactured shoring system consisting of aluminum hydraulic cylinders (crossbraces) used with vertical rails (uprights) or horizontal rails (wales).

Bell-bottom pier hole means a type of shaft or footing excavation, the bottom of which is made larger than the cross section above to form a belled shape.

Benching (Benching system) is a method of protecting employees from cave-ins by excavating the sides of an excavation to form one or more horizontal steps, usually with vertical or near-vertical surfaces between levels.

Cave-in means the movement of soil or rock into an excavation, or the loss of soil from under a trench shield or support system, in amounts large enough to trap, bury, or injure and immobilize a person.

Cross braces mean the horizontal members of a shoring system installed from side to side of the excavation. The cross braces bear against either uprights or Wales.

Safety Management Plan

Trenching Shoring
Excavation Program

Excavation means any man-made cut, cavity, trench, or depression in an earth surface formed by earth removal.

Faces or sides mean the vertical or inclined earth surfaces formed as a result of excavation work.

Failure means the movement or damage of a structural member or connection that makes it unable to support loads.

Hazardous atmosphere means an atmosphere that is explosive, flammable, poisonous, corrosive, oxidizing, irritating, oxygen deficient, toxic, or otherwise harmful, which may cause death, illness, or injury.

Health Safety Officer means the individual at The Workforce Group, LLC responsible for developing and implementing this program, conducting unannounced work site inspections, and ensuring that the departments comply with the program requirements.

Kickout means the accidental movement or failure of a cross brace.

Protective system means a method of protecting employees from cave-ins, from material that could fall or roll from an excavation face into an excavation, or from the collapse of adjacent structures. Protective systems include support systems, sloping and benching systems, shield systems, and other systems that provide the necessary protection.

Ramp means an inclined walking or working surface that is used to gain access to one point from another. A ramp may be constructed from earth or from structural materials such as steel or wood.

Sheeting means the members of a shoring system that retain the earth in position and in turn are supported by other members of the shoring system.

Shield (Shield system) means a structure used in an excavation to withstand cave-ins and which will protect employees working within the shield system. Shields can be permanent structures or portable units moved along as work progresses. Shields used in trenches are usually referred to as "trench boxes" or "trench shields."

Shoring (Shoring system) means a structure that is built or put in place to support the sides of an excavation to prevent cave-ins.

Sides. See "Faces."

Safety Management Plan

Trenching Shoring
Excavation Program

Sloping (Sloping system) means sloping the sides of the excavation away from the excavation to protect employees from cave-ins. The required slope will vary with soil type, weather, and surface or near surface loads that may affect the soil in the area of the trench (such as adjacent buildings, vehicles near the edge of the trench and so forth).

Stable rock means natural solid mineral material that can be excavated with vertical sides that will remain intact while exposed.

Structural ramp means a ramp built of steel or wood, usually used for vehicle access. Ramps made of soil or rock are not considered structural ramps.

Support system means a structure such as underpinning, bracing, or shoring, which provides support to an adjacent structure, underground installation, or the sides of an excavation.

Tabulated data means tables and charts approved by a registered professional engineer and used to design and construct a protective system.

Trench (Trench excavation) means a narrow excavation (in relation to its length) made below the surface of the ground.

Trench box or shield. See "Shield".

Uprights mean the vertical members of a trench shoring system placed in contact with the earth and usually positioned so that individual members do not contact each other. Uprights placed so that individual members are closely spaced, in contact with or interconnected to each other, are often called "sheeting."

Wales are horizontal members of a shoring system placed in the direction of the excavation face whose sides bear against the vertical members of the shoring system or earth (the uprights or sheeting).

Key Responsibilities

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her region is required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Only trained personnel can be involved in working in trenches or excavations. The Workforce Group, LLC personnel DO NOT initiate trenching.

Procedure

Competent Person Duties – The Safety Manager or their designee shall have the following duties:

Protective Systems or Equipment

- Monitoring water removal equipment and operations.
- Removal of workers if conditions dictate.
- Atmospheric testing.
- Inspecting excavations subject to runoff from heavy rains to determine need for diversion ditches, dikes, or other suitable protection.
- Determining cave-in potential to assess need for shoring or other protective system.
- Examining damaged material or equipment used for protective systems to determine its suitability for continued use.
- Classifying soil and rock deposits, by both visual analysis and by testing, to determine appropriate protection; re-classifying, if necessary, based on changing conditions.
- Determining the appropriate slope of an excavation to prevent collapse due to surcharge loads from stored material or equipment, operating equipment, adjacent structures, or traffic, and assuring that such slope is achieved.

Inspecting Trench and Protective Systems

- Inspections prior to entry and authorizing immediate removal of employees from the hazardous area where evidence of possible cave-in, failure of protective systems, hazardous atmospheres, or other hazardous conditions exists.

Unsafe Access/Egress

- Designing structural ramps that are used solely by employees as a means of access or egress. Structural ramps used for access or egress of equipment must be designed by a competent person qualified in structural design.

Utilities and Pre-work Site Inspection

The location of underground installations shall be determined before excavation.

Safety Management Plan

Trenching Shoring
Excavation Program

When utility companies or owners cannot respond to a request to locate underground utility installations within 24 hours, or cannot establish exact location of these installations, The Workforce Group, LLC may proceed, provided it does so with caution and provided detection equipment or other acceptable means to locate utility installations are used.

Excavation shall be done in a manner that does not endanger the underground installations or the employees engaged in the work. Utilities left in place shall be protected by barricades, shoring, suspension or other means as necessary to protect employees.

Protection of the Public

Barricades, walkways, lighting and posting shall be provided as necessary for the protection of the public prior to the start of excavation operations.

Guardrails, fences, or barricades shall be provided on excavations adjacent to walkways, driveways and other pedestrian or vehicle thoroughfares. Warning lights or other illumination shall be maintained as necessary for the safety of the public and employees from sunset to sunrise.

Wells, holes, pits, shafts and all similar hazardous excavations shall be effectively barricaded or covered and posted as necessary to prevent unauthorized access. All temporary excavations of this type shall be backfilled as soon as possible.

Protection Against Falls

Walkways or crossings shall be protected by standard guardrails or railings shall be provided where employees and the general public are permitted to cross over excavations. Where workers in the excavation may pass under these walkways or bridges, a standard guardrail and toe board shall be used.

Protection of Workers in ExcavationsAccess and Means of Egress

Stairs, ladders or ramps shall be provided where employees are required to enter trench excavations over 4 feet deep. The maximum distance of lateral travel (e.g., along the length of the trench) required to reach the means of egress shall not exceed 25 feet.

Structural Ramps

Structural ramps used solely by employees as a means of access or egress from excavations shall be designed by a competent person. Structural ramps used for access or egress of equipment shall be designed by a person qualified in structural design, and shall be constructed in accordance with the design.

Safety Management Plan

Trenching Shoring
Excavation Program

Ramps and runways constructed of two or more structural members shall have the structural members connected together to prevent movement or displacement.

Structural members used for ramps and runways shall be of uniform thickness.

Cleats or other appropriate means used to connect runway structural members shall be attached to the bottom of the runway or shall be attached in a manner to prevent tripping.

Structural ramps used in place of steps shall be provided with cleats or other surface treatments on the top surface to prevent slipping.

Ladders

When portable ladders are used, the ladder side rails shall extend a minimum of 3 feet above the upper surface of the excavation.

Ladders shall have nonconductive side rails if work will be performed near exposed energized equipment or systems.

Two or more ladders, or a double-cleated ladder, will be provided where 25 or more employees will be conducting work in an excavation where ladders serve as the primary means of egress, or where ladders serve two-way traffic.

Ladders will be inspected prior to use for signs of damage or defects. Damaged ladders will be removed from service and marked with "Do Not Use" until repaired.

Ladders shall be used only on stable and level surfaces unless secured. Ladders placed in any location where they can be displaced by workplace activities or traffic shall be secured, or barricades shall be used to keep these activities away from the ladder.

Non-self-supporting ladders shall be positioned so that the foot of the ladder is one-quarter of the working length away from the support.

Employees shall not be allowed to carry any object or load while on the ladder that could cause them to lose their balance and fall.

Exposure to Vehicular Traffic

Employees exposed to vehicular traffic shall be provided with, and shall wear vests or other suitable garments marked with or made of reflectorized or high-visibility material. Warning vests worn by flagmen shall be red or orange, and shall be of reflectorized material if worn during night work.

Employee Exposure to Falling Loads

Safety Management Plan

Trenching Shoring
Excavation Program

No employee shall be permitted underneath loads (or where loads may fall) handled by lifting or digging equipment. Employees shall be required to stand away from any vehicle being loaded or unloaded to avoid being struck by any spillage or falling materials. Operators may remain in the cabs of vehicles being loaded or unloaded when the vehicles provide adequate protection for the operator during loading and unloading operations.

Warning System for Mobile Equipment

A warning system shall be used when mobile equipment is operated adjacent to the edge of an excavation if the operator does not have a clear and direct view of the edge of the excavation. The warning system shall consist of barricades, hand or mechanical signals, or stop logs. If possible, the grade should be away from the excavation.

Hazardous Atmospheres

The atmosphere shall be tested for air contaminants (oxygen, flammable gases, etc.) in excavations over 4 feet deep or if a hazardous atmosphere exists or could reasonably be expected to exist. A hazardous atmosphere could be expected, for example, in excavations in landfill areas, in excavations in areas where hazardous substances are stored nearby, or in excavations near or containing gas pipelines.

Adequate precautions shall be taken to prevent employee exposure to atmospheres containing less than 19.5 percent oxygen and other hazardous atmospheres. These precautions include providing proper respiratory protection or forced ventilation of the workspace.

Forced ventilation will be provided where necessary to ensure the atmosphere is safe.

When controls are used that are intended to reduce the level of atmospheric contaminants to acceptable levels, continuous air monitoring will be performed. The device used for atmospheric monitoring shall be equipped with an audible and visual alarm.

Atmospheric testing will be performed using a properly calibrated direct reading gas monitor. Direct reading gas detector tubes or other acceptable means may also be used to test potentially toxic atmospheres.

Personal Protective Equipment

All employees working in trenches or excavations shall wear approved hard-hats and steel toed shoes or boots.

Employees exposed to flying fragments, dust, or other materials produced by drilling, sawing, sanding, grinding and similar operations shall wear approved safety glasses with side shields.

Safety Management Plan

Trenching Shoring
Excavation Program

Employees exposed to hazards produced by, or performing, welding, cutting, or brazing operations shall wear approved spectacles or a welding faceshield or helmet.

Employees entering bell-bottom pier holes or other similar deep and confined footing excavations shall wear a harness with a lifeline securely attached to it. The lifeline shall be separate from any line used to handle materials and shall be individually attended at all times while the employee wearing the lifeline is in the excavation.

Employees shall wear approved gloves or other suitable hand protection.

Employees using, or working in the immediate vicinity of, hammer drills, masonry saws, jackhammers or similar high noise producing equipment shall wear suitable hearing protection.

Each employee at the edge of an excavation 6 feet or more deep shall be protected from falling. Fall protection shall be provided by guardrail systems, fences or barricades.

Emergency rescue equipment, such as breathing apparatus, a safety harness and line, and a basket stretcher shall be readily available where hazardous atmospheric conditions exist or may develop during work in an excavation. This equipment shall be attended when in use. Only personnel that have received approved training and have appropriate equipment shall attempt retrieval that would require entry into a hazardous atmosphere.

Protection from Hazards Associated with Water Accumulation

Employees shall not work in excavations that contain or are accumulating water unless precautions have been taken to protect employees against the hazards posed by water accumulation. The precautions taken must include inspection by a competent person before work begins, special support or shield systems to protect from cave-ins, water removal to control the level of accumulating water or use of safety harnesses and lifelines.

If water is controlled or prevented from accumulating by the use of water removal equipment, the water removal equipment and operation shall be monitored by a competent person trained in the use of the equipment.

If excavation work interrupts the natural drainage of surface water (such as streams), diversion ditches, dikes, or other suitable means shall be used to prevent surface water from entering the excavation. Precautions shall also be taken to provide adequate drainage of the area adjacent to the excavation.

The competent person shall inform workers of the precautions or procedures that are to be followed if water accumulates or is accumulating in an excavation.

Safety Management Plan

Trenching Shoring
Excavation Program

Stability of Adjacent Structures

The competent person will determine if the excavation work could affect the stability of adjoining buildings, walls, sidewalks or other structures.

Support systems (such as shoring, bracing, or underpinning) shall be used to assure the stability of structures and the protection of employees where excavation operations could affect the stability of adjoining buildings, walls, or other structures.

Excavation below the level of the base or footing of any foundation or retaining wall that could be reasonably expected to pose a hazard to employees shall not be permitted.

Protection of Employees from Falling Objects and Loose Rocks or Soil

Adequate protection shall be provided to protect employees from loose rock or soil that could pose a hazard by falling or rolling from an excavation face. Such protection shall consist of:

- Scaling to remove loose material;
- Installation of protective barricades, such as wire mesh or timber, at appropriate intervals on the face of the slope to stop and contain falling material; or
- Benching sufficient to contain falling material.

Excavation personnel shall not be permitted to work above one another where the danger of falling rock or earth exists.

Employees shall be protected from excavated materials, equipment or other materials that could pose a hazard by falling or rolling into excavations.

Protection shall be provided by keeping such materials or equipment at least 2 feet from the edge of excavations, by the use of restraining devices that are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both if necessary.

Materials and equipment may, as determined by the competent person, need to be stored further than 2 feet from the edge of the excavation if a hazardous loading condition is created on the face of the excavation.

Materials piled, grouped or stacked near the edge of an excavation must be stable and self-supporting.

Using the following categories, soil is classified into different types, which determine the kind of cave-in protection required. Only a competent and trained person can determine the soil type by using these classifications.

Safety Management Plan

Trenching Shoring
Excavation Program

- Grain sizes are usually classified into four types: gravel, sand, silt, clay. Gravel is the least stable, and clay is the most stable.
- Saturation is the amount of water that the soil is currently holding. Complete saturation is much less stable than soil that is only slightly damp. However, soil with no water content is unstable.
- Cohesiveness is a test that determines how well the soil sticks together. The more it sticks together, the more stable the trench walls will be. The field test usually consists of rolling the soil in your hand into the shape of a worm and observing how and when it separates.
- Unconfined compressive strength determines how much weight per square foot the soil can withstand. This will determine how easily the soil will shear and cave in

Soil Types

Soil classifications must be determined by testing and protective systems designed according to soil classifications.

- The most stable type of soil is Type A. It is dense and heavy and consists primarily of clay.
- Type B has a medium level of stability and is made of soils such as silt, sandy loam, and medium clay.
- The least stable soil is Type C, which consists of gravel, loamy sand, and soft clay.

Timber shoring or aluminum hydraulic shoring must be determined according to the appendixes A & C of 29 CFR 1926 (Excavations).

The devices should be used while in good repair and maintenance. If damaged they must be inspected.

Employees should be protected from hazards of falling, rolling or sliding materials or equipment. Shields should not be subjected to excessive forces and will be installed to protect employees from lateral loads. Employees are restricted from being in the shield when installing or removing. The shield must be designed to resist calculated trench forces.

Daily Inspection

The competent person shall conduct daily inspections of excavations, adjacent areas, and protective systems for evidence of a situation that could result in possible cave-ins, failure of protective systems, hazardous atmospheres or other hazardous conditions. An inspection shall be conducted by the competent person prior to the start of work and as needed throughout the shift. Inspections shall also be made after every rainstorm or other hazard increasing occurrence. These inspections are only required when the trench will be or is occupied by employees.

Safety Management Plan

Trenching Shoring
Excavation Program

Where the competent person finds evidence of a situation that could result in a possible cave-in, failure of protective systems, hazardous atmosphere, or other hazardous conditions, exposed employees shall be immediately removed from the hazardous area until precautions have been taken to assure their safety.

There shall be a written log of all inspections conducted. This log shall include the date, work site location, results of the inspection, and a summary of any action taken to correct existing hazards.

Training

All personnel involved in trenching or excavation work shall be trained in the requirements of this program and regulatory requirements.

Training shall be performed before the employee is assigned duties in excavations.

Retraining will be performed whenever work site inspections conducted by the competent person or Health Safety Officer indicate that an employee does not have the necessary knowledge or skills to safely work in or around excavations.

Training records shall include the date(s) of the training program, the instructor(s) of the training program, a copy of the written material presented, and the names of the employee(s) to whom the training was given.

Vacuum Trucks Program

Purpose

During vacuum truck operations, workers are at risk of being exposed to toxic gases, flammable materials and other various hazards. This procedure will address proper and safe vacuum truck operations.

Scope

When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Employees will be aware of provisions of site specific contingency/emergency plans by either The Workforce Group, LLC or of a facility owner.

Safe Work Procedures

Safe work procedures for vacuum truck operations must address the potential for chemical reactions and the potential release of toxic gas or fumes. They must also take into account the variety of fluids or substances that vacuum trucks typically carry. Before starting any vacuum truck operations The Workforce Group, LLC shall make sure that vacuum truck owners and operators, as well as facility personnel are aware of the following hazards of vacuum truck operations and associated controls:

- The numerous potential hazards associated with vacuum truck operations in petroleum facilities including but not limited to:
 - sources of ignition, flammable atmospheres, potential hazards associated with the surrounding area, toxic vapors and their PEL's and STEL's.
 - additional hazards such as slips and falls, spills and releases, fires and explosions and accidents within the facility or on the highway.
- Ensure that air quality monitoring at the work site is continuous at such locations as the discharge area of the vacuum truck venting hose.
- Ensure that first aid is readily available on site in the event of exposure to toxic gas.
- Consult the manufacturer's instructions to confirm that the vacuum equipment is designed for the particular transfer operation.
- Ensure that all equipment including tank and vacuum trucks and pumping equipment is in safe working condition.
- Ensure that the tank interior, filter baghouse and cyclone separators are clean and free of any substances that may react with the liquids to be vacuumed or transferred.

Safety Management Plan

Vacuum Trucks Program

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- The Workforce Group, LLC has inspection requirements that shall be done before beginning operations. Before beginning operations, vacuum truck operators shall obtain any required permits and inspect vacuum trucks, equipment and loading/off-loading sites to assure safe operations.
 - Drivers are to be aware of high discharge temperatures associated with vacuum pumps and blowers. Under normal conditions, the absence of oxygen minimizes the risk of ignition in a vacuum truck. However, operating rotary lobe blowers and vacuum pumps at high speeds creates high air movement and high vacuum levels, resulting in high discharge air temperatures and high discharge vapor concentrations that can present potentially ignitable conditions.

Atmospheric Testing and When It Should Be Conducted

The areas where vacuum trucks will operate must be free of hydrocarbon vapors in the flammable range.

The areas where the vacuum truck operator and others work without respirators must also be at or below air contaminant PEL's/STEL's. If there is any question whether the area is vapor or toxic gas free, atmospheric testing shall be performed by a qualified person using properly calibrated and adjusted detectors.

Testing shall be conducted prior to starting any operations, and if necessary, during operations, including but not limited to the following:

- when operations in the area are subject to change such as automatic pump start-up or product receipt into, or transfer out of, a tank located in the vicinity of the transfer operations
- when off-loading
- when atmospheric conditions change such as wind direction
- when an emergency situation, such as product release, occurs in within the facility that may affect atmospheric conditions in the transfer area

To prevent exposure to toxic gases during transfer operations:

- never transfer fluids from one truck to another unless it has been established that no chemical reaction will occur
- position trucks to minimize exposure to any discharged gases and fumes
- ensure that discharge lines are long enough and large enough for safe operation
- position vent lines away from workers and workstations, including control panels, valve handles, gauges, shut-offs, and hose attachment points - if possible, use a vertical exhaust stack to divert exhaust gases away from workers and ignition sources.
- check air monitoring equipment during operations to confirm that venting is proceeding safely
- monitor the following:

Safety Management Plan

Vacuum Trucks Program

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- tank level indicators to avoid overfilling
 - tank pressure gauges to avoid over-pressurizing receiving tanks or creating excessive vacuum in supply tanks
 - tank temperature gauges to help identify possible chemical reactions
 - minimize the air introduced into the system when pressure loading or unloading - submerge the suction line in liquid, or reduce the vacuum pump speed when skimming or nearing the end of a load
 - maintain a log of transported fluids and any potential residue
 - use gravity loading and unloading whenever possible
 - use a vapor recovery system — when available — to avoid venting tanks directly to the atmosphere

Conductive Hoses and Qualities of Conductive Hoses That Must Be Used

Vacuum hose constructed of conductive material or thick walled hose with imbedded conductive wiring shall be used when transferring flammable and combustible liquids when the potential for a flammable atmosphere exists in the area of operations.

Conductive hose shall provide suitable electrical conductance less than or equal to 1 mega ohm per 100 feet (as determined by the hose manufacturer). Thin walled metallic spiral-wound conductive hoses should not be used because of the potential for electrical discharge through the thin plastic that covers the metal spiral.

Bonding and Grounding

The complete vacuum transfer system needs to be bonded so that there is a continuous conductive path from the vacuum truck through the hose and nozzle to the tank or source container and grounded to dissipate stray currents to earth (ground).

Prior to starting transfer operations, vacuum truck need to be grounded directly to the earth or bonded to another object that is inherently grounded (due to proper contact with the earth) such as a large storage tank or underground piping. A safe and proper ground to earth may be achieved by connecting to any properly grounded object including but not limited to any one or more of the following examples:

- a metal frame of a building, tank, or equipment that is grounded
- an existing facility grounding system such as that installed at a loading rack
- fire hydrants metal light posts, or underground metal piping with at least 10' of contact with earth
- a corrosion free metal ground rod of suitable length and diameter (approximately 9' long and 5/8-in. diameter), driven 8' into the earth (or to the water table, if less)

Safety Management Plan

Vacuum Trucks Program

Vacuum Exhaust Venting

A number of methods can be used by vacuum truck operators to safely vent vacuum pump exhaust vapors, including but not limited to the following:

- operators can prevent dieseling by locating the vacuum truck upwind of vapor sources and by extending the vacuum pump discharge away from the diesel engine air intake,
- vapors may be returned to the source container using conductive and closed connections,
- vapors may be vented into the atmosphere to a safe location using a safety venture,
- vacuum truck operators may provide vertical exhaust stacks extending approximately 12' above the vacuum truck (or higher if necessary) to dissipate the vapors before they reach ignition sources or other potential hazards and personnel, and
- vacuum truck operators may attach a length of exhaust hose to the vacuum exhaust that is long enough to reach an area that is free from potential hazards, sources of ignition, and personnel - the hose should be preferably extended 50' downwind of the truck and away from the source of the liquids.

Training and Personnel Safety

The Workforce Group, LLC requires the safe operation of vehicles and that only qualified operators shall be allowed to operate the vehicle. Training consists of:

- Vacuum truck operators shall be trained and properly licensed in accordance with applicable regulations.
- Vacuum trucks shall not enter into tank dike area until such areas have been checked/monitored and rendered safe.
- Vacuum trucks cargo tanks shall be depressurized.
- Vacuum truck operators must be aware of the effect of speeds, turns and the changing center of gravity.
- Vacuum truck operators shall maintain proper distances when operating vacuum trucks inside facilities with restricted clearances.

Additionally, vacuum truck personnel working in petroleum facilities shall be trained for personnel safety in the following areas:

- In the safe operation of the vacuum equipment.
- To be familiar hazards of the petroleum products, by-products, wastes and materials being transferred.
- To be aware of relevant government and facility safety procedures and emergency response requirements.
- For the MSDS of the substances being vacuumed or transferred.
- Appropriate PPE to be used.
- The requirement that all personnel shall leave the vacuum truck cab during loading and off-loading operations.

Safety Management Plan

Vacuum Trucks Program

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- The requirement that when transferring flammable liquids or hazardous materials, vacuum truck operators shall remain positioned between the vacuum truck and the source or receiving tank, vessel, or container and within 25' of the vacuum truck throughout the duration.
 - The requirement that vacuum truck operators shall monitor the transfer operation and be ready to quickly close the product valve and stop the pump in the event of a blocked line or release of material through a broken hose or connection.
 - The knowledge that smoking, or any other source of ignition, shall not be permitted within at least 100' (depending on local procedures and atmospheric conditions) of the truck, the discharge of the vacuum pump or any other vapor source.

Welding, Cutting, Hot Work Program

Purpose

The purpose of this program is to assure a safe work environment during welding, cutting, and hot work operations.

Scope

This program is applicable to all employees directly involved or assisting in the welding, cutting and hot work operations. When work is performed on a no owned or operated site, the operator's program shall take precedence, however, this document covers The Workforce Group, LLC employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Operators of equipment should report any equipment defect or safety hazards and discontinue use of equipment until its safety has been assured. Repairs shall be made only by qualified personnel.

If fire hazards cannot be taken to a safe place or guards cannot be used to confine heat, sparks, slag and protect the immovable fire hazards, the welding and cutting shall not be performed.

Definitions

Welding/Hot Work Procedures - any activity which results in sparks, fire, molten slag, or hot material which has the potential to cause fires or explosions.

Examples of Hot Work - Cutting, Brazing, Soldering, Thawing Pipes, Grinding, using an electric tool in a hazardous area and Welding.

Special Hazard Occupancies - any area containing Flammable Liquids, Dust Accumulation, Gases, Plastics, Rubber and Paper Products.

Hazards - includes, but not limited to the following; fires and explosions, skin burns, welding "blindness", and respiratory hazards from fumes and smoke.

Key Responsibilities

Managers and Supervisors

- Determine if its property is safe for welding and cutting operations.
- Establish safe areas for welding and cutting operations.
- Provide training for all employees whose task includes heat, spark or flame producing operations such as welding, brazing, or grinding.
- Develop and monitor effective hot work procedures.

Safety Management Plan

Welding Cutting Hot Work
Program

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- Provide safe equipment for hot work.
 - Provide proper and effective PPE for all hot work.
 - Monitor all hot work operations.
 - Ensure all hot work equipment and PPE are in safe working order.
 - Allow only trained and authorized employees to conduct hot work and conduct inspections of the hot work area before operations begin.
 - Ensure permits are used for all hot work outside authorized areas.

Employees

- Follow all hot work procedures.
- Properly use appropriate hot work PPE.
- Inspect all hot work equipment before use.
- Report any equipment problems or unsafe conditions.

Procedure**General**

A hot work permit must be completed before performing hot work. Precautions that are to be taken shall be in the form of a written permit. Before cutting or welding is permitted the area shall be inspected and a written permit shall be used to authorize welding and cutting operations.

Where practicable all combustibles shall be relocated at least 35 feet from the work site. Where relocation is impractical, combustibles shall be protected with flameproof covers, shielded with metal, guards, curtains, or wet down the material to help prevent ignition of material.

Ducts, conveyor systems, and augers that might carry sparks to distant combustibles shall be protected or shut down.

Where cutting or welding is done near walls, partitions, ceilings, or openings in the floor (grating, manholes, etc.), fire-resistant shields or guards shall be provided to prevent ignition.

If welding is to be done on a metal wall, partition, ceiling, or solid decking/flooring, precautions shall be taken to prevent ignition of combustibles on the other side, due to conduction or radiation of heat. Where combustibles cannot be relocated on the opposite side of the work, a fire watch person shall be provided on the opposite side of the work.

Welding shall not be attempted on a metal partition, wall, and ceiling or decking/flooring constructed of combustible sandwich panels.

Cutting or welding on pipes or other metal in contact with combustible walls, partitions, floors, ceilings, or roofs shall not be undertaken if the work is close enough to cause ignition by combustion.

Safety Management Plan

Welding Cutting Hot Work
Program

Cutting or welding shall not be permitted in the following situations:

- In areas not authorized by management.
- In sprinkled buildings while such protection is impaired.
- In the presence of potentially explosive atmospheres, e.g. flammables.
- In areas near the storage of large quantities of exposed, readily ignitable materials.
- In areas where there is dust accumulation of greater than 1/16 inch within 35 feet of the area where welding/hot work will be conducted.
- All dust accumulation shall be cleaned up before welding or hot work is permitted.

Whenever welding or cutting is performed in locations where other than a minor fire might develop or any of the conditions mentioned above cannot be met, a fire watch shall be provided.

- The fire watch shall be provided during and for a minimum of 1/2 hour past the completion of the welding project.
- The fire watch shall be trained in the use of fire extinguishers and the facility's alarm system.
- During this time the fire watch will have appropriate fire extinguishers readily available.
- Suitable extinguishers shall be provided and maintained ready for instant use.
- A hot-work permit will be issued on all welding or cutting outside of the designated welding area.

Fire Prevention Measures

A designated welding area shall be established to meet the following requirements:

- Floors swept and cleaned of combustibles within 35 feet of work area.
- Flammable and combustible liquids and material will be kept 35 feet from work area.
- Adequate ventilation providing 20 air changes per hour.
- At least one 10 pound dry chemical fire extinguisher shall be within access of 35 feet of the work area.
- Protective dividers such as welding curtains or noncombustible walls will be provided to contain sparks and slag to the combustible free area.

Requirements for welding conducted outside the designated welding area:

- Portable welding curtains or shields must be used to protect other workers in the welding area.
- A hot-work permit must be completed and complied with prior to initiating welding operations.
- Respiratory protection is mandatory unless an adequate monitored airflow away from the welder and others present can be established and maintained.

Safety Management Plan

Welding Cutting Hot Work
Program

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- Plastic materials must be covered with welding tarps during welding procedures.
 - Fire Watch must be provided for all hot-work operations.

After welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.

Confined Space

- A space that Is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous occupancy.

Refer to The Workforce Group, LLC's Confined Space Program before commencing any welding, cutting, and/or brazing operations in an area meeting the requirements of a confined space.

Ventilation is a prerequisite to work in confined spaces.

When welding or cutting is being performed in any confined spaces, the gas cylinders and welding machines shall be left on the outside. Before operations are started, heavy portable equipment mounted on wheels shall be securely blocked to prevent accidental movement.

When a welder must enter a confined space through a manhole or other small opening, means shall be provided for quickly removing him in case of an emergency.

- When safety belts and lifelines are used for this purpose, they shall be so attached to the welder's body that it cannot be jammed in a small exit opening.
- An attendant with a preplanned rescue procedure shall be stationed outside to observe the welder at all times and be capable of putting rescue operations into effect.

When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes shall be removed from the holders and the holders carefully located so that accidental contact cannot occur and the machine shall be disconnected from the power source.

In order to eliminate the possibility of gas escaping through leaks of improperly closed valves, when gas welding or cuffing, the torch valves shall be closed and the fuel-gas and oxygen supply to the torch positively shut off at some point outside the confined area whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight. If practical, the torch and hose shall also be removed from the confined space.

Safety Management Plan

Welding Cutting Hot Work
Program

When welding must be performed in a space entirely screened on all sides, the screens shall be so arranged that no serious restriction of ventilation exists. It is desirable to have the screens so mounted that they are about 2 feet (0.61 m) above the floor unless the work is performed at so low a level that the screen must be extended nearer to the floor to protect nearby workers from the glare of welding.

A fixed enclosure shall have a top and not less than two sides which surround the welding or cutting operations, and a rate of airflow sufficient to maintain a velocity away from the welder of not less than 100 linear feet (30 m) per minute.

All welding and cutting operations carried on in confined spaces shall be adequately ventilated to prevent the accumulation of toxic materials or possible oxygen deficiency. This applies not only to the welder, but also to helpers and other personnel in the immediate vicinity. All air withdrawn will be replaced with air that is clean.

In circumstances for which it is impossible to provide such ventilation, airline respirators or hose masks approved for this purpose by the National Institute for Occupational Safety and Health (NIOSH) will be provided. In areas immediately hazardous to life, a full-face piece, positive pressure, self-contained breathing apparatus or a combination full-face piece, positive pressure supplied-air respirator with an auxiliary, self-contained air supply approved by NIOSH must be used.

Where welding operations are carried on in confined spaces and where welders and helpers are provided with hose masks, hose masks with blowers or self-contained breathing equipment, a worker shall be stationed on the outside of such confined spaces to ensure the safety of those working within.

Fumes, Gases and Dust

Fumes produced by some welding processes can be toxic and may require source extraction. An assessment of the work to be performed must be completed before each job is undertaken. Fumes generally contain particles from the material being welded. Welding fumes can have an acute effect on the respiratory system.

Any welding, cutting or burning of lead base metals, zinc, cadmium, mercury, fluorides, beryllium or exotic metals or paints not listed here that could produce dangerous fumes shall have proper ventilation or respiratory protection. This includes inert-gas metal-arc welding or oxygen cutting of stainless steel.

Welders and helpers will refer to The Workforce Group, LLC's Respiratory Protection Program to determine the appropriate respiratory protection to be used during welding operations.

Safety Management Plan

Welding Cutting Hot Work
Program

All welding and cutting operations shall be adequately ventilated to prevent the accumulation of toxic materials. This applies not only to the welder, but also to helpers and other personnel in the immediate vicinity.

Personal Protection

Helmets and hand shields shall be made of a material, which is an insulator for heat and electricity. Helmets, shields, and goggles shall not be readily flammable and shall be capable of withstanding sterilization.

Helmets and hand shields shall be arranged to protect the face, neck and ears from direct radiant energy from the arc.

Helmets shall be provided with filter plates and cover plates designed for easy removal.

All parts shall be constructed of a material, which will not readily corrode or discolor the skin.

Goggles shall be ventilated to prevent fogging of the lenses as much as practicable.

All glass for lenses shall be tempered, substantially free from scratches, air bubbles, waves and other flaws. Except when a lens is ground to provide proper optical vision correction, the front and rear surfaces of lenses and windows shall be smooth and parallel.

Lenses shall bear some permanent distinctive marking which may readily identify the source and shade.

The following is a guide for the selection of the proper shade numbers. These recommendations may be varied to suit the individual's needs.

Welding Operation		Shade Number
Shielded metal — arc welding 1/16, 3/32, 1/8-5/32 inch electrodes		10
Gas-shielded arc welding (nonferrous) 1/16, 3/32, 5/32 inch electrodes		11
Gas-shielded arc welding (ferrous) 1/16, 3/32, 1/8, 5/32 electrodes		12
Shielded metal arc welding: 3/16	7/32, 1/4 inch electrodes	12
	5/16, 3/8-inch electrodes	14
Atomic hydrogen welding		10 – 14
Carbon arc welding		14
Soldering		2
Torch brazing		3 or 4
Light cutting, hp to 1 inch		3 or 4
Medium cutting, 1 inch to 6 inches		4 or 5

Safety Management Plan

Welding Cutting Hot Work
Program

Welding Operation	Shade Number
Healy cutting, 6 inches or over	5 or 6
Gas welding (light) up to 1/8 inch	4 or 5
Gas welding (medium) 1/8 - 1/2 inch	5 or 6
Gas welding (heavy) 1/2 inch or over	6 or 8

NOTE:

In gas welding or oxygen cutting where the torch produces a high yellow light, it is desirable to use a filter or lens that absorbs the yellow or sodium line in the visible light of the operation. All filter lenses and plates shall meet the test for transmission of radiant energy prescribed in ANSI Z87.1 — 1968 — American National standard Practice for Occupational and Educational Eye and face Protection. Where the work permits the welder to be enclosed in an individual booth painted with a finish of low reflectivity such as zinc oxide (an important factor for absorbing ultraviolet radiation) and lamp black, or shall be enclosed with noncombustible screens similarly painted. Booths and screens shall permit circulation of air at floor level. Workers or other persons adjacent to the welding areas shall be protected from the rays by noncombustible or flameproof screens or shields or shall be required to wear appropriate goggles.

Adequate hand protection and clothing must be used to protect the body from welding hazards.

Cleaning Compounds

In the use of cleaning materials, because of their possible toxicity or flammability, appropriate precautions such as manufacturer instructions shall be followed.

- Degreasing and other cleaning operations involving chlorinated hydrocarbons shall be so located that no vapors from these operations will reach or be drawn into the atmosphere surrounding any welding operation.
- In addition, trichloroethylene and perchloroethylene shall be kept out of atmospheres penetrated by the ultraviolet radiation of gas-shielded welding operations.

Oxygen cutting, using a chemical flux, iron powder or gas shielded arc cutting for stainless steel shall be performed using mechanical ventilation adequate to remove the fumes generated.

Cylinders

Compressed gas cylinders shall be DOT-approved and legibly marked near the shoulder of the cylinder for the purpose of identifying the gas content with either the chemical or trade name of the gas.

- All compressed gas cylinder connections must comply with ANSI B57. 1-1965 Standards.
- Compressed gas cylinders shall be secured in an upright position at all times except, if necessary, for short periods of time while cylinders are actually being hoisted or carried.

Safety Management Plan

Welding Cutting Hot Work
Program

All cylinders shall be kept away from sources of heat and from radiators and piping systems that may be used for grounding purposes. Cylinders and cylinder valves including couplings and regulators shall be kept free from oily or greasy substances and must not be handled with gloves or rags in the same condition.

Stored oxygen cylinders shall be kept at least 20 feet from the fuel gas cylinders or combustible materials, especially oil or grease, or separated by a non-combustible barrier at least 5 feet high with a fire rating of at least one-half hour. All empty cylinders shall have closed valves. Valve protection caps shall always be in place and hand-tight except when cylinders are in use or connected for use.

Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards.

Fuel gas cylinders stored inside buildings shall be limited to a total capacity of 2000 cubic feet (300 pounds) of liquefied petroleum gas, except for those in actual use or attached ready for use.

All acetylene cylinders shall be stored valve-end up.

Assigned storage spaces shall be located where cylinders cannot be knocked over or damaged by falling objects or subject to tampering by unauthorized persons.

- Back flow protection shall be provided by an approved device that will prevent oxygen from flowing into the fuel-gas system or fuel from flowing into the oxygen system.
- An approved device that will prevent flame from passing into the fuel-gas system shall provide flashback protection.
- An approved pressure-relief device set at the appropriate pressure shall provide backpressure protection.

Special care must be taken when transporting gas cylinders:

- Cylinders must be secured with valve cap installed.
- Cylinders shall not be lifted by the valve protection caps, the regulators must be removed and cylinders shall not be dropped or permitted to strike each other.
- Removed regulators must be carried in the cab of the vehicle.
- Cylinders shall not be tampered with nor should any attempt be made to repair them.
- They shall be handled carefully - rough handling, knocks, or falls are liable to damage the cylinder, valve or safety device and cause leakage.

Safety devices shall not be tampered with.

Arc Welding and Cutting

All personnel operating, installing, and maintaining welding equipment shall be qualified or trained to operate and maintain such equipment.

Safety Management Plan

Welding Cutting Hot Work
Program

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- All workmen assigned to operate or maintain equipment shall be familiar with and electrical welding equipment shall be chosen for safe operation and comply with applicable Requirements for Electric Arc Welding Standards to include: 29 CFR 1910.254, 29 CFR 1910.252 (a)(b) (c) and if gas shielded arc welding is done the must be familiar with the American Welding Society Standard A6-1-1966.
 - Arc welding equipment must be designed to meet conditions such as exposure to corrosive fumes, excessive humidity, excessive oil vapor, flammable gasses, abnormal vibration or shock, excessive dust and seacoast or shipboard conditions.
 - It shall be operated at recommended voltage in accordance to the manufacturer recommendations.
 - All leads shall be periodically inspected and replaced if insulation is broken or splices are unprotected.
 - Leads shall not be repaired with electrical tape.
 - All ground connections shall be checked to determine that they are mechanically strong and electrically adequate for the required current.

A disconnecting switch or controller shall be provided at or near each welding machine along with over current protection.

All direct current machines shall be connected with the same polarity and all alternating current machines connected to the same phase of the supply circuit and with the same polarity.

- To prevent electrical contact with personnel, all electrode holders shall be placed where they do not make contact with persons, conducting objects or the fuel of compressed gas tanks.
- All cables with splices within 10 feet of the holder shall not be used.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

If an object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards shall be used to confine the heat sparks and slag and to protect the immovable fire hazards.

Resistance Welding

All personnel operating, installing, and maintaining welding equipment shall be qualified or trained to operate and maintain such equipment.

- Voltage, interlocks, guarding, grounding and shields shall be in accordance with manufacturer recommendations.

Safety Management Plan

Welding Cutting Hot Work
Program

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- Precautions such as flash guarding, ventilation and shields shall be provided to control flashes, toxic elements and metal fumes.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

Transmission Pipeline

When arc welding is performed in wet conditions, or under conditions of high humidity, special protection against electric shock shall be supplied.

Pressure testing:

- In pressure testing of pipelines, the workers and the public shall be protected against injury by the blowing out of closures or other pressure restraining devices.
- Protection shall be provided against expulsion of loose dirt that may have become trapped in the pipe.

The welded construction of transmission pipelines shall be conducted in accordance with the Standard for Welding Pipelines and Related Facilities, API Std. 1104-1998.

Oxygen Fuel Gas Welding and Cutting:

Only approved apparatuses such as torches, regulators or pressure-reducing valves, setting generators and manifolds shall be used:

- Mixtures of fuel gases and air or oxygen may be explosive and must be guarded against.
- All hoses and hose connections shall comply with the Compressed Gas Association and Rubber Manufacturers' Associations' applicable standards.
- Workers in charge of the oxygen or fuel-gas supply equipment, including generators, shall be instructed and judged competent by the The Workforce Group, LLC before being left in charge.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

Fire Watch Requirements

A fire watch shall be under these conditions as a minimum and when welding, cutting, brazing and/or soldering is performed near combustible materials and/or locations where fire may develop:

- Locations where other than a minor fire might develop.
- Combustible materials are closer than 35 feet to the point of operation.
- Combustibles that are 35 feet or more away but are easily ignited.
- Wall or floor openings within a 35 feet radius of exposed combustible materials.

Safety Management Plan

Welding Cutting Hot Work
Program

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- Combustible materials are adjacent to the opposite side of metal partitions, ceilings or roofs.

Fire watch personnel shall be maintained at least a half an hour after welding or cutting operations have been completed and fire watchers shall have fire extinguishers readily available.

First Aid Equipment

First aid equipment shall be available at all times. All injuries shall be reported as soon as possible for medical attention. First aid shall be rendered until medical attention can be provided.

Training

Training shall include:

- Position Responsibilities
- Cutters, welders and their supervisors must be suitably trained in the safe operations of their equipment and the safe use of the process.
- Fire Watch Responsibilities - specifically, the fire watch must know:
 - That their ONLY duty is Fire Watch.
 - When they can terminate the watch.
 - How to use the provided fire extinguisher(s).
 - Be familiar with facilities and how to activate fire alarm, if fire is beyond the incipient stage.
 - Operator Responsibilities
 - Contractor Responsibilities
 - Documentation requirements
 - Respirator Usage requirements
 - Fire Extinguisher training.

Working Alone Program

Purpose

The Workforce Group, LLC will provide a safe work environment for its employees. In doing so, The Workforce Group, LLC will take all reasonable and practical measures to eliminate or minimize injury or incident risks associated with the nature of the work performed when employees work alone.

The Workforce Group, LLC shall establish site specific procedures for employees working alone.

Objectives

To minimize risk to employees who may work alone and assistance is not readily available The Workforce Group, LLC will:

- Conduct written hazard assessments to identify existing or potential working alone hazards.
- Take measures to eliminate or control the hazards of working alone at The Workforce Group, LLC worksites.
- Ensure that affected employees are informed of the hazards and methods used to control or eliminate them.
- Provide an effective system for communication between any employee who work alone and persons capable of assisting the employee.
- Ensure all incidents (working related or otherwise) are reported, investigated and documented.
- Review the Working Alone Plan at least annually or more frequently if there is a change in work arrangements which could adversely affect an employee's well-being or a report that the system is not working effectively.

Key Responsibilities

The Workforce Group, LLC Safety Manager

- Conducts a hazard assessment to identify existing or potential hazards related to the nature of the work or the work environment given the circumstances of the work when working alone
- Responsible for the review, implementation and maintenance of the local worksite Working Alone Plan.
- Communicate this policy and its procedures to employees who work alone
- Annually review the effectiveness of the hazard controls and procedures and make improvements as required

Safety Management Plan

Working Alone Program

Worksite Project Manager

- Responsible for the implementation and maintenance of the Working Alone Plan for their project and ensuring all assets are made available for compliance with the procedure.
- Take all reasonable and practical steps to minimize or eliminate identified working alone risks.
- Review the hazard assessment results and provide recommendations to management to minimize or eliminate identified working alone risks.
- Review annually the effectiveness of the policy and guidelines and make changes as required by consulting with management staff and employee representatives.
- Respond to employee concerns related to working alone and communicate these to management.
- Report all incidents of work site incidents immediately.
- Participate in work site hazard assessments and the implementing of procedures to eliminate or control hazards of working alone.

Safe Work Procedures

This procedure applies if an employee is working alone at a work site where assistance is not readily available if there is an emergency or the employee is ill or injured.

Worksite Assessment

A hazard assessment for working alone will anticipate work and travel time, weather, communication, type of work, employee medical conditions and training. The hazard assessment shall address hazards and identify control measures in order to minimize risk associated with working alone.

The hazard assessment will be conducted on a project by project or site basis as circumstances vary between locations and conditions. To assess this hazard The Workforce Group, LLC should review records, past incidents and identify measures or actions needed to correct any hazards. The assessment should involve:

- Participation by employees through methods such as one-on-one interviews, kick off safety meetings, etc.
- The assessment should utilize information from employees about their experiences working alone, their current concerns and their suggestions for improvement.
- Consideration for the time interval between checks and the procedure to follow in case the employee cannot be contacted, including provisions for emergency rescue.

Plan

The Workforce Group, LLC must develop and implement a written procedure for checking the well-being of a worker assigned to work alone or in isolation under conditions which present a risk of disabling injury, if the worker might not be able to secure assistance in the event of injury or other misfortune.

Safety Management Plan

Working Alone Program

Considerations such as length of time missing, weather conditions, physical fitness, must be factored into the site specific working alone program. The program must specify procedures for emergency response including provisions for contacting appropriate local officials. The program shall identify specific criteria to determine when an employee search is necessary.

Communication and Regular Contact Person System

The use of a radio, cellular/satellite phone, electronic monitoring device or another form of direct, reliable correspondence shall be used to establish an effective means of communication is established between the lone employee and designated check person.

Each site specific Working Alone Plan shall address having an established contact person. A check-in/check-out process where employees are monitored or contacted at regular intervals will be established. Individuals must be monitored at regular intervals, or the individual contacts The Workforce Group, LLC at pre-determined intervals based on determinations made in the hazard assessment.

Individual(s) by job function responsible for establishing contact with the affected employee, as well as a back-up form of communication will be established for each site specific plan. The Safety Manager, Project Manager or designee is responsible for check-in with the lone employee at regular intervals.

Backup and Documentation

Backup form of communication in the event primary communication (cell phone or land line) is unavailable will be via satellite phone or if electronic communication is not practicable or readily available at the worksite, The Workforce Group, LLC must ensure that a representative of The Workforce Group, LLC or another competent employee visits the employee at regular intervals. The Workforce Group, LLC shall document communication employee status at the check in intervals.

These visits or contacts shall be at intervals of time appropriate to the nature of the hazards associated with the employee's work.

Limitations on or Prohibitions of Specified Activities

- No heavy equipment will be operated if a worker is alone.
- No hot work will occur if a worker is alone.
- No working at heights will occur if a work is alone and requiring a personal fall arrest system.
- Other limitations will be placed based on the site specific hazard assessment

Minimum Training or Experience

All employees will be trained (if working alone is a hazard at that location) in:

- Any revision to the written local Working Alone Plan and safe work practices.

Safety Management Plan

Working Alone Program

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- Being informed of working alone hazards at the The Workforce Group, LLC worksite and the methods used to control or eliminate them.
 - The methods for identification, hazard reduction and prevention when working alone and dealing with situations or individuals that presents a potential risk.
 - A worker required to work alone and any person assigned to check on the worker must be trained in the written procedure for checking the worker's well-being.
 - All training shall be documented.

Provisions of PPE

- Cold weather clothing shall be worn when appropriate if a worker is alone
- Additional PPE for workers working alone will be identified in the site specific hazard and PPE assessment process

Safe Work Practices

Controls implemented at The Workforce Group, LLC worksites shall, as a minimum:

- Restricted building access to buildings - card keys or regular keys after regular working hours.
- Office doors are to be locked when working alone after hours.
- Have employees check road reports and weather forecast before traveling and NOT allow travel if road conditions are dangerous.
- Develop a travel plan that includes rest breaks, a procedure for tracking overdue employees and emergency contact information.
- Ensure all The Workforce Group, LLC vehicles are to be equipped with cell phones or radios and first aid kits.
- Advise employees to travel with another employee when possible.
- Advise employees to park close to the building in the evening.
- Post signage, emergency contact information, and develop a communication system.
- Report suspicious activity to security or a supervisor.

Provision of Emergency Supplies

- All vehicles shall contain the appropriate emergency supplies including flares, marking devices, food, water, warm clothing during winter and other supplies as determined by the hazard assessment.
- Workers working alone shall have spare batteries for communication devices in case of power failure, a radio for local weather conditions and other equipment as determined by the hazard assessment.
- If an employee requires personal medication, they must ensure they have sufficient supplies available.

Review & Updating Working Alone Plan

- The hazard assessment and Working Alone Plan at each The Workforce Group, LLC worksite must be reviewed at least on an annual basis or more frequently if there is a change in work processes or arrangements which could adversely affect an employee's well-being are introduced or changed.
- The local Working Alone Plan shall also be revised if there is any indication or report that the plan is not working effectively or needs changing.

Safety Management Plan

Working Alone Program

**WORKING ALONE ASSESSMENT & GUIDELINES FOR THE WORKFORCE
GROUP, LLC WORKSITES**

Location:		
Evaluated By:		
Original Date:		Signature:
Revision Date:		Date:

Hazardous Activities

Hazard:	Actions to minimize Risk:
<i>Indicate working alone hazards</i>	<i>Indicate actions taken to minimize risks</i>

Emergency Phone Numbers

Number	Contact:	For:
<i>Indicate #</i>	<i>Indicate source information; i.e., security</i>	ANY emergency: medical, fire, etc.
		Suspicious Person
		General Inquiries
		Need for employee escort
		Maintenance Emergencies
		Information

Location of Resources

<i>Indicate location</i>	<i>(examples shown)</i>
	fire extinguisher
	first aid kit
	telephone
	telephone backup (radios or emergency buttons for worksite security)

Restricted activities when Working Alone

<i>Indicate restricted activities (no driving, locked doors, etc.)</i>

A copy of this form shall be supplied to the The Workforce Group, LLC Safety Manager and the Guidelines be reviewed no less than annually.

Working Near Water Program

Purpose

The purpose of this program is to provide general safety guidelines for working on or near water.

Scope

This program covers all The Workforce Group, LLC employees involved in working on or near water.

Procedure

Hazard Assessment

The Workforce Group, LLC requires a pre-task plan to be completed and signed by all members of the crew that may be working over or near water before employees may begin to work over or near water. The following items will be included:

- Discussion of work to be perform
- Review of required PPE
- Review of emergency procedures and contact numbers
- Reminder that employees with together at least in two man teams in case of man overboard emergency

Life Saving Equipment

Employees working over or near water shall be provided with a U.S. Coast Guard approved life jacket or buoyant work vest when the danger of drowning exists.

If the deck of a barge or work platform is not equipped with an OSHA-compliant railing system, employees walking or working on deck must wear a U.S. Coast Guard approved life jacket or buoyant work vest, also called a life preserver or personal flotation device (PFD). These PFDs should be fully buckled, snapped, or zipped whenever there is a hazard of falling into the water, regardless of the size of the barge. While a PFD is not required to be worn while an employee is inside an enclosed cab or equipment compartment on a barge, each employee should have a PFD accessible to them at all times. This safety precaution will allow employees the opportunity to don a PFD in a reasonable amount of time during an emergency (i.e., vessel sinking, fire, etc.).

PFDs

- An approved and readily available PFD is required to be on board the vessel for each individual on board. An immersion/exposure suit is considered to be an acceptable

Safety Management Plan

Working Near Water Program

substitute for a PFD. All lifesaving equipment designed to be worn is required to be readily available and in serviceable condition.

- Each vessel 26 feet or longer must have at least one approved ring life buoy which is immediately available. All lifesaving equipment designed to be thrown into the water is required to be immediately available and in serviceable condition.
- An approved commercial hybrid PFD is acceptable if worn when the vessel is underway and the intended wearer is not within an enclosed space, is labeled for use on uninspected commercial vessels and used as marked and in accordance with the owner's manual.
- An approved light is required for all PFDs and immersion/exposure suits. Also, all PFDs must have approved retro reflective material installed.
- Employees shall inspect buoyant work vests or life preservers for defects which could alter their strength or buoyancy prior to and after each use. Defective units shall not be used.

Have the necessary safety equipment to hand so it is ready for immediate use:

- Ring Lifebuoy
- 90' Buoyant Heaving Line
- Life Saving Skiff

Ring buoys will be provided and readily available for emergency rescue operations with at least 90 feet of line and the distance spaced between ring buoys may not exceed 200 feet.

At least one lifesaving skiff shall be made immediately available when employees are working over or adjacent to water. Each skiff shall be checked daily prior to work beginning to ensure the capability of the skiff to respond to an emergency.

Man Overboard Prevention

- Employees are not permitted to work alone when performing work over or near water. Employees, who will be performing work over or near water, where the danger of drowning exists, are not permitted to work alone at any time by The Workforce Group, LLC.
- Railing should be continuous around the deck. The ends should be secured with lashings or quick release slips so that you can cut or release them to recover a person from the water.
- Treat any slippery areas with either non-skid paint or stick on strips. Pay particular attention to the tops of hatches and sloping sides which become walkways when the deck is heeled.
- Use harnesses in rough weather and at night. Ensure they are adjusted to a tight fit or you can fall out of them.

Safety Management Plan

Working Near Water Program

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- Fit suitably placed harness attachment points close to the companionway so that you can clip on before coming on deck and on both sides of the cockpit.
 - Rig jackstays on both sides of the boat so that you can walk the full length of the deck without having to unclip.
 - Flat webbing straps are in some ways better than wire because the wire tends to roll underfoot when you stand on it.
 - Wear suitable protective clothing and a USCG approved lifejacket fitted with reflective tape and a light.

Man Overboard Response

- When you first discover that someone has fallen overboard, the most important thing to remember is DON'T PANIC!
- If the person is on a lifeline, stop the boat immediately and then recover them using the lifeline/harness as necessary.
- If you are well prepared and have practiced the drill regularly, you will automatically know how to react.
- Immediately throw a lifebuoy and attachment overboard.
- Raise the alarm by shouting: "MAN OVERBOARD" (Even if you are the only one left aboard, shouting "man overboard" may provide reassurance to the person in the water).
- If there are others on board, instruct a crew member to watch the person in the water and point continuously.
- Start your recovery maneuver.
- If you are the only person remaining on board, do not leave the deck as you may become disorientated and lose sight of the person in the water.
- During the hours of darkness, a white parachute flare, which will pick up the retro reflective tape on clothing/lifejacket, can be used to illuminate area.
- If you cannot see the person in the water or have any doubt about your ability to recover him/her, send a mayday call on your VHF radio.

Slips, Trips and Falls**Minimizing Hazards on Deck**

- Keep all walking and working surfaces clean, dry, and unobstructed.
- Keep all areas free of debris.
- Clean up and/or report any spill immediately.
- Stack materials in a stable manner.
- Secure gear and equipment that is not in use.
- Keep stairs, doorways, walkways, and gangways free of equipment and stowed materials.
- Secure ramps during loading and offloading operations.

Safety Management Plan

Working Near Water Program

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- Repair leaks from hoses, pipelines, and valves immediately.
 - Use non-skid protective deck compound and do not paint over the non-skid compound with standard paint.
 - Have de-icing procedures in place when necessary.
 - Paint the perimeter and tripping hazards in a contrasting color.

Precautions in Walking

- Walk at a normal rate, keeping your hands out of your pockets.
- Slow down when moving between different surfaces.
- Do not run.
- Minimize short stops.
- Avoid sharp turns.
- Modify your way of walking to match the surface, such as an icy deck.
- Do not jump from one vessel to another.
- Do not climb on cargo, supplies, or equipment instead of using a ladder.
- Do not step on hatch covers.
- Avoid walking along the unguarded edge of a vessel.
- Watch out for reduced visibility due to poor lighting and weather conditions. If working at night, be sure there is adequate illumination (e.g., flashlight, headlight, light tower).

Wearing Appropriate Footgear

- Wear safety shoes or boots with slip-resistant soles as appropriate.
- Keep shoes clean of mud, snow, ice, spilled liquids, and debris.

Preventing Elevated Falls

- Always maintain three-points of contact on a ladder—two hands and a foot, or two feet and a hand—so that only one limb is in motion at any one time.
- Avoid overextending the body when performing tasks such as checking sounders, checking lights, and wiring rigging, which can lead to falls from ladders.
- Falls from portable ladders are one of the leading causes of occupational fatalities and injuries. Use the following safe work practices when using ladders:
 - Use ladders only for their designed purpose (i.e., step ladders should not be used as portable rung ladders).
 - Position the ladder so that for every four feet in height, the ladder extends out from the vertical surface at the base approximately one foot.
 - Make sure that the ladder is long enough for the job—if used for access to an upper landing surface the side rails must extend at least three feet above that surface.
 - Make sure that there is proper footing to keep the ladder from slipping or sliding.
 - Tie the ladder to a secure object. Remember that the vessel(s) that the ladder is secured to can move. Use the buddy system, if possible, so that one person can hold

Safety Management Plan

Working Near Water Program

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- the ladder to stop it from moving.
 - Never use portable metal ladders near energized electrical equipment (such as conductors or electric arc welding machines).
 - Keep your body near the middle of the step and always face the ladder while climbing.
 - Do not move, shift, or extend ladders while in use. Move the ladder instead of stretching or leaning to the side to reach your work.
 - Use hand lines or a tool bag/belt to keep hands free when using a ladder.
 - Fully enclosed slip-resistant footwear should always be worn when using ladders.
- An adequate guard rail should be installed or employees should wear Personal Fall Arrest Systems when work is being performed above a solid surface (e.g., to prevent falls from the deck to the dock).
 - Use gangplanks with guardrails to prevent falls on the dock or pilings.
 - All deck holes, openings, and hatches should be covered or guarded.
 - Pigeon holes should not be used to access vessel walking or working surfaces.

Machinery and Equipment Hazards

Hazards related to the use of machinery and equipment can result in injuries to hands, feet, or limbs that become caught in moving machinery; head and other injuries from being struck by falling objects or moving equipment; and burns. Other potential hazards include getting pinned under a load; falling off equipment; and electric shock.

To reduce hazards from machinery and equipment:

- Inspect all equipment before use.
- Maintain equipment properly. Always shut down and lockout the power source before repairing mechanical systems. Make repairs according to the manufacturer's guidelines.
- Ensure that the person using the equipment is trained in its proper use and maintenance.
- Install appropriate rails, temporary or permanent, to avoid equipment being driven off the vessel or dock.
- Ensure retaining pins are properly installed and positively secured with a keeper or locking device.
- Emergency shut-offs must be easily accessible, and sufficient guarding should be used for equipment controls.

Hoists, Cranes and Derricks

Hazards of hoists include being struck by a heavy object, such as the boom or the load being moved. To reduce these hazards:

Safety Management Plan

Working Near Water Program

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- Stay clear when a hoist is being used unless you are part of the procedure and, in which case, never stand under a load or boom with a suspended load.
 - Wear personal protective equipment, such as head, foot, eye, and hand protection at all times.
 - Assess the hoisting systems for structural soundness by inspecting regularly for problems with welds, rivets, chains, pulleys, lines, blocks, hooks, etc.
 - Secure power blocks with a safety chain.
 - Ensure that cranes in use are secured to the vessel.
 - Do not try to help lift a load being hoisted.

Winches

Operating or working near winches may potentially expose employees to hazards such as body parts caught in a winch drum, being struck by a broken line or cable, and tripping over a line or cable. To reduce hazards:

- Use a device or tool, never your hand, to keep the winch line spooling properly.
- Enclose the winch drum in a cage if practical.
- Stay off the deck unless you are part of the operation.
- Never stand in, on, over, or in line with lines or cables connected to winches when they are under tension. The danger zone lies within 15 degrees of either side of a line under tension.
- Never step on or walk over the winch drum.
- Inspect the winch system regularly for problems associated with general or localized deterioration, cracked welds, and other structural, mechanical, or electrical deficiencies.
- Inspect lines and cable systems regularly, including blocks, hooks, and associated components, for signs of damage or deterioration.
- A guard should be installed between the winch operator and the connected cables to protect the operator from potential whiplash.
- Never stand in the bight of a line.

Fire Hazards

Steps that can be taken to prevent fires on board a vessel include the following:

- Store engine fuel tanks and compressed gas tanks properly, away from sources of ignition. Only keep onboard quantities of flammable and combustible materials that are necessary for operations and maintenance. Post appropriate danger signs.
- When dealing with work that is capable of providing a source of ignition through a flame or spark (hotwork), such as welding, cutting, burning, drilling, grinding, etc., follow these precautions:
 - Ensure the space is properly tested by a qualified or shipyard-competent person and deemed safe before work is begun. (See 29 CFR 1915.7 and 1915.15.).

Safety Management Plan

Working Near Water Program

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- Make sure that proper fire extinguishing equipment is near the work area and that it is maintained in a state of readiness for emergency use.
 - Do not leave oxygen or acetylene hoses unattended.
 - Consider where sparks will fall when doing hotwork and employ a fire watch.
 - Shield fuel sources to protect them from ignition sources.
 - Cover openings to prevent sparks from entering.
 - Stop any hotwork if you smell fuel or gas until the source has been identified and the problem fixed.
 - When welding or burning on the deck of a vessel, the space below should be inspected to ensure that no flammable atmosphere or combustible materials are present.
 - Use good housekeeping practices to limit the amount of clutter, debris and combustible/flammable material.

Follow these safety measures to help prevent electrical fires:

- Make sure that electrical systems are installed by a qualified marine electrician and that electrical systems are inspected regularly.
- Regularly conduct visual inspections of connections, switches and wiring, which may be subject to corrosion from saltwater and damage from use.

Fire Extinguishing Equipment

- Hand-portable fire extinguishers and semi-portable fire extinguishing systems must be of the "B" type (i.e., suitable for extinguishing fires involving flammable liquids, greases, etc.).
- Hand-portable fire extinguishers and semi-portable fire extinguishing systems must have a metal name plate listing the name of the item, rated capacity (gallons, quarts or pounds), name and address of person/firm for whom approved, and the manufacturer's identifying mark.
- Portable fire extinguishers must be inspected and weighed every six months.
- Minimum number of B-II hand-portable fire extinguishers required to be on board motor vessels: one if less than 50 tons, two if 50-100 tons, three if 100-500 tons, six if 500-1,000 tons and eight if over 1,000 tons.
- Fixed fire extinguishing systems must be an approved carbon dioxide type and must meet U.S. Coast

Ventilation

Fuel tanks and engine spaces, using fuel with a flashpoint of 110 degrees Fahrenheit or less, must be provided with adequate ventilation to remove explosive or flammable gases from the fuel tank compartment and bilges.

Training

Safety Management Plan

Working Near Water Program

Employees working over or near water will be provided training on the hazards. Employees working over or near water must be adequately trained in their responsibilities and the safe work practices associated with this task and the identified hazard for the site and equipment they are working with.

Training will also be conducted on pre-task planning and hazard identification and daily equipment checks prior to beginning work.

Practice man overboard drills regularly - This can be achieved by using a fender and bucket as the casualty.