US TRADES, LLC

INJURY AND ILLNESS PREVENTION PROGRAM

FOR THE STATE OF ARIZONA

PRINT DATE: MAY 4, 2018
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## ARIZONA FOREWORD

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SCOPE

Arizona is a state plan state, which means that it operates its own state Occupational Safety and Health program under the authorization of the federal Occupational Safety and Health Administration (OSHA).

The Arizona Division of Occupational Safety and Health (ADOSH) is part of the Industrial Commission of Arizona (ICA), and is responsible for occupational safety and health issues within Arizona, excluding mining operations, Indian Reservations, and federal employees.

STATE REGULATIONS

The majority of ADOSH regulations are in agreement with, and have adopted by incorporation, federal OSHA standards 29 CFR 1910 and 1926. Some businesses must adhere to standards that are more stringent as defined by the state. In Arizona, there are state-specific regulations that govern construction and agriculture.

NOTE: The chapters that follow this foreword contain information that is aligned, at a minimum, to OSHA standards. If an applicable OSHA standard does not exist, or is superseded by another regulatory agency or state-specific requirement, the most stringent standard available will be provided.

STATE REQUIREMENTS

The safety and health requirements for the state of Arizona are defined in the Arizona Revised Statutes (ARS). The following sections provide general requirements for all industries, including information regarding worker protection and complaint procedures.

LABOR POSTERS

In addition to the required federal notices, the state of Arizona requires employers to post the following information in a place where employees can easily see it:

- Minimum Wage poster (English and Spanish)
- Earned Sick pay Time poster (English and Spanish)
- Notice to Employees (Workers Compensation) poster (bilingual)
- Work Exposure to Bodily Fluids (HIV, AIDS, Hepatitis “C”) poster
- Work Exposure to MRSA, Spinal Meningitis, or Tuberculosis (TB) poster
- Employee Safety and Health Protection poster (bilingual)

REPORTING

Reporting of Injuries and Illnesses

Employers must report to ADOSH any work-related amputation, loss of an eye, or in-patient hospitalization of any employee, within 24 hours of the incident, and all workplace accidents that involve a fatality within eight (8) hours following the incident. To report an incident to ADOSH, call (602) 542-5795, or toll-free at (855) 268-5251. If you call outside of regular business hours, please leave a message, and someone will return your call as soon as possible.
Office Locations

ADOSH has offices at the following locations:

<table>
<thead>
<tr>
<th>Phoenix Office</th>
<th>Tucson Office</th>
</tr>
</thead>
<tbody>
<tr>
<td>800 W. Washington St.</td>
<td>2675 E. Broadway Blvd.</td>
</tr>
<tr>
<td>Phoenix, AZ 85007</td>
<td>Tucson, AZ 85716</td>
</tr>
<tr>
<td>(P.O. Box 19070, Phoenix AZ 85005-9070)</td>
<td>Phone: (520) 628-5478</td>
</tr>
<tr>
<td>Phone: (602) 542-5795</td>
<td>Toll Free: (855) 268-5251</td>
</tr>
<tr>
<td>Toll Free: (855) 268-5251</td>
<td>Fax: (520) 322-8008</td>
</tr>
<tr>
<td>Fax: (602) 542-1614</td>
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</tbody>
</table>

Reporting Unsafe Workplaces

If you are an employee or employee representative, and believe you or another employee are/is exposed to a condition that is immediately dangerous to life or health, you should first attempt to resolve the matter with the employer. If that is not possible, contact ADOSH at (602) 542-5795 or toll-free at (855) 268-5251, for guidance. If you call after business hours, please leave a message and someone will return your call as soon as possible.

DISCRIMINATION

Under Arizona Revised Statute (ARS 23-425), employees have 30 days to file a complaint if they believe they have been discriminated against. ADOSH investigates complaints and pursues appropriate corrective action. Upon receipt of your completed Discrimination Statement, an investigator will call you as soon as possible to start the investigation.

Please save any evidence bearing on your complaint, such as notes, minutes, discharge slips, letters, pay stubs, etc., and have them ready when the investigator calls. It will be helpful if you write down a brief factual account of what happened and prepare a list of potential witnesses. When ADOSH receives your completed questionnaire, it will advise the employer of the charge and request a written position.

Every effort will be made to thoroughly review and evaluate your complaint as expeditiously as possible. It is your responsibility to advise ADOSH of any changes to your address or telephone number, and your continued attention to the complaint is appreciated.

REFUSAL TO PERFORM UNSAFE WORK

Arizona employees who refuse to perform work in conditions where there is an imminent danger to life or health may be protected under state and federal laws. OSHA recommends that employees first address the issue with their employer before taking action.

Refusing to perform work is recognized favorably for the employee only when it is done in good faith, in an imminently dangerous workplace where there is not enough time to contact OSHA, and when the employee remains readily available to perform other assigned tasks. Employees who simply walk off the job will not be protected.
WORKERS’ COMPENSATION

It is the responsibility of an injured worker to file a claim within one year of the date of an injury. The injured worker should also notify the employer as soon as possible that a work-related injury has occurred. A claim is made by filling out and signing either a Worker’s and Physician’s Report of Injury at the doctor’s office, or a Worker’s Report of Injury, and filing either report with the ICA. Both of these reports constitute a “claim form”.

NOTE: Employers are required to file an Employer’s Report of Injury; however, this is not a claim. It is only a report of the injury.

Workers wishing to inquire about a compensation claim may contact the Claims Division by calling:

Phoenix:   (602) 542-4661
Tucson:    (520) 628 5181

Do not send emails (or attachments to emails) that contain sensitive or personal information (such as social security numbers) to the ICA because neither the website nor email is secure. Instead, fax such materials to the fax number below, or mail paper copies to the above ADOSH office locations.

The fax number at either office is: (602) 542-3373.

TRAINING

OSHA requires employers to train employees before they perform any task that may endanger their health or safety. Employees must be deemed competent to perform all work tasks, or they will work under the supervision of a competent worker.

Employers must perform a job hazard analysis (JHA) to establish the presence and degree of onsite safety hazards, and to effectively mitigate or handle them. This investigation will include:

- The tasks to be performed
- The equipment to be used and/or operated
- The work environment and atmosphere
- The health and safety risks involved with the work

An onsite, competent professional may conduct training, or the company may choose to hire trainers from an approved third-party source.

RECORDKEEPING

An employer must keep all employee complaints, training records, and other documentation, at the place of employment for a period of at least three years.

ATTACHMENTS

The following pages contain the forms listed below, as well as instructions:

- Unsafe Workplace Complaint form
- Workers’ Compensation Claim form
- Employer Injury or Illness Report forms
- Arizona Discrimination Report form
- Release of Employment Records form
Notes:

- Effective July 28 2017, the OSHA Whistleblower Complaint form has been revised, and must be completed online. Once completed the form can be sent electronically, or printed and mailed to the nearest OSHA office.
- The forms listed above are available online as either downloadable or fillable forms at the websites listed below.
  - [http://www.ica.state.az.us/ADOSH/ADOSH_Hazards_Form.aspx](http://www.ica.state.az.us/ADOSH/ADOSH_Hazards_Form.aspx)
  - [http://www.ica.state.az.us/Claims/Claims_main.aspx](http://www.ica.state.az.us/Claims/Claims_main.aspx)
  - [https://www.osha.gov/whistleblower/WBComplaint.html](https://www.osha.gov/whistleblower/WBComplaint.html)
The Industrial Commission of Arizona  
Division of Occupational Safety and Health

This form is provided to assist an employee representative filing a complaint under A.R.S. § 23-408(F). This form does not constitute the exclusive means to file a complaint with the Division of Occupational Safety and Health (“Division”).

Section 23-408.F. of the Arizona Occupational Safety and Health Act provides that an employee or employee representative may request the Division to conduct an inspection when:

1) The employee or employee representative believe that a violation of a safety or health standard exists that threatens physical harm, or

2) The employee or employee representative believe that an imminent danger exists.

An employee or employee representative shall request an inspection under A.R.S. § 23-408(F) by giving written notice to the Director of the Division, or the Director’s authorized representative. An employee or employee representative shall ensure that the written notice states with reasonable particularity the grounds for the notice and is signed by the employee or employee representative.

The Division shall not disclose the employee’s or employee representative’s name upon either:

1) A request from an employee or employee representative not to reveal the employee’s or employee representative’s name because release of the name will result in substantial harm to the employee or employee representative, or

2) A determination by the Division that disclosure of the employee’s or employee representative’s name may result in substantial harm to any person or to the public health or safety.

Upon receipt of a written notice under A.R.S. § 23-408(F), the Director shall determine whether there are reasonable grounds to believe that a violation or danger exists. If the Director determines that a violation or danger may exist, the Director shall conduct a special investigation under the Occupational Safety and Health Act as soon as practicable. If the Director determines that there are no reasonable grounds to believe that a violation or danger exists, the Director shall provide written notice to the employee or employee representative of that determination. NOTE: A person who knowingly makes any false statement, false representation, or false certification in any document filed under the Arizona Occupational Safety and Health Act is guilty of a class 2 misdemeanor. A.R.S. § 23-418(G).

INSTRUCTIONS TO COMPLETE THE NOTICE OF ALLEGED SAFETY OR HEALTH HAZARDS:

Complete all items as accurately and completely as possible. Describe each hazard you think exists in as much detail as you can. If the hazards described in the Notice are not all in the same area, please identify where each hazard can be found at the worksite. If there is any evidence that supports your suspicion that a hazard exists (for example, a recent accident or physical symptoms experienced by employees at the worksite), include the information in your description. If you need more space than is provided on the form, continue on another sheet of paper. (If you type more information into the large text boxes than can be seen all at once, any lines that end up hidden will be saved in the electronic copy of the form but will not appear if the form is printed.)

HOW DO I SUBMIT THE FORM?

This depends on whether or not you intend to sign the form. ADOSH will address each complaint received, but how each complaint is handled will depend on several factors, including: the nature of the complaint items, the seriousness of the allegations, the relationship of the complainant to the employer, and whether or not the complaint is signed. While you may fill out the form, save it on your computer, then submit it as an attachment to an email, doing so will prevent you from signing the complaint form, which may affect the manner in which ADOSH addresses your complaint. If you wish to submit a signed complaint, you will need to print the completed form, sign it, then FAX it or submit it via regular postal service to an address below. Alternatively, you can scan the signed form, then submit that as an email attachment to comments.adosh@dol.gov.

The Industrial Commission of Arizona  
Division of Occupational Safety and Health
P. O. Box 19070  
Phoenix AZ 85006-9070  
FAX: (602) 542-1614

The Industrial Commission of Arizona  
Division of Occupational Safety and Health
2675 East Broadway Blvd  
Tucson AZ 85716-5303  
FAX: (520) 322-8008
NOTICE OF ALLEGED SAFETY OR HEALTH HAZARDS
THE INDUSTRIAL COMMISSION OF ARIZONA
DIVISION OF OCCUPATIONAL SAFETY & HEALTH

EMPLOYER’S NAME: 

EMPLOYER’S ADDRESS: 

EMPLOYER’S MAILING ADDRESS: 

MANAGEMENT OFFICIAL: 

EMPLOYER’S TELEPHONE NUMBER: FAX: 

NATURE OF EMPLOYER’S BUSINESS: 

DESCRIBE FULLY THE HAZARDS THAT YOU BELIEVE EXIST INCLUDING THE NUMBER OF EMPLOYEES EXPOSED: 

SPECIFY EACH LOCATION OR WORK AREA WHERE THE HAZARDS DESCRIBED ABOVE EXIST: 

THIS CONDITION HAS BEEN BROUGHT TO THE ATTENTION OF: (Check all that apply) 

☐ EMPLOYER ☐ FEDERAL OSHA ☐ OTHER (Specify): 

NAME OF PERSON FILING COMPLAINT: TELEPHONE: 

MAILING ADDRESS: 

RELATIONSHIP TO EMPLOYER: ☐ EMPLOYEE ☐ OTHER (Specify): 

IF PERSON FILING COMPLAINT IS AN EMPLOYEE REPRESENTATIVE, WHAT ORGANIZATION DOES THE COMPLAINANT REPRESENT (Provide the name and local # of the organization and your title, if appropriate): 

THE IDENTITY OF THE PERSON FILING THIS COMPLAINT WILL BE REVEALED TO THE EMPLOYER UNLESS THE RELEASE OF THE NAME WILL RESULT IN SUBSTANTIAL HARM TO THE PERSON FILING THE COMPLAINT. PLEASE INDICATE THE FOLLOWING: 

☐ MY NAME MAY BE REVEALED 

☐ DO NOT REVEAL MY NAME TO THE EMPLOYER BECAUSE: 

SIGNATURE: ____________________________ CURRENT DATE: 

INDUSTRIAL COMMISSION OF ARIZONA
800 W WASHINGTON STREET
PHOENIX, ARIZONA 85007
(602) 542-4661

WORKER'S REPORT OF INJURY

ANSWER ALL QUESTIONS FULLY

1. NAME OF INJURED WORKER:
   LAST:    FIRST:    M.I.
   SOCIAL SECURITY #: 
   BIRTH DATE: 
   PHONE #: 

2. ADDRESS:
   CITY:    STATE:    ZIP CODE: 

3. MARITAL STATUS: SINGLE ☐  MARRIED ☐  DIVORCED ☐
   DEPENDENTS AT TIME OF INJURY: YES ☐  NO ☐

4. EMPLOYER:
   EMPLOYER ADDRESS:
   CITY:    STATE:    ZIP CODE: 

5. PHONE #:

6. DATE HIRED:    WHERE HIRED:    OCCUPATION:

7. HOURS WORKED PER DAY:    PER WEEK:    HOURLY WAGE: 

8. DID YOU RECEIVE FOOD OR LODGING IN ADDITION TO WAGE? YES ☐  NO ☐

9. DATE OF INJURY (MONTH/YEAR):    TIME OF INJURY: AM ☐  PM ☐

10. ADDRESS OR LOCATION OF ACCIDENT:

11. DID YOU STOP WORK IMMEDIATELY? WHEN DID YOU STOP?

12. WHEN DID YOU REPORT THE INJURY? TO WHOM? TITLE:

13. WHEN DID YOU RETURN TO WORK? REGULAR WORK ☐  OTHER WORK ☐

14. NAMES OF PERSONS WHO SAW THE ACCIDENT:
   1. NAME:    ADDRESS:    PHONE #: 
   2. NAME:    ADDRESS:    PHONE #: 

15. WAS ACCIDENT CAUSED BY ANOTHER PERSON? IF SO, BY WHOM?

16. NAME OF MACHINE OR TOOL WHICH MAY HAVE CAUSED THE ACCIDENT:

17. STATE HOW ACCIDENT HAPPENED:

18. BODY PART INJURED: DESCRIBE THE INJURY (CUT, BRUISE, ETC.):

19. WHERE WERE YOU FIRST TREATED? NAME:    ADDRESS: 
   WHO TREATED YOU FOR THIS INJURY? NAME:    ADDRESS: 

20. OTHER THAN THIS INJURY, HAVE YOU LOST TIME FROM WORK DUE TO AN ACCIDENT IN THE PAST 12 MONTHS? YES ☐  NO ☐
   NAME OF STATE WHERE ACCIDENT HAPPENED:
   WORK INJURY: YES ☐  NO ☐

21. OTHER THAN THIS INJURY, HAVE YOU EVER RECEIVED ANY PERMANENT DISABLING INJURY? YES ☐  NO ☐
   DATE OF INJURY:    WORK INJURY: YES ☐  NO ☐
   NAME OF STATE WHERE ACCIDENT HAPPENED:

22. OTHER THAN THIS INJURY, ARE YOU RECEIVING COMPENSATION FOR ANY DISABLING CONDITIONS? YES ☐  NO ☐
   IF SO, FROM WHOM? AMOUNT?: WHY?:

I make application for all benefits to which I may be entitled under the law. I certify, with full knowledge that it is an crime to make willful, false statements to obtain compensation and that all of my statements on this form are true, accurate and complete.

Signature of injured worker or injured worker's authorized representative is REQUIRED. Date

Submitter Email Address

Employer Email Address:    Worker Email Address:

THE INDUSTRIAL COMMISSION OF ARIZONA WITH DISABILITY ACT OF 1923. IF YOU NEED THIS DOCUMENT IN ALTERNATIVE FORMAT, CONTACT US AT (602) 542-5455.
Complainant:

Because of the large volume of such inquiries regarding discrimination complaints, we ask that you please complete the following Discrimination Statement and return it to ADOSH at 800 W. Washington St., Phoenix, AZ 85007. Please keep in mind that by statute, your written discrimination complaint must be received by this office within 30 calendar days of the alleged discriminatory act, or it will not be investigated. Upon receipt of your completed Discrimination Statement, an investigator will call you as soon as possible to start the investigation.

Please save any evidence bearing on your complaint such as notes, minutes, discharge slips, letters, pay stubs, etc., and have them ready when the investigator calls. It will be helpful if you could write down a brief factual account of what has happened and prepare a list of any potential witnesses involved. When we receive your completed questionnaire we will advise the employer of the charge and request a written position. Every effort will be made to thoroughly review and evaluate your complaint as expeditiously as possible. It is your responsibility to advise this office of any changes in your address or telephone number, and your continued interest will be appreciated.

Finally, please be advised that as a complainant, you have the right to concurrently file a complaint under section 11(c) with Federal OSHA within 30 days of the alleged retaliatory action, if you are filing against a private sector employer. Concurrently filing a complaint with OSHA will protect your rights to seek a remedy through OSHA in the event that ADOSH reaches a decision with which you do not agree. You may contact Federal OSHA, Region IX, at 415-625-2547.

Sincerely,

ADOSH
DISCRIMINATION STATEMENT

I, ____________________________, reside at ____________________________

__________________________ (Name) ____________________________ (Street Address)

__________________________ (City) ____________________________ (County) ____________________________ (State) ____________________________ (Zip)

My telephone number is: Area Code ( ____________ ) ____________________________ (Number)

I have been employed by: ____________________________

(Name of Employer)

Located at: ____________________________

(Address of Employer)

Employer’s telephone number: Area Code ( ____________ ) ____________________________ (Number)

My job Classification is/was: ____________________________

NARRATIVE

NOTE: The narrative must describe in detail the events surrounding the actions which you claim to be in violation of A.R.S. § 23-425. Therefore, you must include in your narrative the following information: (1) Craft or description of work you did, (2) The reason you believe your employer discharged you or discriminated against you, (3) The date and time the discharge or discrimination occurred, (4) The location where the discharge or discrimination occurred, (5) Your supervisor’s name, (6) The names, addresses, and phone numbers of witnesses who will substantiate your claim, (7) A detailed description (including dates, times, locations, witnesses and persons involved) of events leading up to your discharge or discrimination, (8) Your objective in filing this discrimination complaint, (9) Are you employed at the present time? If so, by whom (10) A phone number where you can be contacted between 7 a.m. and 6 p.m., Monday through Friday. You may use additional paper if needed.
I have read and had an opportunity to correct this statement consisting of ____ pages and swear that the information contained herein is true and correct to the best of my knowledge and belief. **Note:** I am aware that it is unlawful for me to make any false statement, representation or certification in this document which is being fill pursuant to the Arizona Occupational Safety and Health Act of 1972 [A.R.S § 23-418 (H)]. Violation of this requirement is a Class 2 misdemeanor and carries a penalty up to $750.00.

Signature of Complainant: ______________________________ Date: ______________

ADOSH 80
AUTHORIZATION FOR RELEASE OF EMPLOYMENT RECORDS

To Whom It May Concern:

The undersigned __________________________, does hereby authorize The Industrial Commission of Arizona to obtain copies of any and all personnel and employment records involving his/her employment with __________________________.

Dated this ______ day of _____________, 20____

_____________________________
POLICY

The safety and health of employees is the first consideration in operating any business. Without question, it is the responsibility of every employee at all levels in the hierarchy.

US Trades, LLC will comply with all laws and prevent workplace injuries and illnesses. To do this, we must be aware of conditions that can result in injury or illness in every work area. No employees will be required to work at a job they know is unsafe or unhealthy. Companywide cooperation in detecting hazards and controlling them is a condition of employment. Employees will inform their supervisor immediately of any hazardous situation beyond their ability or authority to correct.

Preventing workplace injuries and illnesses takes precedence over operating productivity when necessary. To the greatest degree possible, management will provide safeguards for personal safety and health, in keeping with the highest standards.

We strive to maintain an occupational injury and illness prevention program (IIPP) that conforms to industry best practices for organizations of this type. To be successful, such a program must embody proper attitudes toward injury and illness prevention on the part of both supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also among coworkers.

Our objective is an (IIPP) that reduces the number of work place incidences to an absolute minimum, not merely in keeping with, but surpassing the best experience of operations similar to ours. Our goal is zero accidents and injuries.

Safety and Health Program Components

Our (IIPP) includes the following:

- Communicating with employees about safety issues and workplace hazards through a range of avenues including a safety training program and meetings to exchange ideas about workplace safety and health among employees
- Providing and maintaining mechanical, physical and administrative safeguards to control risks presented by workplace hazards to the maximum possible extent
- Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, to control health hazards, and to comply with safety and health regulations and standards
- Providing necessary personal protective equipment (PPE) and instructions for proper use and care
- Developing and enforcing safety and health rules and requiring employees to cooperate with these rules as a condition of employment
- Investigating promptly and thoroughly every accident, safety incident, and near miss to determine root causes and make appropriate changes to remedy those causes
- Creating a culture of safety that encourages employees to identify workplace hazards, recommend changes to reduce the risks they pose and work for a safer workplace
- Periodic review of all elements of our IIPP to maintain its accuracy
We recognize the responsibilities for occupational safety and health are shared: US Trades, LLC will see that all employees are properly instructed and supervised in safe operation of machinery, tools, equipment, processes, and practices while at work.

US Trades, LLC accepts responsibility for the leadership, effectiveness and improvement of the injury and illness prevention program and for providing the required safeguards to ensure safe work conditions.

Supervisors are responsible for encouraging proper attitudes toward safety and health and for ensuring that workers perform operations with the utmost regard for the safety and health of all personnel.

Employees are responsible for wholehearted, genuine implementation of all aspects of the (IIPP), including compliance with all rules and regulations, and for continuously following best safety and health practices while performing their duties.

Requirements in multiple chapters may apply to the same job, and some health and safety procedures will be addressed at different levels of focus. Where a circumstance is addressed by different requirements throughout this manual, then all requirements apply and when a conflict occurs, the more specific one must be followed.

PROGRAM GOALS

The goal of US Trades, LLC is to continue operating a profitable business while protecting employees from injuries or illness. This can be achieved by delegating responsibility and accountability to all involved in this company’s operation.

- Responsibility: Having to answer for activities and results
- Accountability: The actions taken by management to ensure the performance of responsibilities

To reach our goal of a safe workplace, everyone needs to take responsibility and be accountable.

<table>
<thead>
<tr>
<th>Owner Name</th>
<th>Owner Signature</th>
<th>Date</th>
</tr>
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Our designated safety professional is responsible for the implementation and enforcement of safety rules.
FOLLOWING SAFETY RULES

US Trades, LLC employees will follow all Safety and Health Program rules, provide first aid up to their level of training and promptly report unsafe conditions or practices that can’t be immediately remedied to a supervisor. Not following safety policies and procedures can affect co-workers and the public, and may result in disciplinary action up to and including termination.

If employees are unsure of the safe method to do a job, they must STOP and ask a supervisor.

Employees have the authority to stop work to address a hazard.

DISCIPLINARY ACTION

Employees will be disciplined for infractions of safety rules and unsafe work practices that are observed, not just those that result in an injury. Care will be taken to ensure discipline does not discriminate. Consistency in the enforcement of safety rules will be exercised at all times. While safety rules will be enforced rigorously, no one will be punished for reporting unsafe work practices or for reporting illness or injury. In any disciplinary action, discipline is given to the employee only for violation of safe work policy, not because they were injured or filed a workers’ compensation claim.

Discipline for safety violations will be administered in a manner consistent with US Trades, LLC’s system of progressive discipline.

As in all disciplinary actions, each situation is to be carefully evaluated and investigated. The steps taken in the disciplinary process, up to and including termination, will depend on the severity of the violation, employee history and overall consideration for the well-being of the company, its employees and its customers.

Each department or supervisor may have additional safety rules and policies specific to operations. In following these rules, employees are expected to exercise sound judgment and work in a manner to ensure the safety of themselves and coworkers.

SAFETY INCENTIVE PROGRAMS

Although strict adherence to safety policies and procedures is required of all employees, US Trades, LLC may periodically provide recognition of safety-conscious employees and acknowledge safety-conscious work habits through a safety incentive program. Safety incentive programs must not discourage reporting of injuries and illnesses.

TRAINING AND SAFETY COMMUNICATION

OSHA requires employers to train employees in the safe methods of performing their job. US Trades, LLC is committed to instructing all employees in safe, healthy work practices. Awareness of potential hazards and knowledge of how to control them is critical to maintaining a safe, healthy work environment and preventing injuries. US Trades, LLC will provide training to each employee on general safety issues and safety procedures specific to that employee’s work assignment.
Training provides the following benefits:

- Makes employees aware of job hazards
- Teaches employees to perform jobs safely
- Promotes two-way communication
- Fulfills legal requirements
- Encourages safety suggestions
- Creates additional interest in the safety program

US Trades, LLC will only use training material appropriate in content and vocabulary to the educational level, literacy and language of employees, and will offer retraining as needed to ensure safe practices.

**Training Program**

Actual demonstration of proper task performance will be used whenever possible to instruct new workers. Workers must provide evidence of topic mastery before training is complete. Trainers will rely on the following safe training techniques: tell them how, show them how, have them tell you how, and have them show you how.

Training topics will reflect the hazards of the workplace and may include the following: employee's safety responsibilities; general safety rules; IIPP contents; safe job procedures; mandatory and optional PPE.

**New Employees**

Every new employee will be given instruction by their supervisor or appropriate member of management in the general safety requirements of their job. New employees will not begin a job until they have demonstrated or otherwise confirmed awareness of safe practices for their tasks and general workplace safety rules and guidelines. A copy of the general safety rules will be provided to each new employee, and each new employee will be given access to any element of the safety program that pertains to the work he or she will be expected to do.

**Documentation of Training**

All employee safety training will be documented. Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

**Retraining**

Employees observed performing unsafe acts or not following safe work procedures will be retrained by their supervisor or an appropriate safety trainer. A safety contact report may be completed by the supervisor to document the training. If multiple employees are involved, additional safety meetings will be held.
SAFETY COMMUNICATION

US Trades, LLC will advise employees of changes relating to the safety program. Employee safety communication procedures are designed to develop and maintain employee involvement and interest in workplace safety and health. These activities help ensure effective communication between management and employees on safety-related issues and nurture a culture of safety.

The following are some of the safety communication methods that may be used:

- Frequent accident prevention instructions and periodic practice drills
- Distribution of articles, memos, payroll stuffers and other communication concerning workplace safety and health
- Regular safety meetings with employees that encourage participation and open, two-way communication
- Employee bulletin boards or other displays discussing safety issues, accidents, and general safety suggestions
- New employee safety orientation and training

Safety Suggestion Program

US Trades, LLC encourages all employees to become involved in the development and implementation of the safety and health program. Management will request opinions and comments from workers at all levels and respond to them respectfully and appropriately.

All employee-initiated safety related suggestions will be channeled to the appropriate authority by supervisors, either verbally or in writing. Unresolved issues may be relayed to Kert Stiller, the safety coordinator.

US Trades, LLC will not discriminate against any employee that raises a safety concern, files a complaint, causes a regulatory action to be brought, or testifies against the employer. There will be a system where employees may share safety or health concerns anonymously.

Rules

The following rules are a selection of safety practices to help prevent work-related injury and illness. It is not comprehensive; employees are expected to adhere to any safe work practice necessary to complete their job safely.

Drug- and Alcohol-Impaired Workers

US Trades, LLC encourages employees to discuss personal and interpersonal problems with their supervisor. Supervisors will handle all such contacts with appropriate confidentiality and refer employees who may benefit from outside assistance to appropriate resources.

No employee may work while fatigue, illness, prescription drugs or over-the-counter drugs impair his or her ability or alertness.
No one known to be under the influence of alcohol or drugs will be allowed on the job while in that condition.

Notify a supervisor of any coworker demonstrating signs of impairment that may present a safety or health hazard.

GENERAL SAFETY

- Take time to do every job safely
- Refrain from horseplay, scuffling, pranks, and similar acts that may have an adverse influence on the safety and well-being of employees
- Walk - don’t run - in the workplace
- Smoke, eat and store personal items only in designated areas. Smoking is not allowed in any indoor place of employment
- Maintain awareness of potential hazards when walking about the workplace
- Use tools only for their intended purpose, and always use the right tool for the job
- Listen to instructions. If you don’t understand them, ask before starting work
- Inspect all safeguards before beginning work. Ensure proper functioning of protective devices and report any known deficiencies immediately
- Only operate equipment you can have been trained on
- Refrain from handling or tampering with equipment, machinery or lines outside the scope of your duties
- Report all injuries to the appropriate supervisor so arrangements can be made for medical or first-aid treatment and appropriate reporting may be completed
- Ensure clothing and footwear is appropriate to the hazards of the job. If you are unsure, ask your supervisor
- Wear approved protective equipment in work areas that demand such equipment
- Heed signs, posters, hazard bulletins, and tags posted on company premises
- Only enter hazardous areas after they are made safe to enter

US Trades, LLC strictly prohibits possession of firearms, weapons, illegal drugs or alcoholic beverages on US Trades, LLC property, customer property or other locations while on the job.

Housekeeping

- Keep all exits, fire doors, aisles, and areas around fire extinguishers, first aid kits, emergency equipment, electrical panels, and traffic lanes clear
- Keep tools, materials or other objects off the floor to prevent trips and falls. Remove waste from the work area promptly
- Keep work areas clean and free of debris, electrical cords, and other hazards; immediately clean spilled liquids
- Keep stairways, passageways, exits, and sidewalks clean and clear of obstructions
- Bend or cap sharp wires or protruding nails must be bent or capped
- Place tools and equipment so they will not fall from elevated areas
- Only use approved cleaning agents
Fire Prevention

- Firefighting equipment will be inspected on a regular basis
- Discharged, damaged or missing equipment must be reported immediately to a supervisor. Tampering with fire equipment is prohibited
- Take precautions to prevent fires, particularly from oily waste, rags, gasoline, flammable liquids, acetylene torches, improperly installed electrical equipment and trash
- Access to fire extinguishers must be kept clear at all times. Make note of the location of firefighting equipment in your work area
- In case of fire, employees will consider the safety of themselves and other individuals before saving property
- Never use gasoline or flammable solvents to clean
- Smoking is prohibited within 20 feet of flammable substances

Lifting and Material Handling

- Think before lifting
- Find a better way. If at all possible, use mechanical help from a pushcart or hand truck
- If the load is heavy or awkward to lift alone, get help. Team lifting cuts the load in half and reduces likelihood of injury
- Break the load down into smaller lifts if possible. It is better to make two or more light trips than one heavy trip
- If possible, bring the load up between the knees and waist before lifting
- Do not lift on slippery surfaces
- Test the load before doing the lift; determine how heavy it is by giving it a shove
- Ensure a good handhold on the load before attempting to lift
- Keep the load close. Walk as closely as possible to the load
- Do not jerk the load or speed up. Lift the load in a smooth and controlled manner
- Do not lift in an awkward position or twist while lifting (especially with a heavy load). Turn and take a step
- Avoid long forward reaches and bending your back. Use a step stool or platform if necessary
- Make sure you have plenty of room to lift and to set down the object
- If you are lifting an object above your head, get a ladder or step stool

Personal Protective Equipment (PPE)

- Use the correct PPE for any job assignment that requires it. If you do not know, ask
- PPE will be maintained in good condition and cleaned regularly
- PPE will be stored properly when not in use to protect it from damage
- Damaged or broken PPE must be returned for replacement
- PPE may not hamper or restrict freedom of movement due to improper fit
- Eye protection must be worn when working with hazardous materials or chemicals
Ladder Safety

- Keep portable stairways, ladders, and step stools in good condition and use them only in a safe manner
- Inspect the ladder before using it. If it is broken, remove it from service
- Use the proper ladder for the job
- Do not use “A” frame self-supporting ladders as straight ladders
- Make sure the ladder is tall enough to reach the work area
- Do not use metal ladders for electrical work
- Avoid temporary ladders. Always use a commercially made ladder of the proper length and strength for the work being performed
- Keep ladder rungs must be kept free of grease, oil, mud, or other slippery substances
- Do not place ladders in passageways, doorways, or any location where they might be hit or jarred, unless protected by barricades or guards
- Place ladders only on hard, level surfaces. Make sure ladder feet are not placed on sandy, slippery or sloping surfaces. Clean or sweep the area where the ladder feet will be and make sure the rubber feet are in good shape
- Arrange work so you can face the ladder and use both hands while climbing. Do not carry tools or equipment in your hands while climbing. If tools or equipment cannot be safely stored on your person, as with a belt or vest, climb the ladder, and then hoist them with a line or hoisting device
- Secure portable ladders in place and at a pitch so the leveling indicator is in alignment or the distance from the wall to the base of the ladder is at least 1’ away from the wall for every 4’ of ladder height
- Tie-off straight ladders at the top of the ladder to prevent slipping
- Be aware of objects below you; move or cover sharp objects in case you fall
- Do not stand on or work from the second rung from the top or above
- Do not reach too far from the ladder, and keep your center of gravity as close to the center of the ladder as possible
- Ensure extension ladders extend at least 36” above the level being accessed
- On all ladders, do not step on cross bracing not intended to be used for climbing
- Do not use a ladder as a brace, workbench or for any other purpose than climbing

Electrical Safety

- Only trained, qualified, and authorized employees may work on or repair electrical equipment
- Report exposed wires and damaged electrical equipment or wires immediately
- Extension and temporary power cords must be appropriate to the task and grounded, and only used only as a last resort. Frayed or defective cords will not be used
- Never overload an outlet or circuit. Use approved power strips and extension cords in accordance with company policy and best safety practices
- All energized equipment and installations will be de-energized before work. If the equipment or installation must be energized, special precautions will be taken to protect against the hazards of electric shock
• All equipment will be locked out to protect against accidental or inadvertent operation when such operation could cause injury to personnel. Do not attempt to operate any switch, valve, or other energy-isolating device bearing a lock
• Safety grounds will always be used where there is a danger of shock from back feeding or other hazards
• Suitable attire and personal protective equipment (PPE) must be worn at all times while working on electrical equipment
• Always exercise caution when energizing electrical equipment or installations. Take steps to protect against arc flash and exploding equipment in the event of a fault
• All power tools will be grounded or double insulated. Tools with defective cords or wiring will not be used
• Don’t wear metal jewelry around energized circuits
• Suitable temporary barriers or barricades will be installed when access to opened enclosures containing exposed energized equipment is not under the control of an authorized person
• Enclosures or tight-fitting covers must protect electrical installations from accidental contact.
• Metal measuring tapes, fish tapes, ropes or other metal devices are prohibited where they may contact energized parts of equipment or circuits

Company Vehicles
• Only authorized employees are permitted to operate US Trades, LLC vehicles
• Company vehicles are to be used for US Trades, LLC business only. Personal, off duty and family use is prohibited
• Drive defensively and obey all traffic and highway laws
• Always wear a seat belt, whether driver or passenger
• Report accidents to a supervisor as soon as possible, and obtain a police report
• Lock vehicles and remove keys from unattended vehicles
• Inspect the vehicle before operation and report any defects or operating problems to the appropriate supervisor so repairs can be made
• Smoking is prohibited while inside the vehicle and during vehicle refueling
• If your driver’s license is revoked or expired, immediately notify your supervisor and do not drive. If you receive a moving violation or any citation that may affect your eligibility to drive a company vehicle, inform your supervisor immediately

Hazardous Materials and Chemicals
• Ask a supervisor about any unfamiliar material, chemical or substance
• Read GHS warning labels and pay close attention to the pictographs and signs
• Read the Safety Data Sheets (SDS) before using any chemicals. SDS contain a wealth of safety information and are available to employees at their request
• Hazardous materials will be handled in accordance with the SDS and label. If protective equipment is required, use it
• Store all hazardous materials in suitable containers that are properly labeled
• Use chemicals that produce fumes or vapors only in well-ventilated areas
- Wear eye protection when working with hazardous materials or chemicals
- Mixing of chemicals is prohibited at all times, unless required by the label. Before you mix, review all SDS
- Practice appropriate hygiene after handling hazardous substances and follow special instructions from authorized sources. Wash hands thoroughly after handling chemicals and before eating or smoking, even if wearing protective gloves. Never use solvents for hand cleaning
- Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body must be provided within the work area for immediate emergency use
- Air under Pressure (Compressed Air)
  - Air pressure at the discharge end of a portable air blow gun or portable air hose must be less than 30 pounds per square inch gauge when dead-ended
  - When air under pressure is used to remove chips and dust, a chip guard, such as a fixed or removable shield, safely located, will be provided to protect an employee in an adjacent area
  - The employee using air under pressure will be provided with and use appropriate PPE to the extent necessary to protect against hazards created by the operation
- Air under pressure, used in a manner that could cause injury, must not be used for cleaning clothes while being worn
- Air under pressure must not be directly applied to any part of the body. This could cause a serious or fatal injury (embolism) if air penetrates the skin/enters the body
- Air under pressure must not be used to move flammable dust in an area containing open flames or spark-producing equipment
- Air under pressure must not be used to remove toxic dusts in an employee environment
- Polyvinyl chloride (PVC) piping must not be used for the transportation and distribution of compressed air or other compressed gases in an above-ground installation
- An employee must be protected by guards or location when pressure tests are being performed on materials or equipment where rupture or failure would create a hazard

**Accident Prevention Signage and Tags**

An employer must provide, install and maintain signs and tags where an employee might be, or would likely be, injured or harmed if not alerted to an existing or potential hazard.

Signage must be unobscured, displayed in a well-lit area, and legible from a distance that provides sufficient time or warning for an employee to take appropriate action.

Similarly, accident prevention tags will be used as a temporary means of warning an employee of an existing hazard on certain items, such as defective tools or equipment. Don’t use tags in place of accident prevention signs or consider them a complete warning. Tags must be attached to prevent accidental disengagement, and they must be large enough to attract attention to the hazard. Use “Do Not Start,” “Out of Order,” and “Out of Service” tags in appropriate situations.
Sanitation

Potable water must be provided and placed in locations readily accessible to all employees. The water must be suitably cool and available continuously in sufficient amounts to keep all workers hydrated, taking into account the air temperature, humidity and nature of the work performed. The water will be dispensed in sanitary single-use drinking cups, or by fountains. Common drinking cups are prohibited.

Portable containers used to dispense drinking water must be tightly covered, regularly cleaned and refilled at least daily. Containers must have a tap, and water must not be dipped from containers. The containers must be clearly marked as to the nature of their contents, made of a material that maintains water quality, and not used for any other purpose.

Potable drinking water, as well as toilet and hand-washing facilities, must be maintained in accordance with appropriate public health sanitation practices.

Outlets for non-potable water, such as water for industrial or firefighting purposes only, will be identified by signs that clearly indicate the water is unsafe and is not to be used for drinking, washing or cooking purposes. There will be no cross-connection, open or potential, between a system that furnishes potable water and a system that furnishes non-potable water.

Employers must provide onsite general washing facilities (one per 20 employees) for construction projects, must keep them in sanitary condition, and must provide suitable cleaning agents/single-use towels for the removal of hazardous and other substances.

Toilet facilities must be adequately ventilated, readily accessible, and maintained in a clean and sanitary condition. Mobile crews may be provided transportation to nearby toilet facilities.

Every enclosed workplace must be constructed, equipped, and maintained, as reasonably practicable, to prevent the entrance and presence of rodents, insects, and other vermin. A continuing and effective extermination program must be instituted where their presence is detected.

Color Coding

- Green is used for general safety or accident-prevention signs; yellow is the basic color for designating caution on signage, and for marking physical hazards—solid yellow, yellow and black stripes, or yellow with a suitable contrasting background may be used interchangeably; red is used to indicate a warning/danger on signage, and to indicate “stop” when used with buttons
- A stop bar, stop button, electrical switch, or other mechanical device for the emergency stopping of machinery, excluding cables, will be red in color
- A safety can will be red in color
FORMS AND ATTACHMENTS

Please find the following document on the next page:

- General Safety Rules Receipt and Attestation

This form may be reproduced freely by US Trades, LLC for the purposes of implementing and maintaining a safety and health program.
GENERAL SAFETY RULES RECEIPT AND ATTESTATION

This is to certify that I have received a copy of the general safety rules.

- I have read these instructions, understand them and will comply with them while working for US Trades, LLC.
- I understand that failure to follow the company injury and illness prevention program may result in disciplinary action and possible termination of my employment with this company.
- I understand that I am to report any injury to my supervisor and report all safety hazards as soon as safely possible.
- I further understand that I have the following safety rights:
  - I am not required to work in any area I feel is not safe.
  - I am entitled to receive information about all hazards I am exposed to while working.
  - I am entitled to see a copy of the company safety and health manual.
  - I will not be discriminated against for reporting safety concerns.

<table>
<thead>
<tr>
<th>Employee Name</th>
<th>Signature</th>
<th>Date</th>
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</table>

<table>
<thead>
<tr>
<th>Supervisor Name</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
</table>

cc: Employee File
SCOPE

This chapter is based on OSHA interpretations of the following training regulations to be applicable to the global training policy.

- 1910.134(k) Respiratory Protection; Training and Information
- 1910.147(c) The Control of Hazardous Information; General
- 1910.1030(g) Bloodborne Pathogens; Communication of Hazards to Employees
- 1910.1200(h) Hazard Communication; Employee Information and Training
- 1926.21 Construction; Safety Training and Education

Where unique training requirements particular to specific regulations are needed, they will be addressed in that chapter.

POLICY

US Trades, LLC will freely provide training necessary for employees to perform assigned work in a safe and healthful manner.

Training will be tailored to encourage and assist understanding for all employee education and literacy levels in the languages they receive other job instruction.

EMPLOYER RESPONSIBILITIES

- Provide training to employees:
  - Free of charge
  - During regular working hours
  - In a language and at a competence level that employees can understand
- Train employees in routine and emergency response procedures
- Ensure that, where necessary, only competent/qualified personnel will deliver the training
- Maintain records of employee training for the duration of their employment, or as required by specific regulations
- Provide additional and/or refresher training as required or requested

EMPLOYEE RESPONSIBILITIES

- Attend and participate in all company required training
- Follow all company procedures and safe work practices
- Not perform any work that they have not been trained to safely complete
- Request additional training as needed

GENERAL TRAINING REQUIREMENTS

Employees must know how to identify the health and safety issues at their worksite, analyze the causes, and bring about healthier and safer workplaces for themselves and their co-workers.

Particular standards of training requirements common to most workplaces include:
Emergency response and evacuation procedures
Fire protection and prevention
First Aid (if required)
Hazardous Communication, as necessary
Personal Protective Equipment (PPE)

**Emergency Action Plan**

Employees designated in the emergency evacuation plan to assist in evacuation, will be trained how to safely and orderly help evacuate other employees.

Additional educational considerations include:

- Reviewing the plan with each designated employee when:
  - The plan is developed
  - An employee is first assigned to a job
  - The employee’s emergency action plan responsibilities change
  - The plan is changed
  - Providing the written plan for review when an employee asks to see it.

**Fire Prevention Plan**

Employees will be informed of the fire hazards they are exposed to at the worksite, and the parts of the fire prevention plan they need to know to protect themselves.

The written plan will be available for review when an employee asks to see it.

**First Aid**

The company will have the appropriate number of people available for employees to talk to and give advice on health and safety matters relevant to that worksite hazards.

At worksites that are too far from a clinic or hospital identified as able to handle likely safety and health hazards and injuries at that worksite, there will be an appropriate number of people adequately trained provide first aid.

**Hazard Communication Standard**

Written programs maintained at each worksite will describe how employees will be provided effective information and training on hazardous chemicals they might encounter in their work area:

- At the time of initial assignment
- When a new physical or health hazard is introduced

This training will cover at least:

- How to detect the presence or release (e.g. spills) of hazardous chemicals in that work area
- Physical and health hazards of chemicals in the work area (i.e. either the specific chemicals, or broader categories of hazards like: flammable or cancer causing)
• How employees are to protect themselves from exposure, such as specific safe work procedures
• Details of the written program, particularly the labels and Safety Data Sheets (SDS) of specific chemicals at the worksite, and how to get and use needed hazard information

Personal Protective Equipment (PPE)

Before beginning work that requires PPE, employees will be trained in at least:

• What PPE is needed and when it is necessary
• The protective limitations of the PPE
• How to put on, take off, adjust, and wear the assigned PPE
• How to properly care for and maintain the PPE
• Knowing and recognizing the assigned PPE’s useful life, and how to properly dispose it when necessary

Retraining will occur when the employee shows that they don’t understand or have the skill required to correctly use the PPE in the way they’ve been trained.

Training records will show that the employee as demonstrated they understand the training and how to correctly use the PPE they’ve been trained.

REFRESHER TRAINING

US Trades, LLC will provide refresher training to employees when:

• There are periodic intervals required by the regulation
• Changes in the workplace render previous training obsolete
• Changes in the types of equipment or materials being used render previous training obsolete
• Inadequacies in an affected employee’s knowledge or use of safe practices indicate that the employee has not retained the requisite understanding or skill
• Periodic evaluations show inadequacy in training or results in new safe work procedures

The Company will verify that each affected employee has received and understood the required training through a written certification that contains the name of each employee trained, the date(s) of training, and that identifies the subject of the certification.

SUPPLEMENTAL TRAINING

Company training in each subject will be developed according to the intent of each regulation; covering all elements listed in prescriptive regulations (e.g. respiratory protection training), and focusing on the desired outcome in performance regulations (e.g. confined spaces training.)

In addition to the common training listed above, US Trades, LLC will provide affected employees with job specific training based on their responsibilities. This training can include, but is not limited to:

• Lockout/Tagout
• Confined spaces
• Hand and power tool use
Fall protection
Equipment/machinery operation
Scaffold work
Welding and hot work
Respiratory protection

TRAINING RECORDS

US Trades, LLC will maintain records of all employee training for the length of their employment, or for the time required by specific OSHA regulations. These records will include:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions

All training records will be provided when an employee or their representative, or another authorized person asks for it.

FORMS AND ATTACHMENTS

On the following page, please find a generic training record sheet. This form may be reproduced for the purposes of implementing and maintaining a safety and health program.
<table>
<thead>
<tr>
<th>Trainer (include qualifications):</th>
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<tr>
<td>Date:</td>
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<td>Content of Training:</td>
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<th>Attendees</th>
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POLICY

US Trades, LLC is committed to providing a safe, healthy workplace by eliminating or controlling all workplace hazards. A Job Hazard Analysis (JHA) systematically investigates a job process, equipment, and the workplace environment to identify hazards and reduce risk. Kert Stiller is responsible for ensuring facilities and workplaces are inspected regularly for hazards, and will do so with support and assistance from employees.

EMPLOYER RESPONSIBILITIES

US Trades, LLC is responsible for:

- Ensuring that safety inspections of the facility occur on regular basis
- Training personnel in how to perform a job hazard analysis
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

EMPLOYEE RESPONSIBILITIES

All employees are expected to:

- Assist in job hazard analyses
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

US Trades, LLC will ensure every manager, supervisor and safety team member participates in a JHA training program. This training will be provided at no cost to the employee during working hours.

The Company will use only training material appropriate in content and vocabulary to educational level, literacy, and language of employees.

Training Components

Kert Stiller will verify that all employees have been trained in the following minimum elements:

- Importance of involving employees in job safety analyses
- How to review safety records to identify areas that present hazards
- How to analyze a job to determine the level of risk it presents
- How to prioritize job hazard analysis and hazard control activities
Basic steps of a job hazard analysis, including: breaking the job into steps, analyzing risks, and determining controls

How much detail to include when listing the steps of a job for a JHA

What kinds of workplace hazards might exist and what types of risk they pose

How to review a job hazard analysis and how to write a safe job procedure

When to reanalyze a job for hazards

The person conducting the training will be knowledgeable in the subject matter of the training program as it relates to the workplace.

All employees will be trained in basic hazard identification and will be trained in their jobs according to safe job procedures, as directed by the job safety analysis.

Training Records

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions and attached documents
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions
- Attendance and attestation forms of all persons trained

Employee training records will be retained for the length of their employment.

EMPLOYEE INVOLVEMENT

No one knows how to do a job better than the person currently doing that job does. Employees who are included in a JHA) provide valuable insight and knowledge into work procedures that is valuable in identifying hazards and controlling them. This insight can help prevent potentially dangerous oversights.

Further, soliciting employee input demonstrates that management values everyone’s involvement in creating a safer workplace and provides an opportunity for employees’ active involvement in the JHA process.

Preliminary Review

Reviewing the worksite’s accident history with employees draws attention to failures in hazard controls and deficiencies in work processes, which in turn suggests opportunities for safety program growth. A thorough review of recorded accidents, illnesses and near misses points to jobs, processes and tasks that require closer examination. It also indicates the immediate actions necessary to control all existing risks.

A discussion with employees about hazards they already know to exist also provides an opportunity to discuss ideas to control them.
If there is a hazard that poses an immediate danger, do not wait until after the JHA is complete to establish controls. Problems need to be corrected quickly. This demonstrates a commitment to safety and permits more time and thought for more complicated work safety issues.

**Prioritize Hazardous Jobs**

Understanding the risk posed by a job requires consideration of two main factors: the likely severity or impact of the injury or illness caused by a hazard and the likelihood injury or illness will actually occur (see Table 1). It is important, when assessing the overall risk of a job to determine the number of people exposed to a hazard who could be affected by an incident. Hazards that affect the whole worksite present much more risk than hazards that affect only one worker.

Jobs that present unacceptable risk need to take priority. Place priority on jobs:

- With exceptionally high injury or illness rates
- Where there already have been close calls
- Where violations of standards already have occurred
- With potential to cause serious harm

**Severity**

Factors that increase risk because they increase the severity of an injury or illness often rely on chance. However, certain job elements and behaviors intensify the severity of possible incidents:

- Using high-powered machinery and heavy equipment
- Working at elevation
- Working around hazardous chemicals
- Moving heavy or cumbersome loads
- Working around or with electrically energized equipment
- Working in a confined space

**Probability**

Factors that increase risk because they increase the likelihood of an injury or illness include the number of employees exposed to a hazard, frequency of exposure, duration of exposure, proximity to “point of danger”, unreasonable workload, working under stress, and environment.

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<thead>
<tr>
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<tr>
<td>Not Likely</td>
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<td>Serious Harm</td>
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<tr>
<td>Significant Harm</td>
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<tr>
<td>Minor or no harm</td>
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</tbody>
</table>

**TABLE 1: RISK ASSESSMENT MATRIX**

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Analysis

When analyzing a job’s hazards and determining how best to control them, it’s important to identify all significant hazards accurately, and understand each within the context of the entire job.

Break Job into Steps

Every job requires several steps. Each has its share of hazards that puts workers at risk.

To complete a job hazard analysis, first there must be a clear understanding of the steps required to complete the job. The observer will watch the worker perform the job and list the steps the worker takes to complete it.

When breaking a job into its individual steps, it’s important to balance between too much and too little detail. Too much detail will make the analysis needlessly long, and too little will not cover the basic steps.

Each step is one action. Some actions may not be observable, and some steps may involve specifically not doing things.

The observation stage of the JHA shouldn’t focus on either the employee’s performance, or individual unsafe acts, it should focus on the task itself. All phases of the analysis benefit from employee insight and feedback, and extensive employee involvement is strongly encouraged.

OSHA recommends video recording or photographing the worker performing the job, having them explain each step, and why they did it that way. These visual records can be handy references when doing a more detailed assessment of the work.

When all the steps are documented, the observer will review them with the employee to ensure nothing is missed.

Identify Hazards

The JHA requires answers to the following:

- What can go wrong?
- What are the consequences?
- How could the hazard arise?
- What are the other contributing factors?
- How likely is it that the hazard will result in an incident?

A good description of a possible hazard scenario will reveal the answers to those questions by describing the hazard in terms of the environment in which it occurs, the trigger that would precipitate an incident, how a worker faces exposure to the hazard, and the worst-case consequences.

Again, workers provide excellent insight into the hazards they work with as well as suggestions for how to control risks presented by hazards where they work.

The JHA will not only include actual hazards, but also potential hazards that could arise while performing the job:
- Is there danger of striking against, being struck by or otherwise making harmful contact with an object?
- Can the worker be caught in, by, or between objects?
- Is there potential for a slip or trip?
- Can the employee fall from one level to another or even on the same level?
- Can pushing, pulling, lifting, lowering, bending or twisting cause strain?
- Is the work environment hazardous to safety or health?
- Are there concentrations of toxic gas, vapor, fumes or dust?
- Are there potential exposures to heat, cold, noise or ionizing radiation?
- Are there flammable, explosive or electrical hazards?

Please see the table of Workplace Hazards at the end of this chapter for reference.

A list of hazards must accompany each step of the job. This provides a framework pointing to controls already in place and controls needed to prevent hazards from causing injuries or illnesses.

**Control**

Though awareness and thoughtfulness are excellent ways to reduce risk in the workplace, it is not enough simply to identify workplace hazards. Hazards in the workplace that are identified must be controlled if possible to minimize their risk. The JHA provides a systematic way to approach hazards and their controls. To control a hazard, it is important to remember two very basic principles. First, either eliminate the hazard itself or control worker exposure to the hazard. Second, eliminating a hazard is more effective than controlling exposure to a hazard.

These two principles shape a hierarchy of hazard control strategies (see Figure 1). When considering how to address the hazards in each step of a given job, controls at the top of the hierarchy need to be considered before controls toward the bottom of the hierarchy. The more reliable and less likely a hazard control can be circumvented, the better.

A good hazard control plan often includes a mixture of different things, such as the following:

- Priority given to high-risk hazards
- Inexpensive, easy improvements and temporary solutions until more reliable controls are in place
- Long-term solutions to risks most likely to cause accidents or ill health
- Long-term solutions to risks with the worst potential consequences
- Arrangements for training workers on the main risks that remain and how they are to be controlled
- Regular checks to make sure the control measures stay in place, and clear responsibilities. Who will lead on what action, and by when?

**Controlling the Hazard**

The most effective strategy is to "engineer the hazard out" by using control methods that physically remove or change a hazardous machine, work environment condition or other hazard. If, during the JHA, you discover a hazard that can be engineered out, do it. Turn the dangerous step into a safe step that doesn’t require safety precautions.
Elimination

If there are hazards that can be removed from the worksite, do this first. Good housekeeping procedures keep many hazards under control. Removing redundant or unnecessary equipment, materials or processes also rids the workplace of any risks associated with them.

Substitution

There may be alternative chemicals, machines or processes to accomplish the job but pose fewer hazards to workers. Explore ways to incorporate these alternatives into the job.

Isolation and Other Engineering Approaches

Creating a boundary between a hazard and workers can reduce risk almost as effectively as removing the hazard from the workplace altogether. Limit access to hazards with enclosures, machine guards and physical barriers that reduce the likelihood of exposure to a hazard before turning to controls that rely on a person.

Redesigning equipment and installing new guards (within manufacturer specifications) can remove or redirect hazards away from workers to prevent exposure.

Controlling Exposure

Some jobs and processes demand a level of exposure to some workplace hazards. If this is the case, controlling risk means controlling or eliminating the exposure and the negative effects of exposure.

Administrative or Management Controls

Administrative hazard controls are far-reaching and varied when implemented. These controls rely on appropriate human behavior, which is why they are lower on the hazard control hierarchy than engineering controls. Administrative controls include:

- Policies, procedures and practices to reduce exposure
- Modifying work schedules to reduce exposure
- Monitoring the use of hazardous
- Alarms, signs and warnings
- The buddy system
- Training
Personal Protective Equipment

Personal protective equipment (PPE) is the least effective way to control hazards, but is necessary for some hazardous jobs. The following are examples of when PPE is acceptable:

- When engineering controls are not feasible or do not totally eliminate the hazard
- While engineering controls are being developed;
- When safe work practices do not provide sufficient additional protection
- During emergencies when engineering controls may not be feasible

PPE needs to be chosen carefully to address the hazard, and fitted to the person using it.

Document and Evaluate

By the end of the JHA, there will be a document that clearly outlines the steps to perform the job, the hazards encountered in each step, and appropriate controls that need to be in place to reduce the risk posed by those hazards. This will paint a picture of a process that considers safety from the start to end of the job.
However, unsafe habits have a way of introducing themselves into a process as workers find their “own way” of performing tasks — ways that may not take into account the safety measures identified in the JHA. Further, there may be risks that were not identified or were left insufficiently controlled that may only become evident after the JHA is complete. Monitoring and periodic reviews help ensure the JHA remains current to prevent accidents and injuries.

**Document the Safe Job Procedure**

Once the analysis is complete, communicate the results to all workers who are, or will be, performing that job. The side-by-side format used in JHA worksheets is not an ideal one for instructional purposes. Use a narrative-style communication format to create a safe job procedure that is easy to understand:

Write in step-by-step format. Each step needs its own paragraph that describes the step as one action.

Point out the hazard: If the step involves exposure to a hazard, point out the hazard in the step. Include the possible injury or illness that could result from unprotected exposure to the hazard.

Identify safety precautions: If the step involves exposure to a hazard, also point out the safety precautions to stay safe and healthy.

Paint a ‘word picture’: Write the procedure in a way that someone unfamiliar with the task could perform it safely. The safe job procedure can serve as a training document as well as a safety document. Avoid jargon and technical terms so new employees can easily understand the process.

Write in the second person, present tense. Treat the safe job procedure as a set of instructions. Tell the person who is doing the job exactly how to do it.

Write clearly. While it is important to be concise, it is more important to be clear and accurate. Keep sentences short. Clear writing helps make sure all workers can understand the instructions and follow them. If employees speak a language other than English, translate the job procedure into the language they speak so there is as little confusion as possible.

**Monitor and Review**

Periodically reviewing your JHA ensures it is current and continues to prevent workplace accidents and injuries. Even if the job does not change, unnoticed hazards may become apparent. It is particularly important to review job hazard analyses if an illness or injury occurs.

Based on the circumstances, the job procedure may need to change to prevent similar incidents in the future. If an employee’s failure to follow proper job procedures results in a “close call or near miss,” discuss the situation with all employees who perform the job and remind them of proper procedures. Any time you revise a job hazard analysis, it is important to train all employees affected by the changes in the new job, procedures or protective measures.

Hazard identification, and risk assessment and control are ongoing processes. Make sure to undertake a hazard identification and risk control analysis whenever there is a change to the workplace, including when work systems, tools, machinery or equipment change, or when the existing process is otherwise potentially out of date or no longer valid.
FORMS AND ATTACHMENTS

On the following pages, please find the following documents:

- Workplace Hazards
- Job Hazard Analysis Worksheet
- Safe Job Procedure Form
- Job Hazard Analysis Training Documentation
## Workplace Hazards (Page 1 of 2)

<table>
<thead>
<tr>
<th>Hazard</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slips/Trips/Falls</td>
<td>Conditions that result in falls (impacts) from height or walking surfaces (such as slippery floors, poor housekeeping, uneven walking surfaces, exposed ledges, etc.)</td>
</tr>
<tr>
<td>Mechanical Failure</td>
<td>Self-explanatory; typically occurs when devices exceed designed capacity or are inadequately maintained.</td>
</tr>
<tr>
<td>Caught-in/Caught-on/Crush</td>
<td>Skin, muscle or body part exposed to crushing, caught-between, cutting, tearing, shearing items or equipment.</td>
</tr>
<tr>
<td>Struck By</td>
<td>Accelerated mass that strikes the body causing injury or death. (Examples are falling objects and projectiles.)</td>
</tr>
<tr>
<td>Struck Against</td>
<td>Injury to a body part due to coming into contact with a surface in where the action was initiated by the person. (An example is when a screwdriver slips.)</td>
</tr>
<tr>
<td>Toxic</td>
<td>A chemical that exposes a person by absorption through the skin, inhalation, or through the blood stream that causes illness, disease, or death. The amount of chemical exposure is critical in determining hazardous effects. Check Safety Data Sheets (SDS), and/or OSHA 1910.1200 for chemical hazard information.</td>
</tr>
<tr>
<td>Flammable</td>
<td>A chemical that, when exposed to a heat ignition source, results in combustion. Typically, the lower a chemical’s flash point and boiling point, the more flammable the chemical. Check SDS for flammability information.</td>
</tr>
<tr>
<td>Corrosive</td>
<td>A chemical that, when it comes into contact with skin, metal, or other materials, causes damage. Acids and bases are examples of corrosives.</td>
</tr>
<tr>
<td>Chemical Reaction</td>
<td>Self-explanatory.</td>
</tr>
<tr>
<td>Pressurization</td>
<td>Sudden and violent release of a large amount of powder blast/gas/energy due to ignition or a significant pressure difference such as rupture in a boiler or compressed gas cylinder.</td>
</tr>
<tr>
<td>Temperature Extreme</td>
<td>Temperatures that result in heat stress, exhaustion, or metabolic slow down such as hypothermia or hyperthermia.</td>
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</tbody>
</table>
### Workplace Hazards (Page 2 of 2)

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
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</table>
| Electrical   | **Shock/Short Circuit**  
Contact with exposed conductors or a device that is incorrectly or inadvertently grounded, such as when a metal ladder comes into contact with power lines. 60Hz alternating current (common house current) is very dangerous because it can stop the heart.  
**Fire**  
Use of electrical power that results in electrical overheating or arcing to the point of combustion or ignition of flammables, or electrical component damage.  
**Static / ESD**  
The moving or rubbing of wool, nylon, other synthetic fibers, and even flowing liquids can generate static electricity. This creates an excess or deficiency of electrons on the surface of material that discharges (spark) to the ground resulting in the ignition of flammables or damage to electronics.  
**Loss of Power**  
Safety-critical equipment failure due to a loss of power. |
| Ergonomics   | **Strain**  
Damage of tissue due to overexertion (strains and sprains), work positioning or repetitive motion.  
**Human Error**  
A system design, procedure or equipment that is likely to cause error. (A switch goes up to turn something off).  
**Vibration**  
Vibration that can cause damage to nerve endings, or material fatigue that results in a safety-critical failure. |
| Radiation    | **Ionizing**  
Alpha, Beta, Gamma X-rays and neutral particles that cause injury (tissue damage) by ionization of cellular components.  
**Non-Ionizing**  
Ultraviolet, visible light, infrared, and microwaves that cause injury to tissue by thermal or photochemical means. |
| Noise        | **Noise**  
Noise levels that result in hearing damage (an 8-hour time-weighted average greater than 85 decibels) or inability to communicate safety-critical information.  
**Visibility**  
Lack of lighting or obstructed vision that results in an error or other hazard. |
| Weather Phenomena | **Weather Phenomena**  
Self-explanatory. |
<table>
<thead>
<tr>
<th>Step</th>
<th>Job/Activity</th>
<th>Department/Project</th>
<th>Hazard(s)</th>
<th>Controls</th>
<th>Created By</th>
<th>Date</th>
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<tbody>
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<td>Special Inspection Requirements:</td>
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<td>Required Personal Protective Equipment:</td>
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Please attach any diagrams, flowcharts, or photographs that may be helpful in hazard assessment.
**SAFE JOB PROCEDURE**

DO NOT undertake this job unless a supervisor has instructed you in the safe use of all equipment and appropriate safety precautions for work processes associated with the job. Any employee who undertakes this job must have explicit supervisor permission to do so.

<table>
<thead>
<tr>
<th>Job Performed</th>
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<th>Potential Hazards</th>
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**Personal Protective Equipment**

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<thead>
<tr>
<th>Hand Protection</th>
<th>Respiratory Protection</th>
<th>Eye Protection</th>
<th>Face Protection</th>
<th>Special Footwear</th>
<th>Hearing Protection</th>
<th>Special Clothing</th>
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<th>Other (Specify)</th>
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**Safe Work Procedures** (attach additional sheets if necessary)

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<th>Pre-Operation</th>
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<th>Post-Operation</th>
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**Competent Personnel**

These individuals are permitted to perform the job and supervise others learning to do this job.

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<th>Name</th>
<th>Title</th>
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<th>Contact</th>
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# JOB HAZARDS TRAINING

<table>
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<tr>
<th>Trainer (include qualifications):</th>
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<tr>
<td>Date:</td>
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<td>Content of Training:</td>
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## Attendees

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<tr>
<th>Print Name:</th>
<th>Signature:</th>
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POLICY

US Trades, LLC has implemented this policy for the protection of our employees during emergencies in the workplace. Kert Stiller will supervise the Emergency Action Plan.

The Company will have a written Emergency Action Plan (EAP). The EAP will be posted in the workplace and remain available to employees for review, along with the names and job titles of every person in the chain of command during emergencies.

EMPLOYER RESPONSIBILITIES

It is the responsibility of US Trades, LLC to:

- Ensure adequate workplace safeguards against hazards, including appropriate exit routes, fire alarms, and fire protection systems
- Ensure development and implementation of the EAP
- Ensure training of employees in accordance with this policy

EMPLOYEE RESPONSIBILITIES

Every employee is expected to:

- Report fires or other emergencies
- Follow the EAP

TRAINING

US Trades, LLC will ensure every employee is provided training on emergency planning. This training will be provided at no cost to the employee and held during their working hours.

Training will be provided:

- At the time of assignment
- When the employee’s responsibilities under the Plan change
- When any element of the Plan is changed
- At least annually thereafter, annual training for all employees will be provided within one year of their previous training

The Company will provide additional training when tasks or procedures are added or changed that may affect the employee’s work. It is acceptable for additional training to be limited to addressing only the changes or additions to the employees’ exposure.

US Trades, LLC will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.
Training Components

Kert Stiller will ensure all employees are informed and trained in the following minimum elements for the Emergency Action Plan and Fire Protection Program:

- Fire hazards at the worksite
- Means of controlling or removing fire hazards at the worksite
- Procedures for reporting a fire or other emergency
- Procedures for emergency evacuation for all areas of work, including type of evacuation and exit route assignments
- Safe assembly areas designated for all work areas in the event of evacuation
- Procedures to be followed by employees who are requested to remain to operate critical plant operations before they evacuate, if applicable
- Procedures to account for all employees after evacuation
- Procedures to be followed by employees performing rescue or medical duties
- The members in the chain of command who may be contacted by employees for information about the plans or for an explanation of their duties under the plans
- Proper operation of fire extinguishers provided by the company if the EAP allows employees to fight incipient stage fires rather than evacuate
- The hazards involved in incipient stage firefighting. Employees are instructed to ensure the local emergency response service (Fire Department) is notified before attempting to extinguish any fire, and that if a fire is not immediately extinguished, or the fire recurs to evacuate immediately

Training Records

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

Emergency Action Plan

US Trades, LLC is committed to providing a safe workplace and ensuring procedures are in place to protect employees in the event of any emergency. Accordingly, US Trades, LLC will ensure there is an Emergency Action Plan, written and available to employees, that includes:

- Procedures for reporting a fire or other emergency
- Procedures for emergency evacuation, including type of evacuation and exit route assignments
- Procedures to account for all employees after evacuation
• Procedures to be followed by employees performing rescue/medical duties and operating critical plant operations
• The name or job title of every employee from whom other employees can find out more about the plan

**Employee Involvement**

The continued development and thorough implementation of the EAP is a company-wide effort that demands concerted effort of management and all employees. Accordingly, employees will be involved in every step of the EAP from planning to training to implementation in an emergency.

Kert Stiller, or an approved designate, will review the EAP with all employees to verify they understand procedures to be followed in an emergency.

Employees will report or remedy workplace hazards and unsafe work practices as soon as they may do so safely.

**Possible Workplace Emergencies**

In the planning and implementation of the company’s EAP, employees will consider the range of emergencies that may require response and develop contingencies that respond to the unique workplace impact of these emergencies.

**Weather**

Weather-related events include hurricanes, tornadoes, blizzards, floods and severe storms. Supervisors must communicate unexpected schedule changes because of severe weather to employees as quickly as possible. Such events may result in a loss of power or communication and may limit the ability of first-responders to respond quickly.

**Medical**

Medical emergencies are the most likely workplace emergency. Response time is critical to a positive outcome during a severe medical emergency. Onsite medical first responders will know first aid and CPR, but no employee will perform first aid beyond their training or capability. If first aid trained, personnel are not available, stop any bleeding with firm pressure (avoiding contact with body fluid) and in case of choking, clear the air passages. In the event of a medical emergency, it is imperative to call 911 promptly.

**Threat of Violence**

Threats of violence can come through a range of modes of communication, directed at a single employee, a group of employees or the entire workplace. Every threat is serious. If you receive or are aware of a threat of violence, contact a supervisor immediately, if you are able to do so safely. Please see the chapter on “Workplace Violence Prevention” for more information about how to prevent and respond to threats of violence and violence in the workplace.
Fire
The fire prevention plan requires involvement of all employees to prevent fire emergencies. Response to a fire emergency depends on whether your workplace has decided to allow all employees or some employees to fight incipient-stage fires. Supervisors may have to serve as evacuation wardens, and if the emergency action plan demands it, an employee may need to shut down critical operations before evacuation. A quick, orderly evacuation accompanied by a call to 911 is the acceptable response to an out-of-control fire.

Explosion
If there are flammable substances at your worksite, take extra care during planning to address the hazards they present. Explosions do not offer any warnings, and often, panic presents the biggest obstacle to safety in the wake of such a disaster. Further, explosions often accompany fires, adding complexity to fire response planning.

Earthquake
When an earthquake strikes, the greatest risks come from above, collapsing ceilings and falling objects can severely injured workers. If the workplace is in an earthquake-prone location, consider earthquake drills and make sure you and your coworkers know to protect their head and neck under sturdy furniture or against an inside wall. A severe earthquake will occupy emergency workers, and onsite rescue and triage may be a task that falls into the hands of supervisors or members of the safety committee, if applicable. No employee should perform first aid or attempt rescue beyond training or capacity to do so safely.

CHAIN OF COMMAND
During an emergency, it’s critical that employees understand the chain of command in the emergency action plan. In addition to the chain of command, it’s also important to recognize that the authority of local emergency response officials, like members of the fire department, supersedes the authority of any US Trades, LLC employee.

Emergency Scene Commander
Unless precluded by unforeseen contingencies, Kert Stiller will act as the scene commander in the event of a workplace emergency. US Trades, LLC will determine whether an emergency exists, oversee procedures during an emergency, and notify and coordinate with outside emergency services.

Emergency Scene Coordinators
The emergency action plan requires the worksite to have enough people trained to assist in the evacuation of employees and assist the safety coordinator/emergency scene commander. The number of scene responders depends on the number of employees, the size and complexity of the worksite and the hazards posed by likely emergencies.
Table 3 provides a good guideline when considering how many coordinators will be necessary to implement the EAP. Scene coordinators should know CPR and first aid and would benefit from additional safety training, including workplace violence response. Their duties in an emergency include, but are not limited to the following:

- Checking for employees who may be unable to evacuate
- Knowing who may need assistance during evacuation and how to assist them
- Coordinating emergency activities
- Using their knowledge of workplace, escape routes and hazards to perform a swift, safe evacuation
- Verifying all employees are in designated safe areas following an evacuation

<table>
<thead>
<tr>
<th>Employees in Workplace</th>
<th>Emergency Scene Commander</th>
<th>Emergency Scene Coordinator</th>
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<tbody>
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<td>11-19</td>
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<td>5-12</td>
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<td>250+</td>
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</table>

**Emergency Reporting Procedures**

Employees must report emergencies as quickly as they may do so safely. Emergencies may be reported through manual pull stations or other alarm systems. If the EAP requires employees to call Kert Stiller or other assigned staff, those numbers will be posted at every phone. Major emergencies demand an immediate call to 911 to prevent damage, injury or death. After the report of an emergency, the alarm system will notify employees about the emergency.

**WORKPLACE EVACUATION**

The EAP will include a floor diagram with arrows to designate exit route assignments based on location within the building. There need be secondary routes and exits whenever possible. It is important every employee knows the building’s exit routes and keeps them free of obstacles and debris at all times. For more information about exit routes, please see the floor diagram and consult “Exit Routes” in this chapter.
Evacuation Assistance

Scene coordinators or other assigned personnel will act as evacuation wardens to ensure employees move from danger to safety during an emergency. An employee designated to assist in evacuations will need to know which employees need extra assistance and be trained and prepared to offer this assistance. Further, any visitors on premises may need assistance during evacuations. It is useful to implement a system to account for visitors, like a sign-in sheet, to promote facility security and account for everyone in case of an emergency.

Services During Evacuation

Workplaces with equipment and processes that take time to shut down or with systems that may pose a hazard if not shut down may include, as part of the EAP, a partial evacuation procedure. The roles of those performing critical operations during evacuation must be clear, and anyone left behind must be able to recognize when to abandon the task and evacuate. The same goes for workplaces that plan for employees to fight incipient-stage fires.

Accounting for Employees

The emergency action plan requires US Trades, LLC to account for employees after an evacuation. Employees will gather in an established assembly area (or areas) after an evacuation. After the evacuation is complete, Kert Stiller or an approved designate, will perform a headcount and note the names and last known whereabouts of anyone missing. Accuracy in accounting for employees during an evacuation is vital to prevent a dangerous search-and-rescue operation if one is not needed. Procedures need to include a way to account for visitors, customers and suppliers who are onsite as well.

Sheltering in Place

Not every emergency requires evacuation. Certain contaminants and disasters present greater hazards outside than inside. If an emergency does not require evacuation, it may demand employers instead “shelter-in-place.” Kert Stiller will determine the extent of evacuation, and whether employees need to shelter in place. Sheltering in place means taking refuge in an interior room with no or few windows until the emergency has passed. In many cases, local authorities will issue advice to shelter-in-place via TV or radio. In case of chemical release, special precautions to protect against toxic atmospheres may be necessary. Including shelter-in-place preparations in the EAP demands a means of alerting employees in distinguishable ways and additional training on shelter-in-place procedures.

First Aid and Rescue

US Trades, LLC will ensure that local fire, police and other emergency medical personnel are available and trained to provide assistance. In the absence of those resources, at least one person on staff will be trained to render first aid. An amount and dispersal of first aid supplies appropriate to the size of the facility, number of employees and hazards present will remain readily available. First aid supplies will be added or replaced as frequently as necessary to ensure availability. Facilities for rinsing or drenching eyes or body will be provided as hazards demand. First Aid kits will include or will be accompanied by appropriate personal protective equipment for anticipated hazards, including exposure to blood borne pathogens for personnel while performing first aid. More information is available in the chapters titled “Medical Services and First Aid” and “Bloodborne Pathogens.”

Critical Information
As part of the personnel file, there will be a record of emergency contact information for employees, in case an employee is unable to contact someone for themselves. The confidential record should include physician information and any other medical information the employee shares for use in case of an emergency.

**Multi-Employer Workplaces**

If the company shares a building or worksite with other employers, consider working with them to develop a building-wide emergency plan. If a building-wide plan is not feasible, take all necessary steps to ensure the EAP does not conflict with the plans of other employers in the building.

**PERSONAL PROTECTIVE EQUIPMENT**

During some emergencies, it is necessary for an employee to encounter hazards that require personal protective equipment. A medical emergency involving blood, for instance, will call for gloves as indicated in the bloodborne pathogen exposure control plan. Training, preparation and procedures will include consideration for any necessary PPE.

**EXIT ROUTES**

During an emergency, swift evacuation can ensure the safety and well-being of employees. In an emergency that requires employees to evacuate, US Trades, LLC will adhere to all applicable regulations to ensure safe exit routes remain available to employees in case fire or other emergency demands evacuation of the workplace.

**Basic Requirements**

An exit route must be established and separated by fire resistant materials as quickly as possible during construction, and a safe means of egress must be maintained during renovation and demolition.

If the route connects three or fewer floor levels, construction materials separating the exit from other parts of the workplace must have a one-hour of fire resistance rating. (More stories call for a two-hour resistance rating.) An opening to an exit will only have self-closing, laboratory-tested fire doors as necessary to allow passage of individuals through the established route.

Enclosure and protection of openings for means of passage must occur as soon as possible after exterior walls/windows are in place.
Adequate Exit Routes

US Trades, LLC will ensure sufficient exit routes for the workplace. While a single exit route is permissible in small workplaces with possible safe evacuation, two exit routes, located as far as practical from each other helps employees evacuate safely if one exit route is blocked. There will be enough exit routes to ensure safe evacuation of all employees.

Consult local codes to ensure safe means of passage in any construction. Exit stairways and means of egress in multi-level buildings must be provided immediately after floor decking is installed. In new multi-level buildings, one of the exit stairs may be obstructed for construction, but do not obstruct exit stairs for more than two contiguous floor levels.

Exit Discharge

Exits must discharge outside or to a space with access to the outside that is large enough to accommodate the number of people taking that route. For stairs that continue past the evacuation level, there will be indication of proper direction to discharge area.

Unlocked, Side-Hinged

Under no circumstances will an exit door be locked from the inside. Nothing can restrict the use of an exit door or any means of egress established in the fire protection plan in an emergency.

All exit doors will be side-hinged, with doors that swing out in the direction of exit travel, and rooms designed to hold more than 50 people or in a high-hazard area.

Capacity and Size Requirements

Exit routes must be able to handle the maximum occupant load for that floor. The capacity may not decrease as the route approaches the exit discharge.

The ceiling of an exit route must be at least seven feet six inches high. Any projection from the ceiling must not reach a point less than six feet eight inches from the floor.

An exit access must be at least 28 inches wide at all points. Where there is only one exit access leading to an exit or exit discharge, the width of the exit and exit discharge must be at least equal to the width of the exit access. The width of an exit route must be sufficient to accommodate the maximum permitted occupant load of each floor served by the exit route.

Objects that project into the exit route must not reduce the width of the exit route to less than the minimum width requirements for exit routes.

Outdoor Exit Routes

An outdoor exit route must be protected by guardrails if a fall hazard is present; covered or protected from slipping hazards; reasonably straight, smooth, solid and level; and free of dead ends longer than 20ft.
Minimize Dangers

Exit routes will be unobstructed and clear of hazardous materials or flammable furnishings. An exit route that goes toward a high hazard area requires barriers or partitions to provide a suitable shield from the hazard for workers.

Lighting and Marking

Exit routes must be adequately lit, clearly visible and marked by a sign reading “EXIT.” Decorations and signs must not obstruct or obscure the visibility of the exit door. If a doorway could be mistaken for an exit, it must be marked “Not an Exit” or a sign that identifies its use. If the direction to the exit is not apparent, signs must be posted to indicate the direction for evacuation.

Exit signs must be lighted and comply with the NFPA requirements.

Construction, Repairs, Alterations

Employees may not occupy any workplace during construction, repairs or alterations unless all exit routes and required safety standards are maintained. The Company will ensure removal of or appropriately minimize hazards beyond normal conditions during construction activities.

FORMS

On the following pages, please find the Emergency Action Plan form, which may be reproduced freely by the Company US Trades, LLC for the purposes of implementing and maintaining a safety and health program.
**Company Name** | **Job Location**
---|---

**Street** | **City** | **State** | **ZIP**
---|---|---|---

**Prepared By** | **Title** | **Phone**
---|---|---

**Signature** | **Date**
---|---

### Purpose

This plan is for the safety and well-being of company employees. It identifies necessary management and employee actions during fires and other emergencies. Education and training are provided so that all employees know and understand the Emergency Action Plan.

### Location of Plan

The Emergency Action Plan can be found at the station or office of

Upon request, an OSHA representative may obtain a copy of the plan from

### Exit Routes

Draw a diagram of jobsite or facility exit routes in space below. Locate meeting place or “Roll-Call” area on diagram
### Accounting for Employees

After exiting jobsite or facility, all employees are to assemble for “Roll-Call” at this location.

Note location on exit route diagram.

The following are responsible for ensuring that employees comply with this requirement:

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### Critical Operations

To minimize damage from the emergency, the following personnel are responsible for shutting down the listed critical operations:

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<th>Personnel Names</th>
<th>Critical Operations</th>
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As soon as shutdowns are completed, the employees who performed critical operations must take the nearest exit route in accordance with general emergency procedures.

### Rescue and Medical Duties

The following personnel are certified and trained in both CPR and general first aid:

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### Emergency Action Plans (Page 3 of 4)

#### Reporting Emergencies

The following personnel have the duty of contacting public responders to come to the emergency scene. The personnel are listed in descending order of availability.

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#### Alarm Systems and Notification of Emergencies

In the event of a workplace or facility emergency, employees will be notified as follows:

#### Types of Evacuation

OSHA requires this Company to have an established system of types of evacuation to follow for different emergency circumstances. The following listing represents Company policy for various emergency situations.

**PARTIAL EVACUATION:** Code Yellow – 3 rings or horn blasts
RESPONDERS (trained extinguisher personnel and trained rescue and medical personnel)

**FULL EVACUATION:** Code Red – 4 rings or horn blasts: RESPONDERS (n/a)

**NOTE:** If there is more than one evacuation type, the alarm signal for each must be distinctive.

Other (describe)
## Public Emergency Response Information

<table>
<thead>
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<th>Service</th>
<th>Coverage</th>
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<td>911 emergency services DO / DO NOT cover the area this Emergency Plan covers. (circle one)</td>
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<td>Local Police Department</td>
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<td>Local Fire Department</td>
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<td>Local Ambulance/EMS</td>
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<td>Local Hospital</td>
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## Further Information

For further information or explanation about any duties under this Plan, contact:

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**This Emergency Action Plan is authorized and approved by (Name and Title)**

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<th>Name (print)</th>
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POLICY

Safety incidents indicate the failure of safety control systems and demand changes to prevent future harm. In order to implement necessary changes and prevent future harm, US Trades, LLC will investigate accidents and near misses to identify causes and make safety recommendations.

The primary purpose of workplace accident investigations performed by US Trades, LLC is to find facts to guide future actions, not to find fault or assign blame.

Fatalities must be reported to OSHA within eight hours. Serious accidents where an employee is admitted to a hospital for treatment or observation because of injuries suffered from a workplace accident must be reported to OSHA within 24 hours.

If an employee with an occupational injury or illness receives a medical emergency procedure, Kert Stiller or designate will document the incident on OSHA’s Form 301, “Injury and Illness Incident Report,” and record the injury or illness on OSHA’s Form 300, “Log of Work Related Injuries and Illnesses.” See “29 CFR 1904.7 — Recordkeeping Forms and Recording Criteria” for more information.

EMPLOYER RESPONSIBILITIES

It is the responsibility of US Trades, LLC to:

- Provide accident investigation training
- Require that every accident is investigated to find and remedy the root causes
- Respond promptly to any recommendation following an accident
- Take corrective actions to prevent the recurrence of an accident
- Avoid blaming individuals in incident investigations for safety purposes
- Report to the appropriate authority, as required by law, any fatality, injury or work-related illness
- Share with employees the findings of accident investigations
- Review these accident investigation procedures and this policy annually and revise as necessary

EMPLOYEE RESPONSIBILITIES

Every US Trades, LLC employee is expected to:

- Immediately report any work-related accident, injury, or near miss
- Actively cooperate with investigators during accident investigations
- Participate in recommending changes to processes, systems, and the workplace, and in helping to implement changes as necessary to prevent future accidents
TRAINING

US Trades, LLC will ensure all employees are provided training on their role in the accident investigation process. This training will be provided at no cost to the employee during working hours.

US Trades, LLC will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.

Training Components

Kert Stiller will ensure that all employees at US Trades, LLC are informed and trained in the following minimum elements for accident investigation:

- What an accident is and why accidents occur
- What a near-miss is
- How to report an accident
- A general overview of the accident investigation process
- Why accident investigations are important, and the purpose of them
- Different levels of causes for accidents

Managers and supervisors will complete training in the following minimum elements for accident investigation:

- Learning the legal requirements of accident reporting
- Securing an accident scene
- Planning an accident investigation
- Collecting information from an accident scene
- Conducting interviews as part of an accident investigation
- Photographing and sketching an accident
- Creating a timeline of an accident
- Learning root-cause analysis techniques
- Compiling accident investigation reports
- Recommending change to prevent accidents

Training Records

The company will retain training records for three years from the date on which the training occurred.

The following information must be included:

- Dates of the training
- Contents or a summary of the training
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training
PROCEDURE

It is easy to think of an accident simply as a single event that results in injury or illness to an employee, or in property damage. In reality, an accident is the culmination of a series of events. Accidents are the end of an unplanned, unintended and undesired process. They are complex, and in some industries exceedingly rare, often with several events that can be identified as causes.

It is also easy to think of accidents as being the result of poor chance or fate. However, a competent person can examine workplace conditions, behaviors, and underlying systems to predict what kind of accidents will occur. There is certainly an element of chance in every incident. However, most accidents can be prevented by eliminating and controlling workplace hazards.

A serious accident may result in disability, severe property damage or even death; a minor accident may only cause an inconvenience; near misses may not harm anyone or anything. However, nearly all accidents and near misses point to failures in safety systems that demand a closer look to prevent more harm in the future.

Investigations

An accident investigation may have different purposes, including:

- Identifying and describing the actual course of events
- Identifying the direct and root causes / contributing factors of the accident
- Identifying risk-reducing measures to prevent future, comparable accidents
- Investigating and evaluating the basis for potential criminal prosecution
- Fulfilling legal requirements or processing workers’ compensation claims
- Evaluating the question of guilt in order to assess the liability for compensation

Police, insurance investigators and safety regulators may investigate an accident for other reasons, but US Trades, LLC accident investigations emphasize finding the root causes of the accident to prevent future accidents from happening again.

Investigators are interested in not only individual harmful events, but also the events, systems, and processes that led to the accident. Accident investigations need to determine exactly what happened, but more importantly, must look for deeper causes — the how and why.

Incidents that don’t involve injury or property damage will still be investigated to determine which hazards need to be corrected. The same principles apply to a quick inquiry of a minor incident, and to the more formal investigation of a serious event.

Procedures for Accident Investigations

The best time to develop accident investigation procedures is before the accident occurs.

The plan will include procedures that determine:

- Who to notify when an accident occurs
- Who may notify outside agencies (fire, police, etc.)
- Who will conduct investigations
At US Trades, LLC, pre-accident investigation planning is a team effort between supervisors and Kert Stiller. Nevertheless, there are some key steps to help ensure an accident investigation will accomplish its goal of preventing future incidents. See Figure 1 for an outline of the general steps of an accident investigation.

**IMMEDIATE ACTION**

**Secure Accident Scene**

The first action to take at an accident scene is to prevent further injuries and make the area safe. Administer first aid (or ensure it is administered) or summon appropriate emergency responders as necessary.

Sometimes, an investigation can begin while the victim is being assisted by emergency responders. However, the priority is always taking care of the victim, and usually investigations don’t begin until emergency response is completed. Material evidence will most likely not be in its original location, but effective interviews can shed light on the scene at the time of the accident.

At this point, gathering as much pertinent information as possible for later analysis takes priority over determining the cause of the accident, but the top priority must always be the safety and well-being of workers and the public.

**Preliminary Investigation**

It is important to start the investigation as soon as possible. Significant elapsed time between the accident and the investigation can lead to a deterioration of evidence and undermine the accuracy of the investigation.

**Material Evidence**

There is a temptation to clean up the accident scene immediately so people can get back to work, but an effective procedure will protect material evidence for the investigation.

It is important to secure the scene of an accident quickly and effectively. Tape, rope, cones, or even personnel, can secure the accident scene.
Plan Investigation

Most investigation planning should happen well in advance of an accident. However, some details of the investigation can only be seen after the fact. The nature of the accident will determine the extent of the investigation, the resources that will be needed, what types of investigative processes will be required, who will need to be interviewed, etc.

Build Team

Ideally, someone experienced in accident causation and investigative techniques will conduct accident investigations. An investigator who is also fully knowledgeable of the work processes, procedures, peoples, and general work environment of a particular situation will be able to shed some light on the causes of the accident.

In most cases, the supervisor will help investigate, together with the safety coordinator and/or whoever is in charge of worksite inspections.

Other members of the team can include:

- Employees with knowledge of the work
- A union representative, if applicable
- Employees with experience in investigations
- An impartial expert from outside the company

It’s important the team represent a variety of expert perspectives on workplace safety and the job being performed when the accident happened. However, everyone on the team needs to be trained in appropriate investigative techniques and not be involved in any disciplinary proceedings that might emerge out of the incident, if possible.

It is important to keep the safety-related aspect of the investigation separate from any possible disciplinary action. Accident investigations will always focus on identifying safety failures and remedying them promptly.

COLLECT INFORMATION

The next step is to gather useful information about what directly and indirectly contributed to the accident. When collecting information to understand an incident or accident, consider all possible sources.

Photograph and Video

Photographs and video recording can help in the preparation of a report, as well as in analyzing conditions at the site of the incident. Take photographic evidence as soon as safely possible.

Following are some techniques useful in taking photographs at incident scenes:

- Photograph the overall area before moving to detail the precise incident site
- Take photos from different perspectives and angles—close-up and from a distance
- Use witnesses to help you decide what to shoot, and note their comments
• Record what photos you take in a log that includes details like when the shot was taken, by whom, where, what the shot contains, identifying number on a sketch of the area, and a brief description of what the photograph is trying to identify
• Keep the photos in a safe place along with notes, evidence, and sketches from the accident investigation
• Narrate video with details like those above

**Sketch Scene**

Sketches complement information in photos or video, indicating distances among elements of the accident scene. It is important to be as precise as possible when making sketches.

Following are some things to remember:

• Make sketches large and clear
• Include basic facts (date, time, location, identity of objects, victims, etc.)
• Define spatial relationships with identifiable points of reference and compass directions
• Include important measurements, and note key concepts
• Indicate what has been included in photographs
• Mark where people were standing

Eventually, a precise diagram can reflect the information in a sketch, but it is important to get as much information as possible immediately after the accident.

**Interview Witnesses**

Interviewing witnesses is the easiest way to gain an understanding of how the accident occurred, and the conditions that led to it. Witnesses include people who saw the incident, such as any injured people, and others whose behavior, actions and/or inactions—either intentionally or unintentionally—contributed to the incident. This can include supervisors and trainers, maintenance personnel, and anyone else tied to the investigation.

When interviewing, it is important to remember emotions can run high in the wake of an accident, especially a catastrophic one. The accident investigation is a cooperative effort to create a safer workplace by gathering and understanding information. Keep an open mind and listen with a calm, relaxed, unhurried demeanor.

• Use a voice recorder only with permission; if possible, offer a copy of the recorded conversation, or a transcription, to the interviewee
• Express to the individual that the information given is important, but put the person at ease. Explain the purpose of the interview and your role. Express sincere concern regarding the accident and your desire to prevent a similar occurrence
• Interview witnesses separately, and ensure witnesses can discuss the incident with you in relative privacy where possible. Don’t promise confidentiality though
• Take the witness to the scene if they are comfortable. If you can’t conduct a private interview at the location, find an office or meeting room that the interviewee considers a "neutral" location
- Allow witnesses to have a support person present, but ensure the support person is not directly linked to the incident and is not a witness. If there is a collective bargaining agreement, and a worker requests union representation, do not continue the interview until representation has been secured.

- Direct an eyewitness to “explain what happened” in their own words. If you don’t ask them to explain, you may be left with a simple “Yes” or No” response, which is not as helpful. Open-ended questions elicit much more information than closed-ended questions. “Why” questions can put an interviewee on guard. Look for facts and observations; ignore speculation.

- Take notes casually, but with care. Allow the interviewee to review notes of the interview to ensure accuracy and help bring details to mind. Give the interviewee a copy of the notes you take to help reduce any thought that you’re trying to conceal information.

- Repeat the facts and sequence of events back to the person to avoid misunderstanding, and to establish the correct version of events.

- Request interviewees to offer their own suggestions as to how the incident could have been avoided.

- Conclude interviews by thanking interviewees for their contribution. Ask them to contact you if they think of anything else. If possible, tell witnesses personally of the outcome of the investigation before it becomes public knowledge.

Consult Records

When searching for information, investigations will continue after evaluating the scene of the accident, collecting physical evidence and interviewing the people involved. Documents related to the incident can provide incredible insight into the causes of an accident; especially root causes.

Some examples of useful documents include:

- Technical data sheets
- Inspection reports
- Company policies
- Maintenance reports
- Past accident reports
- Job hazard analyses and safe-work procedures
- Training records and reports
- Work schedules
- Injury and illness logs
- Any other document that may shed light on the safety-related systems in place where the accident took place

Determining the causes of the accident based on available information may be difficult because events must be analyzed not only to identify direct causes for the accident, but also related root causes. “Surface” causes can be obvious. However, it may take a great deal of additional time to unearth weaknesses in management systems, or other root causes that contributed to the conditions and practices associated with the accident.
ORGANIZE AND ANALYZE THE FACTS

Develop Sequence of Events

When all of the evidence is collected, and all the interviews are complete, a timeline of the accident should emerge. Each event on the timeline describes an actor and an action. The actor effects change through action or inaction. Actors do not have to be personnel. Equipment or processes can affect the system to precipitate an accident.

When developing the sequence of events, do not hesitate to stretch the timeline further back as deeper causes begin to emerge. Accidents often result from long-term oversights and failures that have taken some time to have a negative impact.

If gaps in the timeline are apparent, they need to be filled in. If re-interviewing witnesses or investigating the evidence fails to fill the gaps, develop an “educated guess” supported by the rest of the timeline and available evidence.

The sequence of events must describe what happened in such a way that someone unfamiliar can understand what likely happened.

Determine the Causes

When the timeline is established, the next step is to determine the causes of the accident. The key question for an investigator to establish cause is “Why?” Why did an unsafe condition emerge in the workplace? Why did the worker end up exposed to the unsafe condition? Determining the root causes of an accident requires asking “Why?” over and again.

Implement Solutions

Although an accident investigation can be a reactive safety process, it typically ends in recommendations for effective control strategies and system improvements that will help prevent similar accidents in the future.

WRITE THE REPORT

An accident or incident investigation aims to create systemic change and ensure everyday safeguards remain in place to reduce risk and promote safety in the workplace. However, the information uncovered in the investigation, and recommendations that come from the investigation, need to be available to people with authority. A report that includes the pertinent information about the causes of an incident, as well as concrete recommendations, helps the investigation to positively affect the safety culture of US Trades, LLC.

Please see the “Accident/Incident Report” at the end of this chapter for an example template for an incident report.

Background: This section of the report covers the basic information about the accident: when and where the accident occurred, who was involved, etc.
Description: The description of the incident is a timeline of the incident, a step-by-step narrative of what occurred. The incident and the findings of the investigation will determine how far before and after the incident itself, the narrative should stretch. Include enough information to give a person who was not there a clear understanding of the accident. Be specific. Include a diagram of the event.

Findings: Report results of the root-cause analysis with complete thoughts, not short notes. Remember to describe both hazardous conditions and unsafe actions. Findings need to include direct and indirect surface causes. Findings must also clearly outline the root causes of the accident and frame recommendations. Remember, the point of the investigation is not to assign blame. Findings will describe unsafe actions of individuals, but any lack of hazard controls, or deficient safety systems, at the organizational level is what the report aims to remedy.

Recommendations: Recommendations can only be as effective as the findings on which they are based. In the report, recommendations need to be specific and help those in authority take the first steps to implement the recommendations. Include who will be responsible to implement the recommendations, a timeline, and estimated cost—if that can be determined.

Summary: Review the causes of the accident and the corrective steps that are recommended.

Review and Follow-up: This can be included as part of the recommendations. Necessary changes require a system of accountability. Suggesting a specific timeframe and identifying individuals with appropriate authority to enact recommendations will drive the needed changes. Incorporating accident follow-up and accountability is a useful way to build widespread accountability for the types of safety system changes workplace accidents often demand.

Attachments: Be sure to include with the report the notes from interviews, as well as photographs and any other pertinent information and evidence from the investigation.

REPORTING ACCIDENTS

US Trades, LLC will investigate all lost-time injuries. Any fatality, or the hospitalization of three or more employees, must be reported to OSHA within eight hours.

Effective January 1, 2015 any accidents resulting in hospitalization, amputation, and eye loss must be reported within 24 hours (amputations do not include avulsions, enucleations, deglovings, scalpings, severed ears, or broken/chipped teeth.)

Employees will report all accidents and near-miss incidents that result in personal injury, property damage, chemical spills or other emergencies to the assigned supervisor at the time of the event. In addition, emergency medical services, the fire department, and hazmat services will be immediately summoned as needed.

NOTE: Effective Jan. 1, 2017, OSHA will require certain employers to electronically submit injury and illness data that they are already required to record on their onsite Injury and Illness forms.

The new reporting requirements will be phased in over two years:
Establishments with 250 or more employees in industries covered by the recordkeeping regulation must submit information from their 2016 Form 300A by July 1, 2017. These same employers will be required to submit information from all 2017 forms (300A, 300 and 301) by July 1, 2018. Beginning in 2019 and every year thereafter, the information must be submitted by March 2.

Establishments with 20-249 employees in certain high-risk industries must submit information from their 2016 Form 300A by July 1, 2017, and their 2017 Form 300A by July 1, 2018. Beginning in 2019 and every year thereafter, the information must be submitted by March 2.

For a complete list of industries that fall into the “high risk” category, please refer to the compliance section of the following OSHA web location: osha.gov/recordkeeping/finalrule/index.html

**OSHA’s Form 300, 300A and 301**

Unless a company is in a low-hazard industry (see list at right) or employs 10 or fewer individuals, all recordable injuries and illnesses must be recorded appropriately. See 1904.7 — Recordkeeping Forms and Recording Criteria.

If an employee with an occupational injury or illness receives a medical emergency procedure, Kert Stiller or designate will document the incident on OSHA’s Form 301 “Injury and Illness Incident Report” and record the injury or illness on OSHA’s Form 300 “Log of Work Related Injuries and Illnesses.”

Yearly, OSHA’s form 300A “Summary of Work-Related Injuries and Illnesses,” will be completed based on the information in form 300 and posted between February 1 and April 30 of the year following the year covered by the form.

**FORMS AND ATTACHMENTS**

Please find the documents listed below on the following pages:

- Accident/Incident Report
- Accident Investigation Training Documentation

These forms may be reproduced freely by US Trades, LLC for the purpose of implementing and maintaining a safety and health program.

OSHA reporting forms and work-related injury and illness logs are available at:
<table>
<thead>
<tr>
<th>Date of Accident</th>
<th>Time</th>
<th>Day of Week</th>
<th>Shift</th>
<th>Department</th>
</tr>
</thead>
<tbody>
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<td>☐ S ☐ M ☐ T ☐ W ☐ T ☐ F ☐ S ☐ 1 ☐ 2 ☐ 3</td>
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</tbody>
</table>

### Injured Person

<table>
<thead>
<tr>
<th>Name</th>
<th>Age</th>
<th>Address</th>
<th>Phone</th>
<th>Supervisor Name</th>
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</thead>
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<table>
<thead>
<tr>
<th>Length of Employment at Company</th>
<th>Length of Employment at Job</th>
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</thead>
<tbody>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Employment Classification</th>
<th>☐ Full Time ☐ Part Time ☐ Contract ☐ Temporary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment Classification</td>
<td>☐ Full Time ☐ Part Time ☐ Contract ☐ Temporary</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Nature of Injury</th>
<th>☐ Bruising</th>
<th>☐ Dislocation</th>
<th>☐ Other (specify)</th>
<th>Injured Body Part</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strain/Sprain</td>
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<tr>
<td>Scratch/Abrasion</td>
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<tr>
<td>Internal</td>
<td></td>
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<tr>
<td>Fracture</td>
<td></td>
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<tr>
<td>Amputation</td>
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<tr>
<td>Foreign Body</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Injured Body Part</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Nature of Injury</th>
<th>☐ Laceration/Cut</th>
<th>☐ Burn/Scald</th>
<th>☐ Chemical Reaction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Treatment</td>
<td>Name and Address of Treating Physician or Facility</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ First Aid</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ Emergency Room</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ Doctor’s Office</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ Hospitalization</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Damaged Property</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property, Equipment, or Material Damaged</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Object or Substance Inflicting Damage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Incident Description</td>
</tr>
<tr>
<td>----------------------</td>
</tr>
<tr>
<td>Describe what happened (attach photographs or diagrams if necessary)</td>
</tr>
</tbody>
</table>

Make sketches or illustrations to help describe incident
### Accident/Incident Report Form (Page 3 of 3)

**Root Cause Analysis (check all that apply)**

<table>
<thead>
<tr>
<th>Unsafe Acts</th>
<th>Unsafe Conditions</th>
<th>Management Deficiencies</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Improper work technique</td>
<td>□ Poor workstation design/layout</td>
<td>□ Lack of written policies and procedures</td>
</tr>
<tr>
<td>□ Safety rule violation</td>
<td>□ Congested work area</td>
<td>□ Safety rules not enforced</td>
</tr>
<tr>
<td>□ Improper PPE or PPE not used</td>
<td>□ Hazardous substances</td>
<td>□ Hazards not identified</td>
</tr>
<tr>
<td>□ Operating without authority</td>
<td>□ Fire or explosion hazard</td>
<td>□ PPE unavailable</td>
</tr>
<tr>
<td>□ Failure to warn or secure</td>
<td>□ Inadequate ventilation</td>
<td>□ Insufficient worker training</td>
</tr>
<tr>
<td>□ Operating at improper speeds</td>
<td>□ Improper material storage</td>
<td>□ Insufficient supervisor training</td>
</tr>
<tr>
<td>□ Bypassing safety devices</td>
<td>□ Improper tool or equipment</td>
<td>□ Improper maintenance</td>
</tr>
<tr>
<td>□ Guards not used</td>
<td>□ Insufficient knowledge of job</td>
<td>□ Inadequate supervision</td>
</tr>
<tr>
<td>□ Improper loading or placement</td>
<td>□ Slippery conditions</td>
<td>□ Inadequate job planning</td>
</tr>
<tr>
<td>□ Improper lifting</td>
<td>□ Poor housekeeping</td>
<td>□ Inadequate hiring practices</td>
</tr>
<tr>
<td>□ Servicing machinery in motion</td>
<td>□ Excessive noise</td>
<td>□ Inadequate workplace inspection</td>
</tr>
<tr>
<td>□ Horseplay</td>
<td>□ Inadequate hazard guards</td>
<td>□ Inadequate equipment</td>
</tr>
<tr>
<td>□ Drug or alcohol use</td>
<td>□ Defective tools/equipment</td>
<td>□ Unsafe design or construction</td>
</tr>
<tr>
<td>□ Unnecessary haste</td>
<td>□ Insufficient lighting</td>
<td>□ Unrealistic scheduling</td>
</tr>
<tr>
<td>□ Unsafe act of others</td>
<td>□ Inadequate fall protection</td>
<td>□ Poor process design</td>
</tr>
<tr>
<td>□ Other:</td>
<td>□ Other:</td>
<td>□ Other:</td>
</tr>
<tr>
<td></td>
<td>□ Poor work station design/layout</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ Congested work area</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ Hazardous substances</td>
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<tr>
<td></td>
<td>□ Fire or explosion hazard</td>
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<td>□ Inadequate ventilation</td>
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<td>□ Improper material storage</td>
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<td>□ Insufficient lighting</td>
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<td>□ Inadequate fall protection</td>
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<tr>
<td></td>
<td>□ Other:</td>
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</tbody>
</table>

#### Accident/Incident Analysis

Using the root-cause analysis list, explain the cause(s) of the incident in as much detail as possible. Attach a sheet if there is not enough room.

<table>
<thead>
<tr>
<th>How bad could the accident have been?</th>
<th>□ Very Serious  □ Serious  □ Minor</th>
</tr>
</thead>
<tbody>
<tr>
<td>How is the chance of the accident happening again?</td>
<td>□ Frequent  □ Occasional  □ Rare</td>
</tr>
</tbody>
</table>
# Accident/Incident Report Form

## Recommendations and Follow Up

<table>
<thead>
<tr>
<th>Describe actions that will be taken to prevent recurrence (attach another sheet if necessary)</th>
<th>Deadline</th>
<th>By Whom</th>
<th>Complete</th>
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## Summary

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</tbody>
</table>

## Investigation Team

<table>
<thead>
<tr>
<th>Name</th>
<th>Signature</th>
<th>Position</th>
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<tbody>
<tr>
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POLICY

US Trades, LLC is committed to the safety and health of our employees and to ensuring prompt medical attention for any injury that occurs at work.

Part of that commitment includes having readily available medical personnel. Where there is no medical facility close to the worksite, Kert Stiller and other personnel as needed will be trained to provide first aid. First-aid kits are located at: clients job trailers

US Trades, LLC will provide, at no cost, medical services for employee evaluations, employment requirements and special conditions of work.

EMPLOYER RESPONSIBILITIES

It is the responsibility of US Trades, LLC to:

- Verify that all employees receive training that explains the first-aid response plan
- Determine who must be trained to render first aid and ensure every employee expected to render first aid will be trained in appropriate practices and techniques, including response to site-specific hazards
- Check that the first-aid response plan, amount of first-aid-trained personnel, first-aid equipment and all other hazard controls protect against the workplace hazards as determined in job hazard analyses and worksite inspections
- Check that first-aid kits remain fully stocked and any emergency response equipment is in good repair
- Respond to recommendations and concerns from US Trades, LLC employees

EMPLOYEE RESPONSIBILITIES

All employees are expected to:

- Follow the first-aid policy and the first-aid response plan
- Understand the hazards presented by “Good Samaritan” first aid response

TRAINING

US Trades, LLC will ensure every employee receives training that covers the US Trades, LLC first-aid response plan. All personnel expected to render first aid will be certified by an approved first-aid training organization. All training for workplace safety will be provided at no cost to the employee during working hours.

US Trades, LLC will provide training:

- At the time of assignment to tasks where occupational exposure may take place.
- At least annually thereafter, annual training will be provided within one year of previous training.
US Trades, LLC will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

**Training Components**

The training program for medical services and first aid will contain at a minimum the following elements:

- Location and contents of workplace first-aid kits
- “Good Samaritan” hazards and bloodborne pathogens
- Self-care and incident reporting

The person conducting the training will be knowledgeable in the subject matter of the training program as it relates to the workplace.

Any US Trades, LLC employee who is expected to render first aid as part of his or her job duties, will receive additional training from an external organization (e.g. American Heart Association, American Red Cross, and the National Safety Council) including, but not limited to:

- Recommended first-aid practices, especially those that may be necessary for hazards specific to the US Trades, LLC workplace
- Bloodborne pathogen exposure control
- Cardiopulmonary resuscitation incorporating use of automated external defibrillators (if present at worksite)

If a third-party first aid training provider is unable to provide first aid training specific to hazards at US Trades, LLC, first aid responders require supplementary training over the appropriate response to injuries that may result from worksite-specific hazards.

**Potential First Aid Training Elements**

OSHA suggests a number of elements to include when planning first-aid training programs.

**Teaching Methods**

Training programs will incorporate the following principles:

- Basing the curriculum on a consensus of scientific evidence where available
- Having trainees develop “hands-on” skills through the use of mannequins and partner practice
- Having appropriate first-aid supplies and equipment available
- Exposing trainees to acute injury and illness settings as well as to the appropriate response through the use of visual aids
- Including a course information resource for reference both during and after training
- Allowing enough time for emphasis on commonly occurring situations
- Emphasizing skills training and confidence-building over classroom lectures
- Emphasizing quick response to first-aid situations
First Aid Training Elements
The training program will include instruction in repositioning ill/injured victims to prevent further injury.

Preparing to Respond to a Health Emergency
The training program will include instruction or discussion in the following:

- Prevention as a strategy in reducing fatalities, illnesses and injuries
- Interacting with the local EMS system
- Maintaining a current list of emergency telephone numbers (police, fire, ambulance, poison control) accessible to all employees
- Understanding the legal aspects of providing first-aid care, including Good Samaritan legislation, consent, abandonment, negligence, assault and battery, State laws and regulations
- Understanding the effects of stress, fear of infection, panic; how they interfere with performance; and what to do to overcome these barriers to action
- The importance of universal precautions and body substance isolation to provide protection from bloodborne pathogens and other potentially infectious materials
- Learning about personal protective equipment — gloves, eye protection, masks, and respiratory barrier devices
- Appropriate management and disposal of blood-contaminated sharps and surfaces; and awareness of OSHA’s Bloodborne Pathogens standard 29 CFR 1910.1030

Training Records
Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

US Trades, LLC will maintain employee-training records for the length of their employment.

First aid training courses provided to US Trades, LLC employees will include instruction in general and workplace hazard-specific knowledge and skills.

First-aid trained employees will repeat training periodically to maintain and update knowledge and skills.

First Aid Response Planning
Kert Stiller, working with management, will determine a first-aid response plan appropriate to the worksite.

The first-aid response plan can be incorporated into the emergency action plan and will:
• Fit the work location, type of work and environmental conditions
• Identify the police, fire and emergency medical services available, and determine their estimated response times to the worksite
• Verify they are trained to handle the types of emergencies that can be expected
• Verify that their contact numbers are posted at the work site
• Describe the type of first-aid training employees receive, if applicable
• Identify the location(s) of first-aid supplies and/or first-aid station
• Identify the contents of first-aid kits
• Describe how first-aid supplies, kits and equipment will be inspected and maintained
• List all first-aid trained employees

Sharing First Aid Response Plan Information

First-aid policies and procedures are most effective when they are in writing. Whether in writing or not, the first-aid response plan needs to be communicated in such a way that every worker, can understand and follow the plan.

IMPLEMENTATION

Hazard Assessment

A job hazard analysis (see chapter on “Job Hazard Analysis”) will define the extent and nature of first-aid training for a given job and determine the first-aid supplies that need to be available.

First Aid Kits

First-aid supplies will remain available in adequate quantities and be readily accessible at clients job trailers.

Kert Stiller or a designated person will determine the types and quantities of kits and additional first-aid equipment and supplies required at the work site to accommodate larger operations or multiple operations.

Responding to Medical Emergencies

A wide variety of medical emergencies can occur in the workplace; however, they can be divided into two categories, life threatening and non-life threatening. It’s important for US Trades, LLC first aid providers to be trained to deal with situations as they arise, and to be able to recognize the severity of the emergency. Medical emergencies can include, but are not limited to:

- Chest pain
- Impalements
- Electrocution
- Breathing problems
- Hypoglycemia in diabetics taking insulin
- Pregnancy complications
- Reduced level of consciousness
- Stroke
- Crushing
- Severe bleeding
- Anaphylactic reaction
- Seizures
- Abdominal injury
Assessing the Scene and the Victim(s)

The top priorities of first aid providers when responding to a medical emergency are:

- Assessing the scene for safety, number of injured, and nature of the event
- Assessing the toxic potential of the environment and the need for respiratory protection
- Establishing the presence of a confined space and the need for respiratory protection and specialized training to perform a rescue
- Prioritizing care when there are several injured
- Assessing each victim for responsiveness, airway patency (blockage), breathing, circulation, and medical alert tags
- Taking a victim’s history at the scene, including determining the mechanism of injury
- Performing a logical head-to-toe check for injuries
- Continuous monitoring of the victim
- Early activation of EMS
- Safely moving and rescuing victims

RESPONDING TO LIFE-THREATENING EMERGENCIES

First aid training will be designed for the specific worksite and include first-aid instruction for the management of the following:

**Breathing Problems**

The training program will be designed or adapted for the specific worksite and may include first-aid instruction in the following:

- Establishing responsiveness
- Establishing and maintaining an open and clear airway
- Performing rescue breathing
- Treating airway obstruction in a conscious victim
- Recognizing asphyxiation and the danger of entering a confined space without appropriate respiratory protection

Additional training is required if first-aid personnel will assist in the rescue from the confined space.

**Poisoning**

- Ingested poisons: alkali, acid, and systemic poisons. Role of the Poison Control Center (1-800-222-1222)
- Inhaled poisons: carbon monoxide; hydrogen sulfide; smoke; and other chemical fumes, vapors, and gases. Assessing the toxic potential of the environment and the need for respirators
- Knowledge of the chemicals at the worksite and of first aid and treatment for inhalation or ingestion
- Effects of alcohol and illicit drugs so that the first-aid provider can recognize the physiologic and behavioral effects of these substances
Physical Injuries

US Trades, LLC first aid providers will be able to:

- Recognize the signs and symptoms of shock and provide first aid for shock due to illness or injury
- Assess and treat a victim who has an unexplained change in level of consciousness or sudden illness
- Control bleeding with direct pressure

Sudden Cardiac Arrest

Cardiopulmonary Resuscitation

OSHA standards require training in cardiopulmonary resuscitation (CPR) in some employment situations where sudden cardiac arrest from asphyxiation, electrocution or exertion may occur: permit-required confined spaces; logging operations; electric power generation, transmission, and distribution; dive teams; and power transmission and distribution construction. However, sudden cardiac arrest is a potential risk at all worksites and those trained in first aid benefit greatly from learning CPR regardless of work hazards.

Automated External Defibrillators

US Trades, LLC will determine the need for an automated external defibrillator (AED) program as part of the first-aid response plan. Training will reflect whether an AED is included.

If an AED is available at the worksite, CPR training will incorporate AED training.

Corrosive Materials, Strong Irritants or Toxic Chemicals

If a job hazard analysis determines hazards from corrosive materials, strong irritants or toxic chemicals, the US Trades, LLC first-aid plan will include appropriate hazard controls. These controls include eye irrigation equipment, eyewash stations and emergency showers.

Even worksites without high-risk levels from corrosives, irritants and toxic chemicals may find eye-irrigation equipment and eyewash equipment appropriate to address workplace hazards. Be aware that some state requirements and specific chemical safety procedures require such equipment on worksites. Where such requirements exist, US Trades, LLC will adhere to applicable workplace safety and health regulations, and industry best practices.

At construction jobsites, employers must provide a sanitary washing facility for every 20 employees. At jobsites where employees work with paint, coatings, or any substance that may be harmful, the facilities must include suitable cleaning agents/towels for the removal of hazardous and other substances.
Bloodborne Pathogens

If an employee is designated to render first aid as part of his or her job duties, or if they may otherwise be exposed to the hazard of bloodborne pathogens, the employee must meet the requirements of 29 CFR 1910.1030, Bloodborne Pathogens, and must be trained accordingly. Additional requirements may also apply. Please see the chapter on “Bloodborne Pathogens” for more information.

Employees who have not received first-aid training need to understand the hazards presented by delivering first aid to a coworker. While US Trades, LLC discourages the administration of first aid by any employee who has not been trained in first aid, “Good Samaritan” first-aid delivery is a possibility if necessary.

RESPONDING TO NON-LIFE-THREATENING EMERGENCIES

First aid training will be designed for the specific worksite and include first-aid instruction for the management of the following:

Wounds
- Assessment and first aid for wounds including abrasions, cuts, lacerations, punctures, avulsions, amputations and crush injuries
- Principles of wound care, including infection precautions
- Principles of body substance isolation, universal precautions and use of personal protective equipment

Burns
- Assessing the severity of a burn
- Recognizing whether a burn is thermal, electrical, or chemical and the appropriate first aid
- Reviewing corrosive chemicals at a specific worksite, along with appropriate first aid

Temperature Extremes
- Exposure to cold, including frostbite and hypothermia
- Exposure to heat, including heat cramps, heat exhaustion and heat stroke

Musculoskeletal Injuries
- Fractures
- Sprains, strains, contusions and cramps
- Head, neck, back and spinal injuries
- Appropriate handling of amputated body parts

Eye Injuries
- First aid for eye injuries
- First aid for chemical burns
Mouth and Teeth Injuries

- Oral injuries; lip and tongue injuries; broken and missing teeth
- The importance of preventing aspiration of blood and/or teeth

Bites and Stings

- Human and animal bites
- Bites and stings from insects; instruction in first-aid treatment of anaphylactic shock

RECORD KEEPING

All safety and health incidents and near misses will be documented and investigated according to the policy on “Accident Investigation.” This includes prompt notification to OSHA of fatalities and may include other reporting requirements.

PROGRAM REVIEW

Kert Stiller will review the first-aid response plan and all elements at least annually to ensure all elements sufficiently address the safety needs of US Trades, LLC and its employees. Recommended first-aid techniques and knowledge change over time, and US Trades, LLC policy will reflect those changes.

FORMS AND ATTACHMENTS

On the following page, please find a First-Aid Response Plan form that you can use to create your companies plan.
<table>
<thead>
<tr>
<th>Company</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>This plan was written for (site or location this plan covers)</td>
<td></td>
</tr>
</tbody>
</table>

The following person/position is responsible for managing our first-aid response plan

The emergency medical service to be called

Summon the emergency medical service by doing the following (in most cases, it will be to call 911 or some other phone number, but a direct alarm or some other method may be the preferred way)

Emergency phone numbers are posted at the following location(s)

Other means to summon aid are at the following location

When employees need first aid they must do the following

Employees on site who are first-aid trained
### First Aid Response Plan Form (Page 2 of 2)

<table>
<thead>
<tr>
<th>First-aid kits (or a first aid station) are located at</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

The following person/position is responsible for inspecting the first-aid kits

|                                                      |
|                                                      |
|                                                      |

The Company’s Designated Medical Provider is

|                                                      |
|                                                      |
|                                                      |

<table>
<thead>
<tr>
<th>Person Preparing Plan</th>
<th>Signature</th>
<th>Date</th>
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<table>
<thead>
<tr>
<th>Supervisor’s Name</th>
<th>Signature</th>
<th>Date</th>
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POLICY

US Trades, LLC is committed to the safety and health of our employees and to preventing the spread of bloodborne pathogens. Therefore, US Trades, LLC adheres to the following bloodborne pathogen policy and Exposure Control Plan (ECP).

Bloodborne pathogens are diseases caused by microorganisms that live in the bloodstream and are spread through blood and other body fluids. Bloodborne pathogens include the human immunodeficiency virus (HIV), hepatitis B virus (HBV) and hepatitis C virus (HCV). HIV compromises the body’s immune functions and can lead to acquired immunodeficiency syndrome. While the virus does not live out of the body for long, it can enter the bloodstream through cuts, abrasions, small tears in mucous membranes, etc. Hepatitis affects the health of the liver.

Bloodborne pathogens can be transmitted through any bodily fluid, and employees must take care when they are near, or are exposed to, possible contaminants, in order to prevent the spread of bloodborne infections.

If employees, such as those designated as responsible for first aid and medical assistance, or those doing work in certain medical or sanitation facilities, are exposed to bloodborne pathogens, will use universal precautions that requires them to treat all human blood and certain human body fluids as if they were known to be infectious. This includes the use of appropriate gloves, mask and/or gowns.

EMPLOYER RESPONSIBILITIES

It is the responsibility of US Trades, LLC to:

- Enact and enforce an exposure control plan to prevent occupational exposure to potentially infectious materials
- Identify employees who may reasonably be anticipated to come into contact with blood and other potentially infectious materials
- Provide for post-exposure evaluation and follow-up if an employee is exposed to potentially infectious materials
- Verify employees receive appropriate bloodborne pathogens training
- Check that there’s an adequate supply of Personal Protective Equipment

EMPLOYEE RESPONSIBILITIES

Every employee is expected to:

- Offer input on ECP as appropriate, including identification, evaluation, and selection of new control methods
- Follow all elements of the bloodborne pathogens policy and training
- Notify a supervisor if they encounter any problems or concerns related to this policy

TRAINING

US Trades, LLC will ensure every employee who may reasonably anticipate coming into occupational exposure to potentially infectious materials, participate in a bloodborne pathogen training program. This training will be provided at no cost to the employee during working hours.
Training will be provided:

- At the time of assignment to/prior to working on tasks where occupational exposure may take place
- At least annually thereafter

US Trades, LLC will provide additional training when tasks or procedures are added or changed that affect the employee’s occupational exposure. It is acceptable for additional training to be limited to addressing only the changes or additions to the employees’ exposure.

The Company will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

**Training Components**

The training program will contain, at a minimum, the following elements:

- A general explanation of bloodborne diseases
- An explanation of the modes of transmission of bloodborne pathogens
- An explanation of the methods for recognizing tasks and other activities that could cause exposure to blood and other potentially infectious materials
- An explanation of methods to prevent or reduce exposure, including engineering controls, work practices, and personal protective equipment
- Information on the types, proper use, location, handling, decontamination and disposal of PPE
- Information on the hepatitis B vaccine, the benefits of being vaccinated and that the vaccine and vaccination will be offered free of charge to employees who face occupational exposure
- Information on the actions to take and persons to contact in an emergency involving blood or other potentially infectious materials
- An explanation of the procedures to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- An explanation of the applicable signs, labels, and/or color coding

The training will be conducted by a person knowledgeable in the subject matter.

**Training Records**

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.
PROCEDURES

Exposure Determination

It is crucial to determine what jobs expose an employee to blood and other potentially infectious material, as well as how that exposure might occur. Accordingly, management will determine which job classifications can reasonably expect occupational exposure to potentially infectious material.

The following will be determined and documented:

- Job classifications in which all employees have occupational exposure
- Job classifications in which some employees have occupational exposure
- Tasks and procedures in which occupational exposure occurs

Further, input from non-managerial employees exposed to contaminated sharps and infectious material is vital to the success of this exposure control plan, and every employee is encouraged to offer suggestions that will help the effectiveness of the exposure control plan.

Methods of Compliance

Employees will take universal precautions to prevent contact with potentially infectious material. If an employee can’t easily determine the nature of a body fluid, he or she must treat it as infectious.

Engineering and Work Practice Controls

As part of this exposure control plan, US Trades, LLC will seek methods by which to eliminate occupational exposure to the greatest extent possible. This plan encourages work task changes to reduce exposure, as well as for isolating or removing materials that might pose a hazard. The exposure control plan requires the Company to examine regularly, and maintain or replace, engineering controls to ensure their effectiveness.

Handwashing

- US Trades, LLC will provide readily accessible handwashing facilities to every employee. If providing handwashing facilities is not feasible, the Company will provide antiseptic towelettes or an appropriate antiseptic hand cleanser in conjunction with clean cloth/paper towels.
- For construction projects, employers must provide onsite general washing facilities (one per 20 employees), keep them in sanitary condition and provide suitable cleaning agents/towels for the removal of hazardous and other substances.
- In addition to basic workplace hygiene requirements, employees will wash their hands as soon as possible after removing gloves or other PPE.
- If an employee’s skin or mucous membrane were exposed to potentially infectious materials, the employee will immediately wash their skin with soap and water or flush their mucous membranes with water.
Sharps

- Employees will handle and dispose of contaminated sharps in a way that prevents unnecessary exposure to hazards. Employees will not bend, recap or remove contaminated sharps unless no alternative is feasible and the employee can accomplish any bending, recapping or needle removal using a mechanical device or one-handed technique.
- As soon as possible after use, contaminated reusable sharps will be placed in a container that is puncture resistant, labeled or color-coded appropriately, leak-proof on the sides and bottom, constructed in a manner that does not require employees to reach into it to use it.

Other Engineering and Work-Practice Controls

- Employees may not eat, drink, smoke, apply cosmetics or handle contact lenses where occupational exposure may occur.
- No food or drink is to be stored where potentially infectious materials are present.
- Employees may not use their mouths to pipette or suction potentially infectious materials.
- Containers used to store or transport potentially infectious materials must be closable, prevent leaks and be appropriately labeled or color-coded. They should also be puncture resistant, if necessary.
- Employees will examine any equipment that may be contaminated before servicing or shipping, and will decontaminate it as necessary and feasible. If decontamination is impossible, the employee will attach a label to the equipment, and inform all appropriate personnel of the contamination to ensure they take proper precautions.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Where the possibility of occupational exposure exists, US Trades, LLC will provide personal protective equipment appropriate to the hazards and the work being performed. Appropriate personal protective equipment is impermeable to blood or other potentially infectious material under normal conditions and durations of use.
- PPE will be provided free to employees and available in appropriate sizes, and provisions will be made for employees who are allergic to gloves normally provided.
- An employee may decline using appropriate PPE under “rare and extraordinary circumstances” when PPE use might prevent the delivery of health care or public safety services. These exceptions will be investigated and documented to prevent future occurrences.
- PPE will be removed as soon as feasible before leaving the general work area. After removal, the employee will place contaminated PPE in an appropriate area or container to be stored, washed, decontaminated or disposed of.

Gloves

Employees must wear gloves if they anticipate hand contact with potentially infectious materials. Do not reuse single-use gloves, and replace as quickly as possible if torn, punctured or otherwise compromised.
Masks, Eye Protection, and Face Shields

Employees will wear masks, together with proper eye-protection devices whenever splashes, spray, spatter, or droplets of blood or other potentially infectious materials may be generated and eye, nose or mouth contamination can be reasonably anticipated.

Gowns, Aprons, etc.

Employees will wear appropriate protective clothing like gowns or clinic jackets when appropriate; the type of protective clothing is determined by the nature of exposure, and will be sufficient to protect against occupational exposure.

HOUSEKEEPING

- Employees will keep the workplace clean and sanitary. US Trades, LLC will implement a written schedule for cleaning and decontamination based on the demands of the site
- Employees will use an appropriate disinfectant to clean and decontaminate contaminated or potentially contaminated work surfaces after any spill of infectious materials, and at the end of the work shift. US Trades, LLC will replace protective surface coverings as soon as possible if they are contaminated. Bins, cans, pails or other receptacles that may become contaminated must be inspected and decontaminated regularly, in addition to being decontaminated as soon as feasible after visible contamination. Employees must not pick up, by hand, any broken glassware that may be contaminated. Use a brush/dustpan or tongs

LAUNDRY

Employees will handle any contaminated laundry as little as possible. They must put such laundry into a color-coded or labeled container at the site where it was used. Place wet laundry in a leak-proof container. Employees handling contaminated laundry must use appropriate PPE. Employees must never take or wear contaminated clothing outside of the work site.

HEPATITIS B VACCINATION

US Trades, LLC will make available the hepatitis B vaccination series at no cost to any employee who faces occupational exposure. If not vaccinated, employees will be informed of the opportunity to be vaccinated within 24 hours of an exposure incident.

An employee occupationally exposed to potentially infectious material may decline the hepatitis B vaccine, but must sign a declination statement to be kept on file. Anyone who declines vaccination may request and receive the vaccination later at no cost.

Medical records relating to employees’ hepatitis B vaccination status and post-exposure evaluation and follow-up must be kept for 30 years plus the duration of employment.

If an exposure incident occurs, the employee must contact Kert Stiller (or designate), immediately.
In Case of Exposure

A licensed health care professional will conduct a confidential medical evaluation and follow-up, and will provide a medical opinion on diagnosis/course of action, as soon as possible following an exposure incident. After administering initial first aid (cleaning the wound, flushing the eyes or other mucous membranes, etc.), follow the procedure below:

1. Document the routes of exposure and how the exposure occurred.

2. Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law).

3. Obtain consent, and arrange to have the source individual tested as soon as possible, to determine HIV, HCV and HBV infectivity, document and notify the employee’s health care provider of the source individual’s test results. If the source individual is known to be HIV, HCV and/or HBV positive, new testing is not necessary.

4. Provide the exposed employee with the source individual’s test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality).

5. After obtaining consent, collect the exposed employee’s blood as soon as feasible after an exposure incident, and test the blood for HBV and HIV serological status. This will establish a baseline for periodic testing over the next six months. Depending upon the circumstances of the exposure, post-exposure prophylaxis may be recommended to reduce the risk of infection from HIV or HBV.

6. If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible.

Administrative Responsibilities Following Exposure

The Company will ensure that the health care professional responsible for post-exposure evaluation and follow-up receives the following:

- A copy of OSHA’s bloodborne pathogens standard
- A description of the employee’s job duties relevant to the exposure incident
- Route(s) of exposure
- Circumstances of exposure
- Results of the source individual’s blood test if possible
- Relevant employee medical records, including vaccination status
- The Company will provide the employee with a copy of the evaluating healthcare professional’s written opinion within 15 days of the completion of the evaluation
Counseling

The Company will make post-exposure counseling available to employees following an exposure incident. Counseling should include Centers for Disease Control and Prevention (CDC) recommendations for prevention and transmission of bloodborne infections including HIV, HBV and HCV. Counseling must be made available regardless of the employee’s decision to accept serological testing.

RECORDKEEPING

Medical Records

The Company will maintain a confidential medical record for every employee with occupational exposure that will include at least the following:

- Name and social security number of the employee
- Copy of the employee’s HBV status (with dates of all Hep B vaccinations)
- Copy of all post-exposure documentation and healthcare professional’s written opinion
- Copy of the information provided to the healthcare professional

Do not share or report this record unless the employee provides written consent

Sharps Injury/Exposure Incident Log

A Sharps Injury Log is a record of each exposure incident involving a sharp. The purpose of the Sharps Injury Log is to generate a record of exposure incidents that will include enough information about the cause of the incidents to allow the company to analyze them and take preventive action.

The Sharps Injury Log must include:

- The date and time of the sharps-related exposure incident
- The type and brand of the sharp involved in the incident
- A description of the incident including:
  - The job classification of the exposed employee
  - The department or work area where the incident occurred
  - The procedure being performed
  - How the incident occurred
  - The body part injured
  - For sharps with engineered sharps injury protection (ESIP), if the safety mechanism was activated
  - If the incident occurred before action, during activation or after activation of the mechanism. For sharps without ESIP, the employee’s opinion if ESIP could have prevented the injury

Sharps injuries/exposures must be recorded on the log within 14 working days of when the incident was reported to the employer. The Sharps Injury Log must be maintained for five years from the date of the occurrence of the exposure incident.
HAZARD COMMUNICATION

Label containers of regulated biological waste, any container used to store or transport potentially infectious material, as well as contaminated equipment, to prevent exposure. Labels for such containers will include the legend depicted in Figure 1.

All such labels will be fluorescent orange or orange-red and be attached on, or as close as feasible to, the container.

REVIEW AND UPDATE OF EXPOSURE CONTROL PLAN (ECP)

Management will review this ECP and update it at least annually, and whenever necessary, to reflect new or changed tasks and procedures that affect occupational exposure.

Reviews and updates will:

- Reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens
- Document the annual consideration and implementation of effective medical, and commercially available, devices and services designed to eliminate or minimize occupational exposure

The Company will seek the input of non-managerial employees to identify, evaluate and select controls to reduce occupational exposure. This input will be documented as part of this ECP.

FORMS AND ATTACHMENTS

Please find the following documents on the pages below:

- Exposure Control Plan Documentation
- Declination Statement
- Exposure Incident Report
- Evaluating Physician’s Written Opinion
- Sharps Injury Log

These forms may be reproduced freely for the purposes of implementing and maintaining a safety and health program.
## Exposure Control Plan Documentation Form

### Exposure Determination

<table>
<thead>
<tr>
<th>Jobs in which all employees have occupational exposure to potentially infectious materials</th>
<th>Task or procedure where exposure occurs</th>
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<th>Jobs in which some employees have occupational exposure to potentially infectious materials</th>
<th>Task or procedure where exposure occurs</th>
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### Engineering Controls and Work Practice Controls

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### The following types of PPE are available in the following locations

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<th>Location</th>
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Hepatitis B Declination Statement Form

DECLINATION STATEMENT

I understand that due to my occupational exposure to blood or other potentially 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 Hepatitis 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

DECLINATION STATEMENT

I understand that due to my occupational exposure to blood or other potentially 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 Hepatitis 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

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Employee Signature

Date
# Exposure Incident Report Form (Page 1 of 2)

## (Routes and Circumstances of Exposure Incident) – Please Print

<table>
<thead>
<tr>
<th>Employee's Name</th>
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<td>Date of Birth</td>
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<tr>
<td>Telephone</td>
<td>Business</td>
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<td>Job Title</td>
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<td>Date of Exposure</td>
<td>Time of Exposure</td>
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<td>Hepatitis B Vaccination Status</td>
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<td>Location of Incident</td>
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**Describe job duties you were performing when the exposure incident occurred**

**Describe the circumstances under which the exposure incident occurred (What happened that resulted in the incident?)**

**What body fluid(s) were you exposed to?**
## Exposure Incident Report Form (Page 2 of 2)

<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
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<tr>
<td>What was the route of exposure? (e.g., mucosal contact, contact with non-intact skin, percutaneous)</td>
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<td>Describe any personal protective equipment in use at time of exposure incident</td>
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<td>Did PPE fail? Yes □ No □</td>
<td>If yes, how?</td>
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<td>Identification of source individual(s) (names)</td>
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<td>Other pertinent information</td>
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To the Evaluating Physician:

This employee may have suffered an exposure incident to a Bloodborne Pathogen. In accordance with OSHA standards, covering post-exposure evaluation and follow up, the following documents are provided for you:

- A copy of OSHA regulations covering Occupational Exposure to Bloodborne Pathogens
- A description of the exposed employee’s duties as they relate to the exposure incident
- Documentation of the routes of exposure and circumstances under which exposure occurred
- Results of the source individual’s blood testing, if available
- All medical records relevant to this employee’s appropriate treatment, including vaccination status

After you have determined whether there are contra-indications to vaccination of this employee with Hepatitis B vaccine, please state in the space below if:

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<th>Vaccine was indicated</th>
<th>Vaccine was received</th>
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(All other findings are to remain confidential and are not to be included on this page)

Please return this sheet to this employee

Thank you for your evaluation of this employee.

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<th>Physician’s name (printed)</th>
<th>Physician’s signature</th>
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### SHARPS INJURY LOG

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(Retain at least 5 years)
POLICY

US Trades, LLC encourages a safe and healthy work environment. Verbal or physical intimidation, harassment, threats of violence or any violent acts are expressly forbidden. A person who makes threats of violence, exhibits threatening behavior, or engages in violent acts on US Trades, LLC property will be removed from the premises as quickly as safety permits and will be kept off premises pending the outcome of an investigation.

US Trades, LLC is committed to preventing acts of violence and intimidation. US Trades, LLC has adopted a system of controls to prevent workplace violence, mitigate the harm caused by it and otherwise address violence and harassment in the workplace.

Kert Stiller is responsible for implementing and enforcing this policy and will do so with the assistance of management and all employees.

EMPLOYER RESPONSIBILITIES

It is the responsibility of US Trades, LLC to:

- Ensure managers remain committed to preventing aggression and violence
- Document plan to control aggressive or violent behavior in the workplace
- Evaluate reports of workplace violence at least yearly to determine necessary changes to violence prevention policy
- Ensure job hazard analyses include workplace violence hazards
- Exhibit commitment to the safety and health of workers and customers
- Ensure employees understand and fulfill obligations under the violence prevention program
- Establish a program to address medical and psychological repercussions of workplace violence
- Enforce prohibition on sexual harassment

EMPLOYEE RESPONSIBILITIES

US Trades, LLC employees are expected to:

- Contribute to developing procedures to address concerns over safety and security
- Understand and comply with the workplace violence prevention program, and safety and security measures
- Report violent incidents promptly and accurately
- Refrain from hostile and violent acts
- Participate in safety and health committees or teams that receive reports of violent incidents or security problems, make facility inspections and respond with recommendations for corrective strategies
- Participate actively in training programs and share on-the-job experiences that cover techniques to recognize escalating agitation, aggressive behavior or criminal intent
TRAINING

US Trades, LLC will provide training to employees regarding their roles in workplace violence prevention. This training will come at no cost to the employee during working hours.

US Trades, LLC will use only training material that is appropriate in content and vocabulary to the educational level, literacy and language of employees.

Training Components

Kert Stiller will ensure that every employee is trained in the following elements:

- The workplace violence prevention policy
- Risk factors that cause or contribute to assaults
- Early recognition of escalating behavior or recognition of warning signs or situations that may lead to assaults
- Ways to prevent or diffuse volatile situations, manage anger and appropriately
- A standard response action plan for violent situations, including the availability of assistance, response to alarm systems and communication procedures
- Ways to deal with hostile people in the workplace
- Relaxation, stress management and anger control
- Basic self-protection measures
- The location and operation of safety devices such as alarm systems, along with the required maintenance schedules and procedures
- Ways to protect oneself and coworkers, including use of the “buddy system”
- Policies and procedures for reporting and recordkeeping
- Information on multicultural diversity to increase staff sensitivity to racial and ethnic issues and differences
- Policies and procedures for obtaining medical care, counseling, workers’ compensation or legal assistance after a violent episode or injury
- The sexual harassment policy

Managers and Supervisors at US Trades, LLC will be trained in:

- The Company’s Workplace Violence Prevention Program
- Communication skills
- Recognition of aggressive behavior
- Dealing with employee layoffs, job terminations, and discipline; how to assess violence potential of individuals; and take appropriate measures
- Violence prevention, US Trades, LLC security and response procedures
- Addressing problems and conflict promptly
Any employee engaged in a task that faces a high risk of workplace violence (e.g. working alone, especially late at night) will be trained for workplace safety practices specific to the worksite that reduce the risk of workplace violence.

Where US Trades, LLC operations require security personnel, such personnel will receive training specific to the worksite, including the psychological components of handling aggressive and abusive customers, types of disorders and ways to handle aggression and defuse hostile situations.

**Training Records**

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

**PROCEDURES**

**Workplace Violence**

Workplace violence includes violence or the threat of violence against workers. It can occur at or outside the workplace and can range from threats and verbal abuse to physical assaults and homicide. For this policy, workplace violence also includes aggressive behavior, workplace harassment, bullying and intimidation.

US Trades, LLC permits no workplace violence. No negative action will be taken against an employee for reporting any hazardous situation, and appropriate confidentiality considerations will be taken in every instance of such a report.

**High-Risk Occupations**

Workplace violence is a hazard at any worksite for every worker. Some workers, however, are at significantly increased risk, including workers who:

- Exchange money with the public
- Deliver passengers, goods, or services
- Work alone or in small groups, during late night or early morning hours, in high-crime areas, or in community settings and homes with extensive contact with the public

Any US Trades, LLC employee, who faces an increased risk of workplace violence, will be informed of the increased risk, and trained in appropriate practices based on a job hazard analysis of the job. Please see “Workplace Risk Factors” later in this chapter.
Types of Workplace Violence

Type I Criminal Intent: The perpetrator has no legitimate relationship to the business or its employees and may be committing a crime in conjunction with the violence. These crimes can include robbery, shoplifting, trespassing and terrorism.

Type II Customer Client: The perpetrator has a legitimate relationship with the business and becomes violent while being served by the business. This category includes customers, clients, patients, students, inmates, and any other group for which the business provides services.

Type III Worker on Worker: The perpetrator is an employee or past employee of the business who attacks or threatens another employee(s) or past employee(s) in the workplace.

Type IV Personal Relationship: The perpetrator usually does not have a relationship with the business but has a personal relationship with the intended victim. This category includes victims of domestic violence assaulted or threatened while at work.

Horseplay

Horseplay includes playing tricks on coworkers; distracting coworkers; wrestling; showing off; playing punching, kicking, or slapping games; and otherwise drawing focus away from the task to engage in a playful way that disregards safety precautions. Horseplay creates unnecessary hazards in the workplace and presents needless distractions. While horseplay is not necessarily violent, it can have a harmful impact on the safety of US Trades, LLC employees, and is therefore forbidden and will be treated as a workplace violence issue for the sake of this company’s safety and health program.

PROGRAM PLANNING

As with any element of the US Trades, LLC safety and health program, workplace violence prevention requires site-specific and job-specific planning.

Kert Stiller will work with management and appropriate employees to evaluate the ability of US Trades, LLC to prevent workplace violence and handle incidents involving violence to enforce effective protections from workplace violence.

Plans to prevent workplace violence will be evaluated regularly, and when changes are made that affect the risk of workplace violence and when a workplace incident involving violence occurs.

Job Hazard Analyses

Workplace violence risks will be considered in every job hazard analysis performed at US Trades, LLC. If a job or task presents hazards, steps will be taken to control those hazards as soon as safely possible to prevent injury. (See the chapter on “Job Hazard Analysis” in this manual for more information).
Other Planning Considerations

As part of the organization-wide violence prevention program, US Trades, LLC may conduct a screening survey to get employee ideas on the potential for violent incidents and to identify opportunities for improved security measures. These surveys may be repeated as part of the periodic review of this policy.

Independent reviewers such as safety and health professionals, security consultants or law enforcement professionals can provide expert opinions on workplace safety and provide a fresh perspective on preventing workplace violence.

HAZARDS

Violent behavior, like any safety and health risk factor, occurs within a context. Controlling workplace violence hazards first requires identifying them.

Warning Signs of Violence

There is no way to predict all acts of violence; however, the FBI suggests the following indicators of escalating violence risk in an individual:

- Increasing belligerence
- Hypersensitivity to criticism
- Apparent obsession with another person
- Interest in recently publicized violent events
- Extreme disorganization
- Homicidal/suicidal comments or threats
- Ominous, specific threats
- Recent acquisition/fascination with weapons
- Preoccupation with violent themes
- Outbursts of anger
- Noticeable changes in behavior

Workplace Risk Factors

A variety of workplace factors can contribute to violence risk as well, including the following:

- Understaffing
- Frustrations arising from poorly defined job tasks and responsibilities
- Downsizing or reorganization
- Labor disputes and poor labor-management relations
- Inadequate security or a poorly trained, poorly motivated security force
- A lack of employee counseling
- Poor management styles (for example, arbitrary or unexplained orders; over-monitoring; corrections or reprimands in front of other employees, inconsistent discipline)
- A high injury rate or frequent grievances may be clues to problem situations in a workplace

Research indicates that in addition to management oversights, certain job elements increase risk and may indicate the need for greater care when performing job hazard analysis and violence prevention planning.

These factors include the following:
US TRADES, LLC IIPP

- Contact with the public
- Exchange of money
- Delivery of passengers, goods, or services
- Having a mobile workplace
- Working with unstable or volatile people
- Working alone or in small numbers
- Working late at night or during early morning hours
- Working in high-crime areas
- Guarding valuable property
- Working in community-based settings

**CONTROLS**

US Trades, LLC will identify and implement effective controls to protect workers against violence hazards. These controls will be determined based on the work, the environment and the organizational context of the work. Controls may include a variety of engineering and administrative approaches to control the hazards associated with violence in the workplace.

Please see the section on “Control” in the chapter covering “Job Hazard Analysis.”

**Engineering**

- Develop emergency signaling, alarms and monitoring systems
- Increase visibility, especially in high-risk areas. Use cameras and curved mirrors in hallways, and ensure good lighting in the workplace and in parking lots
- Restrict movement of the public and employees with appropriate barriers and card- or key-controlled access
- Design public areas to minimize assault risk
- Provide staff restrooms and emergency exits
- Install enclosed stations, deep service counters, or bullet resistant and shatterproof glass enclosures in reception areas if appropriate
- Arrange furniture and other objects with safety in mind. Be mindful of objects or furniture that can easily be turned into weapons

**Administrative and Work Practice Controls**

- Demonstrate concern for workers’ emotional and physical health and safety, communicating that violence is not permitted
- Design staffing patterns to prevent personnel from working alone and to minimize waiting time for customers
- Provide security escorts to the parking lots at night if appropriate
- Develop a system for alerting security personnel or management to threats of violence and recording incidents to determine need for additional controls
- Encourage employees to use the “buddy system” when personal safety threatened
- Limit the amount of accessible cash and valuables in the workplace
Consider an employee assistance program to help employees handle their personal problems that may affect job performance and workplace safety

Consider potential for violence in human resources operations. Areas where appropriate procedures and policies to prevent violence should be in place include the following:
- Pre-employment screening
- Employee assistance
- Employment transition or outplacement services during layoffs
- Substance abuse prevention programs
- Detailed post-termination security protocol

RESPONSE

US Trades, LLC understands violence can best be prevented through appropriate workplace security measures and caring for the people who work for our company through communication, adequate training and a system for reporting and following up on incidents. However, regardless of the level of hazard control, US Trades, LLC may experience a safety incident involving violence. Response to violence in the workplace will depend on the nature of the incident, but will focus on reducing the negative impacts of the incident and discovering ways to prevent similar incidents in the future.

Workplace violence will be considered during the development of the Emergency Action Plan. Please see the chapter entitled “Fire Prevention and Emergency Action Plans” for more information.

NOTIFICATION

Employees will notify a supervisor as soon as safely possible if an incident involving violence occurs. However, if there is an immediate danger of harm and the situation demands the presence of emergency responders, an employee will contact the appropriate authorities or see that a supervisor contacts them. Employees must report any criminal act immediately to police if safely possible and keep a line of communication with the authorities until police arrive.

Management will handle all reports of violence and threats of violence in a manner that respects the sensitive nature of such reports and maintains confidentiality.

It is a good idea for every worksite to have a means to alert others to an emerging incident. Such means include alarms, codes and signals. These alerts need to be in place, and shared, before an incident occurs to ensure their effectiveness.
### DE-ESCALATION STRATEGIES

<table>
<thead>
<tr>
<th><strong>DO</strong></th>
<th><strong>DON’T</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Be calm. Move and speak slowly, quietly, and confidently.</td>
<td>Make sudden movements.</td>
</tr>
<tr>
<td>Encourage the person to talk; listen closely and patiently.</td>
<td>Speak rapidly, raise your volume or use an accusatory tone.</td>
</tr>
<tr>
<td>Maintain a relaxed, attentive posture.</td>
<td>Reject all demands.</td>
</tr>
<tr>
<td>Position yourself at an angle.</td>
<td>Make physical contact, jab your finger at the other person or use long periods of eye contact.</td>
</tr>
<tr>
<td>Arrange yourself so your access to emergency exits is not blocked.</td>
<td>Pose in challenging stances — directly opposite someone, hands on hips or with arms crossed.</td>
</tr>
<tr>
<td>Acknowledge the person’s feelings.</td>
<td>Challenge, threaten or dare the individual.</td>
</tr>
<tr>
<td>Ask for small, specific favors such as asking the person to move outside.</td>
<td>Belittle the other person.</td>
</tr>
<tr>
<td>Use delaying tactics to give the person time to calm down, such as offering a drink of water.</td>
<td>Criticize or act impatient.</td>
</tr>
<tr>
<td>Point out choices, break big problems into smaller ones.</td>
<td>Attempt to bargain with a threatening individual.</td>
</tr>
<tr>
<td>Avoid sudden movements and maintain a 3-6 foot distance.</td>
<td>Try to make the situation seem less serious than it is.</td>
</tr>
<tr>
<td>If necessary, call the police when safe.</td>
<td>Make false statements or promises you cannot keep.</td>
</tr>
<tr>
<td>A fitness-for-duty evaluation may be appropriate for employees exhibiting dysfunctional behaviors.</td>
<td>Try to impart a lot of technical or complicated information when emotions are high.</td>
</tr>
<tr>
<td>Potential victims will be informed of any threat made to them and permitted access to legal assistance and psychological counseling as warranted.</td>
<td>Take sides or agree with distortions.</td>
</tr>
</tbody>
</table>

### INCIDENT RESPONSE TEAM

Kert Stiller and management, as part of hazard control planning may determine the need for an incident response team responsible for violence response. Training for this team will include identifying hazard escalation, techniques for de-escalating conflict and other appropriate incident response.

### EVACUATION AND SHELTER IN PLACE

All employees will be made aware of appropriate evacuation and “Shelter-In-Place” procedures and follow them as necessary in response to a violent workplace incident. Training and preparation may include drills and simulations for a violent incident.
POST-INCIDENT RESPONSE

In the event of workplace violence, US Trades, LLC will ensure victims and witnesses are provided appropriate treatment, regardless of the severity of the incident. In addition to physical injuries, victims of workplace violence may suffer other consequences such as the following:

- Psychological trauma
- Fear of returning to work
- Changes to relationships
- Feelings of guilt, powerlessness and incompetence
- Fear of criticism by supervisors

Further, to address opportunities to remedy oversights in the violence prevention program, any incident that demands managerial response under this violence prevention program will be followed by an incident investigation.

Please see the chapter on “Accident Investigation” for more information.

RECORDKEEPING AND PROGRAM EVALUATION

US Trades, LLC will record and communicate injuries and illnesses to workers according to applicable regulations.

This policy will be reviewed, and these reviews documented, at least once a year or under the following circumstances:

- Following a workplace violence incident or report
- Change in management
- Change of contact person
- To make needed changes or improvements to the policy
- To identify new training or refresher training needs

SEXUAL HARASSMENT

It is US Trades, LLC’s policy that sexual discrimination, unwelcome sexual advances, requests for sexual favors, and any other conduct of a sexual nature is strictly prohibited.

Requiring coworkers, subordinate employees, or prospective employees to submit to conduct of this nature, explicitly or implicitly, as a term or condition of employment, or used as a basis for any employment decisions is forbidden.

Any behavior that has the purpose or effect of unreasonably interfering with an individual’s work performance, or creating an intimidating, hostile or offensive work environment is banned.

Sexual harassment can occur in a variety of circumstances:
The victim as well as the harasser may be a woman or a man. The victim does not have to be of the opposite sex

The harasser can be the victim’s supervisor, an agent of the employer, a supervisor in another area, a co-worker or a non-employee

The victim does not have to be the person harassed but could be anyone affected by the offensive conduct

Sexual harassment may occur without economic injury to or discharge of the victim

The harasser’s conduct must be unwelcome

Prevention is the best tool to eliminate sexual harassment in the workplace. US Trades, LLC has designated appropriate managers (rather than a direct supervisor) and other alternative routes by which an employee can issue formal complaints of sexual harassment. If possible, any victimized employee should attempt to resolve a sexual harassment issue informally by directly informing the harasser that the conduct is unwelcome and must stop. If informal resolution is unsuccessful, the victim will use the formal complaint form and submit it to an appropriate supervisor.

US Trades, LLC will take immediate appropriate action when an employee files a complaint.

US Trades, LLC recognizes that the question of whether a particular course of conduct constitutes sexual harassment requires a factual determination. US Trades, LLC also recognizes that false accusations of sexual harassment can have serious effects on innocent persons. If an investigation results in a finding that a person who has accused another of sexual harassment has maliciously or recklessly made false accusations, the accuser will be subject to appropriate sanctions, including discharge.

When investigating allegations of sexual harassment, this company will look at the whole record, the circumstances, and the context in which the alleged incidents occurred. US Trades, LLC will make a determination on the allegations from available facts on a case-by-case basis. Outside avenues of resolution are available to employees who feel their rights have not been protected. US Trades, LLC tolerates no sexual harassment.

FORMS AND ATTACHMENTS

Please find the below documents on the following pages:

- Assault/Threat Report
- Sexual Harassment Complaint Form
### ASSAULT/THREAT REPORT FORM (PAGE 1 OF 3)

(Attach additional sheets as necessary)

<table>
<thead>
<tr>
<th>Employee Information</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td></td>
</tr>
<tr>
<td>Telephone</td>
<td></td>
</tr>
<tr>
<td>Address</td>
<td></td>
</tr>
<tr>
<td>Employee Classification</td>
<td></td>
</tr>
<tr>
<td>Manager’s Name</td>
<td></td>
</tr>
<tr>
<td>Telephone</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Employee Information</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of Assailant</td>
<td></td>
</tr>
<tr>
<td>Is he/she an employee?</td>
<td>Yes</td>
</tr>
<tr>
<td>Date of Incident</td>
<td></td>
</tr>
<tr>
<td>Location of Incident</td>
<td></td>
</tr>
<tr>
<td>This Incident Occurred</td>
<td>Over the phone</td>
</tr>
<tr>
<td>Were there any witnesses?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

(Please provide relevant information below and attach statements)

#### Witnesses

| Name |  |
| Address |  |
| Witness Roll (e.g. employee, customer) |  |

| Name |  |
| Address |  |
| Witness Roll (e.g. employee, customer) |  |

#### Threat Information

As closely as possible, what were the exact words used?

Was the assailant in a position to carry out the threat immediately?

How serious do you believe the threat was and why?
## Assault Information

What (if anything) happened to set off the assault?

Did the assailant say anything during the assault? What?

How did the assailant attack? (e.g. punching, kicking, knife, words)

What injuries, if any, did you sustain? Did injuries require medical treatment?

What ended the assault?

How did you leave the site of the assault?
ASSAULT/THREAT REPORT FORM (PAGE 3 OF 3)

(Attach additional sheets as necessary)

<table>
<thead>
<tr>
<th>Employee Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>What actions did you take later? (e.g. worker’s comp claim, medical treatment, sick leave)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Law Enforcement Information (attach police report when possible)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law Enforcement Agency Contacted</td>
</tr>
<tr>
<td>Name of Official</td>
</tr>
<tr>
<td>Was a written report completed? □ Yes □ No</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Manager Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Directions given to employee</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Manager Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Prosecution □ Restraining Order □ Letter to Threatener □ Other (please specify)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Legal Counsel Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>
SEXUAL HARASSMENT COMPLAINT FORM (PAGE 1 OF 2)

Please write legibly and fill out form completely. Attach additional sheets if necessary. Submit completed form to appropriate manager.

<table>
<thead>
<tr>
<th>Complainant</th>
<th>Alleged Harasser</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department</td>
<td>Department</td>
</tr>
<tr>
<td>Job Title</td>
<td>Job Title</td>
</tr>
<tr>
<td>Mailing Address</td>
<td>Other relevant information about Alleged Harasser</td>
</tr>
<tr>
<td>Home Phone</td>
<td></td>
</tr>
<tr>
<td>Work Phone</td>
<td></td>
</tr>
</tbody>
</table>

Details of Incident

- What exactly occurred or was said?
- When did it occur, and is it ongoing?
- Where did it occur?
- How often did it occur?
- How did it affect you?
- What response did you make when the incident(s) occurred or afterwards, and how did you react?
- Has your job been affected in any way?
- Was anyone present when the alleged harassment occurred? List any third-party witnesses
Please write legibly and fill out form completely. Attach additional sheets if necessary. Submit completed form to appropriate manager.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are there any persons who have relevant information?</td>
<td></td>
</tr>
<tr>
<td>Did you tell anyone about it?</td>
<td></td>
</tr>
<tr>
<td>Did anyone see you immediately after episodes of alleged harassment?</td>
<td></td>
</tr>
<tr>
<td>Did the person who harassed you harass anyone else?</td>
<td></td>
</tr>
<tr>
<td>Do you know whether anyone complained about harassment by that person?</td>
<td></td>
</tr>
<tr>
<td>Are there any notes, physical evidence or other documentation regarding the incident(s)?</td>
<td></td>
</tr>
<tr>
<td>Do you know of any other relevant information?</td>
<td></td>
</tr>
<tr>
<td>How would you like to see the situation resolved?</td>
<td></td>
</tr>
</tbody>
</table>

I am aware that false accusations of sexual harassment can have serious effects on innocent persons. I further understand that if it is determined, after investigation, that I have maliciously or recklessly made false accusations, I will be subject to appropriate sanctions, including discharge.

<table>
<thead>
<tr>
<th>Complainant’s printed name</th>
<th>Complainant’s signature</th>
<th>Date</th>
</tr>
</thead>
</table>

Received by

| Signature | Date |
POLICY

US Trades, LLC has implemented this policy for the protection of our employees against the fire and other emergencies in the workplace. Kert Stiller will supervise the Fire Protection Program.

US Trades, LLC will have a written Fire Protection Program (FPP). The FPP will be posted in the workplace and remain available to employees for review along with the names and job titles of every person in the chain of command during emergencies.

EMPLOYER RESPONSIBILITIES

It is the responsibility of US Trades, LLC to:

- Ensure adequate workplace safeguards against hazards, including appropriate exit routes, fire alarms, and fire protection systems
- Ensure development and implementation of FPP and EAP
- Ensure training of employees in accordance with this policy

EMPLOYEE RESPONSIBILITIES

Every US Trades, LLC employee is expected to:

- Report a fire or other emergency
- Follow fire prevention plan and emergency action plan
- Report any suspected problem with fire control systems to their supervisor
- Assist in fire hazard assessment

TRAINING

US Trades, LLC will ensure every employee is provided training on fire protection and emergency planning. This training will be provided at no cost to the employee and held during their working hours.

Training will be provided:

- At the time of assignment
- At least annually thereafter

US Trades, LLC will provide additional training when tasks or procedures are added or change, that may affect the employee’s work. It is acceptable for additional training to be limited to addressing only the changes or additions to the employees’ exposure.

US Trades, LLC will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.
Training Components

US Trades, LLC is committed to informing employees about all fire hazards with which they may come into contact. Kert Stiller or a designate will review the FPP with all employees and inform them of any fire hazards a new assignment might present.

Kert Stiller will verify all employees at US Trades, LLC are informed and trained in the following minimum elements for the Emergency Action Plan and Fire Protection Program:

- Fire hazards at the worksite
- Means of controlling or removing fire hazards at the worksite
- Procedures for reporting a fire or other emergency
- Procedures for emergency evacuation for all areas of work, including type of evacuation and exit route assignments
- Safe assembly areas designated for all work areas in the event of evacuation
- Procedures to be followed by employees who are requested to remain to operate critical plant operations before they evacuate, if applicable
- Procedures to account for all employees after evacuation
- Procedures employees are to follow when performing rescue or medical duties
- The members in the chain of command that employees can contact for information about the plans or for an explanation of their duties under the plans
- Proper operation of fire extinguishers provided by the company if the EAP allows employees to fight incipient stage fires rather than evacuate
- The hazards involved in incipient stage firefighting. Employees are instructed to ensure the local emergency response service (Fire Department) is notified before attempting to extinguish any fire, and that if a fire is not immediately extinguished, or the fire recurs to evacuate immediately
- Where employees have been provided portable fire extinguishers, US Trades, LLC will provide training on the general principles of fire extinguisher use and the hazards involved with incipient-stage firefighting. This training will occur upon hire and repeated annually

Training Records

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.
FIRE PREVENTION PLAN

US Trades, LLC is committed to protecting its employees in the event of a fire emergency. Accordingly, US Trades, LLC will ensure there is a Fire Protection Program written and available to employees as required by OSHA regulations.

This plan will include the following:

- A list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard
- Procedures to control accumulations of flammable and combustible waste materials
- Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials
- The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires; and the name or job title of employees responsible for the control of fuel source hazards

Determining Fire Hazards

A fire is essentially the rapid oxidation of a chemical. It requires heat, oxygen and fuel in the right proportion. Different types of fuel react in different ways and require different levels of heat and oxygen to ignite; however, once the chemical reaction begins, fire provides a source of heat for continued ignition until one of the essential aspects of combustion — fuel, heat or oxygen — is removed and the reactions end. See figure 1.

Kert Stiller or designee will perform an area-by-area assessment of fire hazards and record them by location on the “Major Fire Hazards” list. The assessment will ascertain and document whether the hazard is a fuel or ignition source, control systems in place to protect against fire, and the name or job title of the individual who is responsible for removing or minimizing the listed hazard.

The goal is to systematically eliminate fire hazards wherever possible; ensure a means to prevent a fire if the hazard cannot be removed; inform employees about fire hazards in their workspace; and identify the party responsible for controlling any given fire hazard. Fire hazard identification plays a central role in the FPP, and all employees are expected to contribute their efforts to identify and mitigate fire hazards in the workplace.

Employees will familiarize themselves with the safety data sheet of any hazardous chemicals with which they work and know proper handling and storage procedures to reduce hazards. Flammable and combustible material will be stored and staged in amounts as small as possible for operations and away from sources of ignition. It is important for employees to monitor the workplace for changes that might pose additional fire hazards.
FIRE PROTECTION EQUIPMENT AND SAFEGUARDS

Local Fire Alarm Systems

An alarm system to alert employees and the local fire department will provide a distinctive signal in case of fire or other emergency. The alarm needs to be audible above ambient noise levels and/or seen over ambient light levels.

Inspection, Maintenance and Testing

US Trades, LLC will provide for the frequent testing of all alarm systems and make sure they remain in operating condition. A local, unsupervised fire alarm system must be tested by a qualified, trained, and authorized employee or an outside service not less than once a week to insure operability by the activation of not less than 1 box, not using the same box in consecutive tests, and replacing power supplies as necessary.

Tests for systems that are capable of being supervised will occur at least annually.

Portable Fire Extinguishers

Any portable fire extinguisher provided will:

- Be fully charged and operable
- Be kept in a conspicuous place when not in use
- Not use carbon tetrachloride, chlorobromomethane, or other toxic vaporizing extinguishing agents
- Not be operated by inverting the extinguisher to rupture a cartridge or initiate an uncontrollable pressure-generating chemical reaction to expel the extinguishing agent
- Be protected from freezing (if subject to freezing)

Fire extinguishers are composed of a variety of materials depending on the type of fire they are designed to eliminate. All extinguishers will contain contents under high pressure:

Not all fire extinguishers are manufactured exactly alike. Variations may include operating instructions or distance the user should stand from the fire when dispersing contents. See the required cylinder labeling for specific information.

Each 3,000 square feet of protected buildings during construction requires a fire extinguisher rated at least 2A, spaced within 100 feet of any point of the protected area. In multi-story construction, each floor needs its own extinguisher rated at least 2A, adjacent to the stairwell

US Trades, LLC will provide a fire extinguisher rated not less than 10B within 50 feet of anywhere there is more than 5 gallons of flammable or combustible liquids being used on the jobsite (aside from vehicle fuel tanks)
Inspection, Maintenance and Testing

US Trades, LLC is responsible for the inspection, maintenance and testing of all portable fire extinguishers in the workplace. Maintenance checks of portable fire extinguishing equipment will occur at least annually. The dates of fire extinguisher checks will be recorded; the record of these checks will be retained for at least a year after the last check or the life of the shell (whichever is less). An individual trained to perform hydrostatic testing will test each portable fire extinguisher with suitable equipment. Such testing is also called for when portable fire extinguishers show new evidence of corrosion or mechanical wear.

Each extinguisher in the workplace will be accompanied by a record securely fixed to the extinguisher that indicates:

- Name of the person or agency who performed the last test, and the test date
- Signature of the person who performed the test
- Serial number or other identifier of the fire extinguisher that was tested

Alternatives to Portable Fire Extinguishers

During construction activities, a 55-gallon drum with two fire pails may substitute for a fire extinguisher with a 2A rating.

A $\frac{1}{2}$-inch diameter garden-type hose no longer than 100 feet, can substitute for the same as long as it can discharge at least 5 gallons per minute and the stream ranges at least 30 feet horizontally.

Further, 100 feet or fewer of 1$\frac{1}{2}$-inch hose with a nozzle capable of discharging water at 25 gallons or more per minute may be substituted, if the hose line can reach all points in the area. (Make sure the hose connections are compatible with local firefighting equipment.)

Other Fire Protection Systems

US Trades, LLC will meet or exceed all legal requirements for any fire protection system in the workplace and keep in good working order all safeguards designed to protect employees during emergencies, including fire retardant paints and solutions. Any other fire protection systems in use will also meet applicable regulatory requirements and may include the following:

- Temperature limit switches
- Fixed extinguishing systems
- Fire detection systems
- Standpipe and hose systems
- Flashback arresters
- Automatic sprinkler systems
- Fire brigades

During demolition activities involving combustible materials, charged hose lines that are supplied by hydrants, water tank trucks with pumps, or equivalent, must be available.

WATER SUPPLY

A water supply adequate for the operation of firefighting equipment must be available as soon as there is an accumulation of combustible materials. Underground water mains must be made available as soon as practicable where they are to be provided.
SPRINKLERS

If there will be an automatic sprinkler fire protection system, install, and place it in service as soon as permitted following completion of each story.

Ensure that sprinklers are spaced to provide a maximum protection area per sprinkler, a minimum of interference to the discharge pattern by building or structural members or building contents and suitable sensitivity to possible fire hazards.

Maintain a 36” clearance between the top of stored material and sprinkler heads.

A stock of extra sprinklers must be on hand or readily available for each temperature rating and type so that the system can be returned to readiness as soon as possible.

An automatic sprinkler system having 20 or more sprinklers must have at least one automatic water supply capable of providing design water flow for at least 30 minutes.

During demolition or alterations, keep automatic sprinkler installations in service as long as reasonable. Only authorized personnel may operate sprinkler control valves. Expedite sprinkler system modifications made to permit alterations or additional demolition so that the automatic protection may be returned to service as quickly as possible. Check sprinkler control valves daily at close of work to ensure service.

No one may occupy a portion of a structure (except as permitted under law) that must be protected by automatic sprinklers until the sprinkler system is operable and has been approved.

STANDPIPES

If standpipes are required, or exist in structures being altered, they must be brought up as soon as applicable laws permit and will be maintained as construction progresses in such a manner that they are always ready for fire protection use. Standpipes will be provided with Siamese fire department connections on the outside of the structure, at the street level, and conspicuously marked. Local codes may specify lighting or painting requirements. There must be at least one standard hose outlet at each floor.

During demolition, maintain a standpipe as long as possible in operable condition for firefighting use. Do not demolish the standpipe further than one floor below the floor being demolished.

FIRE PROTECTION

Controlling fire hazards (e.g. accumulations of flammable and combustible materials) and ensuring safe storage of building materials is a priority of the highest order for US Trades, LLC and its employees. Controlling fuel sources demands all workers maintain a tidy work area and dispose of refuse in the appropriate receptacle; it also calls for due consideration of piles and stacks or materials at the worksite. Controlling means of ignition requires following appropriate safety guidelines especially around electricity, open flame, or any work that may produce arc, sparks, excessive heat, etc.
No Smoking, No Open Flame

Smoking is prohibited at the jobsite at all times. Signs will be posted according to local requirements alerting employees and the public to this prohibition. Open fires may not be ignited or maintained at the worksite. Only approved heaters may be used in designated locations in such a way to prevent fires.

Ignition Hazards

Electrical wiring onsite must be installed safely by qualified personnel and in compliance with applicable regulations. If equipment is powered by an internal combustion engine, make sure it is located so that the exhausts are well away from combustible materials. If the exhausts are piped outside, verify there is a 6 in. clearance between piping and combustible materials. If portable battery powered lighting equipment is used near flammable gases or liquids, make sure it’s approved for hazardous locations.

During the cleaning or ventilation of tanks and vessels that contain hazardous concentrations of flammable gases or vapors, nozzles, lines, or hoses for air, inert gas, or steam must be bonded to the tank or vessel shell and neither attached nor detached in hazardous concentrations of flammable gases or vapors.

All debris and refuse must be disposed of promptly (at the end of each shift or more frequently as required), especially if it is combustible. If material is to be disposed of by burning onsite, make sure that method has been approved, and complies with all relevant safety controls. All materials susceptible to spontaneous ignition (oily rags) will be stored in an approved disposal container.

Hotwork must be completed according to appropriate guidelines, and appropriate fire watch must be established and maintained to ensure safety of any operation that presents a fire hazard.

TEMPORARY BUILDINGS

- No temporary building may adversely affect a means of exit
- Temporary buildings erected within another building must be of noncombustible construction or of combustible construction with a fire resistance rating of at least 1 hour
- Temporary buildings, not inside another building and not used for the storage, handling, or use of flammable or combustible liquids, flammable gases, explosives, or blasting agents, or similar hazardous occupancies, must be located at least 10 feet from another building or structure
- Groups of temporary buildings, not exceeding 2,000 square feet in size total, will be considered a single temporary building

OPEN YARD STORAGE

Combustible materials must not be piled higher than 20 feet and must be piled in a stable manner. Where driveways go between or around combustible storage piles, they must be at least 15 feet wide and free of any obstruction. A driveway grid formed by such driveways may not exceed 50ft. by 150ft.

Make sure the storage area is clean and any plant life is controlled to prevent additional fire hazards. Piles of combustible material must be organized, orderly and 10 feet or more from buildings. Ensure appropriate fire extinguishers (at least 2A) are easily accessible.
INDOOR STORAGE

Make sure materials stored indoors do not block exits or impede exit in any way and are piled to maintain a 36” clearance between the top of the stored material and sprinkler heads.

Maintain safe clearance between material piles and lights or heating elements. Also, provide a barricade or ensure at least 24” around the path of travel to fire doors. Never store material within 36” of a fire door.

ACCESS FOR FIREFIGHTING

Vehicle access to a construction, remodel or demolition site must be maintained at all times within 100 feet (consult local codes) of available fire department connections. Temporary vehicle access must be maintained until permanent access is established. Such roads may need to be inspected by local authorities to comply with local laws. Horizontal and vertical clearance for such access routes must be sufficient for emergency vehicle approach and meet applicable local codes.

FLAMMABLE LIQUIDS

Flammable liquids must be stored and handled in approved containers and tanks. Handling and use of flammable liquid materials in quantities of 5 gallons or less requires approved safety cans or DOT-approved containers. Flammable liquids that are hard to pour may be stored, handled and used in quantities of one gallon or less in their original container.

Ensure flammable or combustible liquids are kept clear of areas used for exits or safe passage of people.

This section applies to the handling, storage and use of flammable liquids with a flashpoint below 140°F but not to:

- Bulk transportation of flammable and combustible liquids
- Storage, handling and use of fuel oil tanks and containers connected with oil burning equipment

NOTE: With the adoption of the Globally Harmonized Standards (GHS) by OSHA, liquids capable of being ignited are divided into four categories based on their flash points.

<table>
<thead>
<tr>
<th>Category 1</th>
<th>Category 2</th>
<th>Category 3</th>
<th>Category 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flash Point &lt; 72°F</td>
<td>Flash Point &lt; 72°F</td>
<td>Flash Point ≥ 72°F</td>
<td>Flash Point &gt; 140°F</td>
</tr>
<tr>
<td>Boiling point ≤ 95°F</td>
<td>Boiling point &gt; 95°F</td>
<td>Boiling point ≤ 140°F</td>
<td>Boiling point ≤ 200°F</td>
</tr>
<tr>
<td>Extremely flammable</td>
<td>Highly flammable</td>
<td>Flammable</td>
<td>Combustible</td>
</tr>
</tbody>
</table>

INDOOR STORAGE

Outside of an approved storage cabinet, limit storage of flammable or combustible liquids to 25 gallons. An approved storage cabinet must adhere to the following specifications:

- The bottom, sides, and top will be constructed of an exterior grade of plywood at least 1 in. thick, which will not break down or delaminate under standard fire test conditions
• All joints must be rabbeted and fastened in two directions with flathead wood screws
• When more than one door is used, there will be a rabbeted overlap of not less than 1 inch
• Steel hinges will be mounted in such a manner as to not lose their holding capacity due to loosening or burning out of the screws when subjected to fire
• These cabinets will be painted inside and out with fire retardant paint
• Approved metal storage cabinets are acceptable
• Cabinets must be labeled in conspicuous lettering, “Flammable-Keep Fire Away”

Any one storage cabinet is limited to 60 gallons of flammable liquids, and 120 gallons of combustible liquids. Any one storage area is limited to three storage cabinets. Higher quantities must be stored inside a storage room.

INDOOR STORAGE ROOMS

Storage rooms inside must be sufficiently fire-resistant for their use and comply with test specifications outlined in “Standard Methods of Fire Test of Building Construction and Material, NFPA 251-1969” and table 2.

<table>
<thead>
<tr>
<th>Fire Protection Provided*</th>
<th>Fire Resistance</th>
<th>Maximum size</th>
<th>Total allowable quantities gals. / sq.ft. / floor area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>2 hrs.</td>
<td>500 sq.ft.</td>
<td>10</td>
</tr>
<tr>
<td>No</td>
<td>2 hrs.</td>
<td>500 sq.ft.</td>
<td>4</td>
</tr>
<tr>
<td>Yes</td>
<td>1 hr.</td>
<td>150 sq.ft.</td>
<td>5</td>
</tr>
<tr>
<td>No</td>
<td>1 hr.</td>
<td>150 sq.ft.</td>
<td>2</td>
</tr>
</tbody>
</table>

Automatic extinguishing systems will be designed and installed to meet the following requirements:

• Openings to other rooms or buildings require noncombustible liquid-tight raised sills or ramps at least 4 inches in height, or the floor in the storage area must be at least 4 inches below the surrounding floor
• Openings will be equipped with approved self-closing fire doors
• The room will be liquid-tight where the walls join the floor
• A permissible alternate to the sill or ramp is an open-grated trench, inside of the room, which drains to a safe location
• Where other portions of the building or other buildings are exposed, windows will be protected as set forth in the Standard for Fire Doors and Windows, NFPA No. 80-1970, for Class E or F openings
• Wood of at least 1-inch nominal thickness may be used for shelving, racks, dunnage, scuff boards, floor overlay, and similar installations
• Materials that will react with water and create a fire hazard may not be stored in the same room with flammable or combustible liquids
• Wiring and equipment in such rooms must be approved for Class I, Division 1, Hazardous Locations as outlined in CFR 1926.449
Every storage room must have one clear three-foot wide aisle
Containers over 30 gallons capacity cannot be stacked on top of each other

Each indoor storage room must be equipped with either a gravity or a mechanical exhausting system that meets the following specifications:

- It must start no more than 12 inches above the floor
- It must be designed to provide a complete change of air within the room at least 6 times per hour
- If a mechanical exhausting system is used, it must be controlled by a switch located outside of the door
- Ventilating equipment and any lighting fixtures must not be operated by the same switch
- An electric pilot light will be installed next to the switch if flammable liquids are dispensed within the room
- Where gravity ventilation is provided, the fresh air intake, as well as the exhausting outlet from the room, must be on the exterior of the building where the room is located

Limit the quantity of flammable or combustible liquids near any spraying operations to the minimum required for operations. This must not exceed a supply for 1 day or one shift. Bulk storage of portable containers of flammable or combustible liquids will be in a separate, constructed building detached from other important buildings or cut off in a standard manner.

STORAGE OUTSIDE BUILDINGS

Flammable and combustible liquids in excess of the amount permitted in inside storage rooms will be stored outside of buildings.

Limit groupings of containers (not more than 60 gallons each) to 1,100 gallons in any one pile or area. Piles or groups must be separated by a 5-foot clearance and placed 20 feet or further away from a building.

Within 200 feet of such piles, ensure a 12-foot-wide access for fire control approach.

The area reserved for storing flammable and combustible liquids must be graded to divert spills away from building. Alternatively, the area may be surrounded by a curb or dike at least 12 inches high if provisions are made for draining off accumulations of ground or rain water, or spills of the stored liquids. Drains must terminate at a safe location and be accessible to operation under fire conditions.

OUTDOOR PORTABLE TANK STORAGE

- Portable tanks must be at least 20 feet from any building
- Two or more portable tanks, grouped together, having a combined capacity in excess of 2,200 gallons, must be separated by a 5-foot-clear area
- Individual portable tanks exceeding 1,100 gallons must be separated by a 5-foot-clear area
- There must be a 12-foot-wide access way within 200 feet of each portable tank, to permit approach of fire control equipment
- Storage areas will be kept free of weeds, debris, and other combustible material not necessary to the storage
Portable tanks, not exceeding 660 gallons, must have emergency venting and other devices, as required by chapters III and IV of NFPA 30, The Flammable and Combustible Liquids Code.

Portable tanks, in excess of 660 gallons, must have emergency venting and other devices, as required by chapters II and III of “The Flammable and Combustible Liquids Code, NFPA 30”

**FIRE CONTROL FOR FLAMMABLE LIQUIDS**

- At least one portable fire extinguisher, with a rating of at least 20-B units (capable of extinguishing a twenty square foot fire), must be located outside of, but not more than 10 feet from, the door opening into any room used for storage of more than 60 gallons of flammable or combustible liquids.
- At least one portable fire extinguisher having a rating of at least 20-B units must be located not less than 25 feet, nor more than 75 feet, from any flammable liquid storage area located outside.
- When sprinklers are provided, they will be installed in accordance with the current “Standard for the Installation of Sprinkler Systems, NFPA 13”
- At least one portable fire extinguisher having a rating of not less than 20-B:C units will be provided on all tank trucks or other vehicles used for transporting and/or dispensing flammable or combustible liquids.

**DISPENSING LIQUIDS**

- Areas where combustible liquids are transferred more than 5 gallons at a time must be separated from other activity by 25ft. or construction with a fire resistance rating of 1 hour. Drainage in such areas to control spills is required as is ventilation sufficient to maintain flammable vapor concentrations below 10 percent of the lower flammable limit.
- Flammable liquid transfer between two containers requires the containers to be electrically bonded.
- Draw or transfer flammable or combustible liquids from vessels, containers, or tanks within a building or outside only through a closed piping system, from safety cans, by means of a device drawing through the top, or from a container, or portable tanks, by gravity or pump, through an approved self-closing valve. Transferring by means of air pressure on the container or portable tanks is prohibited.
- Protect dispensing units against collision damage.
- Dispensing devices and nozzles for flammable liquids must be of an approved type.

**HANDLING LIQUIDS AT POINT OF FINAL USE**

- Keep Flammable liquids in closed containers when not in use.
- Dispose of leakage or spillage of flammable or combustible liquids promptly and safely.
- Flammable liquids may be used only where there are no open flames or other sources of ignition within 50 feet of the operation, unless conditions warrant greater clearance.
SERVICE AND REFUELING AREAS

- Flammable or combustible liquids must be stored in approved closed containers, in tanks located underground, or in above-ground portable tanks
- Tank trucks must comply with the requirements covered in the latest edition of the Standard for Tank Vehicles for Flammable and Combustible Liquids, NFPA No. 385
- Only approved types of dispensing hoses may be used
- The dispensing nozzle will be an approved automatic-closing type without a latch-open device
- Do not abandon underground tanks
- Provide clearly identified and easily accessible switch(es) at a location remote from dispensing devices to shut off the power to all dispensing devices in the event of an emergency
- Heating equipment of an approved type may be installed in the lubrication or service area where there is no dispensing or transferring of flammable liquids, provided the bottom of the heating unit is at least 18 inches above the floor and is protected from physical damage
- Heating equipment installed in lubrication or service areas, where flammable liquids are dispensed, must be of an approved type for garages, and will be installed at least 8 feet above the floor
- No smoking or open flames will be permitted in the areas used for fueling, servicing fuel systems for internal combustion engines, receiving or dispensing of flammable or combustible liquids
- Post conspicuous and legible signs prohibiting smoking
- Shut off motors of equipment being fueled during the fueling operation; and provide each service or fueling area with at least one fire extinguisher having a rating of not less than 20B:C located so that an extinguisher will be within 75 feet of each pump, dispenser, underground fill pipe opening, and lubrication or service area.

FORMS AND ATTACHMENTS

Please find on the following page the Major Fire Hazards Form, which may be reproduced freely by US Trades, LLC for the purposes of implementing and maintaining a safety and health program.
<table>
<thead>
<tr>
<th>Site</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gate</td>
<td>Fire Hazard</td>
</tr>
<tr>
<td></td>
<td>Fuel source hazard</td>
</tr>
<tr>
<td></td>
<td>Ignition source hazard</td>
</tr>
</tbody>
</table>

**Example**

- **Gate:** Cigarette butts at gate
- **Fire Hazard:** Yes
- **Fuel source hazard:** Yes
- **Ignition source hazard:** Yes

**Handling, storage, and/or maintenance procedures and other relevant protections (include PPE):**

- Ensure all materials have been properly extinguished and properly disposed of. Fire extinguisher is inside office.

**Name or job title of responsible party:**

- Housekeeping: Employees, Custodian
- Fire extinguisher: Karl Siller
POLICY

US Trades, LLC will manage or eliminate hazards in the workplace to the greatest extent possible with engineering controls and work practice controls. However, if such controls fail to provide employees sufficient protection, project manager or client or designate will provide employees with personal protective equipment (PPE) and ensure proper use thereof. PPE minimizes exposure to a range of hazards. All protective devices must meet the following minimum requirements:

- Provide adequate protection against the hazards for which they are designed
- Be of safe design and construction for the work to be performed
- Be reasonably comfortable when worn under the designated condition
- Fit snugly and not unduly interfere with the movements of the wearer
- Be durable
- Be capable of being disinfected
- Easily cleaned
- Be distinctly marked to facilitate identification of the manufacturer

HAZARD ASSESSMENT

As explained in the chapter on Job Hazard Analysis, hazard assessment is the backbone of the US Trades, LLC safety and health program. Recognizing and documenting hazards is the first step to protecting employees from them. An initial walk-through to develop a list of potential hazards will be followed by a review of records and an analysis of the facility layout to determine what controls would best protect workers. If engineering and administrative controls are unable to protect employees from hazards they face, Kert Stiller and management will determine what PPE is necessary.

US Trades, LLC job hazard analysis is an ongoing process. Monthly inspections and periodic reassessments will look for changes that may affect occupational hazards for workers and will determine if PPE remains viable (in terms of condition, age and appropriateness) to protect a worker from hazards on the job.

US Trades, LLC must certify and document the required workplace hazard assessment in a way that identifies the following:

- Workplace evaluated
- Person certifying the evaluation has been performed
- Date of the hazard assessment
- Document as a certification of hazard assessment
EMPLOYER RESPONSIBILITIES

It is the responsibility of US Trades, LLC to:

- Identify in the hazard assessment where PPE is appropriate and what type is necessary
- Identify and provide properly fitting PPE for employees
- Inform employees how and when to use identified PPE
- Enforce PPE use
- Train employees in the use and care of PPE
- Ensure employees maintain PPE
- Replace worn or damaged PPE
- Ensure employee provided PPE is adequate
- Periodically review, update and evaluate the effectiveness of the PPE program

EMPLOYEE RESPONSIBILITIES

US Trades, LLC employees are expected to attend PPE training sessions provided by management.

US Trades, LLC requires employees use personal protective equipment (PPE) appropriate to the hazards of their job. This equipment may include protection for the following: eyes, face, feet, hands, head and body.

Employees required to use such equipment will be trained in all aspects of its use, maintenance and applicability.

The following list of PPE is available to employees and will be used as required: eye protection, fall protection, gloves, hard hat, harnesses and other as required per job site.

- Use, and properly wear, all PPE provided by the employer
- Properly care for, clean, and maintain all PPE
- Inform a supervisor of the need to repair or replace PPE

TRAINING

US Trades, LLC will ensure every employee is provided training on personal protective equipment. This training will be provided at no cost to the employee during working hours.

US Trades, LLC will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

**Training Components**

US Trades, LLC will ensure training for every employee in the following minimum elements:

- When PPE is necessary
- What specific PPE is necessary
- How to properly put on, take off, adjust and wear PPE
Limitations of PPE
Proper care, maintenance, useful life and disposal of the PPE

Affected employees must demonstrate an understanding of all training and the ability to use PPE properly before they will be permitted to perform work requiring PPE.

US Trades, LLC will provide retraining for any affected employee who is unable to demonstrate the understanding or skills to use PPE properly. Circumstances that require retraining include, but are not limited to the following:

- When there have been changes in the workplace that have rendered previous training obsolete
- When there have been changes to PPE used that render previous training obsolete
- When an employee demonstrates or expresses inadequacies in understanding or skill needed to use assigned PPE properly

Training Records
Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

PPE SELECTION
US Trades, LLC will select only PPE of safe design and construction and will work with employees to ensure PPE remains clean and reliable. In selecting PPE used to control hazards in the workplace, US Trades, LLC will consider comfortable fit, providing sizes appropriate to the affected employees, and ensure any PPE used will be compatible to provide sufficient protection. Comfort and ease of use is an important consideration because workers are more likely to wear comfortable PPE.

All PPE at US Trades, LLC, including any employee-owned PPE, will meet at least the minimum standards and requirements to provide sufficient protection for workers. Following are the standards referenced by OSHA for select groups of PPE:

- Eye and Face: ANSI Z87.1
- Head: ANSI Z89.1
- Foot: ANSI Z41.1

However, alternative protective equipment is acceptable if US Trades, LLC demonstrates it is at least as effective as equipment constructed according to the above standards.

NON-PROVIDED PPE
US Trades, LLC will provide all PPE and replacement PPE at no cost to employees except for the following:
• Non-specialty safety-toe protective footwear, non-specialty prescription eyewear, provided they may be worn away from work
• Shoes or boots with metatarsal protection if US Trades, LLC provides separate metatarsal guards
• Logging boots
• Everyday clothing
• Clothing worn only for protection from weather
• Replacement PPE the employee has intentionally damaged or lost
• Where the employee provides his or her own adequate PPE

WORK CLOTHING

US Trades, LLC requires employees to wear clothing appropriate to the work and conditions. Examples of this stipulation include clothing that provides protection against high temperature hazards that can cause burns, and not wearing loose clothing like ties or loose fitting clothing near moving machinery. Employees will not wearing jewelry that might contact or electric circuitry.

Also any clothing contaminated with a hazardous material (e.g. flammable liquids, toxic substances, irritants or oxidizers) must be removed immediately and properly cleaned before it can be worn again.

EYE AND FACE PROTECTION

US Trades, LLC will ensure adequate protection against the following:

• Flying particles
• Molten metal
• Liquid chemicals
• Acids or caustic liquids
• Chemical gases or vapors
• Potentially infected material
• Potentially harmful light radiation

When there is a hazard from flying particles, eye protection will provide side protection, or US Trades, LLC will provide effected employees with detachable side protectors.

• Employees will ensure that face and eye protectors are used by only the person to whom the items are issued.
• Eye and face PPE must have the manufacturer’s identification distinctly marked.

Prescription Lenses

Everyday glasses will not provide sufficient protection against the types of hazards that require eye protection. Employees who wear prescription lenses to correct their vision must wear either eye protection that incorporates their prescription or that can be worn over glasses without compromising the glasses’ ability to correct the wearer’s vision.

If US Trades, LLC requires more than one worker to wear the same piece of eyewear, employees must disinfect the protective eyewear after each use.
Types of Eye Protection

Safety Spectacles: These protective eyeglasses have safety frames constructed of metal or plastic and impact-resistant lenses. Side shields are available on some models.

Goggles: These tight-fitting eye protectors completely cover the eyes, eye sockets and the facial area immediately surrounding the eyes and provide protection from impact, dust and splashes. Some goggles will fit over corrective lenses.

Welding Shields: Constructed of vulcanized fiber or fiberglass and fitted with a filtered lens, welding shields protect eyes from burns caused by infrared or intense radiant light; they also protect both the eyes and face from flying sparks, metal spatter, and slag chips produced during welding, brazing, soldering and cutting operations. OSHA requires filter lenses to have a shade number appropriate to protect against the specific hazards of the work being performed in order to protect against harmful light radiation.

Laser Safety Goggles: These specialty goggles protect against intense concentrations of light produced by lasers. The type of laser safety goggles an employer chooses will depend upon the equipment and operating conditions in the workplace.

Face Shields: These transparent sheets of plastic extend from the eyebrows to below the chin and across the entire width of the employee’s head. Some are polarized for glare protection. Face shields protect against nuisance dusts, potential splashes or sprays of hazardous liquids, and smaller particles, but will not provide adequate protection against larger impact hazards. Face shields must be worn over the top of basic eye protection devices such as goggles or safety spectacles.

Typical uses for face shields include, but are not limited to, the following situations: woodworking operations where chips and particles fly; metal machining that causes flying particles; buffing, polishing, wire brushing, and grinding; operations that cause flying particles or objects; spot welding; and handling of hot or corrosive materials.

Laser Operations

Laser light radiation can be extremely dangerous to the unprotected eye, and direct or reflected beams can cause permanent eye damage.

Laser retinal burns can be painless, so it is essential that all personnel in or around laser operations wear appropriate eye protection.

Laser safety goggles must protect for the specific wavelength of the laser and must be of sufficient optical density for the energy involved. Safety goggles intended for use with laser beams must be labeled with the laser wavelengths for which they provide protection, the optical density of those wavelengths and the visible light transmission.
Table 1 - Laser Safety Glass

<table>
<thead>
<tr>
<th>Intensity, CW maximum power density (watts/cm²)</th>
<th>Attenuation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Optical density (O.D.)</td>
</tr>
<tr>
<td>10⁻²</td>
<td>5</td>
</tr>
<tr>
<td>10⁻¹</td>
<td>6</td>
</tr>
<tr>
<td>1.0</td>
<td>7</td>
</tr>
<tr>
<td>10.0</td>
<td>8</td>
</tr>
</tbody>
</table>

Laser safety goggles must protect for the specific wavelength of the laser and must be of sufficient optical density for the energy involved. Safety goggles intended for use with laser beams must be labeled with the laser wavelengths for which they provide protection, the optical density of those wavelengths and the visible light transmission.

When a face shield is used in atmospheres or working areas requiring special conditions of non-conductivity or non-sparking, the equipment and materials used must meet those requirements. A face shield must be identified as a “non-conductive face shield” or “non-sparking face shield.”

**Welding Operations**

The intense light associated with welding operations can cause serious and sometimes permanent eye damage if operators do not wear proper eye protection. The intensity of light or radiant energy produced by welding, cutting or brazing operations varies according to a number of factors including the task producing the light, the electrode size and the arc current. Table 2 shows the minimum protective shades for a variety of welding, cutting and brazing operations in general industry and in the shipbuilding industry.

Helmets or hand shields must be used during all arc welding or arc cutting operations, excluding submerged arc welding. Helpers or attendants must be provided with proper eye protection. A hand shield must be constructed of materials similar to those used for a helmet, in a like manner, to protect the body from direct radiant energy.
<table>
<thead>
<tr>
<th>Operations</th>
<th>Electrode Size 1/32 in.</th>
<th>Arc Current</th>
<th>Minimum (*) Protective Shade</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shielded metal arc welding</td>
<td>Less than 3</td>
<td>Less than 60</td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>3-5</td>
<td>60-160</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>5-8</td>
<td>160-250</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>More than 8</td>
<td>250-550</td>
<td>11</td>
</tr>
<tr>
<td>Gas metal arc welding and flux cored arc welding</td>
<td>Less than 60</td>
<td></td>
<td>7</td>
</tr>
<tr>
<td></td>
<td>60-160</td>
<td></td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>160-250</td>
<td></td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>250-500</td>
<td></td>
<td>10</td>
</tr>
<tr>
<td>Gas tungsten arc welding</td>
<td>Less than 50</td>
<td></td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>50-150</td>
<td></td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>150-500</td>
<td></td>
<td>10</td>
</tr>
<tr>
<td>Air carbon arc cutting</td>
<td>(Light)</td>
<td>Less than 500</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>(Heavy)</td>
<td>500-1000</td>
<td>11</td>
</tr>
<tr>
<td>Plasma arc welding</td>
<td>Less than 20</td>
<td></td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>20-100</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>100-400</td>
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</tr>
<tr>
<td></td>
<td>400-800</td>
<td></td>
<td>11</td>
</tr>
<tr>
<td>Plasma arc cutting</td>
<td>(light)(**)</td>
<td>Less than 300</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>(medium)(**)</td>
<td>300-400</td>
<td>9</td>
</tr>
<tr>
<td></td>
<td>(heavy)(**)</td>
<td>400-800</td>
<td>10</td>
</tr>
<tr>
<td>Torch brazing</td>
<td></td>
<td></td>
<td>3</td>
</tr>
<tr>
<td>Torch soldering</td>
<td></td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Carbon arc welding</td>
<td></td>
<td></td>
<td>14</td>
</tr>
</tbody>
</table>
# Filter Lenses for Protection Against Radiant Energy

<table>
<thead>
<tr>
<th>Operations</th>
<th>Plate Thickness – inches</th>
<th>Plate Thickness – mm</th>
<th>Minimum (*) Protective Shade</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gas Welding</td>
<td>Light</td>
<td>Under ¹/₁₆</td>
<td>Under 3.2</td>
</tr>
<tr>
<td></td>
<td>Medium</td>
<td>¹/₁₆ to ¹/₂</td>
<td>3.2 to 12.7</td>
</tr>
<tr>
<td></td>
<td>Heavy</td>
<td>Over ¹/₂</td>
<td>Over 12.7</td>
</tr>
<tr>
<td>Oxygen Cutting</td>
<td>Light</td>
<td>Under 1</td>
<td>Under 25</td>
</tr>
<tr>
<td></td>
<td>Medium</td>
<td>1 to 6</td>
<td>25-150</td>
</tr>
<tr>
<td></td>
<td>Heavy</td>
<td>Over 6</td>
<td>Over 150</td>
</tr>
</tbody>
</table>

Footnote (*) As a rule of thumb, start with a shade that is too dark to see the weld zone. Then go to a lighter shade, which gives sufficient view of the weld zone without going below the minimum. In oxyfuel gas welding or cutting where the torch produces a high yellow light, it is desirable to use a filter lens that absorbs the yellow or sodium line in the visible light of the (spectrum) operation. Footnote (**) These values apply where the actual arc is clearly seen. Experience has shown that lighter filters may be used when the arc is hidden by the workpiece.

# Head Protection

US Trades, LLC will protect employees from potential head injuries by providing proper head protection and accessories, and ensuring that employees wear these items to protect themselves from injury. Hard hats and helmets can protect employees from impact and penetration hazards, as well as from electrical shock and burn hazards.

US Trades, LLC will ensure employees wear head protection if any of the following apply:

- Objects might fall from above and strike them on the head;
- They might bump their heads against fixed objects, such as exposed pipes or beams
- There is a possibility of accidental head contact with electrical hazards or any other harmful contacts or exposures
- There is a risk of injury from any of the following:
  - Electric shock
  - Hair entanglement
  - Chemicals
  - Temperature extremes

Some examples of occupations where employees will be required to wear head protection include construction workers, carpenters, electricians, linemen, plumbers and pipefitters, timber and log cutters, welders, among many others. Whenever there’s a danger of objects falling from above, such as working below others who are using tools or working under a conveyor belt, head protection must be worn. Hard hats must be worn with the bill forward to protect employees properly.
In general, protective helmets or hard hats should do the following:

- Resist penetration by objects
- Absorb the shock of a blow
- Be water-resistant and slow burning
- Have clear instructions explaining proper adjustment and replacement of the suspension and headband, which must be replaced if slack, twisted, worn out, sweat-soaked, etc.

Hard hats must have a hard outer shell and a shock-absorbing lining that incorporates a headband and straps that suspend the shell from 1 to 1¼ inches (2.54 cm to 3.18 cm) away from the head. This type of design provides shock absorption during an impact and ventilation during normal wear.

A metallic head device must not be furnished by an employer or used by an employee for head protection, except where it has been determined that the use of other types of protective helmets or safety hats or caps is impractical, such as where chemical reaction will cause the deterioration of other types of head protection.

**Types of Hard Hats/Helmets**

US Trades, LLC will select protective headgear that meets ANSI standard requirements and will ensure employees wear hard hats/helmets to provide appropriate protection against potential workplace hazards. Hardhat selection must consider all hazards on the worksite, including electrical hazards. This can be done through a comprehensive hazard analysis and an awareness of the different types of protective headgear available.

Hard hats are divided into three industrial classes:

- **Class G** (formerly Class A) hard hats (General) provide impact and penetration resistance along with limited voltage protection (up to 2,200 volts)
- **Class E** (formerly class B) hard hats (Electrical) provide the highest level of protection against electrical hazards, with high-voltage shock and burn protection (up to 20,000 volts). They also provide protection from impact and penetration hazards by flying/falling objects
- **Class C** hardhats (Conductive) provide lightweight comfort and impact protection but offer no protection from electrical hazards

In addition, hard hats/helmets that protect against impacts are classified as either:

- **Type I** – Helmets that are intended to reduce the force of impact resulting from a blow only to the top of the head
- **Type II** – Helmets that are intended to reduce the force of impact resulting from a blow to the top or sides of the head

Another class of protective headgear on the market is called a “bump hat,” designed for use in areas with low head clearance. They are recommended for areas where protection is needed from head bumps and lacerations. These are not designed to protect against falling or flying objects and are not ANSI approved. It is essential to check the type of hardhat employees are using to ensure that the equipment provides appropriate protection. Each hat will have a label inside the shell that lists the manufacturer, the ANSI designation and the class of the hat.
Size and Care Considerations

Head protection that is too large or too small is inappropriate for use, even if it meets all other requirements. Protective headgear must fit appropriately on the body and for the head size of each individual. Most protective headgear comes in a variety of sizes with adjustable headbands to ensure a proper fit (many adjust in $\frac{1}{8}$-inch increments). A proper fit allows sufficient clearance between the shell and the suspension system for ventilation and distribution of an impact. The hat must not bind, slip, fall off or irritate the skin.

Some protective headgear allows for the use of various accessories to help employees deal with changing environmental conditions, such as slots for earmuffs, safety glasses, face shields and mounted lights. Optional rims may provide additional protection from the sun and some hats have channels that guide rainwater away from the face. Protective headgear accessories must not compromise the safety elements of the equipment.

Periodic cleaning and inspection will extend the useful life of protective headgear. A daily inspection of the hardhat shell, suspension system, and other accessories for holes, cracks, tears or other damage that might compromise the protective value of the hat is essential. Paints, paint thinners and some cleaning agents can weaken shells of hard hats and may eliminate electrical resistance. Consult the helmet manufacturer for information on the effects of paint and cleaning materials on their hard hats. Never drill holes, paint, or apply labels to protective headgear as this may reduce the integrity of the protection. Do not store protective headgear in direct sunlight, such as on the rear window shelf of a car, since sunlight and heat can damage them.

Hardhats with any of the following defects must be removed from service and replaced:

- Perforation, cracking, or deformity of the brim or shell
- Indication of exposure of the brim or shell to heat, chemicals or ultraviolet light and other radiation (in addition to a loss of surface gloss, such signs include chalking or flaking)

Always replace a hardhat if it sustains an impact, even if damage isn't noticeable. Suspension systems are available as replacement parts, and must be replaced if damaged or excessive wear is noticed. It's not necessary to replace the entire hard hat when deterioration or tears of the suspension systems are noticed.

Hoods

A hood must be made of materials that combine all of the following:

- Have mechanical strength and lightness of weight to a high degree
- Be non-irritating to the skin when subjected to perspiration
- Be capable of withstanding frequent cleaning and disinfection
- Materials used in the manufacture of hoods must be suitable to withstand the hazards to which the user may be exposed
- A hood must be designed to provide adequate ventilation for the wearer

A protective helmet must be used in conjunction with a hood where there is a head injury hazard and the hood must be designed to accommodate helmets.
Accessories

Faceshield Protection: Faceshield devices can be attached to the helmet without changing the helmet strength and electrical protection. A metal faceshield bracket system can be used on a Class G helmet; however, if a Class E helmet is to be used in an area where Class E protection is required, a type of bracket and shield system that won’t conduct electricity (has a dielectric rating) must be used.

Earmuffs: The required degree of hearing protection will be considered prior to selecting earmuff attachments. If earmuffs are to be attached to helmets, metal attachments are acceptable for Class G helmets. Attachments with a dielectric rating must be used for Class E helmets.

Sweat Bands: If sweatbands are necessary, they must not interfere with the effectiveness of the helmet headband system. Some sweatband devices are made to fit on the headband. For electrical work, metal components must not be used to attach sweatbands to helmets.

Winter Liners: There are many varieties of winter liners. One type fits over the hardhat assembly. It must be flame retardant and elasticized to give the user a snug, warm fit. Other styles fit under the helmet. If the liner is to be used with a Class E helmet, it must have a dielectric rating. Regardless of the warmth characteristics, the liner and helmet combination must be compatible. The liner and helmet must fit properly to give the employee proper impact and penetration protection.

Chin Straps: When wind or other conditions present the possibility of the hard hat being accidentally removed from the head, chinstraps can be used. If chinstraps are used, they must be the type that fastens to the shell of the hard hat. If the chinstraps fasten to the headband and suspension system, the shell may blow off and strike another employee.

Hair Enclosures: Employees must wear a hat, cap or net if there’s a danger of hair entanglement in moving machinery or equipment, or where there’s a risk of exposure to an ignition source. Hair enclosures must completely enclose all loose hair; be adjustable to accommodate all head sizes; be designed to be reasonably comfortable to the wearer.

FOOT AND LEG PROTECTION

Employees who are exposed to possible foot or leg injuries from falling or rolling objects or from crushing or penetrating materials must wear protective footwear. In addition, employees whose work involves exposure to hot substances or corrosive or poisonous materials must have protective gear to cover exposed body parts, including legs and feet. If an employee’s feet may be exposed to electrical hazards, nonconductive footwear must be worn. On the other hand, workplace exposure to static electricity may necessitate the use of conductive footwear.

An employer must ensure that employees wear protective footwear when working in areas where any of the following occur:

- Employees’ feet are exposed to electrical hazards
- There is a danger of foot injuries due to falling or rolling objects, such as barrels or tools
- There is a danger of sharp objects, such as nails or spikes, piercing the soles of shoes
- There is exposure to molten metal that might splash on feet or legs
- There is possible exposure to chemical spills
Employees must also wear proper footwear (including protective footwear when necessary) when working on or around hot, wet, or slippery surfaces.

Foot and leg protection choices include the following:

- Leggings or high boots made of a suitable material (e.g. leather, rubber) for workers exposed to dangerous chemical spill and heat hazards such as molten metal or welding sparks
- When an employee uses a chain saw, he must wear chaps or leg protectors, made from material designed to resists cuts, covering from at least upper thigh to mid-calf
- Metatarsal guards protect the instep area from impact and compression. Made of aluminum, steel, fiber, or plastic, these guards may be strapped to the outside of shoes. Footwear designed to newer versions of ANSI Z41 and the ASTM standards require metatarsal protection to be built into the footwear
- Toe guards fit over the toes of regular shoes to protect the toes from impact and compression hazards. They may be made of steel, aluminum, or plastic

An employer who chooses to provide employees with toe guards must demonstrate that they are as protective as an incorporated toebox used in safety-toe footwear.

- Combination foot and shin guards protect the lower legs and feet, and may be used in combination with toe guards when greater protection is needed
- Safety shoes have impact-resistant toes and heat-resistant soles that protect the feet against hot work surfaces common in roofing, paving and hot metal industries. The metal insoles of some safety shoes protect against puncture wounds. Safety shoes may also be designed to be electrically conductive to prevent the buildup of static electricity in areas with the potential for explosive atmospheres or nonconductive to protect workers from workplace electrical hazards
- If a hazard is created from a process, environment, chemical, or mechanical irritant that could cause an injury or impairment to the feet by absorption or physical contact, other than from impact, the employer must provide any of the following to the employee:
  - Boots
  - Overshoes
  - Rubbers
  - Wooden-soled shoes
  - An equivalent of the above

Special Purpose Shoes

Electrically conductive shoes provide protection against the buildup of static electricity. Employees working in explosive and hazardous locations such as explosives manufacturing facilities or grain elevators must wear conductive shoes to reduce the risk of static electricity buildup on the body that could produce a spark and cause an explosion or fire.

Don’t use foot powder when wearing protective conductive footwear because it provides insulation, reducing the conductive ability of the shoes. Don’t wear silk, wool and nylon socks that can produce static electricity with conductive footwear. Conductive shoes must be removed when the task requiring their use is completed.
Employees exposed to electrical hazards must never wear conductive shoes. Electrical hazard, safety-toe shoes are non-conductive, and will prevent the wearers’ feet from completing an electrical circuit to ground. These shoes can protect against open circuits of up to 600 volts in dry conditions, and should be used with other insulating equipment and additional precautions to reduce the risk of a worker becoming a path for hazardous electrical energy.

The insulating protection of electrical hazard, safety-toe shoes may be compromised if the shoes become wet, the soles are worn through, metal particles become embedded in the sole or heel, or workers touch conductive grounded items. Note: Nonconductive footwear must not be used in explosive or hazardous locations.

Foundry shoes insulate the feet from the extreme heat of molten metal. They keep hot metal from lodging in shoe eyelets, tongues or other shoe parts. These snug-fitting leather or leather-substitute shoes have leather or rubber soles and rubber heels. All foundry shoes must have built-in safety toes.

**Care of Protective Footwear**

As with all protective equipment, safety footwear must be inspected prior to each use. Shoes and leggings need to be checked for wear and tear at reasonable intervals. This includes looking for cracks or holes, separation of materials, broken buckles or laces. Check the soles of shoes for pieces of metal or other embedded items that could present electrical or tripping hazards. Employees will follow the manufacturers’ recommendations for cleaning and maintenance of protective footwear.

**HAND AND ARM PROTECTION**

If a workplace hazard assessment reveals employees face potential injury to hands and arms that cannot be eliminated through engineering and work practice controls, US Trades, LLC will ensure employees wear appropriate protection. Potential hazards that require protection include skin absorption of harmful substances, chemical or thermal burns, electrical dangers, bruises, abrasions, cuts, punctures, fractures, amputations and harmful temperature extremes.

Protective equipment includes gloves, finger guards, and arm coverings. In addition, items such as machine guards and barriers are examples of engineering controls that may eliminate hazards to the hands and arms.

**Types of Protective Gloves**

There are many types of gloves available today to protect against a wide variety of hazards. The nature of the hazard and the operation involved will affect the selection of gloves. The variety of potential occupational hand injuries makes selecting the right pair of gloves challenging. No gloves can provide protection against all potential hand hazards. Employees must use gloves specifically designed for the hazards and tasks found in their workplace. Gloves designed for one function may not protect against a different function even though they may appear to be an appropriate protective device.
The following are examples of some factors that may influence the selection of protective gloves for a workplace:

- Type of chemicals handled (toxic properties of the chemical(s))
- Chemical concentration and temperature (the higher the concentration and temperature, the shorter the breakthrough time)
- Nature of contact (total immersion, continual contact, splash, etc)
- Duration of contact
- Area requiring protection (hand only, forearm, arm)
- Degree of dexterity (fine motor work)
- Grip requirements (dry, wet, oily)
- Thermal protection
- Size and comfort
- Abrasion/cut resistance requirements
- Other job hazards (such as biological, electrical, and radiation hazards)

Gloves are made from a wide variety of materials and are designed for many types of workplace hazards. In general, gloves fall into four groups:

- Gloves made of leather, synthetic fibers, or metal mesh
- Fabric and coated fabric gloves
- Chemical protective gloves
- Insulating rubber gloves (See 29 CFR 1910.137, Electrical Protective Equipment, for detailed requirements on the selection, use and care of insulating rubber gloves)

**Leather, Canvas or Metal Mesh Gloves**

- Sturdy gloves made from metal mesh, leather or canvas provide protection against cuts and burns. Leather or canvas gloves also protect against sustained heat
- Leather gloves protect against sparks, moderate heat, blows, chips and rough objects. These gloves can be used for tasks such as welding
- Aluminized gloves provide radiant heat protection by reflection and insulate/reduce heat conduction with a liner or insert. Employees working with molten materials would benefit from this type of glove
- Aramid fiber gloves such as Kevlar, protect against heat, are cut- and abrasion-resistant and wear well. Employees working in jobs such as firefighting, automotive work, metal fabrication, glass and ceramic handling would benefit from this type of glove
- Synthetic gloves of various materials offer protection against heat and cold, are cut- and abrasion-resistant and may withstand some diluted acids. These materials do not stand up against alkalis and solvents
- Metal mesh hand, wrist, arm and finger protective wear protects against knife cuts; however, it offers very little, if any, protection against punctures. Plastic dots can be adhered to the metal mesh to facilitate gripping
Fabric and Coated Fabric Gloves

Fabric and coated fabric gloves are made of cotton or other fabric to provide varying degrees of protection.

- Fabric gloves protect against dirt, slivers, chafing and abrasions. They do not provide sufficient protection for use with rough, sharp or heavy materials. Adding a plastic coating will strengthen some fabric gloves.
- Coated fabric gloves normally are made from cotton flannel with napping on one side. By coating the un-napped side with plastic, fabric gloves are transformed into general-purpose hand protection offering slip-resistant qualities. These gloves are used for tasks ranging from handling bricks and wire to chemical laboratory containers. When selecting gloves to protect against chemical exposure hazards, always check with the manufacturer or review the manufacturer’s product literature to determine the gloves’ effectiveness against specific workplace chemicals and conditions.

Chemical- and Liquid-Resistant Gloves

Chemical-resistant gloves are made with different kinds of rubber: natural, butyl, neoprene, nitrile and fluorocarbon (viton); or various kinds of plastic: polyvinyl chloride (PVC), polyvinyl alcohol and polyethylene. These materials can be blended or laminated for better performance. As a general rule, the thicker the glove material, the greater the chemical resistance but thick gloves may impair grip and dexterity, having a negative impact on safety.

Some examples of chemical-resistant gloves include:

- Butyl gloves are made of a synthetic rubber and protect against a wide variety of chemicals, such as peroxide, rocket fuels, highly corrosive acids (nitric acid, sulfuric acid, hydrofluoric acid and red-fuming nitric acid), strong bases, alcohols, aldehydes, ketones, esters and nitro-compounds. Butyl gloves also resist oxidation, ozone corrosion and abrasion, and remain flexible at low temperatures. Butyl rubber does not perform well with aliphatic and aromatic hydrocarbons and halogenated solvents.
- Natural (latex) rubber gloves are comfortable to wear, which makes them a popular general-purpose glove. They feature outstanding tensile strength, elasticity and temperature resistance. In addition to resisting abrasions caused by grinding and polishing, these gloves protect workers’ hands from most water solutions of acids, alkalis, salts and ketones. Latex gloves have caused allergic reactions in some individuals and may not be appropriate for all employees. Hypoallergenic gloves, glove liners and powderless gloves are possible alternatives for workers who are allergic to latex gloves.
- Neoprene gloves are made of synthetic rubber and offer good pliability, finger dexterity, high density, and tear resistance. They protect against hydraulic fluids, gasoline, alcohols, organic acids and alkalis. They generally have chemical and wear resistance properties superior to those made of natural rubber.
Nitrile gloves are made of a copolymer and provide protection from chlorinated solvents such as trichloroethylene and perchloroethylene. Although intended for jobs requiring dexterity and sensitivity, nitrile gloves stand up to heavy use even after prolonged exposure to substances that cause other gloves to deteriorate. They offer protection when working with oils, greases, acids, caustics, and alcohols but are generally not recommended for use with strong oxidizing agents, aromatic solvents, ketones, and acetates.

**Care of Protective Gloves**

Protective gloves will be inspected before each use to ensure they are not torn, punctured or made ineffective in any way. A visual inspection will help detect cuts or tears but a more thorough inspection by filling the gloves with water and tightly rolling the cuff towards the fingers will help reveal any pinhole leaks. Gloves that are discolored or stiff may also indicate deficiencies caused by excessive use or degradation from chemical exposure. Interiors of gloves must be kept free of corrosive or irritating contaminants.

Any gloves with impaired protective ability must be discarded and replaced. Reuse of chemical-resistant gloves must be evaluated carefully, taking into consideration the absorptive qualities of the gloves. A decision to reuse chemically exposed gloves should take into consideration the toxicity of the chemicals involved and factors such as duration of exposure, storage and temperature. All gloves must be sanitized and clean before reissue.

**BODY PROTECTION**

Employees who face possible bodily injury of any kind that cannot be eliminated through engineering, work practice or administrative controls must wear appropriate body protection while performing their jobs. In addition to radiation, the following are workplace hazards that could cause bodily injury, and require protection:

- Temperature extremes
- Hot splashes from molten metals and other hot liquids
- Potential impacts from tools, machinery, and materials
- Hazardous chemicals
- Wetness

There are many varieties of protective clothing available for specific hazards. Employers are required to ensure that their employees wear personal protective equipment only for the parts of the body exposed to possible injury. Examples of body protection include laboratory coats, coveralls, vests, jackets, aprons, surgical gowns and full body suits.

If a hazard assessment indicates a need for full body protection against toxic substances or harmful physical agents, the clothing must be carefully inspected before each use, it must fit each worker properly and it must function properly and for the purpose for which it is intended.

Protective clothing comes in a variety of materials, each effective against particular hazards, such as:

- Paper-like fiber, which is used for disposable suits provide protection against dust and splashes
- Treated wool and cotton, which adapts well to changing temperatures, is comfortable and fire-resistant, and protects against dust, abrasions and rough, irritating surfaces
- Duck, which is a closely woven cotton fabric that protects against cuts and bruises when handling heavy, sharp, or rough materials
- Leather, which is often used to protect against dry heat and flames
- Rubber, rubberized fabrics, neoprene and plastics, which protect against certain chemicals and physical hazards
- When chemical or physical hazards are present, check with the clothing manufacturer to ensure that the material selected will provide protection against the specific hazard

**HEARING PROTECTION**

Determining the need to provide hearing protection for employees can be challenging. Employee exposure to excessive noise depends upon a number of factors, including:

- The loudness of the noise as measured in decibels (dB)
- The duration of each employee’s exposure to the noise
- Whether employees move between work areas with different noise levels
- Whether noise is generated from one or multiple sources

Generally, the louder the noise, the shorter the exposure time before hearing protection is required. For instance, employees may be exposed to a noise level of 85 dB for 8 hours per day (unless they experience a Standard Threshold Shift) before hearing protection is required. At a noise level of 85 dB the Company is required to implement a hearing protection program that includes monitoring, employee audiometric testing and training on the use of hearing protection. If employees are exposed to a noise level of 115 dB, hearing protection is required and the exposure time can’t exceed 15 minutes. For more information on the requirements for a comprehensive hearing conservation program, see the chapter on hearing protection.

If engineering and work practice controls do not lower employee exposure to workplace noise to acceptable levels, employees must wear appropriate hearing protection. It is important to understand that hearing protectors reduce only the amount of noise that gets through to the ears. The amount of this reduction is referred to as attenuation, which differs according to the type of hearing protection used and how well it fits. Hearing protectors worn by employees must reduce an employee’s noise exposure to within the acceptable limits.

Types of hearing protection include the following:

- Single-use earplugs are made of waxed cotton, foam, silicone rubber or fiberglass wool. They are self-forming and, when properly inserted, they work as well as most molded earplugs
- Pre-formed or molded earplugs must be individually fitted by a professional and can be disposable or reusable. Reusable plugs must be cleaned after each use
- Earmuffs require a perfect seal around the ear. Glasses, facial hair, long hair, or facial movements such as chewing may reduce the protective value of earmuffs

**Safety Belts, Lifelines, And Lanyards**

The only acceptable use of lifelines, safety belts and lanyards is to safeguard employees. If a lifeline, safety belt or lanyard is subjected to in-service loading; it must be removed from service and discarded.
• Lifelines must be secured above the point of operation to an anchorage or structural member capable of supporting a minimum dead weight of 5,400 pounds
• If a lifeline is subject to cutting or abrasion, as may be the case on rock scaling operations, it must be at least \( \frac{3}{4} \)-inch wire core manila rope. Otherwise, it may be a \( \frac{3}{4} \)-inch manila or equivalent, with a nominal breaking strength of at least 5,400 pounds
• Safety belt lanyards will be at least \( \frac{1}{2} \)-inch nylon and provide for a fall that does not exceed 6 feet. They must also have a nominal breaking strength of 5,400 pounds
• Hardware on safety belts and lanyards in use must be drop forged or pressed steel or cadmium plated according to federal specifications. The surface must be smooth and free of sharp edges
• Safety belt and lanyard hardware, except rivets, must withstand a tensile loading of 4,000 pounds without cracking, breaking, or taking a permanent deformation

For more information, see the “Fall Protection” chapter.

OTHER PPE

High Visibility Apparel

High visibility apparel must be used by workers involved in traffic control, such as flaggers or law enforcement officers, or for employees who work on the roadways, such as sanitation, utility or construction workers and emergency responders. The apparel must be high visibility orange, yellow, yellow-green or a fluorescent version so that it contrasts with the surrounding area. Reflective material visible from all sides for 1,000 feet must be worn during dark hours.

Flotation Vests

Employees working over or near water, where the danger of drowning exists, will be provided with approved life jackets or buoyant work vests. These vests are available as flotation pads inside high visibility international orange nylon shells or as vinyl coated flotation pads of international orange. The flotation vests must be U.S. Coast Guard approved.

Additionally, in any other workplace where employees work over or near water, or use boats, approved life jackets, buoyant work vests or other flotation devices must be provided. All buoyant work vests and life preservers will be checked for defects before and after each use.

Welding and High Heat

Coveralls, jackets, pants and aprons are available for operations involving high heat or molten metal splashes. Leather is the traditional protective material for many welding operations. Where there is exposure to radiant heat as well as molten metal splashes, aluminized garments may be used. They reflect up to 95 percent of the radiant heat. Flame-resistant cotton coveralls designed for comfort and protection are sometimes preferred. Whatever the type of clothing used for welding operations, it must not have external pockets or cuffs. Fabrics of silica, ceramic and fiberglass eliminate the need for asbestos and are now available for welding operations. Protective clothing with asbestos will not be used.
FORMS AND ATTACHMENTS

Please find on the following pages the PPE Hazard Assessment Certification Form, which may be reproduced freely by US Trades, LLC for the purposes of implementing and maintaining a safety and health program.
# PPE Hazard Assessment Certification Form

## Workplace Conducted By

<table>
<thead>
<tr>
<th>Address</th>
<th>Date</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Area(s)</th>
<th>Job or Task</th>
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## Eyes

<table>
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<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ abrasive blasting</td>
<td>□ airborne dust</td>
<td>□ Yes</td>
</tr>
<tr>
<td>□ chopping</td>
<td>□ dirt</td>
<td>□ No</td>
</tr>
<tr>
<td>□ cutting</td>
<td>□ UV</td>
<td>If No, use:</td>
</tr>
<tr>
<td>□ drilling</td>
<td>□ flying particles/objects</td>
<td>□ Safety glasses</td>
</tr>
<tr>
<td>□ hammering</td>
<td>□ blood splashes</td>
<td>□ Safety goggles</td>
</tr>
<tr>
<td>□ other:</td>
<td>□ hazardous liquid chemicals and mists</td>
<td>□ Dust-tight goggles</td>
</tr>
<tr>
<td></td>
<td>□ chemical splashes</td>
<td>□ Impact goggles</td>
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<tr>
<td></td>
<td>□ molten metal splashes</td>
<td>□ Chemical goggles</td>
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<td></td>
<td>□ glare/ high intensity lights</td>
<td>□ Chemical splash goggles</td>
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<tr>
<td></td>
<td>□ laser operations</td>
<td>□ Laser goggles</td>
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<tr>
<td></td>
<td>□ intense light</td>
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</tr>
<tr>
<td></td>
<td>□ hot sparks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>□ other:</td>
<td></td>
</tr>
</tbody>
</table>

**If No, use:**

- □ Safety glasses
- □ Safety goggles
- □ Dust-tight goggles
- □ Impact goggles
- □ Welding helmet/shield
- □ Chemical goggles
- □ Chemical splash goggles
- □ Laser goggles
- □ Shading/Filter (#___)
- □ Other: With:
  - □ Side shields
  - □ Face shield
  - □ Shaded
  - □ Prescription

## Face

<table>
<thead>
<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
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<td>□ cooking</td>
<td>□ extreme heat</td>
<td>□ No</td>
</tr>
<tr>
<td>□ siphoning</td>
<td>□ extreme cold</td>
<td>If No, use:</td>
</tr>
<tr>
<td>□ painting</td>
<td>□ potential irritants</td>
<td>□ Face shield</td>
</tr>
<tr>
<td>□ dip tank operations</td>
<td>□ other:</td>
<td>□ Shading/Filter (#___)</td>
</tr>
<tr>
<td>□ pouring</td>
<td>□ molten metal</td>
<td>□ Welding shield</td>
</tr>
<tr>
<td>□ other:</td>
<td>□ working outdoors</td>
<td>□ Other:</td>
</tr>
</tbody>
</table>

- □ foundry work
- □ welding
- □ mixing
- □ pouring
- □ working outdoors

**If No, use:**

- □ Face shield
- □ Shading/filter (#____)
- □ Welding shield
- □ Other:
## PPE Hazard Assessment Certification Form (Page 2 of 5)

### Head

<table>
<thead>
<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ building maintenance</td>
<td>☐ beams</td>
<td>☐ Yes</td>
</tr>
<tr>
<td>☐ confined space</td>
<td>☐ pipes</td>
<td>If No, use:</td>
</tr>
<tr>
<td>operations</td>
<td>☐ exposed electrical</td>
<td>☐ Protective Helmet</td>
</tr>
<tr>
<td>☐ electrical</td>
<td>wiring</td>
<td>☐ Type G (low voltage)</td>
</tr>
<tr>
<td>☐ walking/</td>
<td>☐ falling objects</td>
<td>☐ Type E (high voltage)</td>
</tr>
<tr>
<td>working under</td>
<td>☐ fixed object</td>
<td>☐ Type C</td>
</tr>
<tr>
<td>catwalks</td>
<td>☐ machine parts</td>
<td></td>
</tr>
<tr>
<td>☐ walking/</td>
<td>☐ utility work</td>
<td></td>
</tr>
<tr>
<td>working on catwalks</td>
<td>☐ other:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ other:</td>
<td></td>
</tr>
</tbody>
</table>

If No, use:
- Protective Helmet
- Type G (low voltage)
- Type E (high voltage)
- Type C

### Hand/Arms

<table>
<thead>
<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ baking</td>
<td>☐ blood</td>
<td>☐ Yes</td>
</tr>
<tr>
<td>☐ cooking</td>
<td>☐ irritating chemicals</td>
<td>If No, use:</td>
</tr>
<tr>
<td>☐ grinding</td>
<td>☐ tools or materials</td>
<td>☐ Protective sleeves</td>
</tr>
<tr>
<td>☐ welding</td>
<td>that could scrape,</td>
<td>☐ Chemical resistance</td>
</tr>
<tr>
<td>☐ working with glass</td>
<td>bruise, or cut</td>
<td>☐ Liquid/leak resistance</td>
</tr>
<tr>
<td>☐ using computers</td>
<td>☐ extreme heat</td>
<td>☐ Temperature resistance</td>
</tr>
<tr>
<td>☐ using knives</td>
<td>☐ extreme cold</td>
<td>☐ Abrasion/cut resistance</td>
</tr>
<tr>
<td>☐ dental and health care</td>
<td>☐ animal bites</td>
<td>☐ Slip resistance</td>
</tr>
<tr>
<td>services</td>
<td>☐ electric shock</td>
<td>☐ Latex or nitrile</td>
</tr>
<tr>
<td></td>
<td>☐ vibration</td>
<td>☐ Anti-vibration</td>
</tr>
<tr>
<td></td>
<td>☐ musculoskeletal</td>
<td></td>
</tr>
<tr>
<td></td>
<td>disorders</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ sharps injury</td>
<td></td>
</tr>
<tr>
<td></td>
<td>☐ other:</td>
<td></td>
</tr>
</tbody>
</table>

If No, use:
- Protective sleeves
- Ergonomic equipment
### PPE Hazard Assessment Certification Form (Page 3 of 5)

#### Feet/Legs

<table>
<thead>
<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ building maintenance</td>
<td>☐ explosive atmospheres</td>
<td>☐ Yes If No, use:</td>
</tr>
<tr>
<td>☐ construction</td>
<td>☐ explosive atmospheres</td>
<td>☐ No</td>
</tr>
<tr>
<td>☐ demolition</td>
<td>☐ exposed electrical wiring or components</td>
<td>☐ Safety shoes or boots</td>
</tr>
<tr>
<td>☐ food processing</td>
<td>☐ heavy equipment</td>
<td>☐ Leggings or chaps</td>
</tr>
<tr>
<td>☐ foundry work</td>
<td>☐ slippery surfaces</td>
<td>☐ Foot-Leg guards</td>
</tr>
<tr>
<td>☐ working outdoors</td>
<td>☐ impact from objects</td>
<td>☐ Metatarsal protection</td>
</tr>
<tr>
<td></td>
<td>☐ pinch points</td>
<td>☐ Heat/Cold protection</td>
</tr>
<tr>
<td></td>
<td>☐ slippery/wet surface</td>
<td>☐ Chemical resistance</td>
</tr>
<tr>
<td></td>
<td></td>
<td>☐ Other:</td>
</tr>
</tbody>
</table>

If No, use:

- Safety shoes or boots
- Toe protection
- Electrical protection
- Puncture resistance
- Anti-slip soles
- Other:

#### Body/Skin

<table>
<thead>
<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ baking or frying</td>
<td>☐ chemical splashes</td>
<td>☐ Yes If No, use:</td>
</tr>
<tr>
<td>☐ battery charging</td>
<td>☐ extreme heat</td>
<td>☐ No</td>
</tr>
<tr>
<td>☐ dip tank operations</td>
<td>☐ extreme cold</td>
<td>☐ Welding leathers</td>
</tr>
<tr>
<td>☐ fiberglass installation</td>
<td>☐ irritating chemicals</td>
<td>☐ Abrasions/cut resistance</td>
</tr>
<tr>
<td>☐ sawing</td>
<td>☐ blood</td>
<td>☐ Other:</td>
</tr>
<tr>
<td>☐ other:</td>
<td>☐ other:</td>
<td></td>
</tr>
</tbody>
</table>

If No, use:

- Vest
- Coveralls
- Raingear
- Apron
- Other:
### Body/Whole

<table>
<thead>
<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ building maintenance</td>
<td>☐ working from heights of 10 feet or more</td>
<td>☐ Yes If No, use:</td>
</tr>
<tr>
<td>☐ construction</td>
<td>☐ impact from flying objects</td>
<td>☐ Fall arrest/restraint</td>
</tr>
<tr>
<td>☐ logging</td>
<td>☐ impact from moving vehicles</td>
<td>☐ Traffic vest</td>
</tr>
<tr>
<td>☐ computer work</td>
<td>☐ sharps injury</td>
<td>☐ Static coats/overalls</td>
</tr>
<tr>
<td>☐ working outdoors</td>
<td>☐ blood</td>
<td>☐ Flame resistant jacket/pants</td>
</tr>
<tr>
<td>☐ utility work</td>
<td>☐ electrical/ static discharge</td>
<td>☐ Insulated jacket</td>
</tr>
<tr>
<td>☐ other:</td>
<td>☐ hot metal</td>
<td>☐ Cut-resistant sleeves/ wristlets</td>
</tr>
<tr>
<td>☒ working from heights of 10 feet or more</td>
<td>☐ musculo-skeletal disorders</td>
<td>☐ No</td>
</tr>
<tr>
<td>☒ impact from flying objects</td>
<td>☐ chemicals</td>
<td>☐ Hoists/lift</td>
</tr>
<tr>
<td>☒ impact from moving vehicles</td>
<td>☐ extreme heat/cold</td>
<td>☐ Ergonomic equipment</td>
</tr>
<tr>
<td>☒ sharps injury</td>
<td>☐ elevated walking/working surface</td>
<td>☐ Other:</td>
</tr>
<tr>
<td>☐ blood</td>
<td>☐ working near water</td>
<td>☐ Face shield</td>
</tr>
<tr>
<td>☒ electrical/ static discharge</td>
<td>☐ injury from slip/trip/fall</td>
<td>☐ Acid/gas crtg</td>
</tr>
<tr>
<td>☒ hot metal</td>
<td>☐ other:</td>
<td>☐ Organic crtg</td>
</tr>
<tr>
<td>☒ sparks</td>
<td>☐ other:</td>
<td>☐ Pesticide crtg</td>
</tr>
</tbody>
</table>

**If No, use:**
- Fall arrest/restraint
- Traffic vest
- Static coats/overalls
- Flame resistant jacket/pants
- Insulated jacket
- Cut-resistant sleeves/ wristlets

**With:**
- Hood
- Full sleeves

### Lungs/Respiratory

<table>
<thead>
<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ cleaning</td>
<td>☐ dust or particulate</td>
<td>☐ Yes If No, use:</td>
</tr>
<tr>
<td>☐ mixing</td>
<td>☐ toxic gas/vapor</td>
<td>☐ Dust mask</td>
</tr>
<tr>
<td>☐ painting</td>
<td>☐ chemical irritants (acids)</td>
<td>☐ Disposable particulate respirator</td>
</tr>
<tr>
<td>☐ fiberglass installation</td>
<td>☐ welding fume</td>
<td>☐ Replaceable filter particulate w/cartridge</td>
</tr>
<tr>
<td>☐ compressed air or gas operations</td>
<td>☐ asbestos</td>
<td>☐ PAPR (air recycle)</td>
</tr>
<tr>
<td>☐ confined space work</td>
<td>☐ pesticides</td>
<td>☐ PPSA (air supply)</td>
</tr>
<tr>
<td>☐ floor installation</td>
<td>☐ organic vapors</td>
<td>☐ No</td>
</tr>
<tr>
<td>☐ ceiling repair</td>
<td>☐ oxygen deficient environment</td>
<td>☐ Face shield</td>
</tr>
<tr>
<td>☐ working outdoors</td>
<td>☐ paint spray</td>
<td>☐ Acid/gas crtg</td>
</tr>
<tr>
<td>☐ pouring</td>
<td>☐ extreme heat/cold</td>
<td>☐ Organic crtg</td>
</tr>
<tr>
<td>☐ sawing</td>
<td></td>
<td>☐ Pesticide crtg</td>
</tr>
<tr>
<td>☐ other:</td>
<td></td>
<td>☐ Spray paint crtg</td>
</tr>
<tr>
<td>☐ other:</td>
<td></td>
<td>☐ Half-faced</td>
</tr>
</tbody>
</table>

**If No, use:**
- Dust mask
- Disposable particulate respirator
- Replaceable filter particulate w/cartridge
- PAPR (air recycle)
- PPSA (air supply)

**With:**
- Hooded
- Full-faced
- Half-faced
## Ears/Hearing

<table>
<thead>
<tr>
<th>Work activities, such as</th>
<th>Work-related exposure to</th>
<th>Can hazard be eliminated without the use of PPE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>generator, ventilation fans, motors, sanding, pneumatic equipment, punch or brake presses</td>
<td>use of conveyers, grinding, machining, routers, sawing, sparks, other:</td>
<td>loud noises, loud work environment, noisy machines/tools, punch or brake presses, other:</td>
</tr>
<tr>
<td>☐</td>
<td>☐</td>
<td>☐ Yes ☐ No</td>
</tr>
</tbody>
</table>

If No, use:
- Ear muffs
- Ear plugs
- Leather welding hood

### Additional Notes
POLICY

US Trades, LLC is committed to the safety and health of its employees. To identify and control hazards presented by products that contain materials, chemicals or components that may cause injury or illness in the workplace, US Trades, LLC has in place a Hazard Communication Program (HCP) to provide information to employees about any hazardous materials to which they are exposed.

If US Trades, LLC employees are exposed to any hazardous chemical, US Trades, LLC designates clients responsibility to ensure a written HCP is created, communicated to all employees, and maintained according to all applicable regulations, standards and industry best practices.

All aspects of this policy and the US Trades, LLC Hazard Communication Program are subject to annual review by clients responsibility to verify the effectiveness of the policy, to guarantee a safe working environment for US Trades, LLC employees, and to reflect any regulatory changes to which the policy must respond.

OSHA has adopted the United Nation’s Globally Harmonized System (GHS) of Classification and Labeling of Chemicals into its Hazard Communication standard, this includes:

- Safety Data Sheets (SDS) and their new format instead of Material Safety Data Sheets (MSDS)
- The requirements and formats for the new primary and secondary labels
- Employee Training requirements so workers understand the risks to safety and health that hazardous materials pose at their worksite, and being able to read and understand the new SDS sheets and labels.”

The Hazard Communication Program (HCP) describes how US Trades, LLC will meet all applicable requirements regarding identifying hazardous chemicals, labeling under the GHS guidelines, providing availability of safety data sheets (SDS), and employee information and training.

The HCP also will include the following:

- A list of chemicals (SDS) in inventory known to present a hazard to US Trades, LLC employees
- Methods US Trades, LLC will use to inform employees of hazards presented by non-routine tasks
- Methods US Trades, LLC will use to inform employees of hazards associated with chemicals contained in unlabeled pipes in their work areas
EMPLOYER RESPONSIBILITIES

- It is the responsibility of US Trades, LLC (through clients responsibility) to:
  - Establish a Hazard Communication Program if employees work with or around any potentially hazardous material
  - Ensure that proper safeguards are in place to ensure the safety of personnel working with or around hazardous chemicals
  - Maintain a list of hazardous chemicals that exist in the workplace as well as in formation on the hazards they present (SDS), and ensure that every employee can readily access them
  - Ensure all hazardous chemicals in the workplace are labeled and have a complete safety data sheet on file
  - Ensure all employees are trained on the Hazard Communication Program (HCP)
  - Provide support for the implementation of HCP
  - Review the HCP at least annually to evaluate the effectiveness of the program
  - Report the use of known carcinogens to the state OSHA division as required.

EMPLOYEE RESPONSIBILITIES

Every US Trades, LLC employee is expected to:

- Follow safety policy and adhere to all precautions and safety requirements when working with or around hazardous chemicals
- Understand the hazards of the chemicals in the workplace by reviewing SDS before using any hazardous chemical
- Understand how to lessen or prevent exposure to hazardous chemicals through safe work practices and use of personal protective equipment
- Understand emergency procedures in the event of exposure to these chemicals
- Verify the proper labeling of chemicals at the worksite, and the presence of SDS for each
- Report any deficiencies in hazard communication as soon as safely possible to his or her supervisor
- Attend and participate actively in safety trainings

TRAINING

US Trades, LLC will provide training covering all aspects of the Hazard Communication Program. US Trades, LLC will provide training on hazardous chemicals in their employee’s work area at the time of assignment and whenever a new hazard is introduced to their work area.

All employees who may be exposed to hazardous chemicals under normal operating conditions while performing their job duties in their assigned work areas must receive training. US Trades, LLC may design training or use training designed to cover categories of hazards or specific chemicals.

The HCP will be made available upon request to any employee (or their designated representatives) and any regulatory official with the authority to demand it.
Training Components

Clients’ responsibility will ensure that all employees at US Trades, LLC are informed and trained in the following minimum elements for hazard communication:

- The requirements of regulatory bodies, industry standards and best safety practices regarding specific chemicals
- Operations in the employee’s work area that involve hazardous chemicals
- Physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area
- Reading and understanding hazardous chemical labeling, including pictograms, signal words, hazard statements, and precautionary statements
- The availability and location of the written HCP, list of hazardous chemicals, and SDS
- How to detect the presence or release of a hazardous chemical in the work area
- The classified and unclassified hazards of chemicals in the work area
  - The Globally Harmonized System of Classification (GHS) determines if a substance or mixture meets their criteria for a hazardous substance, meaning harmful to the environment or to humans. OSHA has adopted the GHS classification of chemicals. Those substances that are identified as hazardous are referred to as Classified. Substances that have not yet been classified are referred to as ‘Hazards Not Otherwise Classified’ (HNOC) or Unclassified.
- Measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented for employee protection
- The details of the HCP, including an explanation of all labels and SDS, how employees can obtain and use the appropriate hazard information. Training must include the order of information on the SDS and how to obtain and use the hazard information

Training Records

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

US Trades, LLC will retain employee training records for the length of their employment.

HAZARD DETERMINATION AND COMMUNICATION

US Trades, LLC will rely on the evaluation of the chemical manufacturer or importer of any hazardous chemicals at the worksite to provide the identifying labels and safety data information required for the HCP.
Container Warning Labels

The purpose of a container warning label is to warn employees about the container's contents and to refer employees to an appropriate SDS for more information about the chemical's physical and health hazards. Manufacturers, importers and distributors must ensure that each hazardous chemical product sold to you has a label that includes the chemical's identity, a hazard warning, and a name and address for additional information about the product. If you use hazardous chemicals at your workplace, you must ensure that each hazardous chemical container has a legible label, in English that identifies the chemical and warns of its hazards.

Original Containers

Original containers of hazardous chemicals from a manufacturer, importer or distributor must have warning labels. Do not remove or deface them.

The GHS does not specify a label format or layout, but requires the inclusion of several elements. All hazardous material containers at US Trades, LLC will be labeled, tagged or marked with the following:

1. **Product Identifier.** The product identifier must match the identifier on the safety data sheet and include the chemical identity of the substance or ingredients in a mixture that contribute to the product’s hazards.

2. **Pictograms.** Pictograms are combinations of graphical elements that convey information about the product’s hazards. GHS hazard pictograms are a black symbol on a white field within a red diamond.

3. **Signal Word.** Signal words indicate the severity of the product’s hazard. “Danger” indicates severe hazards while “Warning” indicates less severe hazards.

4. **Hazard Statements.** Hazard statements are assigned based on the nature of the product’s hazards.

5. **Precautionary Statements.** Precautionary statements inform the reader about how to prevent or minimize the negative effects of storing or handling the product unsafely. They fall into four categories: prevention, response, storage and disposal.

6. **Supplier Identification.** The supplier identification includes the name, address and telephone number that can be used to locate or communicate with the manufacturer or supplier.

Other Elements: GHS permits competent authorities to require or allow additional information and specify where it must be presented on the product label as long as it does not impede, contradict or confuse the standard information. Examples include transport pictograms, precautionary pictograms, first-aid recommendations, universal product codes, general usage information, etc.

Secondary/Portable Containers

Secondary containers are used to hold material transferred from the manufacturers’ original container. These must be labelled if:
- It’s not used within the work shift by the individual who makes the transfer
- The worker who made the transfer leaves the work area
- The container is moved to another work area and is no longer in the possession of the person who filled the container

US Trades, LLC will verify that workplace labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. If US Trades, LLC has employees who speak other languages, the company may add the information in their language to the material presented, as long as the information is presented in English as well.

Labels for secondary containers must include:

- The identity of the chemical and appropriate hazard warnings must be shown on the label.
- The hazard warning that provides users with an immediate understanding of the primary health and/or physical hazard(s) of the chemical through the use of words, pictures, symbols, or any combination of these elements
- The name and address of the manufacturer, importer or other responsible party

The hazard label message must be legible, permanently displayed and written in English.

Portable containers are intended for immediate use of a chemical by the person who makes the transfer. Labels on portable containers are not required if the worker who made the transfer uses all of the contents during the work shift, or the chemical is return to a labelled primary or secondary container at the end of the shift, or when work is completed.

For unclassified hazards, the label requires supplementary information, a description of the unclassified hazards and appropriate precautionary measures to take for safe handling and use.

- Alternatively, hazardous material containers at US Trades, LLC can be marked with the product identifier and words, pictures, symbols, or combination thereof, to provide at least general information regarding the hazards of the chemicals. Labeling is done in conjunction with other information immediately available to employees under the HCP to provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.
- Instead of labelling individual containers, the US Trades, LLC HCP may rely on signs, placards, process sheets, batch tickets, operating procedures or similar written materials, as long as the alternative method provides workers with the same information. See the signage provisions of the National Fire Protection Association contained in NFPA 704 – Standard System for the Identification of the Hazards of Materials for Emergency Response.
- A container for a hazardous substance into which the substance has been transferred for immediate use does not have to be labeled. Labels are necessary, however, for any container that is stored.
- No employee will remove or deface labels or other forms of warnings.
- US Trades, LLC will check that labels are legible in English, but may present the chemical’s hazard information in another language, as long as it’s also present in English.
• Don’t use any container that’s contained a hazardous substance unless the it’s been thoroughly
  cleaned to remove all traces of any hazardous substance, except where the container is refilled
  with the same substance
• Verify that every container is correctly labeled with regard to its contents

SAFETY DATA SHEETS

US Trades, LLC will continuously compile and keep at the workplace a list of all known hazardous
chemicals that are present

The GHS does not specify a specific format or layout for the data sheet, but requires the inclusion of
several elements, which will include the following section numbers and headings, and the information
about the chemical associated with each:

• Section 1, Identification
• Section 2, Hazard(s) identification
• Section 3, Composition/information on ingredients
• Section 4, First-aid measures
• Section 5, Fire-fighting measures
• Section 6, Accidental release measures
• Section 7, Handling and storage
• Section 8, Exposure controls/personal protection
• Section 9, Physical and chemical properties
• Section 10, Stability and reactivity
• Section 11, Toxicological information
• Section 12, Ecological information
• Section 13, Disposal considerations
• Section 14, Transport information
• Section 15, Regulatory information
• Section 16, Other information, including date of preparation or last revision.

EMERGENCY PLANNING

Facilities that maintain Extremely Hazardous Substances (EHS) on-site in quantities greater than
corresponding threshold planning quantities must cooperate in emergency plan preparation with
local/state governments. Local governments are required to prepare chemical emergency response
plans, and to review plans at least annually. State governments are required to oversee and
coordinate local planning efforts.

For a complete list of related requirements, see the Emergency Planning and Community Right-to-
Know Act (EPCRA), passed by Congress in 1986. This section, and the two that follow, contain the
major provisions of the EPCRA.
REPORTING

Facilities must immediately report to state and local officials accidental releases of EHS chemicals and "hazardous substances" in quantities greater than corresponding Reportable Quantities (RQs) defined under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). Information about accidental chemical releases must also be available to the public.

The EPA requires facilities that manufacture, use, or store 500 pounds or the Threshold Planning Quantity (whichever is less), of an extremely hazardous substance (EHS), report to state and local officials, and to local fire departments, inventories of all on-site chemicals for which safety data sheets exist. Facilities that manufacture, use or store 10,000 pounds of any hazardous chemical must also follow the same reporting procedures (gasoline and diesel fuel are the only hazardous chemicals to have higher threshold levels).

Facilities, as applicable, must complete and submit a toxic chemical release inventory form (Form R) annually. Form R must be submitted for each of the over 600 TRI chemicals that are manufactured or otherwise used above the applicable threshold quantities.

COMMUNITY RIGHT TO KNOW

In addition to providing employees with information regarding the hazards of chemicals in the workplace, employers must also, upon request, inform members of the public about the health and environmental hazards posed by stored or released chemicals. The public is also entitled to know the approximate quantities of chemicals stored or released at a given workplace. If an employer denies a reasonable request, the requesting party may then file an application for information with the state agency that has jurisdiction, or federal OSHA.

HAZARD CONTROL

Employers must protect workers against the potential negative health effects of exposure to hazardous substances by ensuring employees use respirators and appropriate equipment if they are, or may be, exposed to substances at levels above permissible exposure limits (PELs).

Permissible Exposure Limits (PELs)

Approximately 500 PELs have been established by OSHA as part of 29 CFR 1910.1000. See tables Z-1 and Z-2 for the current levels, and check to see if their state OSHA (if applicable) has more stringent standards for specific hazardous substances.

Multi-Employer Workplaces

If hazardous chemicals present risk to employees of another employer, US Trades, LLC will ensure the HCP includes the methods to do the following for the other employers on the site:

- Provide onsite access to SDS for each hazardous chemical to which their employees may be exposed
- Inform them of any precautionary measures that need to be taken for worker protection during normal operating conditions and foreseeable emergencies
- Inform them of the labeling system used in the workplace
Multiple Workplaces
If employees must travel between workplaces during a shift, US Trades, LLC may keep the HCP at only the primary workplace facility.

Non-Routine Tasks
Before employees begin work on hazardous non-routine tasks, the appropriate supervisor will give affected employees information about hazardous chemicals to which the employee may be exposed during such activity. This information will include the following:

- Specific chemical hazards
- Protective/safety measures employees can take
- Measures US Trades, LLC has taken to reduce the hazards

Hazardous Chemicals in Unlabeled Pipes
If there are hazards associated with chemicals in the piping system in the work area, a supervisor must inform employees working around the pipes and provide information about the chemical and its hazards. Labels to relay this information are good practice for workplaces that transport potentially hazardous chemicals through pipes, and may be required by other regulations.

Standards for labeling pipes in the workplace can be found in ANSI A13.1.

FORMS AND ATTACHMENTS
Please find on the following pages the below documents, which may be reproduced freely by US Trades, LLC for the purposes of implementing and maintaining a safety and health program.

- Hazardous Chemical labels
- Hazardous Chemicals List
<table>
<thead>
<tr>
<th>NAME OF CHEMICAL:</th>
<th>NAME OF CHEMICAL:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Hazards:</td>
<td>Physical Hazards:</td>
</tr>
<tr>
<td>Health Hazards, Target Organs, or Systems:</td>
<td>Health Hazards, Target Organs, or Systems:</td>
</tr>
<tr>
<td>Optional Information, such as Personal Protective Equipment or Safe Handling:</td>
<td>Optional Information, such as Personal Protective Equipment or Safe Handling:</td>
</tr>
</tbody>
</table>
The following list identifies all hazardous chemicals used at this workplace. Detailed information about the physical and health effects of each chemical is included in a safety data sheet; the identity of each chemical on the list matches the identity of the chemical on its safety data sheet. Safety data sheets are readily available to employees in their work areas.

<table>
<thead>
<tr>
<th>Product or Brand Name</th>
<th>Manufacturer</th>
<th>Hazardous Ingredient</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>
GENERAL ELECTRICAL SAFETY

US TRADES, LLC has established this electrical safety policy to protect all employees from the hazards of working with and around electricity. This policy is intended for employees who may be exposed to electrical hazards on the job. Employees who are qualified and assigned the duties of performing electrical work need to refer to the “Electrical Work” chapter of this manual for additional information. Qualified workers (electrical trade workers) require additional training and or certification.

Many workers in manufacturing and construction deal with potential electrical hazards when working with power equipment and tools, but office personnel and others can also be exposed to these hazards. For that reason, all employees must be trained on electrical hazards and how to avoid them.

EMPLOYER RESPONSIBILITY

US Trades, LLC is responsible for providing:

- All tools and equipment will meet the required safety standards
- Approved PPE to employees as needed
- A written electrical safety program and training on the program

EMPLOYEE RESPONSIBILITIES

All US Trades, LLC employees are expected to:

- Follow safe work practices and adhere to all precautions and safety requirements when working with or around electrical equipment or circuits
- Understand how to reduce or prevent exposure to electrical hazards through safe work practices and use of PPE
- Use only hand tools, electric tools, extension cords and other equipment that are in good repair
- De-energize electric power circuits and/or equipment before working near, inspecting or making repairs
- Understand emergency procedures in the event of an electrical accident
- Report any potential electrical hazards as soon as safely possible to their supervisor
- Attend and participate actively in safety trainings
- Exercise good judgment when working near energized lines (including underground and overhead lines). Comply with OSHA regulations and the current National Electric Code, NFPA 70

HAZARDS

Electrical Shock

An electrical shock is received when electrical current passes through the body. Current will pass through the body in a variety of situations. Whenever two wires are at different voltages, current will pass between them if they are connected. Your body can connect the wires if you touch both of them at the same time. Current will pass through your body.
The severity of injury from electrical shock depends on the amount of electrical current and the length of time the current passes through the body. For example, 100 milliamps of electricity going through the body for just 2 seconds is enough to cause death. The amount of internal current a person can withstand and still be able to control the muscles of the arm and hand can be less than 10 milliamps.

The table below shows what usually happens for a range of currents (lasting one second) at typical household voltages. Longer exposure times increase the danger to the shock victim. For example, a current of 100 mA applied for 3 seconds is as dangerous as a current of 900 mA applied for 0.03 seconds. The muscle structure of the person also makes a difference. People with less muscle tissue are typically affected at lower current levels. Even low voltages can be extremely dangerous because the degree of injury depends not only on the amount of current but also on the length of time the body is in contact with the circuit.

**LOW VOLTAGE DOES NOT MEAN LOW HAZARD!**

<table>
<thead>
<tr>
<th>Current</th>
<th>Reaction</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 milliamp</td>
<td>Just a faint tingle</td>
</tr>
<tr>
<td>5 milliamps</td>
<td>Slight shock felt. Disturbing, but not painful. Most people can “let go.”</td>
</tr>
<tr>
<td>6–25 milliamps (women)†</td>
<td>Painful shock. Muscular control is lost. This is the range where “freezing currents” start. It may not be possible to “let go.”</td>
</tr>
<tr>
<td>9–30 milliamps (men)</td>
<td>Painful shock. Muscular control is lost. This is the range where “freezing currents” start. It may not be possible to “let go.”</td>
</tr>
<tr>
<td>50–150 milliamps</td>
<td>Extremely painful shock, respiratory arrest (breathing stops), severe muscle contractions. Flexor muscles may cause holding on; extensor muscles may cause intense pushing away. Death is possible.</td>
</tr>
<tr>
<td>1,000–4,300 milliamps (1–4.3 amps)</td>
<td>Ventricular fibrillation (heart pumping action not rhythmic) occurs. Muscles contract; nerve damage occurs. Death is likely.</td>
</tr>
<tr>
<td>10,000 milliamps (10 amps)</td>
<td>Cardiac arrest and severe burns occur. Death is probable.</td>
</tr>
<tr>
<td>15,000 milliamps (15 amps)</td>
<td>Lowest over-current at which a typical fuse or circuit breaker opens a circuit!</td>
</tr>
</tbody>
</table>

*Effects are for voltages less than about 600 volts. Higher voltages also cause severe burns.
†Differences in muscle and fat content affect the severity of shock.

**Electrical Burns**

The most common shock-related, nonfatal injury is a burn. Electrical burns can result when a person touches electrical wiring or equipment that’s being used or maintained improperly. Typically, such burns occur on the hands. Electrical burns are one of the most serious injuries you can receive. They need to be given immediate attention. Additionally, clothing may catch fire and a thermal burn may result from the heat of the fire.
Electrical Fires

Electricity is one of the most common causes of fires and thermal burns in homes and workplaces. Defective or misused electrical equipment is a major cause of electrical fires. If there is a small electrical fire, be sure to use only a Class C or multipurpose (ABC) fire extinguisher, or you might make the problem worse.

All fire extinguishers are marked with letter(s) that tell you the kinds of fires they can put out. Some extinguishers contain symbols, too.

Thermal burns may result if an explosion occurs when electricity ignites an explosive mixture of material in the air. This ignition can result from the buildup of combustible vapors, gasses or dusts. Occupational Safety and Health Administration (OSHA) standards, the NEC, and other safety standards give precise safety requirements for the operation of electrical systems and equipment in such dangerous areas. Ignition can also be caused by overheated conductors or equipment, or by normal arcing at switch contacts or in circuit breakers.

PREVENTING ELECTRICAL ACCIDENTS

To prevent electrical accidents, US Trades, LLC will take the following steps:

- Establish safe practices and procedures for working around electrical control cabinets without getting hurt
- Make sure all employees know the importance of de-energizing electrical sources before performing repairs

Note: only qualified personnel can perform work on circuits, including testing

PERSONAL PROTECTIVE EQUIPMENT

Employees who are not working directly on energized parts, equipment or circuits may still be required to wear PPE to prevent the risk of electrical injury. This equipment must meet OSHA/ANSI requirements and be appropriate for the parts of the body that need protection and the work performed. When working near electrical circuits, or on equipment that could become energized, employees must:

- Wear electrically protective gloves
- Wear insulated shoes
- Use only insulated tools

FIRST AID FOR ELECTRICAL INJURIES

If a co-worker is shocked or burned by electricity, the following actions need to be taken:

- Shut off the electrical current if the victim is still in contact with the energized circuit
- Have someone else call for help
- If you can’t shut off the power quickly, pry the victim from the circuit with something that doesn’t conduct electricity such as dry wood. Don’t touch the victim yourself if he or she is still in contact with an electrical circuit!
• Don’t leave the victim unless there’s no other option. Stay with the victim while Emergency Medical Services (EMS) is contacted. The caller should come back to you afterwards to verify that the call was made.

Once you know that electrical current is no longer flowing through the victim, call out to the victim to see if he or she is conscious. If the victim is conscious, tell them not to move. It’s possible for a shock victim to be seriously injured and not realize it. Quickly examine the victim for signs of major bleeding. If there’s heavy bleeding, place a cloth over the wound and apply pressure. If the wound is in an arm or leg, gently elevate the injured area while keeping pressure on the wound. Keep the victim warm and talk to them until help arrives.

If the victim is unconscious, check for signs of breathing. While you do this, move the victim as little as possible. If the victim isn’t breathing, someone trained should begin CPR.

You also need to know the location of:

• Electricity shut-offs (“kill switches”)
• First-aid supplies
• A telephone so you can find them quickly in an emergency

CREATE A SAFE WORK ENVIRONMENT

A safe work environment is created by controlling contact with electrical voltages and the currents they can cause. Electrical currents need to be controlled so they don’t pass through the body. In addition to preventing shocks, a safe work environment reduces the chance of fires, burns and falls.

You need to guard against contact with electrical voltages and control electrical currents in order to create a safe work environment.

A safe work environment isn’t enough to control all electrical hazards. You must also work safely. Safe work practices help you control your risk of injury or death from workplace hazards. If you are working on electrical circuits or with electrical tools and equipment, you need to use safe work practices.

Before you begin a task, ask yourself:

• What could go wrong?
• Do I have the knowledge, tools and experience to do this work safely?

All workers need to be very familiar with the safety procedures for their jobs. You must know how to use specific controls that help keep you safe. You must also use good judgment and common sense.

ELEMENTS OF ELECTRICAL SAFETY

US Trades, LLC employees will use the three-stage approach to safety: recognize, evaluate and control hazards. To be safe, you must think about your job and plan for hazards. To avoid injury or death, you must understand and recognize hazards. You need to evaluate the situation you are in and assess your risks. You need to control hazards by creating a safe work environment, by using safe work practices, and by reporting hazards to a supervisor. If you do not recognize, evaluate and control hazards, you may be injured or killed by the electricity itself, electrical fires or falls.
Recognize Hazards

The first part of the safety model is recognizing the hazards around you. Only then, can you avoid or control the hazards. It is best to discuss and plan hazard recognition tasks with your co-workers. Sometimes others see hazards that we overlook.

Knowing where to look helps you to recognize hazards.

- Inadequate wiring is dangerous
- Exposed electrical parts are dangerous
- Overhead power-lines are dangerous
- Wires with bad insulation can give you a shock
- Electrical systems and tools that are not grounded or double insulated are dangerous
- Damaged power tools and equipment are electrical hazards
- Using the wrong PPE is dangerous
- Using the wrong tool is dangerous
- Ladders that conduct electricity are dangerous
- Electrical hazards can be made worse if the worker, location or equipment is wet
- Overloaded circuits are dangerous

Hazard Indicators

- Tripped circuit breakers and blown fuses show that too much current is flowing in a circuit. This condition could be due to several factors, such as malfunctioning equipment or a short between conductors. You need to determine the cause in order to control the hazard
- An electrical tool, appliance, wire or connection that feels warm may indicate too much current in the circuit or equipment. A qualified person must evaluate the situation
- An extension cord that feels warm can indicate there’s too much current for the wire size of the cord. Unplug the cord and notify your supervisor or a qualified person
- A cable, fuse box or junction box that feels warm may indicate too much current in the circuits
- A burning odor may indicate overheated insulation
- Worn, frayed or damaged insulation around any wire or other conductor is an electrical hazard because the conductors could be exposed. Contact with an exposed wire could cause a shock. Damaged insulation can cause a short, leading to arcing or a fire. Inspect all insulation for scrapes and breaks. You need to evaluate the seriousness of any damage you find and decide how to deal with the hazard
- A GFCI that trips indicates there is current leakage from the circuit. Have a qualified person inspect the circuit

Any of these conditions, or “clues,” tell you something important, there is a risk of fire and electrical shock. The equipment or tools involved must be avoided. You can find yourself in a situation where you need to decide if these clues are present. A supervisor needs to be called if there are signs of overload and you’re not sure of the degree of risk. Ask for help whenever you’re not sure what should be done.
Evaluate Hazards

After you recognize a hazard, your next step is to evaluate your risk from the hazard. Obviously, exposed wires are a hazard. If the exposed wires are 15 feet off the ground, your risk is low. However, if you are going to be working on a roof near those same wires, your risk is high. The risk of shock is greater if you will be carrying metal conduit that could touch the exposed wires. You must constantly evaluate your risk.

Combinations of hazards increase your risk. Improper grounding and a damaged tool greatly increase your risk. Wet conditions combined with other hazards also increase your risk. You'll need to make decisions about the nature of hazards in order to evaluate your risk.

Control Hazards

Once electrical hazards have been recognized and evaluated, they must be controlled.

In order to control hazards, you must first create a safe work environment, and then work in a safe manner. Generally, it is best to remove the hazards altogether and create an environment that is truly safe. When OSHA regulations and the NEC are followed, safe work environments are created.

However, you never know when materials or equipment might fail. Prepare yourself for the unexpected by using safe work practices. Use as many safeguards as possible. If one fails, another may protect you from injury or death.

Controlling electrical hazards (as well as other hazards) reduces the risk of injury or death.

HAZARD TYPES

Wiring Hazards

An electrical hazard exists when the wire is too small a gauge for the current it will carry. Normally, the circuit breaker in a circuit is matched to the wire size. However, in older wiring, branch lines to permanent ceiling light fixtures could be wired with a smaller gauge than the supply cable.

For example, let’s say a light fixture is replaced with another device that uses more current. The current capacity (ampacity) of the branch wire could be exceeded. When a wire is too small for the current it is supposed to carry, the wire will heat up. The heated wire could cause a fire.

When you use an extension cord, the size of the wire you are placing into the circuit may be too small for the equipment. The circuit breaker could be the right size for the circuit but not right for the smaller-gauge extension cord. A tool plugged into the extension cord may use more current than the cord can handle without tripping the circuit breaker. The wire will overheat and could cause a fire.

The kind of metal used as a conductor can cause an electrical hazard. Special care needs to be taken with aluminum wire. Since it is more brittle than copper, aluminum wire can crack and break more easily. Connections with aluminum wire can become loose and oxidize if not made properly, creating heat or arcing. You need to recognize that inadequate wiring is a hazard.
Exposed Electrical Parts Hazards

Electrical hazards exist when wires or other electrical parts are exposed. Wires and parts can be exposed if a cover is removed from a wiring or breaker box. The overhead wires coming into a home may be exposed. Electrical terminals in motors, appliances and electronic equipment may be exposed. Older equipment may have exposed electrical parts. If you contact exposed live electrical parts, you will be shocked. You need to recognize that an exposed electrical component is a hazard.

Overhead Power-Line Hazards

Most people don’t realize that overhead power-lines aren’t normally insulated. More than half of all electrocutions are caused by direct worker contact with energized power-lines.

When dump trucks, cranes, work platforms or other conductive materials (such as pipes and ladders) contact overhead wires, the equipment operator or other workers can be killed. If you do not maintain required clearance distances from power-lines, you can be shocked and killed. Never store materials and equipment under or near overhead power-lines. You need to recognize that overhead power-lines are a hazard.

Defective Insulation Hazards

Insulation that is defective or inadequate is an electrical hazard. Usually, a plastic or rubber covering insulates wires. Insulation prevents conductors from coming in contact with each other. Insulation also prevents conductors from coming in contact with people.

Extension cords may have damaged insulation. Sometimes the insulation inside an electrical tool or appliance is damaged. When insulation is damaged, exposed metal parts may become energized if a live wire inside touches them.

Electric hand tools that are old, damaged or misused may have damaged insulation inside. If you touch damaged power tools or other equipment, you will receive a shock. You are more likely to receive a shock if the tool is not grounded or double insulated. (Double-insulated tools have two insulation barriers and no exposed metal parts.) You need to recognize that defective insulation is a hazard.

Improper Grounding Hazards

When an electrical system is not grounded properly, a hazard exists. The most common OSHA electrical violation is improper grounding of equipment and circuitry. The metal parts of an electrical wiring system that we touch (switch plates, ceiling light fixtures, conduit, etc.) must be grounded and at 0 volts. If the system is not grounded properly, these parts may become energized. Metal parts of motors, appliances or electronics that are plugged into improperly grounded circuits may be electrified. When a circuit is not grounded properly, a hazard exists because unwanted voltage cannot be safely eliminated. If there is no safe path to ground for fault currents, exposed metal parts in damaged appliances can become energized.

Extension cords may not provide a continuous path to ground because of a broken ground wire or plug. If you touch a defective electrical device that’s not grounded or grounded improperly, you will be shocked. You need to recognize that an improperly grounded electrical system is a hazard.
Electrical systems are often grounded to metal water pipes that serve as a continuous path to ground. If plumbing is used as a path to ground for fault current, all pipes must be made of conductive material (a type of metal). Many electrocutions and fires occur because (during renovation or repair) parts of metal plumbing are replaced with plastic pipe, which does not conduct electricity. In these cases, the path to ground is interrupted by nonconductive material.

A ground fault circuit interrupter, or GFCI, is an inexpensive lifesaver. GFCIs detect any difference in current between the two circuit wires (the black wires and white wires). This difference in current can occur when electrical equipment isn’t working correctly, causing leakage current. If leakage current is detected in a GFCI-protected circuit, the GFCI switches off the current, protecting you from a dangerous shock. GFCIs are set at about 5 mA and are designed to protect workers from electrocution. GFCIs are able to detect the loss of current resulting from leakage through a person who is beginning to be shocked.

GFCIs are different from circuit breakers because they detect leakage currents rather than overloads. Circuits with missing, damaged or improperly wired GFCIs may allow you to be shocked. You need to recognize that a circuit improperly protected by a GFCI is a hazard.

**Overload Hazards**

Overloads in an electrical system are hazardous because they can produce heat or arcing. Wires and other components in an electrical system or circuit have a maximum amount of current they can carry safely. If too many devices are plugged into a circuit, the electrical current will heat the wires to a very high temperature. If anyone tool uses too much current, the wires will heat up. The temperature of the wires can be high enough to cause a fire. If their insulation melts, arcing may occur. Arcing can cause a fire in the area where the overload exists, even inside a wall.

In order to prevent too much current in a circuit, a circuit breaker or fuse is placed in the circuit. If there is too much current in the circuit, the breaker “trips” and opens like a switch. If an overloaded circuit is equipped with a fuse, an internal part of the fuse melts, opening the circuit. Both breakers and fuses do the same thing: open the circuit to shut off the electrical current.

If the breakers or fuses are too big for the wires they are supposed to protect, an overload in the circuit will not be detected and the current will not be shut off. Overloading leads to overheating of circuit components and may cause a fire. You need to recognize that a circuit with improper overcurrent protection devices—or one with no overcurrent protection devices at all—is a hazard.

Overcurrent protection devices are built into the wiring of some electric motors, tools and electronic devices. For example, if a tool draws too much current or if it overheats, the current will be shut off from within the device itself. Damaged tools can overheat and cause a fire. You need to recognize that a damaged tool is a hazard.

**Wet Conditions Hazards**

Working in wet conditions is hazardous because you may become an easy path for electrical current. If you touch a live wire or other electrical component—and you are well grounded because you are standing in even a small puddle of water—you will receive a shock.
Damaged insulation, equipment or tools can expose you to live electrical parts. A damaged tool may not be grounded properly, so the housing of the tool may be energized, causing you to receive a shock. Improperly grounded metal switch plates and ceiling lights are especially hazardous in wet conditions. If you touch a live electrical component with an uninsulated hand tool, you are more likely to receive a shock when standing in water.

Remember: you don’t have to be standing in water to be electrocuted. Wet clothing, high humidity and perspiration also increase your chances of being electrocuted. You need to recognize that all wet conditions are hazards.

HAZARD CONTROL

Lock-Out and Tag-Out Circuits and Equipment

Don’t work on equipment unless it’s been locked and tagged out. Only qualified and trained persons are allowed to perform lockout/tagout procedures.

OSHA requires companies to have adequate machine-specific procedures for lockout/tagout. These will be written procedures that are on site and readily available to employees. Provide training on lock-out/tag-out to both authorized and affected employees. Interlocks may not be used as lockout or as equivalent lockout protection.

For more information on lock-out/tag-out procedures, see the “Controlling Hazardous Energy” chapter (if included) of this manual.

Control Inadequate Wiring Hazards

Electrical hazards result from using the wrong size or type of wire. You must control such hazards to create a safe work environment. You must choose the right size wire for current expected in a circuit. The wire must be able to handle the current safely. The wire’s insulation must be appropriate for the voltage and tough enough for the environment. Connections need to be reliable and protected.

MAXIMUM CURRENT DIFFERENT WIRE SIZES CAN SAFELY CONDUCT

<table>
<thead>
<tr>
<th>Gauge Amperage</th>
<th>12 AWG (stranded)</th>
<th>12 AWG (solid)</th>
<th>10 AW G</th>
<th>8 AW G</th>
<th>6 AW G</th>
<th>2 AW G</th>
<th>1/0 AW G</th>
</tr>
</thead>
<tbody>
<tr>
<td>25 amps</td>
<td>25 amps</td>
<td>30 amps</td>
<td>40 amps</td>
<td>55 amps</td>
<td>95 amps</td>
<td>125 amps</td>
<td></td>
</tr>
</tbody>
</table>

Control Hazards of Fixed Wiring

The wiring methods and size of conductors used in a system depend on several factors:

- Intended use of the circuit system
- Building materials
- Size and distribution of electrical load
- Location of equipment (such as underground burial)
- Environmental conditions (such as dampness)
- Presence of corrosives
- Temperature extremes

Fixed, permanent wiring is better than extension cords, which can be misused and damaged more easily. NEC requirements for fixed wiring must always be followed.

**Control Hazards of Flexible Wiring**

Electrical cords supplement fixed wiring by providing the flexibility required for maintenance, portability, isolation from vibration, and emergency and temporary power needs. Flexible wiring can be used for extension cords or power supply cords. Power supply cords can be removable or permanently attached to the appliance. **DO NOT** use flexible wiring in situations where frequent inspection would be difficult, where damage would be likely, or where long-term electrical supply is needed. Flexible cords cannot be used as a substitute for the fixed wiring of a structure.

Flexible cords must not be
- Run through holes in walls, ceilings, or floors
- Run through doorways, windows, or similar openings (unless physically protected)
- Attached to building surfaces (except with a tension take-up device within 6 feet of the supply end)
- Hidden in walls, ceilings, or floors
- Hidden in conduit or other raceways

**Use the Right Extension Cord**

The size of wire in an extension cord must be compatible with the amount of current the cord will be expected to carry. The amount of current depends on the equipment plugged into the extension cord. Current ratings (how much current a device needs to operate) are often printed on the nameplate. If a power rating is given, it is necessary to divide the power rating in watts by the voltage to find the current rating. For example, a 1,000-watt heater plugged into a 120-volt circuit will need almost 10 amps of current. Let’s look at another example: A 1- horsepower electric motor uses electrical energy at the rate of almost 750 watts, so it will need a minimum of about 7 amps of current on a 120-volt circuit. However, electric motors need additional current as they startup or if they stall, requiring up to 200% of the nameplate current rating. Therefore, the motor would need 14 amps.

Add to find the total current needed to operate all the appliances supplied by the cord. Choose a wire size that can handle the total current.
**AMERICAN WIRE GAUGE (AWG)**

<table>
<thead>
<tr>
<th>Wire Size</th>
<th>Handles Up To</th>
</tr>
</thead>
<tbody>
<tr>
<td>#10 AWG</td>
<td>30 amps</td>
</tr>
<tr>
<td>#12 AWG</td>
<td>25 amps</td>
</tr>
<tr>
<td>#14 AWG</td>
<td>18 amps</td>
</tr>
<tr>
<td>#16 AWG</td>
<td>13 amps</td>
</tr>
</tbody>
</table>

Remember: The larger the gauge number, the smaller the wire!

The length of the extension cord also needs to be considered when selecting the wire size. Voltage drops over the length of a cord. If a cord is too long, the voltage drop can be enough to damage equipment. Many electric motors only operate safely in a narrow range of voltages and will not work properly at voltages different from the voltage listed on the nameplate. Even though light bulbs operate (somewhat dimmer) at lowered voltages, do not assume electric motors will work correctly at less-than-required voltages. In addition, when electric motors start or operate under load, they require more current. The larger the size of the wire, the longer a cord can be without causing a voltage drop that could damage tools and equipment.

The grounding path for extension cords must be kept intact to keep you safe.

A typical extension cord grounding system has four components:

1. A third wire in the cord, called a ground wire
2. A three-prong plug with a grounding prong on one end of the cord
3. A three-wire, grounding-type receptacle at the other end of the cord
4. A properly grounded outlet

**Control Hazards to Exposed Live Electrical Parts**

Isolate Energized Components

Electrical hazards exist when wires or other electrical parts are exposed. These hazards need to be controlled to create a safe work environment. Isolation of energized electrical parts makes them inaccessible unless tools and special effort are used. Isolation can be accomplished by placing the energized parts at least 8 feet high and out of reach, or by guarding. Guarding is a type of isolation that uses various structures—like cabinets, boxes, screens, barriers, covers and partitions—to close-off live electrical parts.

Take the following precautions to prevent injuries from contact with live parts:

- Immediately report exposed live parts to a supervisor
- Unless qualified, don’t attempt to correct the condition yourself without supervision
- Provide guards or barriers if live parts cannot be enclosed completely
• Use covers, screens, or partitions for guarding that require tools to remove them
• Replace covers that have been removed from panels, motors, or fuse boxes
• Even when live parts are elevated to the required height (8 feet), use caution when using objects (like metal rods or pipes) that can contact these parts
• Close unused conduit openings in boxes so that foreign objects (pencils, metal chips, conductive debris, etc.) cannot get inside and damage the circuit

Control Hazards of Exposure to Live Electrical Wires

Use Proper Insulation

Insulation is made of material that does not conduct electricity (usually plastic, rubber, or fiber). Insulation covers wires and prevents conductors from coming in contact with each other or any other conductor. If conductors make contact, a short circuit is created.

In a short circuit, current passes through the shorting material without passing through a load in the circuit, and the wire becomes overheated. Insulation keeps wires and other conductors from touching, which prevents electrical short circuits. Insulation prevents live wires from touching people and animals, thus protecting them from electrical shock.

Insulation helps protect wires from physical damage and conditions in the environment. Insulation is used on almost all wires, except some ground wires and some high-voltage transmission lines. Insulation is used internally in tools, switches, plugs, and other electrical and electronic devices.

Special insulation is used on wires and cables that are used in harsh environments. Wires and cables that are buried in soil must have an outer covering of insulation that is flame-retardant and resistant to moisture, fungus and corrosion.

In all situations, you must be careful not to damage insulation while installing it. Do not allow staples or other supports to damage the insulation. Bends in a cable must have an inside radius of at least 5 times the diameter of the cable so that insulation at a bend is not damaged. Extension cords come with insulation in a variety of types and colors. The insulation of extension cords is especially important.

Since extension cords often receive rough handling, the insulation can be damaged. Extension cords might be used in wet places, so adequate insulation is necessary to prevent shocks. Because extension cords are often used near combustible materials (such as wood shavings and sawdust) a short in an extension cord could easily cause arcing and a fire.

Insulation on individual wires is often color-coded. In general, insulated wires used as equipment grounding conductors are either continuous green or green with yellow stripes. The grounded conductors that complete a circuit are generally covered with continuous white or gray insulation. The ungrounded conductors, or “hot” wires, may be any color other than green, white or gray. They are usually black or red.

Conductor and Cable Markings

Conductors and cables must be marked by the manufacturer to show the following:
- Maximum voltage capacity
- AWG size
- Insulation-type letter
- Manufacturer’s name or trademark

**Control Shock Hazards**

When an electrical system is not grounded properly, a hazard exists. This is because the parts of an electrical wiring system that a person normally touches may be energized, or live, relative to ground. Parts like switch plates, wiring boxes, conduit, cabinets and lights need to be at 0 volts relative to ground. If the system is grounded improperly, these parts may be energized. The metal housings of equipment plugged into an outlet need to be grounded through the plug.

Grounding is connecting an electrical system to the earth with a wire. Excess or stray current travels through this wire to a grounding device (commonly called a “ground”) deep in the earth. Grounding prevents unwanted voltage on electrical components. Metal plumbing is often used as a ground. When plumbing is used as a grounding conductor, it must also be connected to a grounding device such as a conductive rod. (Rods used for grounding must be driven at least 8 feet into the earth.

Sometimes an electrical system will receive a higher voltage than it is designed to handle. These high voltages may come from a lightning strike, line surge, or contact with a higher voltage line. Sometimes a defect occurs in a device that allows exposed metal parts to become energized. Grounding will help protect the person working on a system, the system itself, and others using tools or operating equipment connected to the system. The extra current produced by the excess voltage travels relatively safely to the earth.

Grounding creates a path for currents produced by unintended voltages on exposed parts. These currents follow the grounding path, rather than passing through the body of someone who touches the energized equipment. However, if a grounding rod takes a direct hit from a lightning strike and is buried in sandy soil, the rod must be examined to make sure it will still function properly. The heat from a lightning strike can cause the sand to turn into glass, which is an insulator. A grounding rod must be in contact with damp soil to be effective.

Leakage current occurs when an electrical current escapes from its intended path. Leakages are sometimes low-current faults that can occur in all electrical equipment because of dirt, wear, damage or moisture. A good grounding system must be able to carry off this leakage current. A ground fault occurs when current passes through the housing of an electrical device to ground. Proper grounding protects against ground faults. Ground faults are usually caused by misuse of a tool or damage to its insulation. This damage allows a bare conductor to touch metal parts or the tool housing.

When you ground a tool or electrical system, you create a low-resistance path to the earth (known as a ground connection). When done properly, this path has sufficient current-carrying capacity to eliminate voltages that may cause a dangerous shock. Grounding does not guarantee that you will not be shocked, injured or killed from defective equipment. However, it greatly reduces the possibility.
EQUIPMENT GROUNDING REQUIREMENTS

Equipment needs to be grounded under any of these circumstances:

- The equipment is within 8 feet vertically and 5 feet horizontally of the floor or walking surface
- The equipment is within 8 feet vertically and 5 feet horizontally of grounded metal objects, you could touch
- The equipment is located in a wet or damp area and is not isolated
- The equipment is connected to a power supply by cord and plug and is not double-insulated

Use of GFCIs

The use of GFCIs has lowered the number of electrocutions dramatically. A GFCI is a fast-acting switch that detects any difference in current between two circuit conductors. If either conductor comes in contact—either directly or through part of your body—with a ground (a situation known as a ground fault), the GFCI opens the circuit in a fraction of a second. If a current as small as 4 to 6 mA does not pass through both wires properly, but instead leaks to the ground, the GFCI is tripped. The current is shut off.

There is a more sensitive kind of GFCI called an isolation GFCI. If a circuit has an isolation GFCI, the ground fault current passes through an electronic sensing circuit in the GFCI. The electronic sensing circuit has enough resistance to limit current to as little as 2 mA, which is too low to cause a dangerous shock.

GFCIs are usually in the form of a duplex receptacle. They are also available in portable and plug-in designs and as circuit breakers that protect an entire branch circuit. GFCIs can operate on both two- and three-wire ground systems. For a GFCI to work properly, the neutral conductor (white wire) must:

- Be continuous
- Have low resistance
- Have sufficient current-carrying capacity

GFCIs help protect you from electrical shock by continuously monitoring the circuit. However, a GFCI does not protect a person from line-to-line hazards such as touching two “hot” wires (240 volts) at the same time or touching a “hot” and neutral wire at the same time. Also, be aware that instantaneous currents can be high when a GFCI is tripped. A shock may still be felt. Your reaction to the shock could cause injury, perhaps from falling.

Test GFCIs regularly by pressing the “test” button. If the circuit does not turn off, the GFCI is faulty and must be replaced.

The NEC requires that GFCIs be used in these high-risk situations:

- Electricity is used near water
- The user of electrical equipment is grounded (by touching grounded material)
- Circuits are providing power to portable tools or outdoor receptacles
- Temporary wiring or extension cords are used

Specifically, GFCIs must be installed in bathrooms, garages, outdoor areas, crawl spaces, unfinished basements, kitchens, and near wet bars.
Bond Components to Assure Grounding Path

In order to assure a continuous, reliable electrical path to ground, a bonding jumper wire is used to make sure electrical parts are connected. Some physical connections, like metal conduit coming into a box, might not make a good electrical connection because of paint or possible corrosion. To make a good electrical connection, a bonding jumper needs to be installed.

A metal cold water pipe that is part of a path to ground may need bonding jumpers around plastic anti-vibration devices, plastic water meters or sections of plastic pipe. A bonding jumper is made of conductive material and is tightly connected to metal pipes with screws or clamps to bypass the plastic and assure a continuous grounding path. Bonding jumpers are necessary because plastic doesn’t conduct electricity and will interrupt the path to ground.

Additionally, interior metal plumbing must be bonded to the ground for electrical service equipment in order to keep all grounds at the same potential (0 volts). Even metal air ducts need to be bonded to electrical service equipment.

Control Overload Current Hazards

When a current exceeds the current rating of equipment or wiring, a hazard exists. The wiring in the circuit, equipment or tool cannot handle the current without heating up or even melting.

Not only will the wiring or tool be damaged, but the high temperature of the conductor can also cause a fire. To prevent this from happening, an overcurrent protection device (circuit breaker or fuse) is used in a circuit. These devices open a circuit automatically if they detect current in excess of the current rating of equipment or wiring. This excess current can be caused by an overload, short circuit or high-level ground fault.

Overcurrent protection devices are designed to protect equipment and structures from fire. They do not protect you from electrical shock! Overcurrent protection devices stop the flow of current in a circuit when the amperage is too high for the circuit. A circuit breaker or fuse will not stop the relatively small amount of current that can cause injury or death. Death can result from 20 mA (.020 amps) through the chest. A typical residential circuit breaker or fuse will not shut off the circuit until a current of more than 20 amps is reached!

However, overcurrent protection devices are not allowed in areas where they could be exposed to physical damage or in hazardous environments. Overcurrent protection devices can heat up and occasionally arc or spark, which could cause a fire or an explosion in certain areas. Hazardous environments are places that contain flammable or explosive materials such as flammable gasses or vapors (Class I Hazardous Environments), finely pulverized flammable dusts (Class II Hazardous Environments), or fibers or metal filings that can catch fire easily (Class III Hazardous Environments). Hazardous environments may be found in aircraft hangars, gas stations, storage plants for flammable liquids, grain silos and mills where cotton fibers may be suspended in the air. Special electrical systems are required in hazardous environments.

If an overcurrent protection device opens a circuit, there may be a problem along the circuit. (In the case of circuit breakers, frequent tripping may also indicate that the breaker is defective.) When a circuit breaker trips or a fuse blows, the cause must be found.
A circuit breaker is one kind of overcurrent protection device. It is a type of automatic switch located in a circuit. A circuit breaker trips when too much current passes through it. Don’t use a circuit breaker to turn power on or off in a circuit, unless it’s designed for this purpose and marked “SWD” (stands for “switching device”).

A fuse is another type of overcurrent protection device. A fuse contains a metal conductor that has a relatively low melting point. When too much current passes through the metal in the fuse, it heats up within a fraction of a second and melts, opening the circuit. After an overload is found and corrected, a blown fuse must be replaced with a new one of appropriate amperage.

Avoid Wet Working Conditions and Other Dangers

Remember that any hazard becomes much more dangerous in damp or wet conditions. To be on the safe side, assume there is dampness in any work location, even if you do not see water. Even sweat can create a damp condition!

Avoid Overhead Power Lines

Be very careful not to contact overhead power lines or other exposed wires. More than half of all electrocutions are caused by contact with overhead lines. When working in an elevated position near overhead lines, avoid locations where you (and any conductive object you hold) could contact an unguarded or uninsulated line. Stay at least 10 feet away from high-voltage transmission lines.

Vehicle operators must also pay attention to overhead wiring. Dump trucks, front-end loaders and cranes can lift and make contact with overhead lines. If you contact equipment that is touching live wires, you will be shocked and may be killed. If you are in the vehicle, stay inside. Always be aware of what is going on around you.

USE PROPER WIRING AND CONNECTORS

- Avoid overloads — Don’t overload circuits
- Test GFCIs — Test GFCIs monthly using the “test” button
- Check switches and insulation — Tools and other equipment must operate properly
- Make sure that switches and insulating parts are in good condition
- Use three-prong plugs — Never use a three-prong grounding plug with the third prong broken off

When using tools that require a third-wire ground; use only three-wire extension cords with three-prong grounding plugs and three-hole electrical outlets. Never remove the grounding prong from a plug! You could be shocked or expose someone else to a hazard. If you see a cord without a grounding prong in the plug, remove the cord from service immediately.

Use extension cords properly — If an extension cord must be used, choose one with sufficient ampacity for the tool being used. An undersized cord can overheat and cause a drop in voltage and tool power. Check the tool manufacturer’s recommendations for the required wire gauge and cord length. Make sure the insulation is intact. To reduce the risk of damage to a cord’s insulation, use cords with insulation marked “S” (hard service) rather than cords marked “SJ” (junior hard service). Make sure the grounding prong is intact. In damp locations, make sure wires and connectors are waterproof and approved for such locations. Do not create a tripping hazard.
Check power cords and extensions — Electrical cords must be inspected regularly using the following procedure:

- Remove the cord from the electrical power source before inspecting
- Make sure the grounding prong is present in the plug
- Make sure the plug and receptacle are not damaged
- Wipe the cord clean with a diluted detergent and examine for cuts, breaks, abrasions, and defects in the insulation

Coil or hang the cord for storage. Do not use any other methods. Coiling or hanging is the best way to avoid tight kinks, cuts and scrapes that can damage insulation or conductors.

Test electrical cords regularly for ground continuity using a continuity tester as follows:

- Connect one lead of the tester to the ground prong at one end of the cord
- Connect the second lead to the ground wire hole at the other end of the cord
- If the tester lights up or beeps (depending on design), the cord’s ground wire is okay. If not, the cord is damaged and must not be used
- Don’t pull on cords, always disconnect a cord by the plug
- Use correct connectors — Use electrical plugs and receptacles that are right for your current and voltage needs. Connectors are designed for specific currents and voltages so that only matching plugs and receptacles will fit together. This safeguard prevents a piece of equipment, a cord and a power source with different voltage and current requirements from being plugged together. Standard configurations for plugs and receptacles have been established by the National Electric Manufacturers Association (NEMA)
- Use locking connectors — Use locking-type attachment plugs, receptacles, and other connectors to prevent them from becoming unplugged

**USE AND MAINTAIN TOOLS PROPERLY**

Your tools are at the heart of your craft. Tools help you do your job with a high degree of quality. Tools can do something else, too. They can cause injury or even death! You must use the right tools for the job. Proper maintenance of tools and other equipment is very important. Inadequate maintenance can cause equipment to deteriorate, creating dangerous conditions.

Inspect tools before using them — Check for cracked casings, dents, missing or broken parts and contamination (oil, moisture, dirt, corrosion). Damaged tools must be removed from service and properly tagged. Don’t use these tools until they are repaired and tested.

Use the right tool correctly — Use tools correctly and for their intended purposes. Follow the safety instructions and operating procedures recommended by the manufacturer. When working on a circuit, use approved tools with insulated handles. **However, do not use these tools to work on energized circuits. Always shut off and de-energize circuits before beginning work on them.**

Protect your tools — Keep tools and cords away from heat, oil and sharp objects. These hazards can damage insulation. If a tool or cord heats up, stop using it! Report the condition to a supervisor immediately. If equipment has been repaired, make sure that it has been tested and certified as safe before using it. Never carry a tool by the cord. Disconnect cords by pulling the plug—not the cord!
Use double-insulated tools — Portable electrical tools are classified by the number of insulation barriers between the electrical conductors in the tool and the worker. The NEC permits the use of portable tools only if they have been approved by Underwriter’s Laboratories (UL Listed). Equipment that has two insulation barriers and no exposed metal parts is called double insulated.

When used properly, double-insulated tools provide reliable shock protection without the need for a third ground wire. Power tools with metal housings or only one layer of effective insulation must have a third ground wire and three-prong plug.

Use multiple safe practices — Remember, A circuit may not be wired correctly. Wires may contact other “hot” circuits. Someone else may do something to place you in danger. Take all possible precautions.

ATTACHMENTS

The following pages contain a Safe Electrical Practices Checklist that can be reproduced and used by US Trades, LLC and its employees to ensure any electrically related work is performed safely.
“SAFE ELECTRICAL WORK PRACTICES” CHECKLIST (PAGE 1 OF 2)

☐ Are all employees required to report (as soon as practical) any obvious hazard to life or property observed in connection with electrical equipment or lines?
☐ Are employees instructed to make preliminary inspections and/or appropriate tests to determine what conditions exist before starting work on electrical equipment or lines?
☐ When electrical equipment or lines are to be serviced, maintained, or adjusted, are necessary switches opened, locked out and tagged?
☐ Are portable hand-held electrical tools and equipment grounded or are they of the double-insulated type?
☐ Do extension cords have a grounding conductor? Are multiple plug adaptors prohibited?
☐ Are ground-fault circuit interrupters installed on each temporary 15, 20, or 30 ampere, 125-volt AC circuit at locations where construction, demolition, modifications, alterations or excavations are being performed? OR...
☐ Do you have an assured equipment-grounding conductor program in place?
☐ Are all temporary circuits protected by suitable disconnecting switches or plug connectors at the junction with permanent wiring?
☐ Is exposed wiring and cords with frayed or deteriorated insulation repaired or replaced promptly?
☐ Are flexible cords and cables free of splices or taps?
☐ Are clamps or other securing means provided on flexible cords or cables at plugs, receptacles, tools, equipment, and are the cord jackets securely held in place?
☐ Are all cords, cable and raceway connections intact and secure?
☐ In wet or damp locations, are electrical tools and equipment appropriate for the use or locations (or otherwise protected)?
☐ Are electrical power lines and cables located (overhead, underground, underfloor, other side of walls) before digging, drilling, or similar work begins?
☐ Is the use of metal measuring tapes, ropes, hand lines or similar devices with metallic thread woven into the fabric prohibited where these could come into contact with energized parts of equipment or circuit conductors?
☐ Is the use of metal ladders prohibited in areas where the ladder or the person using the ladder could be exposed to energized parts of equipment, fixtures or circuit conductors?
☐ Are all disconnecting switches and circuit breakers labeled to indicate their use or equipment served?
☐ Are disconnecting means always opened before fuses are replaced?
☐ Are all energized parts of electrical circuits and equipment guarded against accidental contact by approved cabinets or enclosures?
☐ Is sufficient access and working space provided and maintained around all electrical equipment to permit ready and safe operations and maintenance?
☐ Are all unused openings (including conduit knockouts) of electrical enclosures and fittings closed with appropriate covers, plugs or plates?
☐ Are electrical enclosures such as switches, receptacles and junction boxes provided with tight-fitting covers or plates?
☐ Are employees prohibited from working alone on energized lines or equipment more than 600 volts?
☐ Are employees forbidden (unless properly qualified/certified) from working closer than 10 feet from high-voltage (more than 750 volts) lines?
☐ Have all underground utilities been located prior to any excavation work?
☐ Is all digging within 4 feet of power lines done by hand?
☐ Are power lines de-energized? Has the utility company been consulted before digging?
☐ Has the power company been notified if work is to be done near overhead lines?
☐ Are live parts of electrical circuits de-energized before an employee works on or near them?
☐ Are all exposed energized parts in the temporary power supply protected from possible contact?
☐ Are all power-supply circuit disconnects marked according to their functions?
☐ Is splicing allowed on extension cords only if they are larger than size 12 and the splicing retains insulation protection equal to the original extension cord?
☐ Are all plug connections used with the voltage for which they were designed?
☐ Do you always ensure that flexible cords are not immersed in water or exposed to damage from vehicles?
☐ Are all junction boxes used in a wet environment waterproof?
☐ Are you using a GFCI, or has an AEGCP been established?
POLICY

Air compressors are used for a variety of applications. Storage tanks hold excess air that’s generated from the compressor, providing a convenient and readily accessible air source. Because of the air pressure within these storage tanks, potential dangers can develop if certain practices and precautions are not followed.

This safety policy and program provides the safe practices for the safe use of air compressor storage tanks. It lists training requirements, guidelines for locating drains and traps, and requirements for gauges and valves.

EMPLOYER RESPONSIBILITIES

It is the responsibility of this company to:

- Provide training for affected employees
- Ensure proper use and maintenance of air compressor storage tanks and equipment
- Ensure that only those employees who have been trained to work with air compressor storage tanks are allowed to operate such equipment
- Ensure that equipment needed is available and is in good working condition
- Ensure damaged equipment is removed from service until repaired and tested
- Ensure that air compressor storage tanks are inspected every six months
- Provide employees with Personal Protective Equipment (PPE) necessary for their job

EMPLOYEE RESPONSIBILITIES

Employees are expected to:

- Inspect all hoses and equipment before connecting to any compressed air system
- Immediately report any damages or defects to their supervisors
- Empty manual drains and taps on a regularly scheduled basis
- Inspect air compressor storage tanks prior to use and note any damage or defects

TRAINING

We will ensure every employee is provided training on air compressors. This training will be provided at no cost to the employee during working hours.

Training will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

Training Components

The safety coordinator or designee will verify that all employees working with air compressors are trained in the following minimum elements:

- The purpose of air compressor storage tanks
- The basic operation of air compressor storage tanks
• Maintenance requirements of drains and traps
• Reading gauges and operating valves
• Identifying damage and defects in the storage tanks, hoses, or air driven equipment

**Training Records**
Training records will include the following information:

• The dates of the training sessions
• The contents or a summary of the training sessions
• The names and qualifications of persons conducting the training
• The names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

**SAFE PRACTICES**

**Pneumatic Tools**
Pneumatic tools include air compressors and a variety of tool attachments such as wrenches, nail guns, drills, and blowguns. Although they require some special handing, they can save a great deal of time and effort and are relatively easy to use.

Always inspect the tool, air hose, and fittings for damage, disrepair, or missing parts before using. Make sure air hoses and fittings are securely tightened. If a tool fails the pre-use inspection, notify your supervisor and remove it from service by attaching a red tag that states “DO NOT USE.”

Never point pneumatic impact tools, such as riveting guns, toward anyone. Turn off the air supply at the control valve and tool blade before disconnecting a pneumatic tool (unless it has quick disconnect plugs). Be especially careful when using pneumatic tools around fuel, flammable vapors, or explosive atmospheres. They can generate static electricity and must be grounded or bonded when these chemical hazards are present.

**Compressed Air Systems**
A compressed air system consists of an air receiver, air distribution lines, and a pressure regulatory device.

**Air Receivers**
Each air tank must have at least one pressure gauge and an American Society of Mechanical Engineers (ASME) safety valve. Use a spring-loaded safety release valve to prevent the receiver from exceeding the maximum allowable working pressure.

Consider the drainage issues associated with receivers. Fit air receivers with a drain cock on the bottom of the receiver. Drain receivers frequently to prevent accumulation of liquid inside the unit. Receivers having automatic drains are exempt from this requirement.

Testing air receivers: Only hydrostatically tested and approved tanks can be used as air receivers. The only time the maximum allowable pressure of an air receiver can be exceeded is when it’s being tested.
Whenever possible, install air tanks so that the entire outside surface can be easily inspected. Do not bury them or place them in hard to reach locations. The intake and exhaust pipes of small tanks must be removable for interior inspections. Tanks over 36 inches in diameter must have manholes. Inspection openings are sufficient for smaller tanks. Tanks with volumes of 5 cubic feet or less can have pipe lug openings.

**Air Distribution Lines**

Select airlines made of high quality materials with standard fittings and secure connections. Check hoses before use to make sure they're free of defects and properly connected to pipe outlets. Repair or replace defective equipment immediately.

Identify the maximum allowable pressures (psi) by tagging or marking pipeline outlets.

Air hoses are subject to damage and can become hazards. Avoid bending or kinking air hoses. Hose reels can help with this. Keep air hoses free of grease and oil to prevent deterioration. Secure hose ends to prevent whipping if an accidental cut or break occurs. Whenever possible, suspend hoses overhead for more efficient access and protection.

**Pressure Regulation Devices**

Use ASME approved cast iron seat or disk safety valves that are stamped for the intended service application. Always install valves, gauges, and other regulating devices so they can’t be disabled. Never set the valve higher than the maximum allowable working pressure of the receiver.

The safety valves should be set to blow at pressures slightly above those necessary to pop the receiver safety valves. Settings must be no more than 10% above the standard operating pressure of the compressor. Shield blow-off valves to prevent personal injury and equipment damage from sudden blow-offs. Don’t position stop valves on airlines running between the compressor and the receiver. If the design of a safety or a relief valve allows liquid to collect on the discharge side of the disk, equip the valve with a drain at the lowest point where liquid can collect.

**PPE**

The company requires employees to wear the appropriate personal protective equipment (PPE) for the task. Safety glasses, face guards or shields, and hearing protection are required with impact tools.

An air-impact wrench creates a noise exposure of about 103 dB, requiring hearing protection. Gloves and steel-toed shoes are also required.

Never wear loose clothing and always keep your shirt tucked into your pants when using pneumatic tools. Tie long hair back or secure under a cap. Respirators may be required when using compressed air for tasks such as painting.
MAINTENANCE

Keep equipment appropriately lubricated while avoiding over lubricating. Don’t use flammable lubricants on compressors because they often operate at high temperatures that could cause a fire or explosion.

Frequent cleaning with soapy water (e.g., lye solutions) is recommended to keep carbon deposits off compressor parts. Don’t use kerosene or other flammable substances to clean compressed air equipment. Be sure to purge air systems after each cleaning.
SCOPE

This chapter provides information on the steps the company will take to protect its assets from fraud, waste and theft. Although OSHA does not have any regulation specifically regarding asset protection, our practices and procedures will be based on best industry practices. This chapter does not provide procedures for security personnel, which is available in a separate chapter.

POLICY

This Company has established an asset protection policy to enforce controls and to aid in the prevention and detection of fraud, theft, waste or abuse against the company. This policy applies to any theft, waste, or abuse or suspected fraud, theft, waste, or abuse involving an employee (including management), a consultant, vendor, contractor, outside agency, or person doing business with the agency or in any other relationship with the agency.

Failure to comply with this policy subjects an employee (including management) to disciplinary action, including immediate termination. Failure to comply by a consultant, vendor, contractor, outside agency, or person doing business with the agency or in any other relationship with the agency could result in cancellation of the business or other relationship between the entity and the agency.

EMPLOYER RESPONSIBILITIES

It is the responsibility of this company to:

- Ensure all employees are appropriately trained to identify instances of and report fraud, theft, waste or other dishonest conduct
- Contact the appropriate authorities when unlawful activities are suspected
- Respond appropriately to suspected improprieties that do not rise to the level of fraud
- Protect the identity of an employee or complainant who reports suspicions of fraud to the maximum extent allowed by law

EMPLOYEE RESPONSIBILITIES

Employees are expected to:

- Participate actively in asset protection training
- Follow this policy, all training and supervisor instructions in regard to preventing theft, fraud or abuse
- Report suspicions of fraud, theft, waste or abuse to the safety coordinator

PROCEDURES

Handling Reported Employee Theft

Whenever a report of employee theft is made, follow these steps. Do not contact the suspected individual in an effort to determine facts or demand restitution.
• Allow the safety coordinator to conduct the investigation. Do not further investigate the allegations
• Observe strict confidentiality. Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so
• Retaliation will not be tolerated. The company will not tolerate any form of retaliation against individuals providing information concerning fraud or suspected fraud
• Every effort will be made to protect the rights and the reputations of everyone involved, including the individual who in good faith alleges perceived misconduct as well as the alleged violator(s)
• The identity of an employee or other individual who reports a suspected act of fraud will be protected as provided by this policy

On receiving a report of suspected fraud, the safety coordinator shall document the contact and conduct a preliminary investigation to determine the credibility of the report. If the report is credible, the person shall follow the investigation guidelines provided in this policy.

The investigator shall make every effort to protect the rights and the reputations of everyone involved in a report of suspected fraud, including the individual who in good faith alleges perceived misconduct, as well as the alleged violator(s). The investigator also shall make every effort to protect the identity of a person who in good faith reported the suspected fraud. However, disciplinary action may be taken as provided by this policy if a report is made in bad faith.

On determining that a report is not credible or is not a report of fraud, the safety coordinator shall document this determination. This documentation shall include support for the determination.

**Customer Theft**

Whenever, you suspect a customer is going to steal from the store notify a supervisor on duty. To prevent false arrest claims and establish probable cause for detaining a suspected shoplifter, the Company requires completion of these six universally accepted steps before approaching a suspect:

1. You must see the thief approach the merchandise or enter the store without any merchandise in their hand(s). This prevents the scenario of falsely detaining a customer who carried an item to be returned or exchanged into your store
2. You must see the customer pick up the merchandise. By being able to say without doubt that you saw the customer pick up your merchandise before putting it into a pocket or otherwise concealing it, you protect the store from a false accusation complaint
3. You must see the shoplifter conceal, carry away or convert the merchandise in question. Concealment can be in pockets, in shopping bags, in a child’s stroller. It can even be accomplished in full view as in when tags are removed from articles of clothing
4. If you reach step four then alert management while maintaining continuous surveillance of the suspect. You must comply with this step in the strictest sense
5. During surveillance, you must observe the customer fail to pay for the merchandise. Sometimes the thief will walk directly out of the store, but sometimes they will pay for some items but not the concealed one. It is important to see that the concealed item is not retrieved and paid for. As a double check, ask the cashier if the specific item(s) has/have been paid for.

6. You must see the shoplifter leave the store. Your approach to the thief should be outside the store. This eliminates all arguments that the shoplifter intended to pay for the item(s)

**Detaining Suspected Thief**

Once the final step has been observed immediately call 911 and report the crime. This lessens the time store personnel must control the situation and a possibly unruly or violent detainee.

If you decide to detain the suspect, they should be approached outside the store by a minimum of two employees.

Do not use or lay your hands on the person while talking to them.

The approach conversation should be firm, to the point, and polite. It’s possible that there has been a mistake and/or a misunderstanding that can be explained. If the approach situation has been polite, and a sincere apology is given, most often a “non-productive” stop, can and will be forgotten.

Here is the company’s suggested script for approaching the suspected thief.

“Sir/Ma’am – I am work here and I’ve been observing you. Perhaps I’m mistaken, but do you have something in your purse/wallet/coat that you haven’t paid for? Would you please accompany me back into the store so we can clear this matter up?”

95 times out of 100, the person will respond to your request to go back into the store. In those few instances they do not, the “expert” must make an informed judgment as to whether or not to try to physically detain the person. IN MOST CASES, the potential for serious injury to store personnel would outweigh the benefits. In other words, let the person go if they put up a fight.

Once the suspect agrees to re-enter the store escort them to a secluded room. The designated detention room for the company is ________________________.

When escorting the person to this room, two store employees should walk closely to the suspect and use only the lightest pressure to guide the suspect to the desired location. On the slight chance that the suspect makes a run for it, many times grabbing loose clothing or a belt loop will restrain the person. If the person runs, and they make it into the clear, resist the temptation to chase him/her through the store, or outside, and certainly not in a car.

At least two store employees should be present in the room at all times until law enforcement officials arrive. One must be the same sex as the suspect.

Make a brief, discrete “pat down” search of the individual to ensure the safety of the detention room. This search MUST BE by a person of the same sex as the suspect. Avoid searching pockets and handbags. (Unless your local legal counsel informs that those procedures are legal in your state).

Separate handbags, purses and packages from the suspect.
While waiting for the police, begin creating a written record of pertinent facts, observations, and verbal exchanges or statements. [See Appendix]

Also, be sure to honor the suspect’s requests for water, requests to take prescription medications, or to use the restrooms, and, of course, any emergencies should be handled by calling “9-1-1.”

Once law enforcement arrives, turn the reins over to them. Cooperate fully, but at this point, it’s their show.

WHAT TO DO DURING A ROBBERY

Follow these tips if involved in a robbery:

- Try to stay calm. Say to yourself — “stay calm”
- Do exactly as you are told. No more, no less
- Use caution, being careful is not cowardice
- Alert the robber to any event or action you know is going to happen that may startle or upset the robber. (Ex. – someone is due to arrive soon)
- Be observant, make a conscious effort to get a description of the robber, but avoid making direct eye contact. (The perception is that eye contact promotes recognition)
- Do not make any sudden or quick movements
- When it is necessary to move or reach to comply with demands, tell the robber what you are going to do and why
- Listen carefully. Not only in order to obey commands but perhaps to hear a name used or something else said that can be used in the investigation
- Do not resist! Take a step back. Place your hands in front of you with palms held outward, turn your body sideways (reduces target area)
- Passively try to keep any note or written instructions the robber may have given you. If you can, turn this over to the police later
- Activate “panic button” or “toe kick” alarms only when you do it secretly. Take no chances!
- Give the robber adequate time to leave. Avoid the urge to give chase!
- Note the direction of travel when he /she leaves
- Try to get a description of any vehicle used in the getaway if you can do so without compromising your personal safety. Record the make, model, color, license number, distinguishing features (decals, dents, bumper stickers, hubcaps, etc.)

What to Do After a Robbery

Follow these steps after being involved in a robbery.

- Call the police – even if the alarm has been triggered
- Alert the dispatcher if there have been injuries so EMTs can be dispatched also
- Provide basic first aid or CPR to any injured employees or customers until paramedics arrive
- Lock the doors from the inside! Ask any witnesses to fill out a Robbery Report. If they cannot take the time to do that, at least get their names, addresses, and phone numbers so the police can follow up
All employees and witnesses should begin filling out the Robbery Report independently
Don’t touch anything the robbers may have touched and block off any areas the robber(s) was to protect evidence they may have left behind
When law enforcement arrives, go outside to greet them to show that the premises are secure
At this point, turn the matter over to the law enforcement officials. Cooperate fully!
Refer any inquiries from outsiders (media, etc.) to the responding law enforcement agency
Do not discuss items or amounts taken with anyone other than law enforcement

Theft Discipline
An employee is subject to disciplinary action, including termination, if they:
- Have engaged in any form of fraud, waste, or abuse
- Suspect or discover fraudulent activity and fails to report his or her suspicions as required by this policy
- Intentionally reports false or misleading information

TRAINING
We will ensure every employee is provided training on asset protection. This training will be provided at no cost to the employee during working hours.
Training will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

Training Records
Training records will include the following information:
- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions
Employee training records will be retained for the length of their employment.

FORMS AND ATTACHMENTS
On the following pages, please find the following documents:
- Internal Shoplifting Loss Control Report
- Internal Robbery Report
- Asset Protection Training Documentation
These forms may be reproduced for the purposes of implementing and maintaining a safety and health program.
## Internal Shoplifting Loss Control Report

<table>
<thead>
<tr>
<th>Date</th>
<th>Store Address</th>
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<tbody>
<tr>
<td></td>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Police Report #</th>
<th>Officer in Charge</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of Suspect</th>
<th>Address of Suspect</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>City</th>
<th>State</th>
<th>Zip</th>
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</table>

<table>
<thead>
<tr>
<th>Social Security #</th>
<th>Driver’s Licence #</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Date of Birth</th>
<th>Photo Taken</th>
<th>Yes</th>
<th>No</th>
<th>Arrest Made</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

### Written Narrative of Incident

Include any pertinent statements made by the suspect during the processing

Continue on back if necessary

<table>
<thead>
<tr>
<th>Merchandise Stolen</th>
<th>Retail Value $</th>
<th>Recovered?</th>
<th>Where is it now</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
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<td></td>
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</tbody>
</table>
## IIPP

### Internal Robbery Report (Page 1 of 2)

Please Print or Type this Form

<table>
<thead>
<tr>
<th>Date of Incident</th>
<th>Store Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time of Incident</td>
<td>Store Address</td>
</tr>
<tr>
<td>Police Report #</td>
<td></td>
</tr>
<tr>
<td>Officer in Charge</td>
<td></td>
</tr>
</tbody>
</table>

### Vehicle Information

<table>
<thead>
<tr>
<th>Make (e.g. Chevy)</th>
<th>Model (e.g. Impala)</th>
<th>Color</th>
<th># Doors</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>License (ST and #)</th>
<th>Features (dents, bumper stickers, etc.)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Weapon?</th>
<th>☐ Yes ☐ No ☐ Don't know/Didn't see ☐ Said he had one/Didn't see</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes</td>
<td>☐ Gun ☐ Knife ☐ Type of gun or knife, if known ☐ Other</td>
</tr>
</tbody>
</table>

### Description of Robber (use more than one sheet if multiple robbers)

<table>
<thead>
<tr>
<th>Height</th>
<th>Weight</th>
<th>Hair Color</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>General Body Type</th>
<th>☐ Thin ☐ Fat ☐ Medium ☐ Large</th>
<th>☐ Male ☐ Female</th>
</tr>
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<tbody>
<tr>
<td></td>
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<table>
<thead>
<tr>
<th>Color of Eyes</th>
<th>Eyeglasses?</th>
<th>☐ Yes ☐ No</th>
<th>Sunglasses?</th>
<th>☐ Yes ☐ No</th>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Race</th>
<th>☐ Caucasian ☐ African-American ☐ Hispanic ☐ Asian ☐ American Indian ☐ Native Hawaiian or Pacific Islander ☐ Other (specify)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Skin Color</th>
<th>☐ Pale ☐ Dark ☐ Light ☐ Black ☐ Brown</th>
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<tbody>
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</table>

<table>
<thead>
<tr>
<th>Skin Type</th>
<th>☐ Good complexion ☐ Pimply ☐ Greasy ☐ Acne ☐ Pock marked</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<table>
<thead>
<tr>
<th>Distinguishing marks: (tattoos, scars, etc.) (include body part) (e.g. dragon tattoo, left bicep)</th>
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<td></td>
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</table>
**Clothing**

<table>
<thead>
<tr>
<th>Clothing Item</th>
<th>Color/Type</th>
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<tbody>
<tr>
<td>Jacket/coat</td>
<td></td>
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<tr>
<td>Shirt/sweater</td>
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<tr>
<td>Pants</td>
<td></td>
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<tr>
<td>Shoes</td>
<td></td>
</tr>
<tr>
<td>Headgear</td>
<td></td>
</tr>
<tr>
<td>Gloves</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

Distinguishing personal mannerisms: (posture, accent, stutter, slurred or fast speech patterns, runny nose, facial tics, body twitches, etc.)

**Written Narrative of Incident**

Continue on back if necessary

**Person Filling Out This Report**

<table>
<thead>
<tr>
<th>Print Name</th>
<th>Signature</th>
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<tbody>
<tr>
<td></td>
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<table>
<thead>
<tr>
<th>Home Phone Number</th>
<th>Date</th>
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</table>
# Asset Protection Training

**Trainer (include qualifications):**

**Date:**

**Content of Training:**

---

**Attendees**

<table>
<thead>
<tr>
<th>Print Name</th>
<th>Signature</th>
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</table>
SCOPE

This chapter contains the requirements and safe practices to be followed to prevent illness or injury from exposure to cold weather. These practices will comply with the OSHA General Duty clause and any state or local regulations. They will also follow the recommendations provided by OSHA’s Cold Stress guide and quick reference card.

POLICY

All work operations involving exposure to low temperatures have the potential for inducing cold stress. This policy has been developed to address these issues. All employees will receive training relating to the causes and effects of, the personal and environmental factors that may lead to, and prevention measures to fight cold stress.

EMPLOYER RESPONSIBILITIES

It is the responsibility of this Company to:

- Provide employees with information on signs and prevention of cold stress
- Provide reliable means of preventing cold stress and other related health hazards

EMPLOYEE RESPONSIBILITIES

Employees working in cold environments, where illness or injury is a risk, are expected to:

- Wear appropriate clothing
- Make sure to protect ears, face, hands, and feet
- Move into warm locations during work breaks; limit the amount of time outside on extremely cold days
- Carry cold weather gear, such as extra socks, gloves, hats, jacket, blankets, a change of clothes, and a thermos of hot liquid
- Include a thermometer and chemical hot packs in your first aid kit
- Avoid touching cold metal surfaces with bare skin
- Monitor your physical condition and that of your co-workers

SAFE PRACTICES

Employees who work in cold environments, or are exposed to extreme cold, are at risk of cold stress. Extremely cold or wet weather is a dangerous situation that can cause occupational illness and injuries such as hypothermia, frostbite, and trench foot. When the body is unable to warm itself, serious cold-related illnesses, and injuries may occur, and permanent tissue damage and death may result.

An individual gains body heat from food and muscular activity and loses it through convection, conduction, radiation, and sweating to maintain a constant body temperature. When a person’s body temperature drops even a few degrees below its normal temperature of 98.6° F, the blood vessels constrict, decreasing peripheral blood flow to reduce heat loss from the surface of the skin. Shivering generates heat by increasing the body’s metabolic rate.
Risk Factors

The four environmental conditions that cause cold-related stress are low temperatures, high/cool winds, dampness, and cold water. One of the gravest dangers of winter weather is wind chill. The wind chill is based on the rate of heat loss from exposed skin by combined effects of wind and cold. As the wind increases, heat is carried away from the body at an accelerated rate, driving down the body temperature. Below is a wind chill chart from the National Weather Service.

**Wind Chill Chart**

<table>
<thead>
<tr>
<th>Temperature (°F)</th>
<th>30 minutes</th>
<th>10 minutes</th>
<th>5 minutes</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>40</td>
<td>35</td>
<td>30</td>
</tr>
<tr>
<td>25</td>
<td>31</td>
<td>28</td>
<td>25</td>
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<td>20</td>
<td>31</td>
<td>28</td>
<td>22</td>
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<td>15</td>
<td>31</td>
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<td>10</td>
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<td>28</td>
<td>22</td>
</tr>
<tr>
<td>0</td>
<td>31</td>
<td>28</td>
<td>22</td>
</tr>
</tbody>
</table>

To work safely, these challenges have to be counterbalanced by proper insulation, such as layered protective clothing, physical activity and by controlling exposure; e.g., work/rest schedule.

**Air Temperature**: Air temperature is measured by an ordinary thermometer in degrees Fahrenheit (°F) or degrees Celsius (°C).

**Wind Speed**: Various types of commercially available anemometers are used to measure wind speed or air movement.

Wind speed is usually measured in km/h or mph. The following is a suggested guide for estimating wind speeds if accurate information is not available:

- 5 mph (8 km/h): light flag moves
- 10 mph (16 km/h): light flag fully extended
- 15 mph (24 km/h): raises newspaper sheet
- 20 mph (32 km/h): causes blowing and drifting snow

**Humidity:** Water conducts heat away from the body 25 times faster than dry air.

**Physical Activity:** The production of body heat by physical activity is difficult to measure. However, tables are available in literature, which shows metabolic rates for a variety of activities. Metabolic heat production is measured in kilocalories (kcal) per hour. One kilocalorie is the amount of heat needed to raise the temperature of one kilogram of water by 24°F.

**Diet:** Workers have increased energy requirements when working in the cold. Consider adding additional wholesome foods to the diet, such as pasta, potatoes, rice, dairy products, nuts, meat, herring, and salmon. Light snacks and warm fluids should be taken during rest breaks. Alcohol must not be consumed when working in the cold. Alcohol produces a deceptive feeling of warmth but may contribute to dehydration and impair judgment.

**Work/rest Schedule:** Regular rest breaks in a heated area are recommended for anyone working in the cold. The frequency of breaks depends on the air temperature and wind speed, as well as the degree of physical activity.

**Protective Clothing:** To be protected from the cold, workers should dress in layers.
- The inner layers should trap moisture and wick it away from the body; the middle layers provide insulation; the outer layers protect against the wind and weather
- As work activity and environmental conditions change, workers should be able to easily add or remove layers

**Wind Chill**
At any temperature, you feel colder as the wind speed increases. The combined effect of cold air and wind speed is expressed as equivalent chill temperature (ECT) or simply wind chill temperature in degrees Fahrenheit or Celsius.

- It is essentially the air temperature that would feel the same on exposed human flesh as the given combination of air temperature and wind speed
- It can be used as a general guideline for deciding clothing requirements and the possible health effects of cold
- In some parts of the United States, the term wind chill factor is used. This is a measurement of a heat loss rate caused by exposure to wind and it is expressed as the rate of energy loss per unit area of exposed skin per second (e.g., joules/second - metre² or watts/metre², W/m²)

**Cold Stress Prevention Controlling Cold Stress Environmental Measures**
- Temperature and wind conditions should be known; e.g., weather report on the radio, current weather office information
- Steps should be taken to protect workers from wind (or indoors from drafts or forced air from air handling units). The combination of low temperatures and even moderate winds can quickly create dangerous working conditions
- Ensure that heated rest areas, such as a truck cab, tent, or hut, are available
Equipment Design

For work below the freezing point, metal handles and bars should be covered by thermal insulating material. In addition, machines and tools should be designed so that they can be operated without a person having to remove mittens or gloves.

Here are some examples of engineering controls to reduce cold exposure:

- Isolate the worker from the environment, where possible
- Use local heating for the body and especially bare hands (when fine work is required)
- This may include the use of warm air jets, radiant heaters, or contact warming plates
- Provide structures to block air or reduce air velocities at the work location
- Provide heated metal tools and handles or cover them with thermal insulating materials
- Use machine controls and tools designed so that workers do not have to remove mittens or gloves to use them

Work Practices

A schedule of regular rest breaks should be established to allow workers to warm up. These breaks should be not less than 10 minutes in length and should be taken in a heated area.

- Heated warming shelters; e.g., tents, cabins, rest rooms, should be provided
- When entering the heated shelter, outer and middle clothing layers (as necessary) should be removed to prevent overheating and to allow dampness to evaporate. A change of dry clothing may be necessary since returning to cold work while damp or sweaty may result in rapid chilling
- Warm fluids should be consumed at the work site to provide energy and warmth and to replace fluids lost during work
- Recognize the symptoms of cold stress. The onset of severe shivering, the feeling of excessive fatigue, drowsiness, irritability, or euphoria indicate the need to immediately return to the shelter

The following additional precautions apply at colder temperatures:

- Workers should be under constant protective observation by a buddy or supervisor
- Work rate should not be high enough to cause sweating. If heavy work must be performed, rest periods in heated shelters and the opportunity to change into dry clothing should be provided
- New employees should not be required to work full-time in the cold during the first days of employment until they become accustomed to the working conditions and required protective clothing
- Weight and bulkiness of clothing should be included in estimating required work performance
- Work should be arranged to minimize periods of standing or sitting still
- Workers should be appropriately trained
- Recognize the environmental and workplace conditions that lead to potential cold-induced illnesses and injuries
- Learn the signs and symptoms of cold-induced illnesses/injuries and what to do to help the worker
• Train the workforce about cold-induced illnesses and injuries
• Select proper clothing for cold, wet, and windy conditions. Layer clothing to adjust to changing environmental temperatures. (Tight clothing, however, can reduce blood circulation to the extremities.) Wear a hat and gloves, in addition to underwear that will keep water away from the skin (polypropylene). Be aware that some clothing may restrict movement resulting in a hazardous situation
• Protect the ears, face, hands, and feet in extremely cold or wet weather. Boots should be waterproof and insulated
• Carry extra socks, gloves, hats, jacket, blankets, a change of clothes, and a thermos of hot liquid
• Include chemical hot packs in your first aid kit
• Avoid touching cold metal surfaces with bare skin
• Take frequent short breaks in warm dry shelters to allow the body to warm up
• Perform work during the warmest part of the day
• Avoid exhaustion or fatigue because energy is needed to keep muscles warm
• Use the buddy system (work in pairs)
• Drink warm, sweet beverages (sugar water, sports-type drinks). Avoid drinks with caffeine (coffee, tea or hot chocolate) or alcohol
• Eat warm, high-calorie foods like hot pasta dishes

Dressing for the Cold

Clothes must be layered to manage moisture and keep dry. Insulating layers trap air for warmth, and outer layers protect workers from wind and weather.

To remain comfortable as weather and work conditions change, clothing layers should be added or removed, or ventilation openings in clothing opened or closed.

Every effort must be made to avoid sweating and becoming damp. Clothing selections are normally made based on staying warm while inactive. Consider the work to be performed and weather conditions, and then have workers dress so layers can be shed and still remain comfortably warm. If clothing layers do become damp and remain that way, workers should be prepared to replace them before becoming chilled and hypothermic. If a worker is sweating, then his or her clothing is probably too warm for the conditions and tasks being performed.

Hand Wear

• Mittens keep hands warmer than gloves since fingers are together. With gloves, fingers are separated and lose heat from one another
• Have workers wear thin liners under gloves or mittens. Liners need not be removed when removing the gloves
• Removable glove and mitten liners can be replaced and dried when they become damp
• New mitten styles, including three-finger lobster claws that keep fingers warm yet offer good dexterity are available
• Windproof over mitts offer additional hand protection, without adding significant bulk
Headwear

- Avoid cotton; use synthetic fabrics or wool instead
- Workers must use an appropriate hard hat liner to reduce heat loss
- Select a hat appropriate for the weather conditions and activity level. Consider thickness, extent of head coverage (e.g., open-faced, full balaclava, ear coverage), need for Wind protection, effect on vision and hearing, and ability to fit into or over protective headwear, if required
- A facemask and eye protection may sometimes be necessary

Footwear

- Warm, insulated safety footwear is essential. Boots should have thick soles for insulation while standing in snow or on cold concrete. Footwear selection should be based on the work being performed, the surfaces on which the worker will work and the weather conditions to which the worker will normally be exposed. Tight-fitting boots reduce circulation and can make feet feel cold
- Footwear should be sized so that it will accommodate an extra layer(s) of socks
- A synthetic sock liner, worn beneath a synthetic blend or wool outer sock, wicks moisture away from the skin, keeping feet drier and warmer

COLD-ENVIRONMENT CONDITIONS AND FIRST AID MEASURES

Hypothermia

Symptoms of hypothermia can vary depending on how long you have been exposed to the cold temperatures. They include:

<table>
<thead>
<tr>
<th>Early</th>
<th>Late</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fatigue</td>
<td>No shivering</td>
</tr>
<tr>
<td>Confusion and disorientation</td>
<td>Blue skin</td>
</tr>
<tr>
<td>Shivering</td>
<td>Dilated pupils</td>
</tr>
<tr>
<td>Loss of coordination</td>
<td>Slowed pulse and breathing</td>
</tr>
<tr>
<td></td>
<td>Loss of consciousness</td>
</tr>
</tbody>
</table>

Treating hypothermia

- Alert the supervisor and request medical assistance.
- Move the victim into a warm room or shelter.
- Remove their wet clothing.
- Warm the center of their body first-chest, neck, head, and groin using an electric blanket, if available; or use skin-to-skin contact under loose, dry layers of blankets, clothing, towels, or sheets.
• Warm beverages may help increase the body temperature, but do not give alcoholic beverages. Do not try to give beverages to an unconscious person.
• After their body temperature has increased, keep the victim dry, and wrapped in a warm blanket, including the head and neck.
• If victim has no pulse, begin cardiopulmonary resuscitation (CPR).

**Cold Water Immersion**

Cold water immersion creates a specific condition known as immersion hypothermia. It develops much more quickly than standard hypothermia because water conducts heat away from the body 25 times faster than air. Typically, people in temperate climates don’t consider themselves at risk from hypothermia in the water, but hypothermia can occur in any water temperature below 70°F. Survival times can be lengthened by wearing proper clothing (wool and synthetics and not cotton), using a personal flotation device (PFD, life vest, immersion suit, dry suit), and having a means of both signaling rescuers (strobe lights, personal locator beacon, whistles, flares, waterproof radio) and having a means of being retrieved from the water. Below you will find links with information about cold water survival and cold-water rescue.

**Frostbite**

Frostbite is an injury to the body that is caused by freezing. Frostbite causes a loss of feeling and color in the affected areas. It most often affects the nose, ears, cheeks, chin, fingers, or toes. Frostbite can permanently damage body tissues, and severe cases can lead to amputation. In extremely cold temperatures, the risk of frostbite is increased in workers with reduced blood circulation and among workers who are not dressed properly.

Symptoms of frostbite include:

• Reduced blood flow to hands and feet
• Numbness
• Tingling or stinging
• Aching
• Bluish or pale, waxy skin

Workers suffering from frostbite should:

• Get into a warm room as soon as possible
• Unless absolutely necessary, do not walk on frostbitten feet or toes-this increases the damage
• Immerse the affected area in warm-not hot- water (the temperature should be comfortable to the touch for unaffected parts of the body)
• Warm the affected area using body heat; for example, the heat of an armpit can be used to warm frostbitten fingers
• Do not rub or massage the frostbitten area; doing so may cause more damage
• Do not use a heating pad, heat lamp, or the heat of a stove, fireplace, or radiator for warming. Affected areas are numb and can be easily burned
Trench Foot

Trench foot, also known as immersion foot, is an injury of the feet resulting from prolonged exposure to wet and cold conditions. Trench foot can occur at temperatures as high as 60 degrees F if the feet are constantly wet. Injury occurs because wet feet lose heat 25-times faster than dry feet. Therefore, to prevent heat loss, the body constricts blood vessels to shut down circulation in the feet. Skin tissue begins to die because of lack of oxygen and nutrients and due to the buildup of toxic products.

Symptoms of trench foot include:

- Reddening of the skin
- Numbness
- Leg cramps
- Swelling
- Tingling pain

Workers suffering from trench foot should:

- Remove shoes/boots and wet socks
- Dry their feet
- Avoid walking on feet, as this may cause tissue damage
- Gangrene (the foot may turn dark purple
- Bleeding under the skin blue, or gray
- Blisters or ulcer

Chilblains

Chilblains are caused by the repeated exposure of skin to temperatures just above freezing to as high as 60 degrees F. The cold exposure causes damage to the capillary beds (groups of small blood vessels) in the skin. This damage is permanent and the redness and itching will return with additional exposure. The redness and itching typically occurs on cheeks, ears, fingers, and toes.

Symptoms of chilblains include:

- Itching
- Inflammation
- Possible blisters
- Redness
- Possible ulceration in severe cases

Workers suffering from chilblains should:

- Avoid scratching
- Slowly warm the skin
- Keep blisters and ulcers clean and covered
- Use corticosteroid creams to relieve itching and swelling
TRAINING

We will ensure every employee is provided training on all equipment, procedures, and processes to protect from cold stress. This training will be provided at no cost to the employee during working hours.

Training will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

Training Components

The safety coordinator will ensure that every employee will be trained in the following minimum elements:

- proper clothing and equipment
- safe work practices
- guidelines for eating and drinking
- risk factors that increase the health effects of cold exposure
- how to recognize signs and symptoms of frostbite
- how to recognize signs and symptoms of hypothermia
- Appropriate first aid treatment, including rewarming procedures

Training Records

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.
SCOPE

This chapter provides the requirements and safe practices for employees working on communication towers during construction, alteration, repair, operation, inspection and maintenance. These practices will comply with the applicable OSHA regulations on telecommunications, steel erection and fall protection.

POLICY

This Company has implemented this policy to ensure the safety of employees when working on and around communication towers.

EMPLOYER RESPONSIBILITIES

It is the responsibility of the Company and management to:

- Require employees to adhere to acceptable conditions for access before climbing a tower at heights above six feet
- Provide employees with all necessary PPE
- Ensure that at least two employees, including at least one competent person, are on site at all times when employees are exposed to fall hazards above six feet
- Visually inspect the tower base for damage, deterioration, structural deficiencies and functionality of safety features and anchorages before employees may climb the tower above six feet
- Ensure the tower is visually inspected, as it is ascended, to the elevation point where work is being performed
- Choose an acceptable training vendor or develop an in-house training program that can ensure safety of all employees
- Complete and document annual inspections of all climbing and fall-protection equipment

Jobsite Supervisor

It is the responsibility of the jobsite supervisor to:

- Conduct pre-job conferences or tailgate meetings to communicate hazards and their controls, special safety considerations, the scope and expected duration of the work to be performed, assign work tasks, review any special job-specific equipment or safety processes, outline the climbing path, etc.
- Perform thorough job safety analysis for the site, including all elevated work activities
- Ensure only competent climbers are permitted to perform elevated work
- Ensure the availability of rescue equipment and/or rescue services before beginning any elevated work
- Actively monitor work practices and site conditions to ensure continued safety through all elevated work activity to correct unsafe conditions and stop work if unsafe conditions arise
- Report safety incidents to the appropriate authorities as required elsewhere in this policy, by statute or by regulations
EMPLOYEE RESPONSIBILITIES

Employees are expected to:

- Abide by all safety training and policies
- Participate in pre-climb meetings and pre-climb planning activities (as appropriate)
- Inspect their PPE and ensure their personal fall arrest system is in safe working order before any climb
- Remove from service any equipment with defect or deterioration that might adversely affect the equipment’s ability to ensure the safety of its user
- Adhere to the 100% fall protection policy during climbing
- Only connect to appropriate anchorages
- Report any unsafe conditions or acts immediately

HAZARD IDENTIFICATION AND ASSESSMENT

A competent person must conduct a hazard assessment to identify and assess hazards in order to control employee exposure before employees climb the structure. The hazard assessment must be conducted at the start of work and daily. It must consider new equipment, materials, and processes for hazards before they are introduced into the workplace. Please see the Job Hazard Assessment policy for more information.

Each hazard identified must be assessed for severity and to determine a means to control risk, such as personal protective equipment. Review all possible hazards including the following:

- Weather-related hazards
- Electrical dangers
- Noise
- Live hazards like snakes, birds, insects, farm animals and other humans
- Other conditions, including non-standard structure hazards

FALL PROTECTION

An employee who climbs above 6 feet will be protected by 100% fall protection systems provided by and maintained by the employer.

**Pre-Climb Planning and Inspection**

In addition to other hazard assessments and pre-climb planning and inspection requirements, a competent person must plan each climb above 6 feet. The planning must meet the following specifications:

- On a daily basis, a competent person will visually inspect the tower for rust, corrosion, deterioration, or other hazards. A visual inspection of the climbing facilities for these hazards must be made as they are ascended, up to the elevation where work will be done. Any identified hazard requires abatement before an employee may climb
- Before use of any fall protection system, a competent person must make sure it is inspected for any deterioration by an individual with appropriate knowledge and training. Any equipment that is defective must be removed from service
• All fall protection equipment must be compatible and used according to manufacturer recommendations
• Pre-climb planning and inspection will be documented. The documentation will be maintained on site while work is being performed, and thereafter by the Company at its place of business
• The documentation will include the following:
  o Date of the planning and inspection
  o The name of the competent person performing the planning and inspection
  o The site location

Other Pre-Climb Planning Considerations

Before a climb, the supervisor will evaluate all other concerns that may impact the safety of climbers including the following:

• The ability of each member of the crew to complete the work assigned
• Additional equipment that will be needed, and the workers’ proficiency with that equipment
• Special fabrication requirements that may be necessary to ensure climber safety
• Emergency services near the site, location of nearest medical facility, and availability of emergency facility phone numbers
• Crew familiarity with location and operation of rescue equipment and location of first aid kit
• Inclement weather
• Security of tools and equipment on the tower (a safety lanyard can prevent them from becoming missile hazards)
• The required site safety meeting

Pre-Climb Safety Meeting

Upon arrival at the site, and before commencing work at elevation, all personnel will participate in a pre-climb safety meeting. During this safety meeting, the competent person must convey all hazards specific to the climb and the means used to control those hazards. The meeting will review emergency and rescue procedures and cover the location and use of any emergency equipment as well as where emergency medical facilities are located. The meeting will cover primary and alternate climbing routes and obstructions. During the pre-climb meeting, the qualifications and training of all climbers needs to be verified, and personnel will be assigned duties as required by the work to be performed.

The length of these meetings is directly related to the complexity and type of work to be performed. An effective meeting relies on a thorough assessment to identify all hazards and their respective controls.

Fall Protection Systems

To comply with the 100% fall protection requirements, employees must utilize a 100% fall protection system. Employees may not climb above six feet without this system in place unless any of the following is true:

• An alternative means of 100% fall protection is used that is at least as effective as the fall protection systems described below
• An alternative means of access to the work area is utilized (such as an aerial lift or elevated work platform)
• The following requirements of a fall protection plan are met

Guardrail Systems

Guardrail systems and their components, as part of the 100% fall protection system, must conform to OSHA regulations on guardrail systems for construction fall protection. See 29 CFR 1926.502(b) and/or consult the chapter on fall protection.

Personal Fall Arrest Systems (PFAS)

All personal fall arrest systems and components used as a means of 100% fall protection must conform to OSHA regulations for personal fall arrest systems as outlined in 29 CFR 1926.502(d) and fall protection policy and be used according to manufacturer guidelines. Attachment points to the structure must also meet OSHA regulations.

Positioning Device System

Positioning device systems also must conform to OSHA regulations for fall protection systems. See 29 CFR 1926.502(e) or the fall protection policy for more information. Positioning devices are not to be used in place of a fall arrest system.

Ladder Safety Systems

Fixed ladders used by employees as part of the 100% fall protection system must conform to OSHA construction standards on ladder safety (29 CFR 1926, Subpart X; Ladder Safety Policy) and must also meet the following criteria:

The climber must test the ladder safety system for safe operation and component compatibility:

• Approach the ladder and connect to the functional safety climb system
• Climb to a height less than 6 feet
• Forcibly engage the device without letting go of the ladder
• If the device engages appropriately, begin ascent
• If the device does not function properly, the climber must descend the structure and not climb until the device works properly

An alternative means of 100% fall protection may be utilized if the ladder is unavailable to climb, as long as the alternative is at least as effective.

Fall Protection Plan

If the structure on which employees’ work has no adequate tie-off anchorage point, fall protection systems as described above create a greater hazard, and/or the work requires an alternative means of access (aerial lift, elevated work platform, etc.), there must be in place a fall protection plan that meets OSHA requirements as outlined in 29 CFR 1926.502(k) and conforms to the following:

• Each employee under the plan must be trained as a qualified climber
The plan must be communicated to each employee before beginning work (communication must be documented)
If there is any location on the tower where other fall protection systems cannot be used, these locations must be identified and adequate fall protection systems used as soon as adequate tie-off anchorage points can be established

Emergency and Rescue Procedures

Procedures for emergency will have been established before such an eventuality. These procedures will be documented and available for review. Emergency and rescue procedures will include whether rescues will be performed by employees or by a third-party.

Employer Rescue Procedures

(Note: These procedures may be ignored if a third party has been designated to provide high angle rescue and emergency services.)

- At least two trained and designated rescue employees must be on site when employees are working at heights over six feet on the tower. However, where there are only two employees on site, then one employee who is a trained and designated rescue employee may accompany one employee who has been employed for less than nine months and has received documented orientation from the employer outlining steps to take in an emergency
- Ensure that personal protective equipment (PPE) and high angle rescue equipment needed to conduct elevated rescues are provided, used and maintained by the designated rescue employees
- Rescue employees will be proficient in the use and maintenance of PPE and high angle rescue equipment needed to conduct elevated rescues
- Designated rescue employees will be trained to perform assigned rescue duties to ensure that they become competent to perform such duties, including conducting simulated rescue operations at least once every 12 months

Suggested Steps for Rescue:

- Alert medical emergency personnel if victim requires medical attention
- Supervisor or lead gets rescue equipment, assigns duties and begins rescue
- Rescuer rigs controlled descent line above victim’s head as near as safely possible
- Rescuer connects descending device to descent line, and positions self to connect to victim.
- Rescuer uses breaking device to lock off, then rigs trail end of rope to ascender and pulley (creates a Z-rig)
- Rescuer attaches a pickoff strap to victim’s back D-ring and controlled descent device, not the rescuer’s harness
- Rescuer raises victim sufficiently to disengage victim’s lanyard or suspension device
- Rescuer removes victim from fall arrest device, removes haul system and lowers victim
- First aid should be given immediately
Third-Party Rescue Procedures

(Note: These procedures may be ignored if employees have been designated to provide high angle rescue and emergency services.)

- Obtain verification from the third-party rescue team or service that it is able to respond to a rescue summons in a timely manner
- Obtain verification from the third-party rescue team or service that it is proficient with rescue-related tasks and equipment as they relate to rescuing climbers from elevated heights on communication structures
- Select a rescue team or service from those evaluated that has verified it has the capability to reach the victim(s) and is equipped for and capable of performing the needed rescue services
- Provide the selected rescue team or service with contact information regarding all towers/structures from which rescue may be necessary so that the rescue service can develop appropriate rescue plans and practice rescue operations as it deems necessary
- Inform the selected rescue team or service, prior to the first day on which employee(s) perform work at heights over six feet on the tower, of the following:
  - The site and location of the tower(s) to be climbed
  - The hazard(s) identified on the site
  - The number of employees that will climb the tower(s)
  - The height(s) at which employee(s) will be working
  - The name(s) and telephone number(s) for any employer contact(s)
  - Any other information that is requested by the rescue team or service

FIRST AID/CPR TRAINING AND SUPPLIES

At least two employees on site will be trained and hold current certifications in basic first aid and cardiopulmonary resuscitation (CPR) issued by the American Red Cross or an organization whose standards are equivalent to the American Red Cross.

Where there are only two employees on site, then if only one employee is trained and holds current certifications in basic first aid and CPR, the other must be designated by the employer as a probationary employee and have been employed for less than six months.

NON-IONIZING RADIATION

General

No employee will be exposed to Radio Frequency Electromagnetic Fields in excess of FCC maximum personal exposure (MPE) limits as described in table below.
## TABLE 1

<table>
<thead>
<tr>
<th>Frequency Range (MHz)</th>
<th>Electric Field Strength (V/m)</th>
<th>Magnetic Field Strength (A/m)</th>
<th>Power Density (mW/cm)</th>
<th>Averaging Time (minutes)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Limits for Occupational/Controlled Exposures</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.3 – 3.0</td>
<td>614</td>
<td>1.63</td>
<td>*(100)</td>
<td>6</td>
</tr>
<tr>
<td>3.0 – 30</td>
<td>1842/f</td>
<td>4.89/f</td>
<td>*(900/f2)</td>
<td>6</td>
</tr>
<tr>
<td>30 – 300</td>
<td>61.4</td>
<td>0.163</td>
<td>1.0</td>
<td>6</td>
</tr>
<tr>
<td>300 – 1500</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>1500 – 100,000</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td><strong>Limits for Population/Exposure</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0.3 – 1.34</td>
<td>614</td>
<td>1.63</td>
<td>*(100)</td>
<td>30</td>
</tr>
<tr>
<td>1.34 – 30</td>
<td>824/f</td>
<td>2.19/f</td>
<td>*(180/f2)</td>
<td>30</td>
</tr>
<tr>
<td>30 – 300</td>
<td>27.5</td>
<td>0.073</td>
<td>0.2</td>
<td>30</td>
</tr>
<tr>
<td>300 – 1500</td>
<td></td>
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<tr>
<td>1500 – 100,000</td>
<td></td>
<td></td>
<td>1.0</td>
<td>30</td>
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</table>

**Protection from Radiation Exposure**

Employees shall not enter areas where RF exposure levels are above the general population/uncontrolled MPE’s described in table 1 unless they understand the potential for exposure and can exercise control over the exposure.

**Control Procedures**

Before employees performing work in areas on a communication tower where RF exposure levels exceed acceptable occupational/controlled MPE values, there must be written control procedures written and enforced to provide for the reduction, elimination, avoidance or protection from such RF levels. These written control procedures shall include the following:

- Reducing the transmitter power to a level that ensures RF exposure levels in areas where employees are working, do not exceed the occupational/controlled MPE values, and that the transmitter power level is not increased until all employees have ceased working in those areas. If this method is chosen, the transmitter power shall be locked out and tagged out at the reduced level by a competent person in accordance with OSHA lockout/tagout standards. Before removing lockout/tagout devices and restoring the original transmitter power level, notify all employees and check the work area to ensure all employees have been safely positioned and removed.
• If the transmitter power level in areas where employees are working cannot be reduced and maintained at a level that ensures RF exposure levels do not exceed the occupational/controlled MPE values, the transmitter power shall be locked out and tagged out by a competent person. Before removing lockout/tagout devices and restoring the original transmitter power level, notify all employees and check the work area to ensure all employees have been safely positioned and removed.
• If the transmitter power level cannot be reduced or eliminated, an employer may permit employees to access areas where the acceptable occupational/controlled MPE values are exceeded if it implements engineering or administrative controls that comply with the FCC’s regulations concerning such exposure, including limiting the duration of the exposure and utilizing monitoring equipment, RF protective clothing and other related PPE.
• If an employer cannot ensure that the control procedure conditions are met, employees may not access areas where RF exposure levels exceed the occupational/controlled MPE values shown in the Table.

Use of Controls

Before beginning work on a communication tower, a competent person will assess potential RF hazards of areas that may be accessed by employees in the course of their work, and post temporary signage to indicate areas where the RF hazard exceeds the general population/uncontrolled MPE limits for exposure. Temporary signage shall remain in place while work is performed and the hazard exists.

RF Safety Program

A written safety and health program with site specific procedures and elements based on the electromagnetic radiation hazards present in accordance with 13 NCAC 07F .0609(g) will be developed, implemented, and maintained when employees are exposed to RF fields in excess of the general population/uncontrolled MPE limits as a consequence of their employment.

HOISTS AND GIN POLES

Hoists

Hoists used during the construction, alteration, repair, maintenance, or demolition of communication towers will meet the following requirements:

• All hoists shall meet the requirements set forth in this rule, and OSHA regulations on materials handling and storage, where applicable
• All hoists shall meet applicable requirements for design, construction, installation, testing, inspection, maintenance, and operation as prescribed by the manufacturer, or a licensed professional engineer
• Employers shall maintain at the work site the operating manual developed by the manufacturer for the specific make and model hoist being used, as well as documentation for any inspection, testing, and operator training certification required by the rules in this Section
• An employer shall not operate or permit to be operated a hoist that the employer knows, or reasonably should know, will expose his employee(s) to an unsafe condition which is likely to result in personal injury or property damage

Gin Poles

Rigging Equipment
Wire rope, slings, chains, shackles, turnbuckles, links, hooks, sheaves, rotating rooster heads, blocks, and hoists, used in a gin pole lifting arrangement shall meet the manufacturer’s safe working load limits. In addition, each component shall have a nominal breaking strength of no less than five times the static load applied. Consideration for end fitting losses and actual positioning of connecting parts shall be given.

Lugs or other devices for lifting or attaching the gin pole in position shall be designed with load and resistance factors appropriate for their intended use.

Only alloy chains marked by the manufacturer with an 8, T, or an A, rated for lifting, shall be used.

Only quenched and tempered hooks and shackles shall be used. The manufacturer’s load rating shall be stamped on the product.

The breaking strength of the sheave shall equal or exceed the breaking strength of the wire rope intended for the sheave.

**Gin Pole Use**

- A user’s gin pole load chart shall be provided for each pole.
- Any special engineered pick, which is outside of the load chart, shall only be allowed at the direction of a licensed professional engineer. Monitoring and measuring conditions, as specified by a licensed professional engineer, shall be provided and used during all special engineered picks.
- Modifications or repairs of a gin pole shall be made with like or similar materials to meet or exceed the original specifications. Modifications or repairs shall be recertified by a licensed professional engineer.
- There shall be a mechanism in place to prevent the gin pole from tipping during the jumping process.

**Wire Rope**

Wire rope used for rigging shall be as follows:

- Compatible with the sheaves of the rooster head and hoisting blocks.
- Lubricated in accordance to manufacturer specifications to prevent corrosion and wear.
- End connections shall be terminated per industry and manufacturer’s specifications.
- Wedge sockets shall have a minimum tail length of one rope lay with a properly torqued clip attached to prevent accidental disengagement.
- Flemish eyes shall contain heavy duty thimbles of appropriate size for the wire rope diameter, and shall have a minimum tail length of one rope lay secured with a properly torqued clip at its end.

**Inspections**

- Gin poles must have a documented inspection annually by a qualified person.
In addition to the annual inspection, the employer shall designate a competent person who shall visually inspect the gin pole and rigging prior to each use, and during use, to make sure it is in safe operating condition. Any deficiencies shall be repaired before use continues.

During each inspection, the qualified or competent person shall:
- Inspect the legs and bracing members for bends or distortion
- Inspect the straightness tolerances for the overall assembly (including leg and bracing members)
- Visually inspect the welds for quality, deformation, cracks, rust, or pitting or loss of cross sectional area
- Inspect the members for excessive rust or pitting or loss of cross sectional area
- Inspect the sling attachment points for distortion, wear, cracks, and rust
- Ensure proper bolts are used and all associated hardware is in good condition
- Inspect side plates on rooster heads for distortion or other damage
- Inspect all attachment hardware, including rigging and parts such as cables, slings, and sling attachment points, shackles, hooks, and sockets for wear, distortion, cracks, and rust
- Ensure that all problems identified during the inspection are corrected before placing the gin pole into service

**TRAINING**

Every employee will be provided training on communication tower safety. This training will be provided at no cost to the employee during working hours. This training may be provided by a third-party vendor as long as it sufficiently addresses topics outlined in this policy, local, state or federal requirements and industry best practices for tower climbing safety.

- We use a third-party trainer

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
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<td></td>
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</tbody>
</table>

Phone

The training program will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.

**Training Components**

The individual overseeing this policy will be qualified to ensure that every employee will be adequately trained in the following minimum elements:

- Written policies and work procedures and manufacturers’ operating instructions for any equipment used and work processes undertaken
- How to handle hazardous materials that might be used or encountered during work
- Fall protection:
  - The nature of fall hazards in the work area
The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used
- The correct procedures for inspecting fall protection equipment for wear, damage, defect or deterioration
- Climbing safety procedures
- The use and operation of the fall protection systems utilized by the employer
- The role of each employee in any safety monitoring system being used
- The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection
- The role of employees in fall protection plans
- The compatibility of fall protection equipment and fall protection systems

Every hoist operator will be trained to operate such equipment safely according to OSHA hoist-operator training guidelines.

Employees exposed to RF in excess of the general population/uncontrolled MPE limits (see table 1) must receive RF hazard awareness training including the following:

- MPE Limits for occupational/controlled exposure
- Recognition of RF exposure sources in communication tower work
- Proper use and interpretation of RF exposure
- Work procedures to avoid excessive RF exposure
- Proper use of RF protective clothing and other related PPE
- Symptoms and health issues related to RF exposure
- RF exposure first-aid procedures

Retraining

A qualified person will ensure retraining for a trained employee does not have the understanding and skills required to safely perform assigned work such as when the following occurs:

- Changes in the workplace render previous training obsolete;
- Changes in the types of fall protection systems or equipment to be used render previous training obsolete; or
- Inadequacies in an employee’s knowledge or use of fall protection systems or equipment indicate that the employee has not retained the requisite understanding or skill.

Training Records

Training records will include the following information:

- The dates of the training sessions
- A copy of the lesson plans for the training session
- The names, qualifications and signature of persons conducting the training
- The names and job titles of all persons attending the training sessions

Employee training records will be maintained for the length of their employment.
RECORDKEEPING

The following records will be maintained and provided to all authorized personnel upon request:

- Training Records
- Medical Records and Non-Ionizing Radiation Exposure Records
- Equipment Inspections and Testing Records

FORMS AND ATTACHMENTS

On the following pages, please find the following document(s):

- Suggested Competent Tower Climber Training Topics
- Pre-work Safety Assessment
- PFAS Equipment Daily Inspection Checklist
## Suggested Competent Tower Climber Training Topics

Training for competent tower climbers should include a full work day each of classroom instruction, field instruction and rescue training.

### Classroom Instruction

- Basics of fall protection
- Regulations
- Hierarchy
- Fall restraint vs. fall arrest
- Proper selection, inspection, care, and maintenance of equipment
- Rooftop and leading edge
- Scaffold overview
- Ladder safety
- Elements of Competency Evaluation Form

### Body Holding Devices

- Body harness vs. safety belt
- Fall dynamics

### Connectors

- Ropes – rigging, knots, inspection, care, maintenance
- Hardware – snap hooks, carabiners, straps
- Lanyards

### Anchorage Systems

- Engineering considerations
- Regulatory requirements
- Selecting proper anchor points (for fall arrest and work positioning)
- Selecting proper equipment to attach to different anchor points

### Specialty Systems

- Vertical lifelines
- Horizontal lifelines
- Ladder safety systems
- Self-retracting lifelines
- Hoist and winch systems
- Controlled descent – descent devices, rope grabs, etc.
- Rigging

### Industry Hazards

- Types of towers, structures (monopoles, self-support, guyed, roof tops, smokestacks, etc.)
- Access
- Ladders
- Climbing systems

### Weather

- Lightning
- Snow
- Ice
- Wind

### Clothing

### Falling Objects

- Tool lanyards
- Exclusion zones
- Equipment restraints

### RF/EME

- RF site safety requirements
- Lockout/Tagout
- Personal protection monitors

### Crane Usage

- Setup
- Outriggers
- Swing radius hazards
- Rigging

### Suspended Personnel Platform Usage

- OSHA requirements
- Fall protection
- Pre-lift meeting
- Trial and test lift
- Man basket certification and inspection
- Required rigging

### Climbing Techniques

- 3-point contact
- Free Climbing prohibition/policy

### Tower Inspection

- Safety limbs
- Corrosion
- Insects (wasps, hornets, etc.)
- Power lines
- Step bolts (missing, loose, etc.)
- Tower grounds

### Field Instruction

**Pre-Job Planning – JSA/JHA**

- Inspecting tower structure
- Proper selection of fall protection system
- Written rescue plan and equipment

**Fall Protection Equipment**

- Proper fitting, donning
- Removal
- Care and maintenance inspection

**Tower Exercises**

- Actual work simulation from elevated heights
- Transitioning
- Determining anchor points
- Proper equipment use
- Tower Inspection
- Pre-climb plan
- Falling object protection
- Rigging
- Job completion/down rigging

### Rescue

**Training and Tower Exercises**

- Pre-job planning
- Company rescue plan, policies and responsibilities
- Rescue overview
- Rescue techniques
- Proper tower access
- Proper connecting
- Transferring
- Lowering
- Raising
- Assisted rescue
- Self-rescue
## Pre-Work Assessment (Complete Before Work and Review Daily) (Page 1 of 2)

### Job Information

<table>
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### Personnel

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<th>CPR / First Aid?</th>
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### Emergency Procedures / Telephone Numbers (attach directions to the site)

<table>
<thead>
<tr>
<th>911 system functional?</th>
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<tr>
<td>Police</td>
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<tr>
<td>Hospital</td>
<td>Evacuation Point</td>
<td>Communication Point</td>
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</tbody>
</table>

### Job Site Hazards

#### Physical Hazards

- □ Falls from Falls
- □ Slips, Trips and Falls
- □ Vehicle Traffic
- □ Combustibles
- □ Other
- □ Electrical
- □ Underground Utilities
- □ Elevation/Terrain
- □ Drilling

#### Health Hazards

- □ Heavy Equipment elevation
- □ Overhead Utilities
- □ Permit required
- □ Confined Space
- □ Excavation
- □ Heat Stress
- □ Noise (>85 dBA)
- □ Respiratory Hazard
- □ Lifting Hazards
- □ Cold Stress
- □ Chemical Exposure
- □ EME/RF
- □ Other:
## Hazard Control Measures

<table>
<thead>
<tr>
<th>PPE/Monitoring Equipment</th>
<th>Inspections</th>
<th>Safety Program/Training</th>
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<tr>
<td>□ Safety Hats</td>
<td>□ Tools/Equipment</td>
<td>□ Signage/Barricades</td>
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<tr>
<td>□ Hearing</td>
<td>□ Fall Protection</td>
<td>□ Tag Lines</td>
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<tr>
<td>□ Gloves</td>
<td>□ RF Monitors</td>
<td>□ Rinse Protection</td>
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<tr>
<td>□ RF Monitors</td>
<td>□ Rigging</td>
<td>□ Permit (personnel hoisting, excavation, confined spaces, etc.)</td>
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</table>

## Tower Details

<table>
<thead>
<tr>
<th>Type of Tower</th>
<th>Type of Antenna Boom</th>
</tr>
</thead>
</table>

## Fall Protection to be Used

- □ Full Body Harness
- □ Retractable Lifeline
- □ Double Leg or Two Lanyards
- □ Anchorage Straps
- □ Anchorage Straps
- □ Anchorage Straps
- □ Ropes
- □ Descenders

---

**Fall protection system for accessing antenna booms or performing tower erection.**

## Hoisting Equipment to be Used

- □ Personnel Platform/Manbasket
- □ Crane/Boom Truck
- □ Man-rated Hoist
- □ Gin Pole

## Review Signatures

<table>
<thead>
<tr>
<th>Name</th>
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## Notes/Comments

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# Personal Fall Arrest System Equipment Daily Inspection

( Check if acceptable; if unacceptable, remove from service, make note )

## Daily Inspection

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<thead>
<tr>
<th>Employee</th>
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<th>Week Of</th>
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<td>Webbing (No tears, cuts, burns, chemical exposures)</td>
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<tr>
<td>Buckles and Rivets (No deformities, missing springs, abnormal wear)</td>
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<tr>
<td>D-Rings (No cracks, wear, deformities)</td>
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<tr>
<td>Harness (Fits properly)</td>
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<tr>
<td><strong>Lanyards</strong></td>
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<td>Harness (Fits properly)</td>
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<tr>
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<td>Buckles and Rivets (No deformities, missing springs, abnormal wear)</td>
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<td>D-Rings (No cracks, wear, deformities)</td>
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<tr>
<td>Harness (Fits properly)</td>
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</table>

- **Webbing:** (No tears, cuts, burns, chemical exposures)
- **Grommets:** (No excessive wear or deformity)
- **Pelican Hook:** (Working safety catch, bar closes and latches, no wear or deformity)
- **Buckles and Rivets:** (No deformities, missing springs, abnormal wear)
- **Snap Hooks:** (Latch properly, no excessive wear or deformity)
- **Safety Climb:** (Spring chains and quick release pins)
- **D-Rings:** (No cracks, wear, deformities)
- **Rope or Strap:** (No cuts, wear, fraying, chaffing, bunny fur, chemical exposure, ripping or unraveling braid)
- **Spreader Bars/Chains:** (No visible damage or wear)
- **Harness:** (Fits properly)
- **Notes**
SCOPE

This chapter provides information on the safe practices for working with compressed gas cylinders. Our safe practices will comply with the requirements of OSHA regulations 1910.101 and/or 1926.350 whichever is applicable.

POLICY

Compressed gas cylinders can be extremely hazardous when misused or abused. Compressed gas cylinders can present a variety of hazards due to their pressure and/or content. Because of the hazards posed by compressed gas cylinders in the workplace, employees must adhere to industry best practices and safety regulations applicable to the transportation, use, and storage of compressed gas cylinders.

EMPLOYER RESPONSIBILITIES

This company will:

- Train employees on compressed gas cylinder safety
- Procure and track pressurized gas cylinders to minimize quantity onsite
- Document procedures on safe pressurized cylinder handling and storage
- Train emergency response personnel to handle an emergency
- Label and identify every cylinder
- Ensure each cylinder has the hydrostatic test label
- Document procedures to dispose of cylinder and have them refilled
- Secure gas cylinders

EMPLOYEE RESPONSIBILITIES

Employees are expected to:

- Use appropriate PPE as needed
- Transport, store, and use compressed gas cylinders according to best safety practices
- Report any unexpected hazard that cannot safely be remedied immediately

SAFE PRACTICES

Depending on the particular gas, there is a potential for simultaneous exposure to both mechanical and chemical hazards. Gases used may be:

- Flammable or combustible
- Corrosive
- Explosive
- Poisonous
- Inert
- Reactive
- A combination of hazards
- Acidic

Without proper use and care, compressed gas cylinders can explode, killing workers and destroying equipment. Cylinders can become flying projectiles when cylinder valves are damaged or broken off. Regulators can become bullets that tear through workers if safety precautions are not taken.
- When the gas is flammable, flash points lower than room temperature compounded by high rates of diffusion present a danger of fire or explosion
- Additional hazards of reactivity and toxicity of the gas, as well as asphyxiation, can be caused by high concentrations of even "harmless" gases such as nitrogen
- Since the gases are contained in heavy, highly pressurized metal containers, the large amount of potential energy resulting from compression of the gas makes the cylinder a potential rocket or fragmentation bomb
- Careful procedures are necessary for handling the various compressed gases, the cylinders containing the compressed gases, regulators, or valves used to control gas flow, and the piping used to confine gases during flow
- Always use safety glasses (preferably with a face shield) when handling and using compressed gases, especially when connecting and disconnecting compressed gas regulators and lines

Careful procedures are necessary for handling the various compressed gases, cylinders, regulators or valves used to control gas flow, and the piping used to confine gases during flow.

**Identifying Contents of Compressed Gas Cylinders**

The contents of any compressed gas cylinder must be clearly identified. Gas identification should be stenciled or stamped on the cylinder or a label. Commercially available three-part tag systems may be used for identification and inventory.

No compressed gas cylinder should be accepted for use that does not legibly identify its contents by name. If the labeling on a cylinder becomes unclear, the cylinder should be marked "contents unknown" and returned to the supplier.

Do not rely on the color of the cylinder for identification, always read the label. Color-coding is not reliable because cylinder colors may vary with supplier. Also, never rely on labels on caps because they are interchangeable.

All gas lines leading from a compressed gas supply should be clearly labeled to identify the gas and the area served. The labels should be coded to distinguish hazardous gases such as flammable, toxic, or corrosive substances. Signs should be posted in areas where flammable compressed gases are stored or used, identifying the substance and appropriate precautions.

**Transporting Gas Cylinders**

- Never drag, slide, or roll a cylinder; use a cylinder cart or basket
- Always have the protective cap covering the valve when transporting the cylinder
- Never transport the cylinder with the regulator in place
- Make sure the cylinder is secured to the cart before moving it
- Do not drop cylinders or strike them against each other or against other surfaces violently
- Do not use valve covers to lift cylinders; they could be damaged and become unattached. If the cylinder is dropped on a hard surface, it can cause an explosion
Storage of Gas Cylinders

- Gas cylinders must be secured at all times to prevent tipping
- Use appropriate material, such as chain, plastic coated wire cable, commercial straps, etc., to secure cylinders
- Gas cylinders cannot be stored in public hallways or other unprotected areas
- Cylinders must be segregated in hazard classes while in storage. Oxidizers (oxygen) must be separated from flammable gases, and empty cylinders must be isolated from filled cylinders
- The proper storage for oxygen cylinders requires a minimum of 20 feet to be maintained between flammable gas cylinders and oxygen cylinders or the storage area be separated, at a minimum, by a firewall five (5) feet high with a fire rating of 30 minutes
- Store out of direct sunlight and away from sources of heat and ignition; temperatures must not exceed 125° F
- Acetylene cylinders must never be stored on their sides
- Always place valve protectors on gas cylinders when the cylinders are not connected for use
- Cylinders must be protected from damage. Do not store cylinders near elevators or gangways, or in locations where heavy-moving objects may strike or fall on them
- Cylinders must be stored where they are protected from the ground to prevent rusting
- Cylinders should be protected against tampering by unauthorized individuals
- Storage areas must be well-ventilated, cool, dry, and free from corrosive materials

Use of Compressed Gas Cylinders

Before first use:
- Make sure the cylinder is equipped with the correct regulator
- Inspect the regulator and cylinder valves for grease, oil, dirt, and solvent. Never use grease or oil to lubricate regulators or cylinder valves because they can cause an explosion
- The cylinder should be placed so that the valve handle at the top is easily accessible
- When using toxic or irritating gas, the valve should only be opened while the cylinder is in a working fume hood
- Only use wrenches or tools that are provided by the cylinder supplier to open or close a valve. Pliers should never be used to open a cylinder valve. Some regulators require washers; this should be checked before the regulator is fitted
- Refer to the Safety Data Sheet for the gas being used for information regarding use and toxicity
- Fire extinguishing equipment should be readily available when combustible materials can be exposed to welding or cutting operations using compressed cylinder gases

During use:
- Only properly trained personal should handle compressed gas cylinders
- Back off the pressure adjusting screw of the regulator to release spring force before opening the cylinder valve
- Open the valve slowly and only with the proper regulator in place. Stand with the cylinder between yourself and the regulator (cylinder valve outlet facing away) when opening the cylinder valve
• Acetylene or other flammable gas cylinder valves should not be opened more than ½ turns of the spindle, and preferably no more than ¾ of a turn. This reduces the risk of explosion and allows the cylinder valve to be closed quickly cutting off the gas flow
• Never heat a cylinder to raise the pressure of the gas (this can defeat the safety mechanisms built in by the supplier)
• Keep the cylinder clear of all electrical circuits, flame, and sparks
• Never leave the valve open when equipment is not in use, even when empty; air and moisture may diffuse through an open valve causing contamination and corrosion within the cylinder
• Do not refill a cylinder; mixing of residual gases in a confined area may cause a dangerous reaction
• Never use copper fittings or tubing on acetylene tanks – an explosion may result
• Never use compressed gas to dust off clothing; this could cause injury to the eyes or body and create a fire hazard. Clothing can become saturated and burst into flames if touched off by an ignition source such as a spark or cigarette
• Never leave pressure in a regulator when it is not in use
• Valve protection caps should remain in place until ready to withdraw gas or connect to a manifold
• Cylinder discharge lines should be equipped with approved check valves to prevent inadvertent contamination of cylinders connected to a closed system
• Do not force connections that do not fit
• Close the cylinder valve and release all pressure before removing the regulator
• Do not smoke when oxygen or fuel gases are present. Smoking can cause a fire or explosion
• Do not use acetylene at operating pressures above 15 psig
• Purge fuel and oxygen hoses individually before lighting up a torch tip
• Follow the equipment manufacturer’s operating instructions at all times
• If an outlet valve becomes clogged with ice, thaw it with warm water (if the gas is not water reactive), applied only to the valve
• Use the cylinder valve for turning gas off, not the regulator
• Workers should wear safety glasses and face shields when handling and using compressed gases, especially when connecting and disconnecting regulators and lines
• Never use oxygen as a substitute as a “compressed air” to run pneumatic tools, in oil heating burners, to start internal combustion engines, to blow out pipelines, or to create pressure for ventilation
• Oxygen cylinder valves should be opened all of the way during use
Housekeeping Procedures

The following are housekeeping items to remember when working with all compressed gas cylinders:

When you're unsure about the proper handling of a compressed gas cylinder or its content, consult the manufacturer or supplier. Information about the gas is available from the safety coordinator, or on the Safety Data Sheet (SDS), kept in the Right-to-Know folder in your work area. It contains the material's identity; hazardous ingredients; and the name, address, and phone number of the manufacturer. The person handling the cylinder and connections is responsible for checking the identity of the gas by reading the label or other markings on the cylinder before using it. If the content is not clearly marked, do not use it.

Return it to the supplier as soon as possible. If a foreign substance enters a cylinder or the valves are damaged, notify the owner or manufacturer. Be prepared to provide details about the incident and serial number of the cylinder involved.

Keep oily substances away from cylinders, valves, coupling hoses, and other apparatus. Valves on empty cylinders should be kept closed at all times. Keep valve protection caps in place when cylinders are moved or not in use. Screw the protection cap all the way down.

Close cylinder valves when the job is finished.

When transporting compressed gas cylinders outside your work area:

- Make sure the valves are closed
- Remove the regulators
- Make sure the protection cap is in place
- Secure the cylinder on a cylinder cart

NEVER use compressed gases to dust off clothing or skin, as this may cause serious injury to the eyes and/or body in the form of an air embolism in the bloodstream, which can lead to heart failure. Compressed air used for cleaning purposes must be reduced to less than 30 psi, compressors must be visually inspected, and the safety valves must be tested. Compressed air used for cleaning is only permitted with effective chip guarding and personal protective equipment to protect the operator and other employees from the hazards of the release of compressed air and flying debris.

Cylinder Leaks

- If the cylinder contains a flammable, inert, or oxidizing gas, remove it to an isolated area, away from possible ignition sources. Allow it to remain isolated until the gas has discharged, making certain that appropriate warnings have been posted
- If the gas is a corrosive, remove the cylinder to an isolated, well-ventilated area. The stream of leaking gas should be directed into an appropriate neutralizing material
- For toxic material, the cylinder should be removed to an isolated, well-ventilated area but only if this is possible while maintaining personal safety. It may be necessary to evacuate the facility
- 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
- Never use a flame to detect a gas leak. Use soapy water
Empty Cylinders

- Do not completely empty the cylinder; always leave some residual pressure
- If the cylinder is empty, replace the cap and remove it to the empty cylinder storage area
- Label all empty cylinders with tags so that everyone will know their status. Empty cylinders can be marked with “MT” and date with chalk
- Handle empty cylinders as carefully as full ones; residual pressure can be dangerous
- Never refill a cylinder. This requires specialized equipment and techniques
- Never mix gases in a cylinder. The next person who draws from it may unknowingly cause an explosion

Piping, Hoses and Connections

Piping

- Polyvinyl chloride (PVC) plastic pipes cannot be used for transporting compressed gases aboveground unless they are completely enclosed in a conduit or casing of sufficient strength to provide protection from external damage and deterioration. The heat generated from compressed air can weaken the PVC pipe and create an explosion hazard. When PVC piping explodes, plastic shrapnel pieces can be thrown in all direction and injure workers or damage equipment
- Do not use copper piping for acetylene
- Do not use cast iron pipe for chlorine
- Distribution lines and their outlets need to be clearly labeled
- Inspect piping systems on a regular basis
- Pay attention to fittings as well as possible cracks that may have developed

Hoses and Connections

- Examine hoses regularly for leaks and set up an inspection schedule
- Do not use unnecessarily long hoses
- Keep hoses free from kinks and away from high traffic areas
- Repair leaks promptly and properly
- Store hoses in a cool place and protect them from hot objects and sparks
- Do not use a single hose having more than one gas passage

Engineering Controls

Listed below are some engineering controls that can be used in some cases to control the risk of compressed gas use:

- Emergency Shutoff Switch – can be used at a remote location to cause pneumatic valves to shut, stopping gas flow. Switches should be non-electric so that arcs or sparks are not created around flammable gases
- Gas Cabinets – hazardous gas cylinders should be housed in a gas cylinder cabinet. These cabinets can be equipped with sprinkler protection and ventilation
• **Flow Restrictors** – can be used to limit hazardous gas flow to just over maximum flow needed, must be installed immediately downstream of each hazardous gas cylinder
• **Emergency Eyewash** – must be present in areas were corrosive materials or gas is used

**SPECIAL PRECAUTIONS**

**Flammable Gas**

- Cylinders of flammable gas must be stored away from flammable liquids, combustible materials, oxidizers, open flames, sparks and other sources of heat or ignition. Maintain a distance of at least 20-feet from these materials unless separated by a noncombustible wall, not less than 5-feet high, having a fire-resistance rating of ½-hour
- All lines and equipment associated with flammable gas systems must be grounded and bonded
- Flash arrestors are designed to prevent a flashback, should it occur, in a line containing a flammable gas
- Portable fire extinguishers should be available in the area of use and storage
- Use spark-proof tools when working with flammable gas
- Do not leave “flow” experiments unattended
- Do not use acetylene at operating pressures over 15 psig
- Never use copper fittings or tubing on acetylene tanks

**Oxidizing Gas**

- Cylinders of oxygen and other oxidizers must be stored at least 20-feet from fuel-gas or other combustible materials unless separated by a noncombustible wall, not less than 5-feet high, having a fire-resistance rating of ½-hour
- All equipment used for oxidizing gases must be cleaned with oxygen-compatible materials free from oils, greases, and other contaminants
- Do not use oily hands or gloves when handling cylinders. The reaction between oxygen and hydrocarbons can be violent even when small quantities are involved

**Corrosive Gas**

- Avoid contact with skin and eyes
- An emergency shower and eyewash must be installed within 50 feet where corrosive materials are used
- Metals become brittle when used in corrosive gas service; check equipment and lines frequently for leaks

**Inert Gases**

Inert gases such as argon, carbon dioxide, helium, krypton, neon nitrogen, and xenon are simple asphyxiants that can displace oxygen in the air and can cause suffocation. When the normal amount of oxygen in the air is reduced by displacement with an inert gas, it is a potential hazard to employees. Reduced concentration of oxygen in the air causes sleepiness, fatigue, loss of physical coordination, even death.
Poisonous Gases

Storage of highly toxic or poisonous gases must be outdoors or in a separate non-combustible building without any other occupancy. Poison gases such as arsine, diorama, methyl bromide, nitric oxide, nitrogen dioxide, phosgene, and phosphine can cause potential hazards to personnel and requires special handling.

These products must never be handled except by specially trained personnel who are fully aware of the potential hazards involved and who are equipped with such special personal safety gear as is necessary in the handling of these products.

Top Safety Tips

- Cylinders must be secured
- Racks containing small cylinders must be secured by special attachments
- Storage areas must be labeled for the specific gases to be stored in those areas
- NO SMOKING signs must be posted and clearly visible
- Flammable gas cylinders and oxidizer cylinders must be separated by 20 feet or by a noncombustible barrier 5 feet high having a fire resistance rating of at least one half-hour. No ignition sources are allowed in the area
- Cylinders of all gases must be stored upright with the cylinder cap in place
- Empty and full cylinders must be segregated in the rack or otherwise clearly marked
- Cylinder storage areas must not be placed next to combustible materials or obstruct exit routes
- Storage areas must be well ventilated
- Take care in handling and storing compressed gas cylinders. If you have any questions about particular gases check the SDS, or speak to the manufacturer or senior safety officer in your area. Following safety procedures will minimize the risks involved with handling compressed gas cylinders

TRAINING

We will ensure every employee is provided training on compressed gas cylinder safety. This training will be provided at no cost to the employee during working hours.

Training will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

Training Records

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.
FORMS AND ATTACHMENTS

On the following pages, please find the Compressed Gas Cylinders Safety Training Document. This form may be reproduced for the purposes of implementing and maintaining a safety and health program.
# COMPRESSED GAS CYLINDERS SAFETY TRAINING

**Trainer (include qualifications):**

**Date:**

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<thead>
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<th>Content of Training:</th>
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## Attendees

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SCOPE
This chapter provides the safe practices and requirements for employees authorized to drive a Company vehicle or personal car on Company business. It does not include information on vehicle inspections, maintenance or load securement, which are addressed in other chapters of this manual.

POLICY
Driving any vehicle presents significant risks to workers. This Company is committed to reducing traffic-related deaths and injuries. As part of this commitment, this Company maintains a driver safety policy designed to support a culture of safety and reduce accidents.

EMPLOYER RESPONSIBILITIES
This Company will:

- Establish and maintain policies and rules in accordance with applicable regulations and best industry practices to promote safety and prevent injuries and illnesses
- Ensure that every employee asked to drive a Company car or personal car on Company business has been trained in the Company’s driver safety policy and safe driving practices
- Record and maintain documents pertaining to the eligibility and qualification of an employee to drive a Company car or a personal vehicle on Company business
- Ensure vehicles driven on Company business are in good repair and adhere to all legal regulations and requirements
- Encourage and respect the involvement of employees in the planning and implementation of safe driving policy
- Ensure drivers participate in regular safety meetings to promote a continued culture of safety and address safety concerns
- Devise and implement a system of disciplinary action and rewards to encourage safe driving habits, as appropriate
- Prevent unnecessary travel by employees

EMPLOYEE RESPONSIBILITIES
Company employees who, as part of their job, drive a Company vehicle or their own on Company business are expected to:

- Complete a driver safety course that addresses general driver safety as well as hazards specific to the job being done
- Ensure the roadworthiness of his or her vehicle before operation
- Operate the vehicle according to best safety practices
- Respond to accidents and near misses according to established Company policies and procedures
- Inform a supervisor of any changes to their Motor Vehicle Record that may impact their eligibility to drive
• Maintain a driver’s license that permits them to perform their job in compliance with the law
• Demonstrate awareness and understanding of the Company driver safety policy
• Make recommendations to improve the Company’s driver safety policy

SAFE PRACTICES
This Company recognizes that its greatest assets are its employees, a fact demonstrated by a commitment to their safety.

A driver safety program saves lives and reduces injuries. It also prevents material losses and helps this Company guard against the range of liabilities that may emerge from a vehicular accident.

Accordingly, management will provide resources needed to support a culture of safety and will actively encourage employees to participate in planning and implementation of the driver safety program.

If the Company operates any of the following types of commercial motor vehicles in interstate commerce, it will comply with applicable U.S. Department of Transportation (DOT) safety regulations, many of which may not be detailed in this chapter.

• A vehicle with a gross vehicle weight rating or gross combination weight rating of 10,0001 lbs. or more
• A vehicle designed or used to transport between 9 and 15 passengers for compensation
• A vehicle designed or used to transport 16 or more passengers
• Any size vehicle used in the transportation of materials classified as hazardous under the Hazardous Materials Transportation Act and are required to be placarded under the Hazardous Materials Regulations

FLEET
This Company will maintain a fleet of vehicles if necessary for business in accordance with relevant regulatory standards and vehicle manufacturer’s advice.

Fleet Selection
The safety coordinator will work with this Company’s insurance Company to establish guidelines for the selection of Company vehicles, and will include the following:

• The appropriate vehicle type for expected use
• Required safety equipment
• Maintenance procedures
• Inspection procedures
• Protections against unauthorized use
• Record-keeping procedures
• Insurance

The National Highway Transportation Administration provides information on vehicle safety according to make and model.
Preventive Maintenance

All Company vehicles will be maintained according to a regular schedule to ensure their safety and roadworthiness. All maintenance will be performed by a qualified individual or automotive shop according to the manufacturer's recommended service schedule.

In addition to regularly scheduled maintenance, fleet upkeep should include, but not be limited to:

- Basic inspections of the vehicle by the driver before every trip
- Immediate removal from service of any vehicle with mechanical problems
- Managerial certification of requested repairs before return to service

Recordkeeping

All vehicle maintenance, repair certification and driver review will be recorded and kept through the life of the vehicle.

Vehicle Inspection

The operator will inspect each vehicle or piece of equipment on a daily basis before and after operation. Each operator is responsible for the safe condition of the equipment. No employee may drive a vehicle having steering, brake or other safety problems until a mechanic has made repairs. Drivers will report any other unsafe conditions to their supervisor as soon as safely possible.

DRIVER SELECTION, QUALIFICATION AND EVALUATION

The safety coordinator will work with management and the Company's insurance Company to determine the qualification standards for motor vehicle operators.

Employment History

The evaluation for any new employee anticipated to drive a vehicle on Company business will include a reference check and review of driving history through past employers.

Licenses

Any driver of a Company vehicle or a personal vehicle on Company business will possess a valid driver’s license appropriate for the vehicle that will be driven and the circumstances in which the vehicle will be driven. All government regulations and insurance Company requirements will be followed concerning driver qualification.

A driver will only operate a vehicle that requires a commercial driver’s license (and any endorsement) if he or she is in possession of the appropriate license.

Motor Vehicle Records

This Company will check the driving records of any employee expected to drive for work. Further, periodic review of a motor vehicle record (MVR) for employees expected to drive for work reasons will indicate if they remain eligible to drive a Company vehicle or their own on Company business.
Initial Assignment

The Company will request and review an MVR for new applicants or current employees expected to add driving to existing responsibilities, whether operating their own vehicle or a Company vehicle. The MVR review will consider the most recent three years of driving and should include motor vehicle records from all states in which the applicant has lived in that time.

MVRs and the information contained therein will remain as confidential as possible. Discussions of motor vehicle records will be restricted to individuals with a legitimate “need to know.”

Any qualification standard may entail a multi-tiered or point system approach to driver eligibility based on the frequency of the employee’s anticipated work driving and the severity of traffic convictions recorded in the MVR.

Following are some examples of violations that, having occurred in the past 3 years, may warrant ineligibility to drive on Company business:

- DWI/DUI
- Negligent motor vehicle homicide
- Operating with a suspended license
- Using a motor vehicle for commission of a felony
- Aggravated assault with a motor vehicle
- Operating a motor vehicle without the owner’s consent
- Reckless, careless or negligent driving, including speeding more than 15 MPH over limit
- Hit and run or leaving the scene of an accident with injury or death resulting, or property damage in excess of $1,000

Following are examples of violations that, having occurred more than three times in two years, may warrant ineligibility to drive:

- Minor moving violations
- Accidents

Annual Review

Employees cited for a violation that may affect their eligibility to drive on Company business will inform their supervisor.

In addition to the initial MVR review, a review of an employee’s MVR will occur annually to confirm the driver’s continued eligibility to drive for work.

Defensive Driver Training

The Company may consider or require the completion of a driver safety course or defensive driving course in determining eligibility to drive a Company vehicle or a personal vehicle while on Company business.

Driver Agreements

Employees who will operate a motor vehicle as part of their job are required to confirm awareness and understanding of the Company’s driver safety policy.
The safety coordinator, with the safety committee, will create a “driver agreement” that allows a driver to confirm his or her awareness and understanding of this policy, driver expectations, vehicle maintenance and care requirements, and the procedures for reporting moving violations and accidents.

Driver Qualification File

The Company will maintain a driver qualification file for every driver including all documents required to verify his or her qualifications.

Meetings

The safety coordinator, with the safety committee, will determine whether or under what conditions an employee may permit another individual to drive a Company vehicle.

A driver or other employee who permits an unauthorized individual to operate a Company vehicle faces disciplinary action and financial accountability for any costs incurred by allowing unauthorized personnel to operate a Company vehicle.

Securing Materials

The driver will prevent the unsafe movement of any materials such as tools or equipment by securing it appropriately. Drivers should secure anything that may present a hazard outside the passenger compartment.

Vehicle Occupancy

No Company vehicle transport more passengers than safely possible. Every adult in the vehicle must have a seatbelt. If children must be transported, each must have the appropriate child safety restraint. Vehicles may be operated only if each passenger is safely restrained in their seat.

Seat Belts

The Company recognizes that seat belts effectively prevent injuries and loss of life in an automotive accident.

All Company employees will wear seatbelts when operating a Company-owned vehicle or any vehicle on Company premises or on Company business. Any occupant of a vehicle owned by this Company, on Company premises, or in a vehicle on Company business will wear a seatbelt or, if required, an appropriate child restraint system.

This Company encourages its employees to always wear a seatbelt when driving or riding in an automobile, to ensure child restraints are used properly, and to encourage other passengers or drivers do the same.

Alcohol and Drug Use

The Company forbids employees from consuming or being under the influence of alcohol or illegal drugs during “duty hours.” Duty hours include working hours, break periods and on-call periods. The consumption of alcohol or illegal drugs while performing Company business or while in a Company facility may result in disciplinary action up to and including termination.
If an employee takes prescribed medication or over-the-counter medication known to affect the ability to operate a motor vehicle or other heavy machinery, the employee will inform his or her immediate supervisor and refrain from such duties until able to do so safely.

Drivers will remain aware of driving behaviors that indicate impairment such as weaving, inappropriate speed and erratic or abrupt driving. Staying a safe distance from drivers who may be impaired and bringing dangerous drivers to the attention of the authorities helps keep roads safe.

Drivers who operate a commercial motor vehicle as defined by the federal highway administration (FHA) must possess a CDL and are subject to FHA’s regulations on alcohol and drug use and testing.

A drug free workplace policy and supporting procedures must be in place and communicated to all employees before drug testing. The rule requires pre-employment, reasonable suspicion, random, post-accident, return-to-duty and follow-up testing. For details on the program, refer to the Federal Motor Carrier Safety Regulations, Title 49, Part 382.

**Distracted Driving**

Driving skills rely on the focus of the vehicle operator. Every driver will devote his or her full attention to the task of driving while behind the wheel. Text messaging while driving is strictly prohibited. Distractions come in many forms and contribute to 25 to 30 percent of all traffic accidents. Distractions include, but are not limited to the following:

- Text messaging and other cell phone use (even with hands-free headset)
- Reaching for an object inside the vehicle
- Looking at an object, person or event outside the vehicle
- Eating and drinking
- Reading
- Grooming and hygiene
- Electronics use (computer, tablet, GPS)
- Adjusting non-critical controls
- Horseplay
- Emotional distractions

**Fatigued Driving**

Drowsy driving greatly increases the risk of an accident. All drivers will be trained in the dangers of driving drowsy and the importance of sufficient rest before operating a motor vehicle.

**Aggressive Driving**

The Company prohibits aggressive driving while operating a Company vehicle or a personal vehicle on Company business. Aggressive driving behaviors include, but are not limited to the following:

- Excessive Speed
- Tailgating
- Failure to signal lane change
• Running a red light
• Passing on the right
• Any offensive, rude, or hostile act or gesture directed at another driver

**Young Drivers**

Teenage drivers are the most likely to engage in risky driving behaviors, and vehicle crashes are the leading cause of death for 15-20-year-olds. Federal law prohibits drivers under 17 to operate a vehicle as part of their job, and it is at the discretion of the safety coordinator to prohibit driving for any employee based on a lack of driving experience.

**Driving in Work Zones**

All drivers in work zones must take special care. Patience and care goes a long way to contribute to driving safely around construction. Heavy machinery and workers can slow everything down, but driving rushed makes it difficult to observe other workers and leads to poor decision making. Workers must be vigilant and minimize distractions to respond quickly to the unexpected when behind the wheel, especially when driving where others are working.

**MONITORING**

As part of our driver safety policy, every work-related accident and near miss involving motor vehicles will be handled in a way to reduce risk and encourage future safe behaviors in the future.

Additionally, the Company’s driver safety policy requires periodic review of the policy itself and its impact on the safety and health of employees.

**Incident, Accident Analysis, and Reporting**

If an employee experiences a vehicular accident while driving a Company car or a personal car on Company business, he or she will do the following:

• Stop the vehicle. If it can be done safely, move the vehicle off the road
• Call appropriate law enforcement authority if damage is done to another vehicle or property that does not belong to this Company For an emergency, call 911 to summon both police and emergency medical services
• Mark the scene as necessary for safety
• Gather the names of other drivers and witnesses
• Diagram the accident, noting vehicles involved, where vehicle occupants were seated at the time of the accident, the date, time and weather conditions
• Exchange the following information with other drivers involved: License plate number, registration information and insurance information
• Document the name and badge number of the responding law enforcement professional.
• Notify the supervisor as soon as safely possible
• Cooperate with law enforcement professionals and participate in the Company’s accident investigation

Do not assume blame or apologize. Only give statements about what happened to police or an appropriate member of Company management.
Any accident will be investigated according to the Company’s accident investigation policy. (See chapter on “Accident Investigation” for more details.) Use the Motor Vehicle Accident Report at the end of this chapter to accompany the Company’s Accident/Incident Report.

This Company will comply with all recordkeeping requirements of our safety policy and any applicable regulatory authority.

**Disciplinary Actions**

Safety incidents involving an employee and a violation of our safety policy in a Company vehicle (or personal vehicle used on Company business) may result in disciplinary actions up to termination, including the revocation of driving privileges as determined by management.

**Reward Program**

It is at the discretion of the safety coordinator and, if appropriate, the safety committee to devise and implement a safe driver reward program to encourage safe driving habits and reward safe driving behaviors.

**Policy Review**

All aspects of this policy and the Company’s driver safety program are subject to annual review by the safety coordinator and the safety committee to ensure the effectiveness of the policy to guarantee a safe working environment for Company employees.

**TRAINING**

This Company will train every employee who will drive for work related reasons on driver safety at no cost to the employee during working hours.

The Company will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

**DRIVER TRAINING**

The driver safety program focuses on training and prevention. All new drivers must complete an orientation to cover:

- Policies and procedures for drivers
- Governmental regulations
- Maintenance guidelines and inspection procedures
- Driver training that encourages safe, defensive road behavior

**Training Components**

The safety coordinator will ensure any employee at this Company who drives on work business is qualified and capable to drive. Drivers will complete training in the following minimum elements for driver safety:

- Defensive driving
- Safe distances
• Intersection driving
• Poor driving conditions
• Split-second decision making
• Distracted driving
• Driving in Work Zones
• Safety restraints

Training Records

Training records will include the following information:

• The dates of the training sessions
• The contents or a summary of the training sessions
• The names and qualifications of persons conducting the training
• The names and job titles of the employees attending the training

The Company will retain employee training records for the length of their employment.

FORMS AND ATTACHMENTS

On the following pages, please find the following document(s):

• Motor Vehicle Accident Report
• Driver Safety Training Documentation
# MOTOR VEHICLE ACCIDENT REPORT

**AFTER AN ACCIDENT:**  1 Stay Calm  2 If the vehicles are drivable and it is safe to do so, move them safely out of traffic  3 Apply first aid (if properly trained)  4 Call police, and if necessary, ambulance  5 Take brief notes

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<th>Vehicle Driver Name</th>
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<td>Describe other vehicle's damage</td>
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**Investigating Officer Name**

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**Police Department**

**Investigating Officer Name**

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**Witness Info**

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**Witness Info**

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**Report Completed By**

| Signature |

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IIPP 19-11
**Driver Safety Training**

Trainer (include qualifications):

Signature:

Date:

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SCOPE

This chapter covers the safe use of elevating work platforms (EWPs), also known as either aerial work platforms (AWPs) or mobile elevating work platforms (MEWPs). This category of equipment includes articulating aerial devices (cherry pickers) and scissor lifts. These devices can be vehicle mounted, self-propelled or unpowered, and are intended to provide workers access to work areas above ground.

The designs and styles of the devices vary greatly, and the manufacturer’s information should always be referenced before using a particular model.

POLICY

This Company has adopted this program for the safety of employees when working on or around “Vehicle Mounted Elevating and Rotating Work Platforms” from OSHA regulations.

The safety coordinator is designated by this Company as the competent person in authority over all aerial device work procedures. The Safety Coordinator, or designee, will ensure that all safety measures and systems are correctly installed, all safety procedures are adhered to, and ensure regular inspections of the operational site and aerial equipment are made. This Company has implemented, and will enforce, the following work practices and procedures to assure that no employee will be exposed to hazards during aerial lifting operations:

RESPONSIBILITIES

Because Elevated Work Platforms (EWPs) are often rented from an equipment supplier, there can be confusion as to the responsibilities of the parties involved. Generally, the responsibilities can be summarized in the following ways:

**Equipment Owner or Supplier**

The owner or supplier must ensure that the machine:

- Is maintained in good operating condition
- Conforms to appropriate regulations and standards
- Includes the operator’s manual and correct load rating charts

**The Employer**

The Company and/or safety coordinator will:

- Make sure that the operator is fully trained to operate the particular equipment being used
- Verify that the machine has the correct load rating capacity for the job
- Maintain the equipment and all its protective devices
- Maintain a daily inspection log for each platform
- Require all workers to use the necessary PPE
- Keep the manufacturer’s operating instructions and safety rules with the equipment
• Confirm and verify that all employees follow all safety procedures to protect all employees involved in aerial lifting operations or who work near aerial lifting operations
• Keep all work platform proper working order according to the manufacturer's instructions
• Remove any unsafe work platform from service until it is repaired
• Ensure all repairs are made by a qualified service person according to the manufacturer's instructions
• Make no modifications or alterations to work platforms without the written permission of the manufacturer or any other equivalent entity
• Ensure each work platform has a mechanical parking brake that will hold the unit on any slope it’s capable of climbing
• Use wheel chocks, whenever possible, when installing or using an aerial lift on an incline

Employee Responsibility
An employee must:
• Operate an aerial device only after being trained and authorized by the Company
• Report known defects and hazards concerning an aerial device to the supervisor
• Operate the machine in a safe manner as prescribed by the manufacturer and according to Company safety and health policies
• Inspect the equipment each day or each shift before use
• Perform function tests before use
• Report any defects to the supervisor
• Read, understand, and obey the manufacturer’s safety rules, including the operating manual and warning decals

Osha Regulations and Responsibilities
OSHA Regulations include the following requirements:
• EWPs must be engineered and tested to meet the applicable standards for that equipment
• Aerial devices must be checked each day before use by a trained worker
• The owner or supplier must keep a log of all inspections, tests, repairs, modifications, and maintenance
• The log must be kept up to date and include names and signatures of persons who performed inspections and other work
• Workers must be given oral and written instruction before using the platform for the first time. Instruction must include items to be checked daily before use

VEHICLE MOUNTED ELEVATING AND ROTATING WORK PLATFORMS
There are two basic types of elevating work platforms (EWP) – boom and scissor. Both types come in:
1. “On-Slab” models for use on smooth hard surfaces such as concrete or pavement
2. “Rough-Terrain” models for use on firm level surfaces such as graded and compacted soil or gravel
Both types share three major components: base, lifting mechanism, and platform assembly.
Scissor-Type Machines

These are raised and lowered by hydraulic pistons and an expanding scissor mechanism. Platforms are available in various configurations with different capabilities for extension and movement. Some have extendable platforms or platforms that can rotate. Extendable platforms should be retracted before raising or lowering the device. Typical machines are illustrated in Figure 1.

On-Slab Units

- Not designed for uneven or sloping ground
- Normally have solid rubber tires
- Generally powered by rechargeable DC battery
- Some are powered by internal combustion engine, either gasoline or propane
- Most have “pothole protection” – a metal plate lowered close to the ground to afford some protection against inadvertent movement into depressions or debris
- Lifting mechanism is hydraulic
- Normally have wider wheelbases, larger wheels, and pneumatic tires
- Some fitted with outriggers for extra stability
- Usually powered by internal combustion engines: gasoline, diesel, or propane
- DC Battery powered units are also available, but are not common

Rough-Terrain Units

- Similar in design to on-slab machines
- Built to handle rigorous off-slab challenges

Scissor-lifts range in capacity from 500 to several thousand pounds. They’re available with platform heights often reaching 50 feet or more. Scissor-lifts must be set up on stable, level ground, even with outriggers deployed. A slight imbalance or instability is amplified when the machine is raised.

EWP HAZARDS

The following are some of the basic hazards to be aware of during operations:

- Machine Tipping or Overturning – Many factors can cause instability sudden stops, depressions, drop-offs, overreaching and overloading. Overturning and tipping result in many fatalities and injuries
- Overriding Safety Features – Defective or disabled features such as the tilt or level warnings or a deadman switch; can prevent operators from knowing when they are in a dangerous situation. Overriding a deadman switch has resulted in fatalities; so has the malfunction of the tilt warning
- Overhead Powerline Contact – Contacting overhead wires can cause electrocution. This can happen with any type of machine – and with the loads carried by or overhanging the machine
- Falls from Elevated Platforms – Many falls occur because workers get in a hurry and fail to use standard fall protection procedures
• Makeshift Extensions – If an EWP can’t reach the desired working height, don’t compensate by using scaffold planks, ladders, blocks of wood or other makeshift arrangements, these practices lead to falls and machine instability.

• Overloading the Platform – Elevating work platforms overloaded or loaded unevenly can become unstable and fail. Articulating type machines are especially sensitive to overloading. Always stay within the operating range specified by the manufacturer.

• Failure to Cordon Off:
  o EWPs can be struck by other construction equipment or oncoming traffic if the work area isn’t properly marked or cordoned off. Make sure there’s enough clearance for all aerial work platforms.
  o Workers have been injured when they inadvertently entered an unmarked area and were struck by falling material, tools, or debris.
  o Workers have also been injured in unmarked areas by swinging booms and pinched by scissor mechanisms.

• Accidental Contact – Many work platforms have blind spots. Moving the machine or platform can cause contact with workers or with obstacles. Use a designated signaler on the ground to guide the operator when the path of travel is not clear or access is tight.

• Improper Blocking During Maintenance – Failing to block, or improperly blocking the machine, boom, or platform can cause serious crushing injuries and property damage.

• Improper Access – Never enter or leave the platform by climbing the scissors or the boom. Don’t use extension ladders to gain access. Ladders exert lateral loads on the platform and can cause it to overturn. For the safest access, lower the machine completely.

• Moving with Platform Raised – Lower the platform before moving the machine unless:
  o The machine is designed to move with platform raised.
  o The supporting surface is smooth and level. Slight dips and drops are amplified when the platform is raised and can cause the machine to overturn.

• Improper Refueling – Take care when refueling. Gasoline, for instance, should be kept in approved containers and dispensed to prevent spills and sparking.

• Pinch Points – Clothing, fingers and hands can get caught in scissor mechanisms. As platforms are raised, machines may sway. Workers can be pinched between guardrails and the structure. Position the platform so that work takes place above guardrail height.

FALL PROTECTION REQUIREMENTS

The fall protection required for persons who work on aerial lifts depends on the type of aerial lift used. The table below shows acceptable fall protection.
<table>
<thead>
<tr>
<th>Type of Lift</th>
<th>Fall Protection Required</th>
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<tbody>
<tr>
<td>Vehicle-Mounted Elevating and Rotating Work Platforms (ANSI A92.2 devices)</td>
<td>Platforms other than buckets or baskets must include guardrail systems – guardrails, a midrail and toeboards. Each person who works on a boom-supported platform must wear a body harness and lanyard attached to the boom or basket.</td>
</tr>
<tr>
<td>Manually Propelled Elevating Aerial Platforms (ANSI A92.3 devices)</td>
<td>The platform must have a guardrail at least 42 inches ±3 inches above the floor, a midrail and toeboards at least 4 inches high.</td>
</tr>
<tr>
<td>Boom-Supported Elevating Work Platforms (ANSI A92.5 devices)</td>
<td>The platform must have a guardrail at least 42 inches ±3 inches above the floor, a midrail and toeboards at least 4 inches high. Each worker on the platform must wear a body harness and lanyard attached to the boom or platform.</td>
</tr>
<tr>
<td>Self-Propelled Elevating Work Platforms (ANSI A92.6 devices)</td>
<td>The platform must have a guardrail 42 inches ±3 inches above the floor, a midrail and toeboards at least 4 inches high.</td>
</tr>
</tbody>
</table>

- Employees must maintain firm footing on the platform while working on the platform. The use of railings, planks, ladders or any other devices on the platform for achieving additional height is prohibited
- The Company will provide employees with a safety harness that has an approved lanyard that’s affixed to attachment points provided and approved by the manufacturer. A fall arrest system will only be used when the aerial lift is designed to withstand the vertical and lateral loads caused by an arrested fall
- A body belt may be used with a restraint device with the lanyard and the anchor arranged so that the employee is not exposed to any fall distance. A restraint device is required where the aerial lift cannot withstand the vertical and lateral loads imposed by an arrested fall
- Belting off to an adjacent pole, structure, or equipment while working from an aerial work platform is prohibited
- The Company will not allow employees to exit an elevated aerial work platform, except where elevated work areas are inaccessible or hazardous to reach. When employees exit to unguarded work areas, adequate fall protection will be provided and used

**Fall Protection for Aerial Devices**

- Employees must always stand firmly on the floor of the basket, and must not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position
- Boom and basket load limits specified by the manufacturer must not be exceeded
- A safety belt or harness must be used with a lanyard attached to the boom or basket when working from an aerial lift. The employer must provide the safety belt, harness and lanyard. An in-plant, industrial-type aerial device used on a level surface and equipped with a platform with approved railings is exempt from this rule
Body belts are not acceptable as part of a personal fall arrest system. The use of a body belt in a tethering system or in a restraint system is acceptable.

A boom platform must have a rail or other structure around its upper periphery that’s at least 38 inches above the floor of the platform and with a toeboard at least 4 inches high. A basket of a cherry picker is considered to meet this requirement. A platform may have the guardrail removed from the working side if a safety belt and lanyard is worn by the employee on the platform.

STABILITY AND TIPPING

In general, elevating work platforms are well manufactured and are safe to use within their specific limitations. However, as with any equipment or tool, there are rules to follow. One of the most dangerous hazards in operating elevating work platforms is tipping over. This can be caused by one or more of the following factors:

- Sudden movement of the unit or parts of the unit when elevated
- Making sudden stops while in motion with platform elevated
- Uneven or overloading of the platform
- Traveling or operating on a slope or uneven terrain
- Changing the weight distribution of the machine by replacing parts with others of a different weight or adding attachments not approved by the manufacturer
- Holes or drop-offs in the floor surface causing one wheel to drop suddenly
- Operating the equipment in windy conditions

FACTORS AFFECTING STABILITY

Dynamic Forces

Dynamic forces are forces generated by movement or change of movement. For example, applying the brakes suddenly or traveling too fast around corners can cause instability – as in a car or van. Sudden stops while raising or lowering the platform can also cause instability.

Traveling

Traveling the platform over rough or uneven ground can also cause instability. Figure 10 shows how a tire dropping 4 inches can cause the boom to sway 2 feet. It is important to lower the platform fully or to retract telescoping sections while traveling, particularly on uneven surfaces.

Stability on Inclined Surfaces

Unless recommended for such use by the manufacturer, no elevating work platform must be used on an inclined surface. Procedures for maintaining stability must be clearly outlined in the special warnings section of user’s manual. The user must not deviate from the manufacturer's instructions.

EQUIPMENT INFORMATION

EWPs are designed for different uses. It is essential to select the appropriate equipment for the job.
Typical Mistakes

- Using an on-slab machine on rough terrain
- Using a unit undersized with respect to height, reach, and lifting capacity
- Lifting large materials that overhang the platform
- Using a scissor lift where the reach of a boom-type machine is needed
- Extending the platform with planks, ladders, or other devices because the machine cannot reach the required height

Factors to Consider

- Capacity – Does the machine have the lifting capacity, the reach and the height to complete the task?
- Surface Conditions – Are the surface conditions hard or soft, sloped or level? Will the ground have an effect on the type of machine selected?
- Platform Size and Configuration – Do you need a regular or extendable platform? Is rotation required? Are there space restrictions to consider?
- Mobility – Is a boom type better suited than a scissor lift for the job?
- Material to be Lifted – Will the machine be able to lift the size and weight of material required for the job?
- Access – Will the machine be able to travel around the workplace safely? Are there obstructions or depressions that will restrict the use of certain machines?
- Operator Skill or Training – Are the people on site competent to operate the machine? If a propane-powered engine is used, has the operator received propane training?
- Work Environment – If the work is to be done indoors, or in a poorly ventilated area, will an electrically powered machine be required?

Construction

- Aerial work platforms must be designed, constructed and tested to comply with the requirements of ANSI standards A92.2, A92.3, A92.5, and A92.6
- Aerial work platforms must not be field-modified for uses other than those intended by the manufacturer, unless the modification has been certified in writing by the manufacturer or by any other equivalent entity, to comply with the applicable ANSI standard, and to be at least as safe as the equipment was before modification
- Directional controls must be in compliance with all of the following provisions:
  o Be of the type that will automatically return to the off or neutral position when released
  o Be protected against inadvertent operation
  o Be clearly marked as to their intended function
- The platform must have a working overriding control that’s continuously activated for platform directional controls, and which automatically returns to the off position when released
- Aerial work platforms must be equipped with emergency controls at ground level
- Emergency ground level controls must be clearly marked as to their intended function and be capable of overriding the platform controls
All of the following information must be clearly and permanently marked on each work platform:
- Special workings, cautions, or restrictions necessary for operation
- Rated workload
- A clear statement of whether or not the aerial work platform is electrically insulated

Rotating shafts, gears and other moving parts that are exposed to contact must be guarded.

Attachment points must be provided for fall protection devices for personnel who occupy the platform on aerial work platforms.

**Elevating Work Platform Equipment**

- The platform deck must be equipped with a guardrail or other structure around its upper periphery that must be 42 inches high, plus or minus 3 inches, with a midrail. (Chains or the equivalent may be substituted where they give equivalent protection.) Where the guardrail is less than 39 inches high, an approved personal fall protection system must be used.
- The configuration of an elevating work platform may include a ladder for employees to use in reaching the platform deck. Any ladder device used in this way must have rungs located on uniform centers not to exceed 12 inches.
- Any elevating work platform equipped with a powered elevating assembly and having a platform height exceeding 60 inches must be supplied with safe emergency lowering means compatible with the specific elevating assembly employed.
- Elevating Work Platforms must include:
  - Toeboards at sides and ends, which must be at least 4 inches high
  - Exception: Toeboards may be omitted at the access openings
  - A hinged trap access door, if applicable
  - A platform with a minimum width of 16 inches

**Guarding of Moving Parts**

All rotating shafts, gearing and other moving parts must be guarded.

**Self-Propelled Boom-Supported Platforms**

- Normally fitted with rough-terrain undercarriages
- Some smaller on-slab units
- Platforms have lifting capacity of about 500 pounds or two workers
- Lack capacity of scissor-type machines; not intended for lifting materials
- Usually powered by an internal combustion engine: gasoline, diesel, or propane

Booms can be:
- Telescopic, articulating, or combination of both
- Raised and extended by hydraulic cylinders
- Can reach up to 150 feet

Platforms can extend well beyond the wheelbase.
Although the controls of boom machines are fixed in position, operators can become disoriented by the machines rotation, and must remain aware of the direction of its movement. Many machines have color-coded directional arrows to help the operator move the machine in the right direction.

As with mobile cranes, stability decreases with length of boom and boom angle as the center of gravity moves in relation to the platform position. The machine will overturn if the center of gravity moves outside the machine’s base.

Machines come with load charts that show safe operating configurations. Machines with booms long enough to cause overturning at low boom angles are required to have radius-limiting interlocks to prevent operation in unstable configurations.

Users must be familiar with the operating range of the individual make and model of the equipment they are using. This knowledge is essential in order to position the machine correctly and reach the work location safely.

**Non-Self-Propelled or Push-Arounds**

As the name indicates, these units are not self-propelled and must be transported from one location to another with an independent power source or manually in the case of the smaller devices.

The machines are intended primarily for use on smooth, level, hard surfaces or on-slab conditions. Some trailer-mounted units are available. Many of the smaller models can be folded up to pass through standard doorways, and can be transported by pick-up trucks. As a result, they are suitable for maintenance or renovation work.

**Push-Arounds**

- Raising mechanism normally powered by gasoline or propane engine or by electric motors, either AC or DC
- Normally raised and lowered by hydraulic cylinders
- Platform capacities vary from 300 to 1000 pounds or more but are generally less than 500 pounds
- Devices with capacity less than 500 pounds are not recommended for construction—this type is better suited to maintenance activities
- Platforms usually do not exceed 36 feet in height
- As platform is raised, risk of overturning increases
- Extra care required when operating at maximum height

**Factors of Safety in Design of Work Platform Assembly**

- Where the platform is supporting its rated workload by a system of wire ropes or lift chains, or both, the safety factor of the wire or chain must not be less than 6 to 1
All critical components of a hydraulic or pneumatic system used in a work platform must have a bursting strength that exceeds the pressure attained when the system is subjected to the equivalent of four times the rated workload. Critical components are those in which a failure would result in a free fall or free rotation of the boom. All noncritical hydraulic components must have a bursting safety factor of at least 2 to 1.

Automatic safety devices or systems must be provided to prevent free fall of the work platform should a failure of the power supply or elevating system occur.

**Construction and Modification**

All aerial devices and elevating work platforms must be assembled and erected in accordance with these rules and must be maintained in safe operating condition.

- ANSI A92.2 — Vehicle Mounted Elevating and Rotating Aerial Devices
- ANSI A92.3 — Manually Propelled Elevating Work Platforms
- ANSI A92.5 — Boom Supported Elevating Work Platforms
- ANSI A92.6 — Self-Propelled Elevating Work Platforms

All electrical tests must conform to the requirements of the applicable NFPA 70 Standard or equivalent DC voltage test approved by the equipment manufacturer or equivalent entity.

Mobile elevating devices must be mounted on a vehicle capable of handling the imposed load. The vehicle must be a stable support for the aerial device.

The lifting and outrigger system of an aerial device must have a means to ensure that the system will not permit the work platform to drop in a free fall in event of a power or hydraulic line failure.

In addition to the welding requirements prescribed in ANSI A92.2, an aerial device must conform to the AWS D2.0, Specifications for Welding Highway and Railway Bridges standard.

**Controls**

- Any powered elevating work platform must have both upper and lower control devices
- An emergency stopping device must be provided at the upper controls of elevating work platforms
- Upper controls must be located within reach of the operator
- Lower controls must be capable of overrides the upper controls. Except in case of an emergency, the lower controls must not be operated unless approved by the employee in the basket or on the work platform
- Controls must be designed, guarded and oriented so that the operator doesn’t inadvertently move the machine in the wrong direction. Many machines have color-coded directional arrows on the chassis to aid the operator in moving the machine.
Stability Requirements for New or Modified Aerial Devices

Each new or modified aerial device must be inspected and tested before initial use to assure compliance with all of the following requirements.

- Each aerial device mounted on a vehicle that meets the manufacturer’s minimum vehicle specifications must be capable of sustaining a static load 1 ½ times its rated load capacity in every position where the load can be placed when the vehicle is on a firm and level surface. If having the outriggers extend to a firm footing is part of the definition of the configuration, they must be extended to provide leveling for determining whether the mobile unit meets the stability requirements.
- Each aerial device mounted on a vehicle that meets the manufacturer’s minimum vehicle specifications must be capable of sustaining a static load 1 1/3 times its rated load capacity in every position in which the load can be placed when the vehicle is on a slope of 5 degrees downward in the direction most likely to cause overturning.
- If having the outriggers extended to a firm footing is part of the definition of the configuration, they must be extended to provide leveling for determining whether the mobile unit meets the stability requirements. If other facilities, such as a means of turntable leveling, are provided to minimize the effect of the sloping surface, then those facilities must be used to determine whether the mobile unit meets the stability requirements. Vertical towers designed specifically for operation only on a level surface must be excluded from this requirement.
- None of the stability tests described must produce instability of the mobile unit, or cause permanent deformation of any component. The lifting of a tire or outrigger on the opposite side of the load does not necessarily indicate a condition of instability.

Verification by the manufacturer or an equivalent entity that the stability of an aerial device meets the requirements may be used to demonstrate compliance.

MANUALS, SIGNS, AND DECALS

Signs Clearly Visible to the Operator at the Controls Must Indicate:

- The equipment’s rated working load
- All limiting operating conditions, including the use of outriggers, stabilizers and extendable axles
- The specific firm, level surface conditions required for use in elevated position
- All warnings that are specified by the manufacturer
- Other than for a boom-type elevating work platform, the direction of machine movement for each operating control
- The name/number of the ANSI standard that the platform was designed to meet
- The name and address of the owner

 ANSI Standards Required Information

- Caution or restrictions of operation or both
- Operating instructions
- A permanently affixed plate containing the designed rating capacity
- The make, model, serial number and manufacturer’s name and address
- The maximum platform height
- The maximum travel height, if not equal to the maximum platform height
- Maximum recommended operating pressure of hydraulic or pneumatic system(s) or both
- The nominal voltage rating of the batteries, if battery-powered
- A warning to study the operating manual before using the equipment
- A statement identifying whether or not the platform is insulated
- A notice outlining the required inspections
- Diagrams/description of various platform configurations and its capacity in each configuration
- Warnings against replacing, without the manufacturer’s consent, components critical to the machine’s stability

Each unit must have a manual containing instructions for maintenance and operations. If a unit can be operated in different configurations, then these must be clearly described, including the rated capacity in each configuration.

Many of these signs are vital to the operation of the machine and the protection of workers. All signs and decals must be kept clear of dust and grease so they can be easily read. Torn or damaged signs must be replaced.

**PROCEDURES**

This section provides for the safe operation and maintenance by the employer and the safe use by the employee of vehicle mounted elevating and rotating work platforms in, around and about a place of employment. Firefighting equipment and powered industrial trucks are not included in these rules.

**Elevating Work Platforms**

These rules apply to equipment that has a primary function of elevating personnel, together with their tools and necessary materials, on a platform that is mechanically positioned. The following units are covered:

- **ANSI Standard A92.2, "Vehicle-Mounted Elevating Work Platforms,"** which applies to vehicle-mounted devices installed on commercial chassis and covers the following type of units:
  - Extensible boom aerial devices
  - Aerial ladders
  - Articulating boom aerial devices
  - Vertical towers
  - A combination of any of the equipment specified

- **ANSI Standard A92.3, "Manually Propelled Elevating Work Platforms,"** which is adopted by applies to work platforms that are manually propelled, vertically adjustable by manual or powered means, and which may be towed or manually moved horizontally on wheels or casters that are an integral part of the work platform base

- **ANSI Standard A92.5, "Boom-Supported Elevating Work Platforms,"** which applies to all integral frame, boom-supported elevating work platforms which telescope, articulate, rotate or extend beyond the base dimensions
• ANSI Standard A92.6, “Self-Propelled Elevating Work Platforms,” which applies to self-propelled vertically adjustable integral chassis work platforms. Such work platforms are power operated with primary controls for all movement operated from the platform.

Equipment Not Covered

• Equipment that has a primary function other than elevating personnel, such as fork trucks or cranes that are adapted to elevating personnel, are not covered by these rules

• Also excluded from coverage of these rules is firefighting equipment that’s covered by the provisions of the publication entitled “American National Practices for the Maintenance, Care, Testing and Use of Fire Department Aerial Ladders and Elevating Platforms”

SAFE PRACTICES

Operators must be familiar with the requirements for the specific machine they will use:

• The manufacturer’s operating manual
• The manufacturer’s warning and caution signs on the machine
• The location of all emergency controls and emergency procedures
• The daily maintenance checks to perform

General Safety Guidelines

• Always check for overhead power lines before moving the machine or operating the platform. The limits of approach from overhead power lines must be observed. If work must be done within these limits, make arrangements with the owner of the utility to have the power line de-energized. Allow for movement or sway of the lines as well as the platform. Be aware of overhanging tools or equipment
• Wear a full body harness and tie off to a designated tie-off point while the machine is moving
• Never leave the machine unattended without locking it or otherwise preventing unauthorized use
• Don’t load the platform above its Rated Working Load (RWL). Wherever possible, keep the load below 2/3 of the RWL
• Make sure that all controls are clearly labeled with action and direction
• Keep guardrails in good condition and ensure that gate is securely closed before moving the platform. Don’t remove guardrails while the platform is raised
• Shut off power and insert the required blocking before maintenance or servicing
• Deploy stabilizers or outriggers according to the manufacturer’s instructions
• Position the boom in the direction of travel where possible
• Keep ground workers away from the machine and out from under platform
• Never access the platform by walking on the boom
• Don’t try to push or move the machine by telescoping the boom
• Don’t use the machine as a ground for welding
• Don’t use a boom-supported platform as a crane
• Don’t operate the EWP in windy conditions. For safe wind speeds, refer to the operator’s manual
• Don’t place the boom or platform against any structure to steady either the platform or the structure
• Secure loads and tools on the platform so that machine movement will not dislodge them
• Make sure that extension cords are long enough for the full platform height and won’t be pinched or severed by the scissor mechanism
• Use three-point contact and proper climbing techniques when mounting or dismounting the machine
• Stunt driving and horseplay is prohibited
• Employees must keep a firm footing while working on the platform unless they are secured by safety harness and lanyard devices fixed to manufacturer-approved anchor points. Don’t railings or planks, ladders or any other device on the work platform to achieve additional height
• The operator will immediately report defects or malfunctions that become evident during operation and must stop use of the work platform until correction has been made
• Altering or disabling of safety devices or interlocks is prohibited

Important Note: Never operate equipment that you haven’t been trained on, or that you’re not comfortable operating. Your safety and that of others on site depends on competent, knowledgeable operation of the equipment.

Vehicles

Before a vehicle supporting an aerial ladder, is moved for highway travel:
• The ladders must be secured in the lower position, and the manually operated device at the base of the ladder, or other effective means, must be used to prevent elevation or rotation of the ladder
• The boom must be inspected to make sure that it’s properly cradled and the outriggers are in the stowed position

A vehicle supporting an aerial device must not be moved at the job site when the boom is elevated with employees in working position, unless the equipment is specifically designed for this type of operation and.

Pre-Operation Procedures

Before operating elevating work platforms and aerial devices, check the work area for:
• Drop-offs or holes in the ground
• Slopes
• Bumps or floor obstructions
• Debris
• Overhead obstructions
• Overhead wires, power lines, or other electrical conductors
• Hazardous atmospheres
• Adequate operating surface – ground or floor
Sufficient ground or floor support to withstand all forces imposed by the platform in every operating configuration

Wind and weather conditions

Before each elevation of the work platform, the operator must:

- Make sure the brakes are set and outriggers, when used, are positioned on pads or a solid surface
- Install wheel chocks before using an aerial device on an incline
- Check for overhead obstructions and high-voltage conductors. A minimum distance of ten feet from energized high-voltage conductors must be maintained at all times between the conductors and the operator and platform equipment
- Make sure that the load and its distribution on the platform meet the manufacturer's rated capacity. The manufacturer's recommended load limits must never be exceeded
- Operate all platform and ground controls to verify that they perform their intended function
- Make sure that guardrails are properly installed and gates are closed

Before and during driving while the platform is elevated, the operator will:

- Be required to look in the direction of, and keep a clear view of, the path of travel and assure that the path of travel is firm and level
- Keep a safe distance from obstacles, debris, drop-offs, holes, depressions, ramps or other hazards to safe elevated travel
- Maintain a safe distance from overhead obstacles
- The operator must limit travel speed according to conditions. Conditions to be observed are ground surface, congestion, slope, location of personnel and other factors that may create a hazard of collision or injury to personnel

Before use on each work shift, an aerial work platform must be given a visual inspection by the operator for defects that would affect its safe operation and use. The visual inspection will be done for all of the following:

- Cracked welds
- Bent or broken structural members
- Hydraulic or fuel leaks
- Damaged controls and cables
- Loose wires
- Tire condition
- Fuel and hydraulic fluid levels
- Slippery conditions on the platform

All unsafe items found because of the inspection of the aerial work platform or work area must be corrected before further use of the aerial work platform.

When the specified clearances can't be maintained, the owner of electrical lines, the authorized representative or the utility must be notified and provided with all pertinent information before the commencement of operations near electrical lines.
Any overhead wire must be considered an energized line until the owner of the line or the authorized representative states that it is de-energized/visibly grounded, or the line is insulated for the system voltages and the task will not compromise the insulation of the conductor and/or cause an electrical hazard.

**Operating Procedures**

- The aerial work platform must be used according to the manufacturer’s operating instructions and safety rules.
- The manufacturer’s rated load capacity for any given angle of elevation must not be exceeded. The Company will ensure that the load and its distribution on the platform comply with the manufacturer’s specifications. The aerial work platform’s rated load capacity must not be exceeded when loads are transferred to the platform at elevated heights.
- Only personnel, their tools and necessary materials must be on or in the platform.
- The guardrail system of the platform must not be used to support any of the following:
  - Materials
  - Other work platforms
  - Employees
- Personnel must maintain firm footing on the platform while working on the platform. The use of railings, planks, ladders or any other devices on the platform to achieve additional height is prohibited.
- Fuel gas cylinders must not be carried on platforms that would allow the accumulation of gases.
- A safety harness with a lanyard, that meets the construction Fall Protection safety standard and is affixed to attachment points provided and approved by the manufacturer will be provided by the Company and used by any employee using an aerial work platform. A fall arrest system must only be used if the aerial lift is designed to withstand the vertical and lateral loads caused by an arrested fall.
- A body belt with a lanyard may be used as a restraint device when anchored so that the employee is not exposed to any fall distance. A restraint device is required where the aerial lift cannot withstand the vertical and lateral loads imposed by an arrested fall.
- The Company does not allow employees to exit an elevated aerial work platform, except where elevated work areas are inaccessible or hazardous to reach. Employees may exit the platform with the knowledge and consent of the employer. When employees exit to unguarded work areas, fall protection must be provided and used as required.
- Only aerial work platforms that are equipped with a manufacturer’s installed platform controls for horizontal movement must be moved while in the elevated position.
- Before and during driving while elevated, an operator of a platform must do both of the following:
  - Look in the direction of, and keep a clear view of, the path of travel and make sure that the path is firm and level.
o Maintain a safe distance from all of the following:
  - Obstacles
  - Debris
  - Drop-offs
  - Holes
  - Depressions
  - Ramps
  - Overhead obstructions
  - Overhead electrical lines
  - Other hazards to safe elevated travel

- Outriggers or stabilizers, when provided, will be used according to the manufacturer’s instruction. Outriggers and stabilizers must be placed on pads or a solid surface.

- Aerial work platforms must be elevated only when on a firm and level surface or within the slope limits allowed by the manufacturer’s instructions.

- Platform gates must be closed while the platform is in an elevated position.

- Stunt driving and horseplay are prohibited.

- Altering, modifying, or disabling safety devices or interlocks is prohibited.

- Ropes, cords, and hoses must be prevented from becoming entangled in the aerial work platform.

- A platform operator must ensure that the area surrounding the EWP is clear of personnel and equipment before lowering the platform.

- Before and during travel, except as provided for horizontal movement, an operator must do all of the following:
  o Inspect to see that booms, platforms, aerial ladders, or towers are properly cradled or secured.
  o Ensure that outriggers are in a stored position.
  o Limit travel speed according to the following factors:
    - Condition of the surface
    - Congestion
    - Slope
    - Location of personnel
    - Other hazards

- Do not position the work platform against another object to steady the platform.

- The aerial work platform must not be operated from a position on a truck, trailer, railway car, floating vessel, scaffold or similar equipment.

- Do not use the boom and platform of the aerial work platform to move or jack the wheels off the ground unless the machine is designed for that purpose by the manufacturer.

- If the platform or elevating assembly becomes caught, snagged or otherwise prevented from normal motion by adjacent structures or other obstacles, and control reversal does not free the platform, all employees must be removed from the platform before attempts are made to free it.

**Operating Instructions (Elevating Work Platforms)**

- No employee will ride, or tools, materials, or equipment be allowed on a traveling elevated platform unless the following conditions are met:
  o The travel speed at Maximum Travel Height does not exceed 3 feet per second.
  o Self-propelled units must have an electrical or other interlock means to prevent driving them with the platform height greater than the Maximum Travel Height or at speeds greater than permitted at Maximum Travel Height.
The operating surface of the unit is level with no hazardous irregularities or accumulation of debris that might cause a moving platform to overturn.

- Units must be assembled, used and disassembled according to the manufacturer's instructions.
- Units must be assembled, and used only by employees who have been trained in their use. Units must be inspected for damaged and defective parts before use.
- Units must not be loaded in excess of their working load and must be taken out of service when damaged or weakened from any cause. They must not be used until repairs are completed.
- Employees must not sit, stand or climb on the guardrails of an elevating work platform or use planks, ladders, or other devices to gain greater working height or reach.
- Employees must not work on units when exposed to high winds, storms or when they are covered with ice or snow (unless provisions have been made to ensure the safety of the employees).
- Employees climbing or descending vertical ladders must have both hands free for climbing.
- Where moving vehicles are present, the work area must be marked with warning flags, roped-off or other effective means of traffic control must be provided.
- Unstable objects such as barrels, boxes, loose brick, tools, debris, must not be allowed to accumulate on the work level.
- Screens must be installed that extend along the entire opening between toeboards and guardrails, when the work being performed creates small debris or involves the use of small tools and materials if persons are will work or pass under the equipment.

Pin-On Platforms

- Pin-on platforms must be securely pinned to the boom or boom extension.
- Employees on the elevated pin-on platform must be secured to the boom by a safety belt and lanyard or a body belt and safety strap.

Operating Instructions (Aerial Devices)

- Aerial baskets or platforms must not be supported by adjacent structure(s) when workers are on the platform or in the basket while in an elevated position.
- Lift controls must be tested before use to determine that they are in safe working condition.
- Only authorized persons must operate an aerial device.
- Belting off to an adjacent pole, structure, or equipment while working from an aerial device is not be permitted.
- Employees must not sit or climb on the edge of the basket or use planks, ladders or other devices to gain greater working height.
- Boom, basket and platform load limits specified by the manufacturer must not be exceeded.
- When elevating personnel with the vehicle stationary the braking systems must be set.
- Provided they can be safely installed, wheel chocks must be installed before using an aerial device on an incline.
- When used, outriggers must be positioned on pads or a solid surface. All outriggers must be equipped with hydraulic holding valves or mechanical locks at the outriggers.
- Climbers must not be worn while performing work from an aerial device.
When an insulated aerial device is required, the aerial device must not be altered in any manner that might reduce its insulating value.

An aerial device truck must not be moved when the boom is elevated in a working position with employees in the basket or platform except when all of the following are complied with:

- The equipment is specifically designed for this type of operation
- All controls and signaling devices are tested and are in good operating condition
- An effective communication system must be maintained at all times between the basket or platform operator and where applicable, the vehicle operator
- The route to be traveled is surveyed immediately prior to the work trip, checking for overhead obstructions, traffic, holes in the pavement, ground or shoulder, ditches, slopes, etc., for areas other than paved, a survey should be made on foot
- The speed of the vehicle does not exceed three (3) miles per hour
- Only one employee is in the basket
- Both the driver and/or the elevated employee have been specifically trained for this type of work

Lower level controls must not be operated unless authorized by the employee in the device, except in case of emergency.

Before moving an aerial device for travel, the boom(s) must be inspected to see that it is properly cradled and outriggers are in stowed position.

An employee, while in an elevated aerial device, must be secured to the boom, basket or tub of an aerial device by a safety belt, body belt or body harness equipped with safety strap or lanyard.

- Safety belts/body belts are prohibited for use in personal fall arrest systems, but may be used as part of a fall restraint or positioning device system.
- Safety belts/body belts used as part of a positioning device system must be rigged to prevent an employee from free falling more than 2 feet.
- A body harness may be used in a personal fall restraint, positioning or fall arrest system. When a body harness is used in a fall arrest system, the lanyard must be rigged with a deceleration device to limit maximum arresting force on an employee to 1,800 pounds and prevent the employee from hitting any levels or objects below the basket or platform, and must limit free fall to a maximum of 6 feet.

Use – Near Power Lines

- Any overhead line must be considered energized until the owner, owner representative or utility indicates otherwise and the line has been visibly grounded.
- Except as prescribed, or where insulating barriers not a part of, or an attachment to the aerial device, have been erected to prevent physical contact with the lines, an aerial device must maintain the distances from energized distribution and transmission power lines and equipment shown in Table 1.
- A qualified lineman or a qualified line clearance tree trimmer, working on or near an exposed power transmission or distribution line from an aerial lift, must maintain the clearance distances shown in Table 2, unless they are insulated or guarded from the energized part by gloves or gloves and sleeves, or insulated, isolated, or guarded from any other conductive part or the energized part is insulated from the employee.
A qualified telecommunications employee must maintain the clearance distances shown in Table 3 when working from an aerial lift, unless they are insulated, isolated, or guarded from any other conductive part or the energized part is insulated from the employee.

**TABLE 1**

<table>
<thead>
<tr>
<th>Voltage</th>
<th>Clearance with Boom Raised</th>
<th>Clearance Boom Lowered and no Load in Transit</th>
</tr>
</thead>
<tbody>
<tr>
<td>To 50kV</td>
<td>10 feet</td>
<td>4 feet</td>
</tr>
<tr>
<td>Over 50kV</td>
<td>10 feet + .4 inch per each 1 kV over 50 kV</td>
<td>10 feet</td>
</tr>
<tr>
<td>50 to 345kV</td>
<td>10 feet</td>
<td>10 feet</td>
</tr>
<tr>
<td>346 to 750 kV</td>
<td>15 feet</td>
<td></td>
</tr>
</tbody>
</table>

**TABLE 2**

<table>
<thead>
<tr>
<th>Voltage Range Phase to Phase (KV)</th>
<th>Minimum Working Distance</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1 to 15.0</td>
<td>2'0&quot;</td>
</tr>
<tr>
<td>15.1 to 35.0</td>
<td>2'4&quot;</td>
</tr>
<tr>
<td>35.1 to 46.0</td>
<td>2'6&quot;</td>
</tr>
<tr>
<td>46.1 to 72.5</td>
<td>3'0&quot;</td>
</tr>
<tr>
<td>72.6 to 121.0</td>
<td>3'4&quot;</td>
</tr>
<tr>
<td>138.0 to 145.0</td>
<td>3'6&quot;</td>
</tr>
<tr>
<td>161.0 to 169.0</td>
<td>3'8&quot;</td>
</tr>
<tr>
<td>230.0 to 242.0</td>
<td>5'0&quot;</td>
</tr>
<tr>
<td>345.0 to 362.0</td>
<td>7'0&quot;</td>
</tr>
<tr>
<td>550.0 to 552.0</td>
<td>11'0&quot;</td>
</tr>
<tr>
<td>700.0 to 765.0</td>
<td>15'0&quot;</td>
</tr>
</tbody>
</table>

*NOTE: For 345 — 362 kV., 500 — 552 kV., and 700 — 765 kV., the minimum working distance and the minimum clear hot stick distance may be reduced that such distances are not less than the shortest distance between the energized part and a grounded surface.*
<table>
<thead>
<tr>
<th>Voltage Range (Nominal Phase to Phase)</th>
<th>Minimum Approach Distances</th>
</tr>
</thead>
<tbody>
<tr>
<td>300 V and less</td>
<td>12˝</td>
</tr>
<tr>
<td>Over 300 V, not over 750 V</td>
<td>18˝</td>
</tr>
<tr>
<td>Over 750 V, not over 2 kV</td>
<td>24˝</td>
</tr>
<tr>
<td>Over 2 kV, not over 15 kV</td>
<td>36˝</td>
</tr>
<tr>
<td>Over 15 kV, not over 37 kV</td>
<td>42˝</td>
</tr>
<tr>
<td>Over 37 kV, not over 87.5 kV</td>
<td>48˝</td>
</tr>
<tr>
<td>Over 87.5 kV, not over 121 kV</td>
<td>54˝</td>
</tr>
<tr>
<td>Over 121 kV, not over 140 kV</td>
<td>--˝</td>
</tr>
</tbody>
</table>

- The clearance requirements of this rule do not apply to the following situations:
  - Where work is performed from an insulated aerial device that is insulated for the work and the work is performed in accordance with the provisions of construction safety standard "Power Transmission and Distribution" and "Telecommunications"
  - Where the owner, authorized representative, or utility representative have ensured that the conductor is insulated for the system voltages and the task will not compromise the insulation of the conductor and/or cause an electrical hazard
  - Where the electric power transmission or distribution lines have been de-energized and visibly grounded at the point of work or where insulating barriers that are not a part of an attachment to the aerial work platform have been erected to prevent physical contact with the line
  - Where work is being performed by journeymen electricians on equipment up to .5kV. Two journeymen electricians will be required for work within the minimum clearance on equipment over .5kV

- The insulated bucket, gloves and sleeves used to comply must be rated at more than the voltage to be worked on, or that with which they might come into contact

**INSPECTION, TESTING, AND MAINTENANCE**

The Company will comply with all of the following requirements:

- Each aerial work platform must be inspected, maintained, repaired, and kept in proper working condition in accordance with the manufacturer’s operating, maintenance, and repair manuals
• Any aerial work platform found not to be in a safe operating condition must be removed from service until repaired
• All repairs must be made by an authorized person in accordance with the manufacturer’s operating, maintenance, and repair manuals
• If the aerial work platform is rated and used as an insulated aerial device, the electrical insulating components must be tested for compliance with the rating of the aerial platform in accordance with ANSI standard A92.2

**Inspection and Tests**

- An aerial device must be inspected and tested at least annually for permanent deformation and cracks by using 1 ½ times the rated load and for defects by visual inspection during and following the load test
- Written, dated and signed test reports must be made available by the employer for examination by regulatory agencies
- The insulated part of an EWP must not be altered in any way that might reduce its insulating value
- An annual electrical test of insulated aerial devices must be made. An equivalent DC voltage test may be used in place of the prescribed AC voltage
- Field inspection and tests must be performed only by an authorized and trained employee or outside service
- Lift controls must be tested daily before use to determine they are in safe working condition. An aerial device with defective controls must not be used until repaired
- All danger, caution and control markings and operational plates must be legible and not obscured

**Equipment Inspection**

All components that affect the safe operation of the EWP, and can change from day to day, must be inspected daily.

Users must check the operator’s manual for a complete list of pre-operational checks. See the end of this section for Daily Inspection Checklists for Elevating Work Platforms and Aerial Devices.

**Minimum Requirements**

Before climbing onto a work platform, check:

- Tires for proper pressure and wheels for loose or missing lug nuts
- Steer cylinder, linkage, and tie rods for loose or missing parts, damage, and leaks
- Hydraulic oil for leaks and fluid level. Hydraulic hoses, lift cylinder(s), and connections for leaks or loose connections
- Fuel supply – adequate fuel, filler cap in place, no damage, leaks, or spills
- Battery for fluid level and state of charge
- Proper connection of all quick-disconnect hoses
- Structural components for damage, broken parts, cracks in welds, including scissor arms, outrigger arms, and pads
- Ladder or steps for damage and debris (ladder must be firmly secured to the platform and relatively free of grease, mud, and dirt)
- Beacon and warning lights for missing and defective lenses or caps
- Ground controls (manual and powered) – including emergency stop switch and platform lower/lift switch – for proper function and damaged and missing control sticks/switches
- Decals and warning signs to make sure they are clean, legible, and conspicuous

After mounting the platform, check:
- Platform assembly for missing or loose parts, missing or loose lock pins and bolts
- Platform floor for structural damage, holes, or cracked welds and any dirt, grease, or oil that can create a hazard
- Operator’s manual to make sure it is in place
- Extendable platform deck for ease of extension/retraction and proper function of locking position of platform
- Guardrails to make sure they are in place and secure
- Access gate for ease of movement, missing parts, latch, and locking capabilities
- All fall protection anchorage points
- All control mechanisms for broken or missing parts
- All emergency controls for proper function – stopping, descending, master OFF switch
- All safety devices such as tilt and motion alarms for malfunction
- Swivels for freedom of rotation
- Scissors for smooth movement up and down
- Brakes for stopping capabilities
- Horn for proper function

Maintenance and Repairs
- The materials used to repair aerial devices and elevating work platforms must meet the standard specifications of strength, dimensions, and weights and must be able to support the rated workload
- Electrical wiring and equipment must meet NFPA 70 provisions
- All exposed surfaces must be free from sharp edges, burrs, or other hazardous projections

Electrical Ratings
- The EWP rating plate must indicate whether the aerial device is insulated or non-insulated and, if insulated, the rated line voltage for which the aerial device was designed and tested
- The insulating portion of an aerial device must not be altered in any manner that might reduce its insulating value
TRAINING AND PERMITS

Training Requirements

The Company will provide employees who will operate an aerial work platform with instruction and training regarding the equipment before a required permit is issued or reissued. Such instruction and training must include the following:

- Instruction by a qualified person in the intended purpose and function of each of the controls
- Proper use and care of all necessary PPE
- Training by a qualified person, or reading and understanding the manufacturer’s or owner’s operating instructions and safety rules
- Understanding by reading, or by having a qualified person explain, all decals, warnings, and instructions displayed on the aerial work platform
- Reading and understanding all of the following provisions of this “Training and Permits” standard, or being trained by a qualified person on their content

Employees who will use fall protection equipment must receive additional training specific to the type of equipment used.

Permits

The Company will provide operators of aerial work platforms with an operators permit. The operator must carry the permit or have it available at the jobsite/workplace, and must be displayed upon request by a regulatory agency. The permit must indicate the type of work platforms an operator has been trained on, and is qualified to operate. A permit to operate an aerial work platform is valid only when performing work for the Company who issued the permit.

The Company will certify that their employees are competent to operate applicable aerial work platforms at least once every three years. Permits will be issued at the time of certification or recertification.

A permit will contain the following information:

- The Company’s name
- The operator’s name
- The name of the issuing authority
- The types of aerial work platforms the operator is authorized to operate. These include:
  - Vehicle-mounted elevating work platform such as: extensible boom aerial devices, aerial ladders, articulating boom aerial devices, and vertical towers
  - Manually propelled elevating work platforms
  - Boom-supported elevating work platforms
  - Self-propelled elevating work platforms
- The date issued
- The expiration date
Training Records

The Company will maintain employee-training records for three years. These records will include the name of the employee, the type of training received, the date of the training, and the name of the instructor.

Retraining

Employees operating aerial devices and elevated work platforms should receive training annually, and any time there is a change in operating procedures or equipment. In addition, employees must be retrained anytime there is an accident or near miss, or they demonstrate a lack of understanding of safe work procedures, equipment operation or the use of PPE.

ATTACHMENTS

The following pages contain a sample inspection checklist that can be reproduced for Company use.
### Scissor Lift Operator Daily Inspection/Checklist (Page 1 of 2)

<table>
<thead>
<tr>
<th>OK</th>
<th>Repair</th>
<th>N/A</th>
<th>Mechanical</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Structural damage or cracked welds – Visual walk-around inspection.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Parking brake – Check operation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Tires/wheels and fasteners – Visually inspect, check operation and tightness.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Guides/rollers and slider pads – Visually inspect, check operation, and ensure there is no metal to metal contact with slider, slider side, or running surface. Check for free movement of surface. Also check for free movement of the slider pin through the slider.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Railings and railing lock pins – Visually inspect and check tightness.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Entry chains or gates – Check operation and tightness.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Bolts and fasteners – Check tightness.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Safety Bar – Check operation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Wheel Bearings and Kingpins – Visually inspect, check operation and lubricate.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Pothole Protection – Visually inspect and check operation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Steering cylinder and tie rod – Visually inspect, check operation and lubricate.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OK</th>
<th>Repair</th>
<th>N/A</th>
<th>Electrical</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Battery fluid level – Visually inspect.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Control switches – Visually inspect and check operation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Cables and wiring harnesses – Visually inspect.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Battery Terminals – Visually inspect and check tightness.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Terminals and Plugs – Check tightness.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Generator/receptacle – Visually inspect and check operation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Limit switches – Check operation.</td>
</tr>
</tbody>
</table>
### Scissor Lift Operator Daily Inspection/Checklist (Page 2 of 2)

<table>
<thead>
<tr>
<th>OK</th>
<th>Repair</th>
<th>N/A</th>
<th>Hydraulic</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Hydraulic oil reservoir level – Check oil level.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Hydraulic Hoses/Fittings – Visually inspect and check for leaks.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Lift/lowering time – Check operation and refer to specification tables.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Cylinders – Visually inspect and check operation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Emergency lowering – Check operation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Lift capacity – Check relief valve setting and refer to specification tables.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OK</th>
<th>Repair</th>
<th>N/A</th>
<th>Miscellaneous</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Manual – Visually check that proper manual is in box.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Placards, I.D. plates, warnings and control labels – Replace if missing/illegible.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OK</th>
<th>Repair</th>
<th>N/A</th>
<th>Prestart Checks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Ensure that there are no obstacles around the work platform and in the path of travel such as holes, drop offs, ditches, soft fill, or debris.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Check overhead clearances.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Make sure the batteries are fully charged. Disconnect the AC charger cord from the external power source.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Make sure that the Free-Wheeling Valve is fully closed.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Make sure all guardrails and lock-pins are in place and locked in position.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Make sure both side battery and hydraulic trays are closed and locked.</td>
</tr>
</tbody>
</table>

**NOTE:** At any point during this inspection there are any deficiencies, do not operate lift any further. Notify the proper personnel or repair unit as needed. Do not operate equipment without proper authorization and training.

<table>
<thead>
<tr>
<th>Signature (person(s) performing inspection/evaluation)</th>
<th>Date</th>
</tr>
</thead>
</table>
# General Elevating Work Platform Inspection List

## Items to check during the daily inspection:

- Tires for proper pressure and wheels for loose or missing lug nuts.
- Steer cylinder, linkage, and tie rods for loose or missing parts, damage, and leaks.
- Hydraulic oil for leaks and fluid level. Hydraulic hoses, lift cylinder(s), and connections for leaks or loose connections.
- Fuel supply – adequate fuel, filler cap in place, no damage, leaks, or spills.
- Battery for fluid level and state of charge.
- Proper connection of all quick-disconnect hoses.
- Structural components for damage, broken parts, cracks in welds, including scissor arms, outrigger arms, and pads.
- Ladder or steps for damage and debris (ladder must be firmly secured to the platform and relatively free of grease, mud, and dirt).
- Beacon and warning lights for missing and defective lenses or caps.
- Ground controls (manual and powered) – including emergency stop switch and platform lower/lift switch – for proper function and damaged and missing control sticks/switches.
- Decals and warning signs to make sure they are clean, legible and conspicuous.

## After mounting the platform, check:

- Platform assembly for missing or loose parts, missing or loose lock pins and bolts.
- Platform floor for structural damage, holes, or cracked welds and any dirt, grease, or oil that can create a hazard.
- Operator’s manual to make sure it is in place.
- Extendable platform deck for ease of extension/retraction and proper function of locking position of platform.
- Guardrails to make sure they are in place and secure.
- Access gate for ease of movement, missing parts, latch and locking capabilities.
- All fall protection anchorage points.
- All control mechanisms for broken or missing parts.
- All emergency controls for proper function – stopping, descending, master OFF switch.
- All safety devices such as tilt and motion alarms for malfunction.
- Swivels for freedom of rotation.
- Scissors for smooth movement up and down.
- Brakes for stopping capabilities.
- Horn for proper function.
SCOPE
This chapter provides information on the U.S. Department of Labor and Office of Federal Contract Compliance Programs that this Company will follow regarding Equal Employment and Affirmative Action business practices.

EEO/AA POLICIES
The purpose of this Company’s Equal Employment and Affirmative Action Plan (the “Plan”) is to describe the application of key policies and procedures designed to assure the right of all persons to work and to advance based on ability. This Plan has been developed for the following purposes:

- To achieve full equal treatment of minority groups and women at all levels and in all sectors of the work force
- To ensure compliance with applicable equal employment laws and government regulations
- To set forth mandatory steps to be taken at all Company office locations to maintain and implement equal employment and affirmative action policies throughout the Company

Protected Classes - The federal government defines the following persons as protected classes, and may not be discriminated based on:

- Race
- Color
- Age
- Handicap status
- Disabled veterans
- Genetic information
- Religion
- Sex
- National origin
- Vietnam era veterans
- Pregnancy status
- Any other basis prohibited by law

Equal Employment – Our employment policy will make no distinctions in treatment, hiring or advancement of applicants or employees who are identified as a member of a protected class.

Affirmative Action – The Board of Directors, President and all officers of the Company will affirmatively implement the policies and procedures in this plan with regard to protected classes and will regard those policies and procedures as contract requirements.

DISSEMINATION OF THE PLAN AND POLICIES

Internal
The Company will communicate to each executive, manager and supervisor this Plan and its equal employment and affirmative action policies through the following procedures:

- Upon request, the Company will give to any employee a copy of this Plan
- The existence and requirements of the Plan will be communicated to all employees from time to time through such internal publications as may be appropriate
- A copy of the Statement of Policies will be given to all applicants for employment upon their request for an employment application
- Implementation of the Plan will be discussed during management staff meetings
• Periodically, the Equal Opportunity Officer will meet with each manager and the manager’s immediate staff to give them assistance in implementing the Plan
• The Company will communicate to union officials this Plan and its equal employment and affirmative action policies and procedures
• Posters and policies relevant to the Plan will be displayed in conspicuous places where employees are located and particularly, in employment areas

**External**

The Company will communicate the Plan and the Statement of Policies to the public by the following procedure:

• Recruiting sources, such as personnel agencies, community organizations, colleges and training institutes, will be informed of the basic aims of the Plan and the Statement of Policies and will be requested to include minorities, females, and handicapped persons in their referrals
• Advertisements for employment will be placed in news media chosen to reach all qualified applicants, including minorities, women, and handicapped persons. All employment advertisements will contain the phrase “An Equal Opportunity Employer”
• The Company will, in all solicitations or advertisements for employees placed by or on behalf of the Company; state that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, national origin, handicap status, or disabled Veterans status
• The Company will send each labor union or representative of workers with which they have a collective bargaining agreement or other contract or understanding, a notice advising the labor union or workers’ representative of the Plan and policies. The Company’s recruitment and hiring practices will include:
  o The avoidance of any help-wanted advertising in sex-segregated columns in newspapers or other publications
  o The avoidance in recruitment letters, or other materials of any reference to “male” or “female” or any indication of preference for men or women in certain jobs

**RESPONSIBILITY**

The Company’s Board of Directors has the overall responsibility for the policies included in the Plan. The President of the Company has the primary responsibility for the successful implementation of the Plan. The President has appointed, , to be the Company’s Equal Opportunity Officer with delegated responsibility for program planning, direction, and operation.

**Duties of the Equal Opportunity Officer**

• Manages, coordinates, supervises, and integrates day-to-day operations and activities in implementing the Plan at all offices of the Company
• Develops programs and policies for securing compliance at all the Company locations with equal employment opportunity and affirmative action policies of the Company
• Reviews employment practices as required to determine whether any current policies serve to bar handicapped individuals from employment
• Reviews all qualification requirements to assure that they are job-related, are consistent with job necessity and safe performance on the job
• Directs compliance reviews and investigations of complaints of discrimination
• Prepares and issues statistical data and evaluation of progress to measure the success of the program and to identify areas where minorities, women, and handicapped persons are underutilized

UTILIZATION AND WORK FORCE ANALYSIS

Utilization Analysis

The purpose of the utilization analysis is to identify job classifications within the Company’s work force in which minorities and women are being under-utilized. The utilization analysis will include an examination of the Company’s work force and a comparison of the availability of minorities, women and handicapped persons in the job classification and geographic areas where the Company can recruit.

In determining if minorities and women are underutilized in any of the Company’s job classifications, the Equal Opportunity Officer shall evaluate the following factors:

• The minority and female populations of the area surrounding the Company and their proportion to the total
• The size of the minority and female unemployment force in the area surrounding the Company
• The general availability of minorities and women having requisite skills in an area from which the Company can recruit
• The minorities and women employed by the Company with the requisite skills for the job classifications involved
• The number and percentage of minorities and women applying for employment

Work Force Analysis

The Equal Opportunity Officer will develop an analysis of job titles and job classifications held by minorities and women that will include a listing of each job title, the wage rate or salary range ranked from the lowest paid to the highest paid within each organizational unit, and the total number of employees by sex and minority group in each job title.

IDENTIFICATION OF PROBLEM AREAS

The Equal Opportunity Officer will be responsible for the periodic analysis of the entire employment process in order to identify problem areas. Among the subjects covered will be:

• The recruitment process
• Concentration of women and minorities in various job titles and job classifications
• Selection standards and procedures
• Transfer and promotion policies
• Provisions and practices regarding seniority in union contracts
• Administration and validity of all tests for employment and promotional purposes
Upward mobility systems, promotions, and training
Termination and disciplinary actions
Utilization of qualified handicapped persons

GOALS AND TIMETABLES

The final process in the utilization and work force analysis is the formulation of goals and timetables for employment of minorities and women. The Company will use the following process in establishing goals and timetables:

- A goal will be established when the percentage of total minorities and women in a job classification within the Company is lower than the total percentage of minorities and women available in that job classification within the surrounding labor market area.
- The goal will be stated as a percentage of the total employees in the job classification and will be equal to the percentage of minorities and women available for work in the job classification in the surrounding labor market area.
- For each job classification with a goal, a specific timetable will be established for reaching the goal in the minimum feasible time.

EXECUTION OF THE EEO/AA

Recruitment

The Company will actively seek minorities, women, and handicapped persons for employment. The following techniques will be used to ensure that personnel practices of the Company are not discriminatory:

- The Company will analyze and review recruitment procedures for each job title to identify and eliminate discriminatory barriers.
- The Company will establish objective measures to analyze and monitor the recruitment process. These shall include application records, including for each job applicant, name, race, sex, handicap status, Vietnam era or disabled veterans status, referral source, date of application, position applied for, and whether a job offer was made.
- Prior to filling any position for which goals and timetables have been established, the Equal Opportunity Officer will review the number of minority and women applicants who applied for the position.
- Recruitment sources will be listed to ensure that the Company is making contact with recruitment sources that provide the widest range of applicants.

Selection Standards and Procedures

- The Company will carefully review and evaluate every step of its hiring process to ensure that the job requirements, hiring standards, and methods of selection and placement do not discriminate, are job related, and contribute toward the goals of this Plan.
- Having identified handicap status, reasonable accommodation to the known physical or mental limitations of an otherwise qualified handicapped applicant will be made, unless it can be shown that such accommodation would impose an undue hardship for the project.
Upward Mobility, Promotions, Training

In order to assure the absence of discrimination against the employment of minorities, women, and handicapped persons in all positions, the Company will review all practices – both formal and informal – affecting promotions and training opportunities to ensure that minorities, women and handicapped persons are promoted and given training opportunities. The following records and procedures will be used, developed and implemented in order to ensure compliance:

- The number and percentage of minorities, women and handicapped persons in all training programs for employees of the Company
- Employees will be informed of all job opportunities

Layoffs, Discharges, Demotions, Disciplinary Action

The standards for deciding when an employee will be terminated, demoted, or disciplined, will be the same for all employees of the Company and will not be applied differently for minorities, women and handicapped persons. The Company will keep a record of:

- All Terminations, indicating total, name, date, number of members of minority group, handicapped persons, and women by job category and reason for termination
- All Layoffs and Demotions, indicating total, name, date, number of members of minority group, handicapped persons, and women by job category and reasons for action

AUDITS AND REPORTS

The Company will monitor appropriate personnel records and reports to ensure a policy of equal opportunity and to ensure compliance with the Company goals and timetables. The Company will develop and implement a reporting procedure that will provide for the continued auditing, monitoring and evaluation of the Company offices. A formal audit of the Company will be made at least annually with periodic checks as deemed appropriate.

SUBCONTRACTORS, CONSULTANTS, SERVICES

The Company recognizes its responsibilities in the areas of equal opportunity and affirmative action with respect to subcontractors, consultants and companies that supply materials and services to the Company. The Equal Opportunity Officer will develop and implement policies and procedures to ensure that those responsibilities are being met.

Use of Women and Minority Business Enterprises

Our Company will ensure that women and minority business enterprises have the maximum practicable opportunity to participate in the performance of Company contracts.

The Company will establish policies and procedures that will enable women and minority business enterprises to be considered fairly as subcontractors and suppliers under contracts.
These policies and procedures will ensure that:

- The Company will develop and implement policies and procedures to recruit and give equal consideration to women and minority firms and consultants to provide personnel services or supplies to the Company.
- The Company will develop a listing of women and minority firms and consultants that provide services for which the Company normally contracts.
- The Equal Opportunity Officer will periodically review and monitor the Company use of subcontractors, suppliers, consultants and services in order to assure fair use, consideration, and treatment of women and minority suppliers, subcontractors, consultants and services.
- The Company will notify all subcontractors and suppliers that its Affirmative Action Plan is on file before bidding on the contract.
- The Company will endeavor to cause nondiscrimination clauses in collective bargaining agreements and endeavor to discover any present discriminatory provisions in collective bargaining agreements and to modify and delete same.
- When the Company contemplates subcontracting activities, a good faith effort will be made to employ women and minority firms or subcontractors.
- The Company will not use a facility or any portion thereof that segregates because of race, religion, color, age, national origin or sex. Further, the Company will not sponsor, endorse or contribute to any association or establishment that excludes minorities, women, and handicapped persons.
**STATEMENT OF COMMITMENT**

This Company will provide equal employment opportunity in all employment practices, including but not limited to, recruitment, advertising, hiring, layoff, rate of pay, training, termination, upgrading, demotion, transfer, fringe benefits and use of facilities; without discrimination because of race, color, sex, age, religion, national origin, handicap status, veteran status or on any other basis prohibited by law. This Plan will be updated and revised to reflect experience, changes in laws and regulations, and better understanding of effective approaches that will assure equal employment opportunities for all.

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AFFIDAVIT OF CONTRACTOR’S POLICIES AND COMMITMENTS TO EQUAL EMPLOYMENT OPPORTUNITY AND UTILIZATION OF WOMEN AND MINORITY-OWNED BUSINESS

I, ____________________, do hereby solemnly swear and affirm under the penalty of perjury that _________________________. (Hereinafter referred to as “the Company”),

1. Has a policy to provide equal employment opportunities to all employees and applicants for hiring without regard to race, color, religion, age, sex, national origin, handicap status, Vietnam era or disabled veterans status or on any other basis prohibited by law and to make all personnel decisions to further this policy of equal employment opportunity;

2. That the aforementioned Company has a written Affirmative Action Plan, Contractor’s Qualification Committee and that the above-described Affirmative Action Plan reflects the true attitude and intent of the Company regarding equal employment opportunities;

3. That the contents of the Affirmative Action Plan are true and correct;

4. That each executive, officer, supervisor, and manager of the Company has received a copy of the Affirmative Action Plan and has been expressly instructed that he or she has the obligation to act in accordance with our policy to provide equal employment opportunity at all times to all employees and all applicants for hiring;

5. That ________________________ has been appointed to administer and implement our Affirmative Action Plan and otherwise carry out our commitment to equal employment opportunity; and,

6. ________________________, will take affirmative steps to employ minority and female-owned businesses as subcontractors and suppliers on any and all contract awards received; and, finally that all information and data furnished regarding use of minorities, females and the handicapped

7. Minority-owned businesses and female-owned businesses are true and correct and that if at any time such information may no longer reflect the true composition of our work force and use of minority-owned businesses and female-owned businesses, that the changes will be reported.

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**Work Force Analysis Report**

Name of Company

Report all permanent, temporary or part-time employees including apprentices and on-the-job trainees. Enter the appropriate figures on all lines and all columns. All blank spaces will be considered zero.

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<tr>
<th>Job Categories</th>
<th>Overall Totals</th>
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<td>White</td>
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<td>Officials and Managers</td>
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<td>Apprentices</td>
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### Establishment Information

What is the major activity of the establishment? Be specific, e.g. manufacturing, construction, maintenance, repair, demolition of physical facilities, etc. Include the specific type of product or type of service provided, as well as the principal business or industry activity.

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<th>Certification</th>
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<td>All reports are accurate and were prepared in accordance with instruction.</td>
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<th>Name of Certifying Official</th>
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All reports and information will be kept confidential.
SCOPE
This chapter contains the safe practices to protect employees from the hazard of musculoskeletal disorders (MSDs). Although OSHA does not currently have any regulations governing ergonomics, NIOSH provides guidelines to reduce the risk of these disorders from occurring. Our Company will make every practical effort to ensure workers are not exposed to ergonomic hazards.

POLICY
Some of the tasks workers perform such as lifting, reaching and repeating the same movements can strain our bodies. These tasks can result in an injury to the muscles, tendons, ligaments, nerves, blood vessels and joints of the neck, shoulders, arms, wrists, legs and back. This type of injury is called either musculoskeletal disorders (MSDs), or respective motion injuries (RMIs). MSDs are a common workplace injury in all industries. For these reasons, this Company has developed the following safe work practices to prevent employee injury.

EMPLOYER RESPONSIBILITIES
- Perform a job hazard analysis to identify particular jobs that pose a risk of MSDs to workers
- Consult with the safety committee or worker health and safety representative about risk identification
- Investigate any reported injury requiring medical attention or an unsafe condition that could lead to injury
- Implement controls to eliminate or minimize the risk factors

EMPLOYEE RESPONSIBILITIES
- Assist in the process of identifying risk factors
- Report any work-related injuries and signs or symptoms of an MSD immediately

JOB HAZARD ANALYSIS
The Company will perform an ergonomic assessment of all jobs and duties. For each task, it will identify which, if any, of the four primary risk factors (force, repetition, work posture, local contact stress) are present. These questions will be examined:

- Does the length of time spent doing a particular task increase the physical demands on an employee?
- Do any of the following increase the physical demands on the employee?
  - Layout of the workplace or workstation (such as work surfaces that are too high or too low or that result in excessive reaching distances)
  - Characteristics of the objects being handled (objects that are too large to handle or that their weight is unevenly distributed)
  - Environmental conditions (an atmosphere or objects cold enough to make a workers hands cold while the objects)
  - Organization of the work duties (a lack of variety of task resulting muscles not having a chance to rest and recover)
WHAT IS MSD?
An MSD is a disorder of the muscles, tendons, ligaments, joints, nerves, blood vessels or related soft tissue including a sprain, strain and inflammation that may be caused or aggravated by work.

Signs and Symptoms of MSD
It’s important for the Company and workers to recognize the early signs and symptoms of MSDs. If treatment is needed, it can be started right away. You can also take steps in the workplace and outside it to avoid making the condition worse.

Signs and symptoms of MSDs can:
- Swelling
- Redness
- Difficulty moving a particular body part
- A symptom can be felt, for example:
  - Numbness
  - Tingling
  - Pain

If employees are experiencing signs or symptoms of an MSD, they need to inform their supervisor immediately.

Signs and symptoms of MSD may appear suddenly, from a single incident that causes an injury, or they may appear gradually over a longer period. Don't ignore early signs and symptoms of an MSD. Treatment may be needed to prevent the injury from getting worse.

POTENTIAL HEALTH EFFECTS
MSDs can affect an employee’s ability to perform tasks at work. Early signs or symptoms of MSD’s can progress into conditions that can have long-term effects, such as the following:

- Muscle strains to the neck, back, shoulders, or legs
- Tendonitis (swelling of a tendon)
- Carpal tunnel syndrome (pressure on a nerve in the wrist, resulting in numbness, tingling, pain, or weakness in the hand, wrist, or forearm

CUMULATIVE TRAUMA DISORDERS
Musculoskeletal injuries caused by working are common. The majority of these injuries are not accident related broken bones or strained ligaments. They usually develop over time as a result of repeated stress on a particular body part. The condition is often ignored until the symptoms become chronic and permanent injury occurs. Cumulative trauma disorders (CTDs) and repetitive motion injuries are terms used to refer to certain musculoskeletal injuries.
Carpal Tunnel Syndrome

Carpal Tunnel Syndrome (CTS) is a common nerve CTD. It’s a progressively disabling and painful condition of the hand. CTS results from injury to the median nerve, which is located in the wrist. Since musculoskeletal strain from repeatedly flexing the wrist or applying arm-wrist-finger force doesn’t cause observable injuries, it often takes months or years for workers to detect damage.

Symptoms of CTS include weakness, clumsiness, numbness, pain, tingling and a lack of sweating in parts of the hand innervated by the median nerve. CTS has been reported to occur from two to ten times more frequently in women than in men. The condition is progressive and can lead to compensable hand disabilities.

Tests Used to Determine the Presence of CTS:

- **Phalen’s wrist-flexion test** - The patient props his or her elbows on a table and allows the wrists to drop into complete flexion for 30 to 60 seconds. If paresthesia and numbness occur almost immediately, the test is considered positive.
- **Forced wrist-flexion test** - The patient props his or her elbows on the table, one wrist is held and the other is in complete flexion for 20 to 30 seconds. If the patient has CTS, symptoms should occur immediately.
- **Tinel’s sign test** - A percussion hammer is used to tap the patient at the wrist crease. If the patient feels a tingling in the hand along the median nerve distribution, the test is positive.
- **Electroneuromyography** - A physician performs this test, which requires an electromyograph and related equipment. Its purpose is to measure the median nerve’s conduction velocity, the speed at which nerve impulses translate into muscle responses. If the velocity measures 5 milliseconds or more below normal, chances are, the median nerve is compressed in the carpal tunnel. A negative result, however, does not rule out CTS since a median nerve may be compressed yet its conduction velocity may remain normal. Electroneuromyography is the most reliable of these tests used to determine the presence of CTS.

Other CTDs Include:

Although CTS is the best known of repetitive motion disorders, other disorders can also be disabling.

- **Tenosynovitis** - Tenosynovitis is the inflammation of the tendons and sheaths. It is often associated with tasks demanding extreme wrist deviation. For example, wrist deviation is required to hold an in-line nut-runner in a horizontal position.
- **Trigger finger** - Trigger finger is a form of tenosynovitis that results when any finger must be frequently flexed against resistance. It may be avoided by designing tool handles for operation by the thumb, by more than one finger, with lower force requirements, or by not requiring constant pressure.
- **De Quervain’s Disease** - In De Quervain’s Disease, the tendon sheath of both the long and the short abductor muscles of the thumb narrows. The disease is common among workers, who perform repetitive manual tasks involving radial or inward hand motion and firm grips.
- **Tennis Elbow** - Also called epicondylitis, this form of tendinitis is an inflammatory reaction of tissues in the elbow region. In an industrial environment, tennis elbow may follow effort requiring palm-upward hand motion against resistance, such as using a screwdriver, or the violent upward extension of the wrist with the palm down. The condition may be avoided by ensuring that the rotation axis of the tool or machine coincides with the rotation axis of the forearm.

- **White Finger** - White Finger Disease or Raynaud’s Syndrome occurs when blood vessels and nerves in the hands constrict from conditions such as cold temperature or vibration. The hands, fingers or fingertips may become cold, blue, numb, and lose fine manipulative ability. Upon recovery, the hands become red, accompanied by a burning sensation. It can be confused with the one-sided numbness of carpal tunnel syndrome.

**TREATMENT**

Treatment will vary according to the type of MSD. Treatment can include the application of cold or heat, medication, physical therapy and even surgery. MSDs are treated more effectively they’re discovered and reported early.

**Corrective Actions to Prevent CTDS**

Based on risk assessment results, the Company will implement as many of the following actions as are warranted and feasible:

- Adjusting the height of work tables, conveyors, and seats
- Automating tasks to eliminate manual handling
- Reducing the frequency of tasks or increasing the frequency to a point where automation is necessary
- Reducing the size or weight of loads
- Providing arm rests
- Redesigning hand tools so that the axis of rotation or application of force coincides with the axis of rotation of the arm
- Providing operator training
- Using careful pre-placement screening to identify high risk employees
- Changing load positions in relation to the body or hands
- Minimizing the time that a load is held in the hands
- Eliminating gloves if they cause a problem or trying different gloves

Recommendations to help prevent the development of CTS include:

- Use of Low frequency vibration in hand tools should be eliminated or reduced
- Wrist deviation from the straight position should be minimized especially where a great deal of force must be exerted
- Where possible, a closed fist (rather than a pinch) should be used to reduce tendon tension
RISK FACTORS

The factors that contribute to the risk of MSDs are called risk factors. A risk factor is something that may cause or contribute to an injury. Two or more risk factors can be present at one time, increasing the risk of injury.

Workers may not always be able to identify all the risk factors in a task. However, it is important for workers to recognize situations when they are at higher risk. If a worker must bend awkwardly to lift a heavy object in a cramped area, the worker will be exposed to a greater risk of MSD than a worker who uses a mechanical lifting device or one who has enough room to follow safe lifting procedures.

The primary risk factors for MSDs are the physical demands of a task:

- Force
- Repetition
- Work posture
- Local contact stress

Other risk factors that can affect these physical demands include:

- Layout and condition of the workplace or workstation, for example, a workstation that is too high or too low can create awkward working postures
- Characteristics of objects handled - for example, an object that is slippery or has no handles may cause awkward postures and require greater force to handle the object in a stable manner
- Environmental conditions of the workplace - for example, cold temperatures or drafts reduce blood flow to the hands and arms, requiring more grip force
- Organization of work tasks - for example, a worker performing a variety of different tasks throughout the day is likely at less risk of injury than a worker who has little variety in their job, and is exposed to the same risk factor for a longer time

FORCE

The force that a worker exerts on an object is a primary risk factor. Muscles and tendons can be overloaded when you apply a strong force against an object. Holding a lighter object for long periods can also expose workers to a risk of MSD.

Three types of activity that require force:

- Force involved in lifting, lowering, or carrying
- Force involved in pushing or pulling
- Grip force

Lifting, Lowering, or Carrying

Lifting, lowering, or carrying an object or person requires force. A worker needs to exert more force to lift a heavy object than a light one.

Pushing or Pulling

Force is needed for pushing or pulling an object. Pushing may be less of a risk than pulling because it uses stronger back muscles.
Grip Force

Additional grip force is needed in situations such as the following:

- The worker is gripping a small tool
- The worker is handling slippery or odd-shaped objects that are difficult to hold
- Objects are too large for a comfortable grip
- Objects are grasped or handled using a pinch grip instead of a power grip
- Vibrating tools or equipment are used
- The worker is wearing heavy or bulky gloves that make gripping more difficult
- Handles or grip spans are too large or too small
- The handles on tools have an awkward shape
- The worker's hands are cold

REPETITION

Repeatedly doing a task that uses the same muscles with little chance for rest or recovery, puts workers at a higher risk of injury when other risk factors are also present (such as an awkward posture or heavy force). This applies to both large and small muscles.

Situations that increase the risk of MSD include the following:

- There is not enough variety in the worker's tasks to give muscles a rest or opportunity to recover
- The worker is unaccustomed to the task, for example, when starting a new job or returning from a prolonged absence from work, or when the equipment or workstation has changed

WORK POSTURE

Posture refers to the position of different parts of your body. Muscles, tendons and ligaments must work harder, and can be stressed, when you're in an awkward posture. Awkward posture occurs when any joint of your body bends or twists excessively, outside a comfortable range of motion. If the position is held long enough for you to feel aches and pains, then your muscles have been held in one position for too long. A posture held for a long time is called a static posture.

Various work activities can result in awkward postures:

- Leaning sideways, such as when reaching into a low drawer to one side (awkward back posture)
- Bending down to work at a low level (awkward back posture)
- Reaching overhead (awkward shoulder posture)
- Flaring the elbows out to the side (awkward shoulder posture)
- Bending the wrist when moving objects or keyboarding (awkward wrist posture)
- Bending the neck down, such as looking at small components in poor lighting conditions (awkward neck posture)
- Twisting part of the body, such as twisting the neck to view documents while keyboarding for a long time (awkward neck posture)
The effects of awkward posture can be made worse by:

- Applying force in an awkward position, such as lifting a heavy object with arms above the body or using a strong grip with a bent wrist
- Holding an awkward position for a prolonged period (static posture), such as holding a telephone between the head and shoulder

**LOCAL CONTACT STRESS**

Local contact stress occurs when a hard or sharp object meets the skin. The pressure can injure the nerves and the tissues beneath the skin.

Here are some examples of activities that can result in local contact stress:

- Ridges and hard edges on tool handles digging into the hand
- Edges of work surfaces digging into the forearm or wrist
- Striking objects sharply with the hand, foot, or knee (such as striking the carpet stretcher with the area above the knee when laying carpet)

The effects of local contact stress can be made worse if:

- The hard object contacts an area without much protective tissue, such as the wrist, palm, or fingers
- Pressure is applied repeatedly or held for a long time

**Duration and Magnitude**

Duration should be considered along with the four primary risk factors rather than separate from them. The amount of risk depends on how long the worker is exposed to the risk factor.

The person looking at risk factors should consider questions about duration for each:

- How long is the worker using force (for example, to lift or grip an object)?
- How long does the worker perform a repeated task?
- How long does the worker perform a task with an awkward body posture?
- How long is one part of the body exposed to the local contact stress?
- Magnitude, or “how much,” should also be considered for each risk factor:
- How much force is the worker using?
- How fast is the worker doing the repeated movements?
- How severe is the awkward posture?
- How hard is the edge digging into the skin, causing local contact stress?

**Multiple Risk Factors**

More than one risk factor can occur at the same time. The more risk factors in the task, the greater the risk of injury. This example is used to show how several risk factors might occur at one time.
TRAINING

This Company will ensure that employees who may be exposed to the risk of musculoskeletal injuries are trained on the following:

- The employer's program
- The exposures which have been associated with MSDs
- The symptoms and consequences of injuries caused by repetitive motion
- The importance of reporting symptoms and injuries to the employer
- Methods used by the employer to minimize MSDs
- The safe work procedures for some tasks, such as adjusting their workstation to fit the task correctly
- The proper use of any mechanical aids or PPE provided to them

IMPLEMENTING A REPETITIVE MOTION INJURY PREVENTION PROGRAM

Our Company will implement a prevention program when MSDs have occurred to more than one employee under all of the following conditions:

- The MSDs were predominantly caused by a work-related repetitive job or operation
- The employees incurring the MSDs were performing a job process, or operation of identical work activity. Identical work activity means that the employees were performing the same repetitive motion task, such as but not limited to word processing, assembly or, loading
- The MSDs were identified and diagnosed by a licensed physician
- The MSDs were reported by the employees to the employer in the last 12 months

The program will include a worksite evaluation, control of exposures that have caused MSDs and training.

1. Worksite evaluation—each job, process, or operation of identical work activity covered by this section, or a representative number of such jobs, processes, or operations of identical work activities, must be evaluated for exposures that have caused MSDs.

2. Control of exposures that have caused MSDs—any exposures that have caused MSDs must be corrected in a timely manner, or if they are not capable of being corrected, the exposures must be minimized to the extent feasible. The employer must consider engineering controls, such as workstation redesign, adjustable fixtures or tool redesign, and administrative controls such as job rotation, work pacing or work breaks.

The Company will implement controls that cause the greatest reduction in MSDs, unless those controls would impose unreasonable costs.

Work Area Design

A work area should be designed to accommodate the person who actually works on a given job. For example, workstations should not force workers into awkward body positions. Workstations should be easily adjustable and selected to fit specific tasks, so that they are comfortable for the workers using them. The workspace should be large enough to allow for the full range of required movements, especially where knives, saws, hooks and similar tools are used.
The equipment used should be suited to the job. It should be organized so that:

- Forced air exhausts are not directed toward the user
- Workstation adjustment controls are convenient and easy to use
- Equipment with the longest and/or most frequent eye contact lies in the center of the work field
- Equipment used the most is located closest to the worker
- Glare is avoided
- Pronounced visual contrast differences between important subjects is avoided

Methods for Reducing Extreme and Awkward Postures Include:

- Adjustable fixtures and rotating tables so that the position of the work can be easily manipulated
- Workstations and bins that can accommodate the heights and reach limitations of a wide range of workers
- Work platforms that move up and down for certain operations

Hand and Wrist Postures

Some hand tools may force the wrist into awkward positions. The wrist position affects the effective strength of the contracting muscles. Therefore, as the angle of the joint increases or decreases from the neutral position, there is more stress on the tendons.

Examples of Methods to Reduce the Need to Use Excessive Force Include:

- Adjustable fixtures that allow operations and movements to be easily made
- Properly located bins so that workers do not have to toss products and by-products
- Mechanical or powered devices that eliminate the need for extreme manual force
- The suspension of heavy tools

MINIMIZING MANUAL MATERIALS HANDLING

Manual materials handling is another area in which injuries to employees can occur. This type of work entails lifting, bending and twisting, which can cause great damage to the human body if done improperly.

Lifting puts stress on two main body systems. One is the musculoskeletal system and the other is the cardiovascular system. Since the problem associated with the cardiovascular system deals with oxygen consumption or increased heart rate, the focus of most information regarding lifting has been the musculoskeletal system.

Mechanical Aids

One way to reduce manual materials handling problems is by using self-leveling dispensers, such as the spring-loaded tray dispensers used in many cafeterias.

The way these mechanisms work is that when a load is removed, the platform rises in order to maintain the top layer at a constant level. A worker does not have to bend over or stretch upward to receive work. Instead, work can be reached at a constant height. These dispensers can eliminate unnecessary motion and thereby reduce worker fatigue.
Many other types of mechanical aids are available to assist employees during manual materials handling.

Hooks, bars, rollers, jacks, platforms and trestles are examples of simple job aids. Drum handling units are in common use and exist as either a trestle or lever. In most cases, the engineer or ergonomist can find off-the-shelf aids readily available to fit the lifting task and to minimize the amount of manual lifting.

Other available equipment which will minimize, if not eliminate, manual materials handling includes the standard industrial equipment classes of conveyors, hoists and cranes, industrial vehicles (such as tow-motor or forklift trucks), and positioners. The International Material Management Society defines positioners as equipment used to transfer material from workplace to materials handling equipment, or vice versa. Positioners include manipulators, dumpers, up-enders, positioning tables, lifts, jacks, and transfer machines.

Today, with so much equipment available to the plant engineer or ergonomist, manual materials handling can be reduced, if not eliminated, for most tasks.

**COMPUTER WORKSTATIONS**

Work involving the extended use of computer workstations can be repetitious and confining, special attention must be paid to the user’s comfort. Traditional ergonomic considerations include chair and table selection, rest breaks, office noise, light, and temperature. However, VDT use poses unique questions, such as:

- What type of screen image, character size and screen brightness is optimal for the task?
- How can screen glare and reflections be eliminated?
- What type of keyboard is best for the user and the task?
- Where should the screen, document holder and accessories be placed?

**Visual Display Terminals (VDTs)**

A hidden toll is taken on employees who daily sit in front of their flickering display screens. They pay this price with sore necks and shoulders, cramped fingers, tired eyes, strained backs, numb buttocks, and aching legs and feet. Tension headaches are common. It may be possible to trace these ailments directly to improper workspace layout.

A standard visual display terminal is an electronic device that displays information on a screen and works on a principle similar to that of a television set. It contains a source of electrons which, when beamed across the phosphor-coated screen, produces a visible image. The operator manipulates the image through specific commands entered through a keyboard or a pointing device such as a mouse.

The primary viewing area should be between 0 and 60 degrees below the horizontal line of sight. The screen should be tilted so that the middle of the screen is perpendicular to the viewing angle. The top row of data should not lie above eye level, and observation angles greater than 40 degrees should be avoided. To avoid distracting reflections, it may be necessary to tilt the screen or to use screen filters.
The recommend observation distance between the eye and cursor is between 17 and 24 inches in an upright sitting position. ANSI recommends that the minimum viewing distance be 12 inches. ANSI also specifies several optical quality requirements.

- The contrast ratio between the characters and the background should be at least 3:1
- Small characters must have a higher minimum contrast
- “Jittering” displays should be eliminated
- The discrete dots that make up the characters should not be perceptible, the characters must appear solid to the viewer
- Saturated blue on a dark background, thin lines or high-resolution information for text should be avoided
- Pure red in displays should also be avoided to help color-blind people read displays

Workstation Accessories

Workstation accessories are available to help provide a comfortable workstation and reduce fatigue.

Keyboards

ANSI recommends that keyboards be positioned to allow the user to keep an angle between the upper arm and forearm at 70 to 90 degrees. The angle may increase if the operator is leaning back, but the maximum angle should not exceed 135 degrees. The keyboard should consist of the standard QWERTY layout.

The keyboard should be stable for normal keying functions. A number keypad should be provided if the main task involves numerical data input from the keyboard. To reduce user discomfort, alternative keyboards may be needed, such as split-fixed or split and vertical inclined styles.

There a number of keyboard accessories, that can reduce the risk of MSD’s. One such accessory is the keyboard armrest. Because typists frequently rest their wrists on the keyboard or tabletop while typing, excessive strain is placed on tendons controlling the fingers and hands. The wrist rest elevates and rests the wrists and reduces tendon stress. (The usual recommendation is to use the wrist rest during pauses in typing.)

The keyboard drawer slides under a desk when not in use, allowing efficient use of desk space. When the drawer is extended, the keyboard can be raised or lowered.

The extension arm allows the operator to place the monitor in a comfortable location for maximum efficiency. The extension arm rotates, extends, and retracts a swiveling monitor platform for viewer comfort and glare reduction.

Workers should alternate computer work with other tasks that don’t require similar, close-work skills. Managers should be conscious of this work routine when planning a day’s work schedule. Frequent breaks should be provided to allow the operator to stretch, move and other non-hand intensive tasks.
Document Holders; Footrests

Document holders and footrests should be provided, if needed by individual operators. The document holder should be adjustable and extensible.

Work Surfaces

The work surface should provide adequate legroom so that the legs are not cramped. The height of the leg clearance should be at least equivalent to the highest point on the thigh or knee. ANSI recommends that when the leg is perpendicular to the floor, minimum leg clearance depth under the work surface is 60 percent of the buttocks-to-knee length. The size of the work surface should also accommodate the task.

Work Chairs

The height of a chair should allow the user to place the feet firmly on a support surface. The maximum seat depth should allow contact with the seat back at the lumbar region while allowing clearance behind the knees. Minimum seat width should be 18 inches or the thigh breadth of the seated user, whichever is greater.

If the chair design requires the user's feet to be flat on the floor, the seat pan angle should keep the angle between the upper and lower leg between 60 and 100 degrees. In addition, the angle between the seat pan and back should allow the user to maintain a working posture in which the torso-thigh angle is not less than 90 degrees (100 degrees is preferred). Chairs should have backrests with lumbar support.

If the chairs have arms, the distance between the armrests should be at least 18.2 inches. Appropriate chair castors should be provided.

Noise and Temperature

Noise should be reduced to a maximum of 55 decibels and sporadic noises above normal ambient sound levels should be prevented. ANSI recommends that surface temperatures of equipment intended to be touched not exceed 95° F. Air drafts should not be allowed to flow under desks. Care should be taken to see that heat does not build up under desks as well.

LIGHTING

Sufficient Lighting is essential to reduce worker fatigue and allow them to perform visual tasks. How a space is used and what it is used for influences how lighting should be applied. Other factors that influence lighting design for a task include appearance, economics, building costs, energy consumption, and the quality of lighting desired. Factors affecting the visual environment include lighting fixtures, visual tasks, lighting maintenance, lighting system design and the individuals’ eyesight.

Lighting Quantity

The quantity of light is the amount of light that exists or is required at a workplace. The amount of light necessary for effective work depends on the type of the work, the quality of a worker’s vision, and the environment where the work is done.
The absolute minimum amount of light required for reading, writing and many manual tasks is approximately one foot-candle. As a reference point, a light in an indoor exit sign has at least five foot-candles.

In the design of good lighting, safety and welfare should be taken into account as well as visual efficiency.

In some jobs where visual demands are not great, it is normal for recommended levels of illumination to be based on safety and the creation of a pleasant environment. The minimum lighting level for a workplace is 20 foot-candles. When light levels fall below 20 foot-candles, workers usually have a negative reaction to the lighting.

Too much light can be as damaging as too little. The quantity of lighting needed depends on the age of a person performing the task, the reflecting characteristics present, the amount of light needed to do a task, and the speed and accuracy required of the person performing the task. As the amount of lighting provided for a task increases, so does the luminance (light reflected upward) and, as a result, the accuracy and speed of vision improves. The best ergonomic solution for these varying needs is to provide general workplace lighting and supplement it with specific task lighting.

Lighting systems should be designed to provide a uniform distribution of light over the entire work area. To ensure that a given lighting level will be maintained, give more light initially than is minimally required. The reason for this is that such factors as dirt, use and time deteriorate lighting. Over time, most lights will become dull, this generally happens when 80 percent of the stated life of the bulb or light has been used. The best ergonomic solution is to replace it at this point.

**Quality of Lighting**

The quality of lighting relates to the distribution of brightness in an environment. A good quality of lighting means that all brightness contributes favorably to visual performance, visual comfort, ease of seeing, safety, and aesthetics for the specific task.

A worker can normally see the task itself, the immediate background to the task, and the general surroundings.

The eyes tend to be attracted to brighter and more colorful parts of the field of vision. Therefore, light and color can be used to direct the focus of attention to the task. Lighting should be directed to the work, or special local lighting should be provided to match the needs of the work and the general lighting levels.

The level of brightness required for a task is determined by the degree of detail the operator has to meet, the time allowed for seeing, and the reflection characteristics of the task. The general level of brightness in the room also contributes to the level of brightness required for a task. In practice, it's best to plan the lighting first in relation to what the operator needs to accomplish the task and then to plan the brightness of the other parts of the room to provide proper emphasis, visual comfort, and interest.

Poor quality industrial lighting is easy to recognize. It creates uncomfortable and hazardous situations.
Certain tasks, such as distinguishing fine details, require higher quality illumination than do others. In addition, work areas where visual tasks are demanding, and are performed over a prolonged period require higher quality illumination.

Slight glare conditions may result in a loss of seeing efficiency and undue fatigue. Some factors that affect the quality of light include glare, shadows, colors, veiling, reflections and luminance distribution.

**The Effect of Glare on the Quality of Light**

Glare is a disturbance of the eye’s ability to adapt to amounts of light. It can cause discomfort or reduce the ability to see, or both. It occurs when some parts of the field of view are excessively bright in relation to the general level of brightness. A common example is presented by a person who is trying to watch a television set in a bright room. The ergonomic solution is to lower the lighting in the room.

The degree of glare resulting directly from light sources depends on such factors as the brightness and sizes of the sources, their position in the operator’s field of view, and the average brightness of the surroundings against which they are seen. Glare can cause discomfort without affecting the operator’s ability to see the work, especially in very bright surroundings. Ensuring that lights are placed above the line of sight will help eliminate glare.

There are three major types of glare. They are absolute, adaptive and relative glare. Absolute glare exists when luminosity is so high that adaptation is impossible. Adaptive glare exists when adaptation to a certain amount of light has not yet been reached.

Relative glare is present when there is too much of a contrast in the visual field. In addition, glare can be classified as direct or specular. Direct glare results from a light source, whereas specular glare is created by reflection from a bright surface.

Direct glare can be reduced by:

- Avoiding bright light sources within 60 degrees of the center of the visual field
- Using shields, hoods, and visors to keep the direct light source out of the viewers’ eyes
- Using indirect lighting
- Using several low intensity sources of light rather than one high intensity source

Specular glare can be reduced by:

- Using diffuse light
- Using a dull matte surface (flat paints, desk blotters) rather than polished surfaces
- Arranging direct light sources so that the viewing angle to the work is not equal to the angle of incidence from the source

**Light Sources Used in the Industrial Environment**

Daylight and electrical light are the two major sources of light used in industrial sites. Artificial light is commonly used in industrial buildings during daytime to provide additional local lighting on the work.
There are many instances where the amount of daylight in a building is inadequate or obstructed, and artificial lighting is required as permanent supplement to daylight. Daylight, however, is by far the best light source if it’s available.

**Work Areas with Nominal Lighting**

Intensity at 750 lux must be individually tested to determine whether the area is suited for display workstations. In rooms with nominal lighting intensity of 1,000 lux or higher, there should not be any display workstations, unless special precautions are taken, such as using micromesh or glare filters (polarized and/or non-reflective coating should also be considered). See table

**Recommended Work/Break Intervals**

One break (5–10 minutes) for every hour of keying moderate workloads, with more frequent, short mini breaks or pauses (30–60 seconds) for more intense VDT use.

The key to a comfortable and productive office environment is recognizing each worker as an important individual with individual needs. This recognition will increase morale and heighten productivity.
<table>
<thead>
<tr>
<th>Contributing Factors (CF)</th>
<th>Reason for CF</th>
<th>Comments</th>
<th>Ergonomic Improvements</th>
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SCOPE

This chapter provides information on the safe practices and fall protection requirements of OSHA 1926 Subpart M and 1910 Subpart D. Included is information on fall protection equipment, the types of fall protection systems and limitations regarding alternative fall protection methods.

POLICY

This company has implemented this policy to ensure that proper safe work practices and procedures are followed to protect employees from the fall hazards. A Program Administrator will be designated as the responsible person for managing and supervising the Fall Protection Program.

EMPLOYER RESPONSIBILITIES

This company will:

- Provide adequate and timely resources to support the fall protection program
- Identify fall hazards and implement procedures to eliminate or control them
- Develop and maintain written fall protection procedures wherever an active fall protection system is being used
- Inform authorized employees about a foreseeable fall hazard before exposure
- Provide continuous fall protection or ensure that such protection is available to employees and within regulations
- Provide training to operate any active fall protection systems
- Ensure supervision of employees exposed to fall hazards
- Verify all fall protection procedures are understood and followed

FALL PROTECTION PROGRAM ADMINISTRATOR

The program administrator will:

- Develop and implement the managed fall protection program
- Be knowledgeable of current fall protection regulations, standards, equipment, and systems
- Advise and provide guidance to managers, employees, and other departments on all managed fall protection program matters
- Establish and assign all duties and responsibilities outlined in this policy to trained and qualified individuals
- Provide or verify that the personnel have the necessary resources to accomplish their duties and responsibilities
- Establish and implement a system to identify, eliminate, or control new and existing fall hazards
- Ensure that written procedures for fall protection, rescue, and evacuation are developed for every foreseeable fall hazard to which persons are exposed
- Develop training programs for all Authorized Persons
- Verify that all Authorized Persons are provided with training
• Measure and evaluate the effectiveness of the managed fall protection program by: conducting periodic program evaluations and making improvements
• Participate, either personally or through a designated qualified person, in the investigation of all incidents related to falls from heights, including:
  o Reviewing incident reports
  o Taking corrective action to eliminate causes
  o Making necessary reports to management
  o Maintaining an incident report system

COMPETENT AND QUALIFIED PERSONNEL

Effective fall protection relies on the efforts of all personnel. However, each worksite that demands fall protection measures must have personnel onsite with the knowledge and authority to prevent injury as hazards arise.

Qualified Person Responsibilities

A qualified person has successfully demonstrated his or her ability to solve problems relating to the project by possession of a recognized degree, certificate or professional standing or by extensive knowledge, training and experience.

Company employees who are identified as “a qualified person” are expected to:

• Analyze and design all anchor points for structural engineering strength requirements as set by this standard and also be in compliance with local and state building code requirements
• Analyze and design all horizontal lifeline systems for structural engineering strength requirements and also be in compliance with local and state building code requirements
• Establish the clearance requirements for each fall protection system selected
• Verify the fall protection equipment system is adequate for the specific fall hazards
• Verify that available clearance is adequate before allowing persons to work at heights
• Maintain a safety factor of 2.0 against failure of the structural system for both anchor points and horizontal lifeline systems
• Establish adequate vertical and horizontal clearance requirements for each fall protection system. Analyze swing fall consideration and establish limitation requirements for each fall protection system
• Supervise design, installation, and use of horizontal lifeline systems to ensure that they can maintain a safety factor of at least twice the impact of a worker free-falling six feet
• Supervises design, installation, and use of personal fall-restraint anchorages
• Supervises design, installation, and use of personal fall-arrest anchorages
• Verify that fall protection systems have been installed and inspected in compliance with this standard and all applicable federal, state, and local regulations
• Identify, evaluate, and impose limits on the workplace activities to control fall hazard exposures and swing falls
• Communicate limits to all Authorized Persons who use the fall protection systems
• Prepare, update, and approve written fall protection, rescue, and evacuation procedures
• Specify that written fall protection rescue, and evacuation procedures include:
  o Anchorage locations
  o Connecting means
  o Body supports
  o Other required fall protection equipment
• Review the written procedures as workplace activities change for needed additional practices, procedures, or training
• Verify that Authorized Persons:
  o Are trained and have reviewed the fall protection, rescue, and evacuation procedures reviewed before work begins
  o Provide or ensure that a prompt rescue can be accomplished with the rescue and evacuation procedures
  o Participate in the investigation of all incidents related to falls from heights
  o Immediately remove from service all damaged equipment or components (and equipment or components that have experienced a fall arrest)
  o Inspect for damage and follow the manufacturer’s instructions for damaged equipment and equipment that has experienced a free-fall arrest
  o Periodically inspect all fall protection equipment as per the manufacturer’s requirements and applicable regulations

Competent Person Responsibilities
A competent person can identify existing hazards as well as potential hazards. Furthermore a competent person has the authority to take prompt corrective actions to eliminate such hazards and ensure employees are out of harm’s way until the hazards can be eliminated.

The competent person:
• Serves as the monitor in a safety-monitoring system, is responsible for recognizing hazards that cause falls, and warns workers about hazards
• Determines whether safety nets meet requirements
• Inspects a personal fall-arrest system after it arrests a fall and determines whether the system is damaged
• Evaluates alteration to a personal fall-arrest system and determines if it is safe to use
• Supervises installation of slide-guard systems
• Trains employees how to recognize fall hazards and follow safety procedures

Authorized Person Responsibilities
Company employees who are identified as “an authorized person” are expected to:
• Follow the instructions of the program administrator and the Competent Person regarding the use of fall protection systems
• Understand and adhere to the fall protection procedures
• Notify the Competent Person of unsafe or hazardous conditions or acts that may cause injury before proceeding with workplace activities
- Correctly use, inspect, maintain, store, and care for fall protection equipment and systems
- Inspect any fall protection equipment, prior to use, for defects or damage
- Notify the Competent Person of defects and damage found from inspections
- Use only equipment free of defects or damage

**FALL PROTECTION REQUIREMENTS**

Fall protection may be required in areas and activities including, but not limited to, the following:

- Ramps, runways, and other walkways
- Excavations
- Hoist areas
- Holes
- Formwork and reinforcing steel
- Leading edge work
- Unprotected sides
- Edges
- Overhand bricklaying and related work
- Roofing work
- Precast concrete erection
- Wall openings
- Residential construction
- Other walking/working surfaces

Employees will be protected from fall hazards and falling objects whenever an affected employee is above the established threshold height (6 feet for construction or 4 feet for general industry) above a lower level. Typical fall protection systems are shown in this table.

<table>
<thead>
<tr>
<th>Type of fall protection system</th>
<th>What it does</th>
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<tbody>
<tr>
<td>Personal fall-arrest system</td>
<td>Controls a fall</td>
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<tr>
<td>Personal fall-restraint system</td>
<td>Prevents a fall</td>
</tr>
<tr>
<td>Positioning-device system</td>
<td>Positions and limits fall to 2 feet</td>
</tr>
<tr>
<td>Guardrail system</td>
<td>Prevents a fall</td>
</tr>
<tr>
<td>Safety-net system</td>
<td>Controls (arrests) a fall</td>
</tr>
<tr>
<td>Warning line</td>
<td>Warns of fall hazard</td>
</tr>
</tbody>
</table>
FALL PROTECTION PLAN

Planning Fall Protection

Methods, systems, and procedures to control exposure to fall hazards must be established before work commences. Careful preparation lays the groundwork for an accident-free workplace. A site-specific fall protection plan must reflect all anticipated fall hazards at the worksite. The nature and scope of the planning effort depend on the complexity and size of the project.

Planning must at least identify fall hazards and the systems and procedures to control the hazards. Effective planning reduces exposure risks for workers during a project and for others after the project is finished. For example, anchor points used by construction workers on a project might also be used to protect window cleaners or other maintenance personnel.

Use the plan will:

- Identify all fall hazards that workers are likely to encounter during the project
- Describe how workers will gain access to the worksite (by ladders or stairs, for example)
- Describe how workers will prevent tools and materials from dropping to lower levels
- Establish procedures for inspecting, maintaining, and storing fall protection equipment
- Identify the tasks that expose workers to fall hazards
- Make sure workers use fall protection systems appropriate for their tasks
- Identify anchor point locations
- Describe the methods for setting anchors and securing lifelines
- Identify areas where workers may be exposed to falling objects and how they will be controlled
- Describe emergency-response procedures for rescuing workers who fall
- Post emergency responders’ phone numbers and make sure workers know them
- Describe all equipment that will be available for rescuing workers who fall

Assign supervisory responsibility to a competent person: A competent person must know the site-specific fall protection plan, how to perform work tasks safely and the hazards associated with those tasks. You must designate a competent person to implement the fall protection plan.

Document accountability: Your fall protection plan must describe how workers and supervisors will comply with its requirements.

Establish a training program: Everyone covered by a fall protection plan must be trained by a competent person. Be sure to document the names of those who receive fall protection training and their training dates.

The training program must cover:

- Fall hazards that workers will encounter
- Types of systems that will protect workers from falls
- Workers’ responsibilities under the fall protection plan
- Procedures for assembling, maintaining, and dissembling personal fall arrest systems
• How workers should comply with the plan
• Retraining procedures when the plan changes, tasks change or when workers are not following the plan

**Update the plan when site conditions change**: When worksite conditions change and affect how workers are protected from falling, you must update your fall protection plan so that it addresses the changes. An on-site qualified person must approve the changed plan.

The updated plan must:
• Describe the site-condition changes that required the update
• Include the qualified person’s reasons for the update
• Include the date the qualified person approved the plan changes and the person’s signature

**Investigate accidents**: If a worker falls or has a near miss incident, you must investigate the accident and, if necessary, change the plan so that similar events don’t occur.

**Keep the plan at the job site**: You must keep a copy of the fall protection plan, with all approved changes, at the job site.

**Other Fall Protection Requirements**
If activities at height include any of the following, consult the appropriate regulation and/or policy for more information on appropriate fall protection:
• Scaffolds
• Cranes and derricks
• Steel erection work
• Tunneling operations
• Electric transmission lines/equipment
• Stairways and ladders

**Covers for Roof Openings or Holes**
Roof Openings are fall hazards and must either be covered or surrounded by a guardrail. Skylights will usually break unless guarded or screened.

A cover is necessary regardless of the fall distance and includes any rigid object used to overlay openings in floors, roofs, and other walking and working surfaces. Covers must be able to support at least twice the maximum anticipated load of workers, equipment, and materials. Covers should have full edge bearing on all four sides. All covers must be color-coded or marked with the word “Hole” or “Cover” and must be secured to prevent accidental displacement.
CONVENTIONAL FALL PROTECTION

Personal Fall Arrest System

These consist of an anchorage, connectors and a body harness and may include a deceleration device, lifeline, or suitable combinations. If a personal fall arrest system is used for fall protection, it must do the following:

- Limit maximum arresting force on an employee to 900 pounds used with a body belt
- Limit maximum arresting force on an employee to 1,800 pounds used with a body harness
- Be rigged so that an employee can neither free fall more than 6 feet nor contact any lower level
- Bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet
- 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

The use of body belts for fall arrest is prohibited; however, the use of a body belt in a positioning device system is acceptable.

Personal fall arrest systems must be inspected before each use for wear, damage, and other deterioration. Defective components must be removed from service.

Anchorage - a fixed structure or structural adaptation, often including an anchorage connector, to which the other components of the PFAS are rigged

Body Wear - a full body harness worn by the worker

Connector - a subsystem component connecting the harness to the anchorage, such as a lanyard

Deceleration Device - a subsystem component designed to dissipate the forces associated with a fall arrest event

Anchor

An anchor provides a secure point of attachment for a lifeline, lanyard, or deceleration device and is perhaps the most important personal fall arrest system component. It must support a minimum load of 5,000 pounds – a challenging requirement, particularly on wood framed and residential-type structures. If you don't know how much weight an anchor will hold, you should have a qualified person design a complete fall protection system. The system must be installed under the supervision of the qualified person and it must maintain a safety factor of at least two – twice the impact force of a worker free-falling six feet.

Never use hoists or guardrails as anchors. They are not built to withstand the forces generated by a fall.
In addition to anchor strength, consider the following:

- Anchorage connector: Unless an existing anchorage has been designed to accept a lanyard or lifeline, you'll need to attach an anchorage connector — a device that provides a secure attachment point. Examples include tie-off adapters, hook anchors, beam connectors and beam trolleys. Be sure the connector is compatible with the lanyard or lifeline and appropriate for the task.
- Attachment point: The anchorage can be used only as the attachment point for a personal fall-arrest system; it can't be used to support or suspend platforms.
- Location: The anchorage should be located directly above the worker, if possible, to reduce the chance of a swing fall.
- Fall distance: Because a personal fall-arrest system doesn't prevent a fall, the anchorage must be high enough above a worker so that the arrest system, rather than a lower level, stops the fall. Consider free-fall distance, lanyard length, shock-absorber elongation, and body-harness stretch in determining the height of an anchorage.

### Body Harness

The full-body harness has straps that distribute the impact of a fall over the thighs, waist, chest, shoulders and pelvis. Before you purchase harnesses, make sure that they fit those who will use them, they're comfortable and they're easy to adjust.

A full-body harness should include a back D-ring for attaching lifelines or lanyards and a back pad for support. Never use a body belt as part of a personal fall-arrest system.

Full-body harnesses must:

- Be made from synthetic fibers
- Have an attachment point, usually a D-ring, in the center of the back at about shoulder level. The D-ring should be large enough to easily accept a lanyard snap hook
- Have chest straps that are easy to adjust and strong enough to withstand a fall without breaking
- Are made for industrial use, not recreational climbing
- They meet ANSI and CSA standards

### Connectors

An anchorage, a lanyard and a body harness are not useful until they're linked together. Connectors do the linking; they make the anchorage, the lanyard and the harness a complete system. Connectors include carabiners, snap hooks and D-rings. Connectors must be dropforged, pressed or made from formed steel or equally strong material. They must be corrosion-resistant, with smooth surfaces and edges that will not damage other parts of the personal fall arrest system.

**Carabiner**

This high-tensile alloy steel connector has a locking gate and is used mostly in specialized work such as window cleaning and high-angle rescue. Carabiners must have a minimum tensile strength of 5,000 pounds.
Snap hook

A hook-shaped member with a keeper that opens to receive a connecting component and automatically closes when released. Snap hooks are typically spliced or sewn into lanyards and self-retracting lifelines. Snap hooks must be high-tensile alloy steel and have a minimum tensile strength of 5,000 pounds. Use only locking snap hooks with personal fall-arrest systems; locking snap hooks have self-locking keepers that won’t open until they’re unlocked.

D-ring

D-rings are the attachment points sewn into a full-body harness. D-rings must have a minimum tensile strength of 5,000 pounds.

Deceleration Devices

Deceleration devices protect workers from the impact of a fall. Any mechanism with a maximum length of 3.5 feet, such as a rope grab, rip stitch lanyard, tearing or deforming lanyards, self-retracting lifelines, etc. 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 may be used as a deceleration device.

Shock Absorbing Lanyard

Because a shock-absorbing lanyard extends up to 3.5 feet, it’s critical that the lanyard stops the worker before the next lower level. Allow about 20 vertical feet between the worker’s anchorage point and the level below the working surface. Always estimate the total distance of a possible fall before using a shock-absorbing lanyard.

Remember: Never use a shock-absorbing lanyard if the shock absorber is even partially extended or if the lanyard has arrested a fall.

Self-Retracting Lanyards or Lifelines

Self-retracting lanyards and lifelines offer more freedom to move than shock-absorbing lanyards. Each has a drum-wound line that unwinds and retracts as the worker moves. If the worker falls, the drum immediately locks, which reduces free-fall distance to about two feet — if the anchorage point is directly above the worker. Some self-retracting lanyards will reduce free-fall distance to less than one foot. Self-retracting lanyards are available in lengths up to 20 feet. Self-retracting lifelines, which offer more freedom, are available in lengths up to 250 feet.

Rope Grab

A rope grab allows a worker to move up a vertical lifeline but automatically engages and locks on the lifeline if the worker falls.

When using a rope grab, keep the following in mind:

- The rope grab must be compatible with the lifeline
- The rope grab must be correctly attached to the lifeline (not upside down)
- Keep the lanyard (between the rope grab and the body harness) as short as possible
- Keep the rope grab as high as possible on the lifeline
Lifelines

A lifeline is a cable or rope that connects to a body harness, lanyard or deceleration device, and at least one anchorage. There are two types of lifelines, vertical and horizontal.

Vertical Lifeline: A vertical lifeline is attached to an overhead anchorage and must be connected directly to a worker’s full-body harness, lanyard, retractable device, or rope grab; it must have a minimum breaking strength of 5,000 pounds. When a worker needs to move horizontally, however, a vertical lifeline can be hazardous due to the potential for a swing fall — the pendulum motion that results when the worker swings back under the anchor point. A swing fall increases a worker’s risk of striking an object or a lower level during the pendulum motion.

Horizontal Lifeline: Unlike a vertical lifeline, the horizontal lifeline stretches between two anchorages. When you connect a lanyard or rope grab to a horizontal lifeline, you can move about freely, thus reducing the risk of a swing fall. However, horizontal lifelines are subject to much greater loads than vertical lifelines. Horizontal lifelines can fail at the anchorage points if they’re not installed correctly. For this reason, horizontal lifelines must be designed, installed and used under the supervision of a qualified person.

Sag Angles: Any load on a horizontal lifeline will cause it to deflect or sag. The sag angle is a horizontal lifeline’s angle of deflection when it’s subjected to a load, such as a falling worker. Reducing the sag angle (making a horizontal lifeline too tight) actually increases the force on the line during a fall. As you tighten a horizontal lifeline, you increase the impact load dramatically!

For example, when the sag angle is 15 degrees, the force on the lifeline and anchorages subjected to a load is about 2:1. However, if you decrease the sag angle to five degrees, the force increases to about 6:1.

Fall Arrest Rules

When using personal fall arrest systems:

- If you fall, the impact force to the body has to be less than 1800 pounds, achieved by using shock absorbing lanyards and a harness
- Minimize fall distance; the maximum free fall distance can only be 6 feet
- There cannot be any structures below in your fall distance
- Maximum weight of an individual w/tools is 310 pounds

OTHER FALL PROTECTION SYSTEMS AND METHODS

Those who work on elevated surfaces must be familiar with systems and methods that control their exposure to fall hazards; they must also ensure that their equipment and tools don’t endanger workers below them.

Common methods for protecting workers from falling objects include the following:

- Canopies suspended above the work area
- Barricades and fences to keep people from entering unsafe areas
- Screens, guardrail systems, and toeboards to prevent materials from falling to lower levels
The following guidelines will help you keep your tools and equipment where they belong:

- If you use toeboards, they must be strong enough to withstand a force of at least 50 lbs. applied in any downward or outward direction and be at least 3 1/2" high
- If you need to pile material higher than the top edge of a toeboard, install panels or screens to keep the material from dropping over the edge
- If you use canopies as falling object protection, make sure they won’t collapse or tear from an object’s impact
- You can use guardrails with toeboards as falling object protection if the guardrail openings are small enough to keep the objects from falling through
- When you do overhand bricklaying work, keep material and equipment – except masonry and mortar – at least four feet from the working edge. Remove excess mortar and other debris regularly
- When you do roofing work, keep materials and equipment at least six feet from the roof edge unless there are guardrails along the edge. All piled, grouped, or stacked material near the roof edge must be stable and self-supporting

**Fall Restraint System**

OSHA allows the use of a fall restraint system instead of a personal fall arrest system. The fall restraint system must be rigged to prevent a worker from reaching a fall hazard and falling over the edge. A fall restraint system can consist of a full body harness or body belt that’s connected to an anchor point at the center of a roof by a lanyard of a length that will not allow a worker to physically reach the edge of the roof.

A personal fall-restraint system prevents a worker from reaching an unprotected edge and thus prevents a fall from occurring. The system consists of an anchorage, connectors, and a body harness or a body belt. The attachment point to the body belt or full-body harness can be at the back, front, or side D-rings.

The anchorage for a fall-restraint system must support at least 3,000 pounds or be designed and installed by a qualified person and have a safety factor of at least two — twice the impact force of a worker free-falling six feet.

**Positioning Device System**

Positioning-device systems make it easier to work with both hands free on a vertical surface such as a wall or concrete form. Positioning-device systems are also called “class II Work-positioning systems” and “work-positioning systems.”

The components of a positioning-device system — anchorage, connectors, and body support — are similar to those of a personal fall arrest system. However, the systems serve different purposes. A positioning-device system provides support and must stop a free fall within two feet; a personal fall arrest system provides no support and must limit free-fall distance to six feet.

- Anchorage. Positioning-device systems must be secured to an anchorage that can support at least twice the potential impact of a worker’s fall or 3,000 pounds, whichever is greater
• Connectors. Connectors must have a minimum strength of 5,000 pounds. Snap hooks and D-rings must be proof-tested to a minimum load of 3,600 pounds without deforming or breaking.
• Body support. A body belt is acceptable as part of a positioning-device system. However, it must limit the arresting force on a worker to 900 pounds and it can only be used for body support. A full-body harness is also acceptable but must limit the arrest force to 1,800 pounds. Belts or harnesses must have side D-rings or a single front D-ring for positioning.

Guardrails

A guardrail system consists of a top rail, midrail, and intermediate vertical member. Guardrail systems can also be combined with toeboards that prevent materials from rolling off the walking/working surface.

Guardrail systems must be free of anything that might cut a worker or snag a worker’s clothing. Top rails and midrails must be at least ¼-inch thick to reduce the risk of hand lacerations; steel and plastic banding cannot be used for top rails and midrails.

Other requirements for guardrails include:
• Wire rope used for a top rail must be marked at least every six feet with high-visibility material.
• The top rail of a guardrail must be 42 inches (plus or minus three inches) above the walking/working surface. The top-edge height can exceed 45 inches if the system meets all other performance criteria.
• Midrails must be installed midway between the top rail and the walking/working surface unless there is an existing wall or parapet at least 21 inches high.
• Screens and mesh are required when material could fall between the top rail and midrail or between the midrail and the walking/working surface.
• Intermediate vertical members, when used instead of midrails between posts, must be no more than 19 inches apart.
• A guardrail system must be capable of withstanding a 200-pound force applied within two inches of its top edge in any outward or downward direction.
• Midrails, screens, and intermediate structural members must withstand at least 150 pounds of force applied in any downward or outward direction.

Safety Nets

Safety-net systems consist of mesh nets and connecting components.
• Safety-net openings can’t be more than six inches on a side, center to center.
• Safety nets must not be installed more than 30 feet below the working surface.
• An installed net must be able to withstand a drop test consisting of a 400-pound sandbag, 30 inches in diameter, dropped from the working surface.
• Inspect safety nets regularly and remove debris from them no later than the start of the next work shift.
Warning Line System

Warning line systems consist of ropes, wires, or chains, and supporting stanchions that form a barrier to warn those who approach an unprotected roof side or edge. The lines mark off an area within which one can do roofing work without using guardrails or safety nets; warning line systems can be combined with guardrail systems, personal fall arrest systems, or safety monitoring systems to protect those doing roofing work on low slope roofs (4:12 or less, 2:12 in some jurisdictions).

When mechanical equipment is not being used, the warning line shall be erected not less than 6 feet from the roof edge. When mechanical equipment is being used, the warning line shall be erected not less than 6 feet from the roof edge that is parallel to the direction of mechanical equipment operation, and not less than 10 feet (3.1 m) from the roof edge that is perpendicular to the direction of mechanical equipment operation.

Safety Monitoring System

A safety monitoring system is a set of procedures assigned to a competent person for monitoring and warning workers who may be unaware of fall hazards. A safety monitoring system used in conjunction with a controlled access zone and a fall protection plan is also appropriate in situations where conventional fall protection is not feasible.

Controlled Access Zones

The controlled access zone is best thought of as a combination of a warning line system and a safety monitoring system.

It defines an area where workers can do leading edge, overhand bricklaying and related work, or work under a fall protection plan without using conventional fall protection. All others are prohibited from entering a controlled access zone. The zone is created by erecting a control line, or lines, to restrict access to the area. The control line warns workers that access to the zone is limited to authorized persons.
Control lines must meet the following criteria:

- Consist of ropes, wires, tapes, or equivalent materials and supporting stanchions
- Be flagged at least every 6 feet with high visibility material
- Be no less than 39 inches from the working surface at its lowest point and no more than 45 inches from the working surface at its highest point (50 inches in overhand bricklaying operations)
- Have a minimum breaking strength of 200 lbs.
- For work such as overhand bricklaying, the control lines should be 10-15 ft. from the unprotected edge

**ALTERNATIVE FALL PROTECTION METHODS**

If leading edge, precast concrete erection or residential-type construction work is being performed, an alternative fall protection system can be used provided the company can demonstrate that using the conventional systems aren’t feasible or would create a fall hazard.

**Alternative Fall Protection Plan**

If implemented, an alternative fall protection plan used by this company will meet the following requirements:

- The fall protection plan will be prepared and maintained by a qualified person for the site where the work is being performed
- A copy of the fall protection plan and changes will be maintained at the job site
- A competent person will implement the fall protection plan
- The fall protection plan will document the reasons why the use of conventional fall protection systems are infeasible or why their use would create a greater hazard
- The fall protection plan will include a written discussion of other measures that will be taken to reduce or eliminate the fall hazard for workers who can’t be provided with protection from the conventional fall protection systems. For example, the employer must discuss the extent to which scaffolds, ladders, or vehicle mounted work platforms can be used to provide a safer working surface and thereby reduce the hazard of falling
- The fall protection plan will identify each location where conventional fall protection methods can’t be used. These locations will then be classified as controlled access zones and adhere to all appropriate policies and regulations
- Where no other alternative measure has been implemented, the company will implement a safety monitoring system
- The fall protection plan must include a statement that provides the name or other method of identification for each employee designated to work in controlled access zones. No other employees may enter controlled access zones
- In the event an employee falls, or some other related, serious incident occurs, the company will investigate the circumstances of the fall or other incident to determine if the fall protection plan needs to be changed (e.g. new practices, procedures, or training) and will implement those changes to prevent similar types of falls or incidents
In addition, you must:

- Describe access to controlled-access zones will be limited, including procedures that authorize workers to enter controlled-access zones
- Describe how controlled-access zones will be identified and separated from other work areas
- Identify all workers who will enter controlled-access zones

**INSPECTING AND MAINTAINING FALL PROTECTION EQUIPMENT**

Employees will inspect fall protection systems and equipment regularly for wear or damage.

- Inspect manila, plastic, or synthetic rope used for top rails or midrails or a guardrail system frequently
- Inspect safety nets at least once a week, removing defective nets from service
- Inspect PFAS or positioning device systems every time they are used
- A PFAS that has been subjected to a fall must not be used again until a competent person determines it is safe

**Lanyard Inspections**

**Snaps**

Inspect closely for hook and eye distortions, cracks, corrosion, or pitted surfaces. The keeper (latch) should seat into the nose without binding and should not be distorted or obstructed. The keeper spring should exert sufficient force to firmly close the keeper. Keeper locks must prevent the keeper from opening when the keeper closes.

**Thimbles**

The thimble must be firmly seated in the eye of the splice and the splice should have no loose or cut strands. The edges of the thimble must be free of sharp edges, distortion, or cracks.

**Wire Rope (Steel) Lanyard**

Always wear gloves when inspecting a wire rope lanyard because broken strands can cause injury. To inspect, rotate the wire rope lanyard while watching for cuts, frayed areas or unusual wearing patterns on the wire. Broken strands will separate from the body of the lanyard.

**Web Lanyard**

While bending webbing over a pipe, observe each side of the webbed lanyard. This will reveal any cuts, snags or breaks. Swelling, discoloration, cracks and charring are obvious signs of chemical or heat damage. Observe closely for any breaks in stitching.

**Rope Lanyard**

Rotate the rope lanyard while inspecting from end-to-end for any fuzzy, worn, broken or cut fibers. Weakened areas from extreme loads will appear as a noticeable change in original diameter. The rope diameter should be uniform throughout, following a short break-in period.
Shock Absorber Pack

The outer portion of the pack should be examined for burn holes and tears. Stitching on areas where the pack is sewn to D-rings, belts or lanyards should be examined for loose strands, rips, deterioration or other signs of activation.

Shock-Absorbing Lanyard

Shock-absorbing lanyards should be examined as a web lanyard. However, also look for the warning flag or signs of deployment. If the flag has been activated, remove this shock-absorbing lanyard from service.

**Common Types of Damage to Webbing and Lanyards**

**Heat**

In excessive heat, nylon becomes brittle and has a shriveled brownish appearance. Fibers will break when flexed and must not be used above 180 degrees Fahrenheit.

**Chemical**

Change in color usually appears as a brownish smear or smudge. Transverse cracks appear when belt is bent over tight. This causes a loss of elasticity in the belt.

**Ultraviolet Rays**

Do not store webbing and rope lanyards in direct sunlight, because ultraviolet rays can reduce the strength of some material.

**Molten Metal or Flame**

Webbing and rope strands may be fused together by molten metal or flame. Watch for hard, shiny spots or a hard and brittle feel. Webbing will not support combustion, nylon will.

**Paint and Solvents**

Paint will penetrate and dry, restricting movements of fibers. Drying agents and solvents in some paints will appear as chemical damage.

**Self-Retracting Lines**

**Check Housing**

Before every use, inspect the unit’s housing for loose fasteners and bent, cracked, distorted, worn, malfunctioning or damaged parts.

**Lifeline**

Test the lifeline retraction and tension by pulling out several feet of the lifeline and allow it to retract back into the unit. Maintain a light tension on the lifeline as it retracts. The lifeline should pull out freely and retract all the way back into the unit. Do not use the unit if the lifeline does not retract. Also, check for signs of damage. Inspect for cuts, burns, corrosion, kinks, frays or worn areas. Inspect any sewing (web lifelines) for loose, broken or damaged stitching.
Braking Mechanism
Test the braking mechanism by grasping the lifeline above the load indicator and applying a sharp steady pull downward to engage the brake. There should be no slippage of the lifeline while the brake is engaged. Once tension is released, the brake should disengage and the unit should return to the retractable mode. Do not use the unit if the brake does not engage.

Snap Hook
Check the snap hook to be sure it operates freely, locks, and the swivel operates smoothly. Inspect the snap hook for any signs of damage to the keepers and any bent, cracked or distorted components.

Anchorage Connection
Make sure the carabiner is properly seated and in the locked position between the attachment swivel/point on the device and the anchor point

Self-Retracting Lines

Webbing
Grasp the webbing with your hands 6 to 8 inches apart. Bend the webbing in an inverted “U.” The surface tension resulting makes damaged fibers or cuts easier to detect. Follow this procedure the entire length of the webbing, inspecting both sides of each strap. Look for frayed edges, broken fibers, pulled stitches, cuts, burns and chemical damage.

D-Rings/Back Pads
Check D-rings for distortion, cracks, breaks, and rough or sharp edges. The D-ring should pivot freely. Inspect for any unusual wear, frayed or cut fibers, or broken stitching of the D-ring attachments. Pads should also be inspected for cracks, excessive wear, or other signs of damage.

Buckles
Inspect for any unusual wear, frayed or cut fibers, or broken stitching of buckle attachments.

Tongue Buckles/Grommets
Buckle tongues should be free of distortion in shape and motion. They should overlap the buckle frame and move freely back and forth in their socket. Roller should turn freely on frame. Check for distortion or sharp edges. Inspect for loose, distorted, or broken grommets. Webbing should not have additional punched holes.

Friction and Mating Buckles
Inspect the buckle for distortion. The outer bars and center bars must be straight. Pay special attention to corners and attachment points at the center bar.

Quick-Connect Buckles
Inspect the buckle for distortion. The outer bars and center bars must be straight. Make sure buckles engage properly.
Harness Fall Arrest Indicators

Inspect fall arrest indicators (located on the back D-ring pad) for signs of activation. Remove from service if broken or stretched between any of the four pairs of arrows.

Cleaning of Equipment

Basic care for fall protection safety equipment will prolong the life of the equipment and contribute to its safety performance. Proper storage and maintenance after use is as important as cleaning dirt, corrosives or contaminants off the equipment. The storage area should be clean, dry, and free of exposure to fumes or corrosive elements.

Nylon and Polyester

Wipe off all surface dirt with a sponge dampened in plain water. Squeeze the sponge dry. Dip the sponge in a mild solution of water and commercial soap or detergent. Work up a thick lather with a vigorous back and forth motion. Then wipe the belt dry with a clean cloth. Hang freely to dry but away from excessive heat.

Housing

Periodically clean the unit using a damp cloth and mild detergent, and towel dry.

Drying

Harness, belts, and other equipment should be dried thoroughly without exposure to heat, steam, or long periods of sunlight.

EMERGENCY PLANNING

The best strategy for protecting workers from falls is to eliminate the hazards that cause falls. If you can’t eliminate the hazards, you must protect workers with an appropriate fall protection system or method. If a worker is suspended in a personal fall-arrest system, you must provide for a prompt rescue.

The emergency response plan outlines key rescue and medical personnel, equipment available for rescue, emergency communications procedures, retrieval methods, and primary first-aid requirements. Please see the chapter on Emergency Action Plans for more information.

Before Work Begins

- Identify emergencies that could affect your work site
- Establish a chain of command
- Document procedures for responding to emergencies and make sure they’re available on-site
- Post emergency-responder phone numbers and addresses at the work site
- Identify critical resources and rescue equipment
- Train on-site responders
- Identify off-site responders and inform them about any conditions at the site that may hinder a rescue effort
• Identify emergency entry and exit routes
• Make sure responders have quick access to rescue and retrieval equipment, such as lifts and ladders

During Work
• Identify on-site equipment that can be used for rescue and retrieval, such as extension ladders and mobile lifts
• Maintain a current rescue-equipment inventory at the site. Equipment may change frequently as the job progresses
• Re-evaluate and update the emergency-response plan when on-site work tasks change

When an Emergency Occurs
• First responders should clear a path to the victim. Others should direct emergency personnel to the scene. You can use 911 for ambulance service; however, most 911 responders are not trained to rescue a worker suspended in a personal fall-arrest system
• Make sure only trained responders attempt a technical rescue
• Prohibit all nonessential personnel from the rescue site

After an Emergency
• Report fatalities to OSHA within eight hours
• Report injuries requiring overnight hospitalization with medical treatment (other than first aid) to OSHA within 24 hours
• Identify equipment that may have contributed to the emergency and put it out of service
• Have a competent person examine equipment. If the equipment is damaged, repair or replace it. If the equipment caused the accident, determine how and why
• Document in detail the cause of the incident and describe how it can be prevented from happening again
• Review emergency procedures. Determine how the procedures could be changed to prevent similar events. Revise the procedures accordingly

TRAINING
This company will ensure every employee is provided training on Fall Protection. This training will be provided at no cost to the employee during working hours.

The company will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.

Training Components
The program administrator will ensure that every employee will be trained in the following minimum elements:
• The nature of fall hazards in the work area
• The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used
- The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used
- The role of each employee in the safety monitoring system when this system is used
- The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs
- The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection
- The role of employees in fall protection plans

Training Records
Training records will include the following information as a written certification:
- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of the attendees

Employee training records will be maintained for the duration of the employee’s employment.

Retraining
If the company has reason to believe that any employee who has already been trained doesn’t have the understanding and skill required, the employee must be retrained. Examples where such retraining may be required include, but are not limited to, the following:
- Changes in the workplace render previous training obsolete
- Changes in the types of fall protection systems or equipment to be used render previous training obsolete
- 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

FORMS AND ATTACHMENTS
On the following pages, please find the following document(s):
- Fall Hazard Assessment
- Employee Training for Fall Protection Certification
## Fall Hazard Assessment Checklist

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>1. Can an employee enter the area without restriction and perform work?</td>
<td>□</td>
<td>□</td>
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<tr>
<td>2. Are fall prevention systems such as cages, guardrails, toeboards and manlifts in place?</td>
<td>□</td>
<td>□</td>
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<tr>
<td>3. Have slipping and tripping hazards been removed or controlled?</td>
<td>□</td>
<td>□</td>
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<td>4. Have visual warnings of fall hazards been installed?</td>
<td>□</td>
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<tr>
<td>5. Can the distance a worker could fall be reduced by installing platforms, nets etc.?</td>
<td>□</td>
<td>□</td>
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<tr>
<td>6. Are any permanently installed floor coverings, gratings, hatches or doors missing?</td>
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<tr>
<td>7. Does the location contain any other recognized safety and or health hazards?</td>
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<td>8. Is the space designated as a Permit Required Confined Space?</td>
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<td>9. Have anchor points been designated and load tested?</td>
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## Assessment Information

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<tr>
<th>Initials</th>
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<td>Total potential fall distance:</td>
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<td>Number of workers involved:</td>
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<td>Frequency of task:</td>
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<td>Obtainable anchor point strength:</td>
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<td>Required anchor point strength: (not less than 5000 lbs.)</td>
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## Additional Requirements

### Potential environmental conditions that could impact safety:

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<th>Initials</th>
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### Possible required structural alterations:

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### Possible task modification that may be required:

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### Training requirements:

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### Personal protective equipment required:

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### Comments:

**Authorization**

- □ Approved

I certify that I have conducted a Fall Hazard Assessment of the above designated location and have detailed the findings of the assessment on this form. * Further detailed on attachment: Yes □ No □

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<thead>
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<th>Signature</th>
<th>Date</th>
<th>Time</th>
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EMLOYEE TRAINING FOR FALL PROTECTION

The Company certifies that the following employee has been trained in the understanding, knowledge, and skills necessary for the safe performance of duties assigned in areas of fall protection hazards.

________________________________________ has demonstrated proficiency in the following areas of fall protection:

☐ The nature of fall hazards in the work area.
☐ The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used.
☐ The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, personal fall restraint systems, slide guard systems, positioning devices, and other protection to be used.
☐ The role of each employee in the safety monitoring system when this system is used.
☐ The limitations on the use of mechanical equipment during the performance of roofing work.
☐ The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection.
☐ The role of employees in the fall protection work plan.

<table>
<thead>
<tr>
<th>Employee Trained by</th>
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<th>Employee Signature</th>
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cc: Employee Personnel File
POLICY

This Company is committed to creating a safe and healthy work environment. Forklifts (also known as Powered Industrial Trucks) can help employees move material safely, but create hazards that must be controlled. This forklift safety program will ensure the safe use and service of such equipment.

Each forklift operator must be competent to operate the equipment safely, as demonstrated by the successful completion of the training and evaluation specified in OSHA regulations.

EMPLOYER RESPONSIBILITIES

It is the responsibility of this Company to:

- Select and purchase equipment compliant with relevant regulations and safety standards
- Ensure safe operation of forklifts in the workplace
- Designate areas to store fuel and batteries, change and charge batteries, and maintain forklifts safely, including equipment to prevent and respond to hazard exposure
- Ensure operators and those maintaining forklifts are: 18 or older, fully trained and re-tested not less than every three years, mentally and physically competent, in receipt of a state-issued driver’s license, and knowledgeable in safe practices regarding forklifts. Exceptions for trainees over 18 are permitted
- Provide a safe work environment free from hazards to employees

EMPLOYEE RESPONSIBILITIES

Company employees are expected to:

- Be aware of hazards associated with forklifts
- Store and handle fuel and batteries in a safe manner, according to established safe procedures
- Actively participate in all training relevant to their position
- Operate forklifts safely, according to all relevant standards and regulations
- Report potentially hazardous situations or maintenance concerns as soon as safely possible
- Load and unload forklifts in a safe manner

TRAINING

The Company will ensure every employee is provided training on forklifts. This training will be provided at no cost to the employee during working hours.

The Company will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.

Trainees may operate a forklift only:

- Under the direct supervision of persons who have the knowledge, training, and experience to train operators and evaluate their competence
- Where such operation does not endanger the trainee or other employees
Training Components

Training for forklift operation will include formal instruction, practical training and evaluation. Trainers will be competent, and demonstrate the knowledge and experience necessary to both train and evaluate operators.

The Safety Coordinator will ensure that every employee who works with forklifts will be trained in the following minimum elements:

- Truck-related topics
- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate
- Differences between the truck and the automobile
- Controls and instrumentation: where they are located, what they do, and how they work
- Engine or motor operation
- Steering and maneuvering
- Visibility (including restrictions due to loading)
- Fork and attachment adaptation, operation, and use limitations
- Vehicle capacity
- Vehicle stability
- Any vehicle inspection and maintenance that the operator will be required to perform
- Refueling and/or charging and recharging of batteries
- Operating limitations
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle operated
- Workplace-related topic
- Surface conditions where the vehicle will be operated
- Composition of loads to be carried and load stability
- Load manipulation, stacking, and unstacking
- Pedestrian traffic in areas where the vehicle will be operated
- Narrow aisles and other restricted places where the vehicle will be operated
- Hazardous (classified) locations where the vehicle will be operated
- Ramps and other sloped surfaces that could affect the vehicle’s stability
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation

Refresher Training

Refresher training in relevant topics will be provided to operators under any of the following conditions:

- They operate the vehicle in an unsafe manner
- They are involved in an accident or a near-miss incident
- They receive an evaluation that reveals they are not operating the truck safely
- They are assigned to a different type of truck
- A condition in the workplace changes that could affect safe operation of the truck

**Training Records**

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions

Employee training records will be maintained for three years from the date on which the training occurred.

**Testing**

All employees must successfully pass a test no less than every three years in order to operate a forklift, except a motorized hand truck.

The test will assess the employees:

- Operating ability
- Knowledge of the equipment
- Knowledge of state safety standards
- Knowledge of daily checks

The assessment will include a performance test to determine whether the employee can operate the assigned forklift through the functions necessary to perform the required work.

Employees who have a valid permit to operate a forklift issued by another employer may be tested without receiving the training outlined above. They must receive the training, however, if they do not pass their test.

**Permits**

If employees meet the training/testing requirements, the employer may issue those employees permits to operate applicable forklifts. Permits must be carried by employees, and the employer must keep a list of permits issued. Permits must list the specific truck(s) that the named employee is qualified to operate. Also included should be the name of the issuing Company/employee, and the issue/expiration dates.

Trainees are exempt from the permit requirement for a period of not more than 30 days if they are under the supervision of an authorized, competent individual.
SAFE PRACTICES

Design and Construction Requirements

Forklifts and attachments will be selected based on the work performed, with utmost concern for the safety and wellbeing of employees. All forklifts will meet OSHA-approved design and construction requirements for trucks of their type.

Labels, Nameplates, Markings

Any forklift in use will bear a label that indicates approval by a nationally recognized testing lab. This durable, corrosion-resistant nameplate must be inscribed with the following information:

- Truck model and serial number
- Truck weight
- designation of compliance with the mandatory requirements of ASME B56.1, "Safety Standard for Low and High Lift Trucks," applicable to the manufacturer
- Type designation to show conformance with the requirements, such as those prescribed by Underwriters Laboratories, Inc., and Factory Mutual Research Corporation; and Capacity

Before employees operate a forklift, they must demonstrate the ability to read and interpret truck nameplates to prevent overloading or other improper use.

Modifications and Attachments

Any modification or addition to industrial trucks used that will affect their capacity or safe operation requires the written approval of the original manufacturer of that truck. If equipped with an after-market attachment, the truck will be marked to indicate the approximate weight of the truck with the attachment.
SAFETY GUARDS AND OTHER COMPONENTS

Overhead Guard

An end control, reach, narrow aisle, order picker high-lift, order picking and stacking, and motorized hand rider truck must be equipped with an overhead guard that extends beyond the operator’s position on each side. The guard must be able to withstand a compression load equal to impact of the maximum load capacity. The guard must permit rapid and unobstructed access to and from the truck. All high-lift rider trucks, order-picker trucks and rough-terrain forklift trucks must be equipped with an overhead guard in accordance with OSHA regulations and ANSI B56.1, "Safety Standard for Low and High-Lift Trucks".

Seat Belts

If the forklift is equipped with a seat belt or any operator restraint system designed to contribute to the safety of truck operation, the operator is required to use the restraint.

Handling Controls and Guards

With regard to levers or handle-type controls, including toggle switches, the sense of rotation of the control handle should be in the same direction as the desired motion of the mast or load (if the load should go forward, the control should go forward, etc.).

Moving parts that represent a hazard from the operator's position must be protected by suitable guards.

Vertical Load Backrest

A load backrest extension prevents the load from shifting back when the carriage is lifted to full height and will be used when necessary to prevent any part of a load from falling rearward.

Steering Controls

Except on a motorized hand and motorized hand or rider truck, the steering controls of a forklift are best suited to be contained inside the truck. If they are not, the steering controls must be guarded to prevent injury to the operator's hands during movement of the truck.

On a motorized hand and motorized hand or rider truck, the steering handle must be provided with a guard or device to protect the operator's hands from injury when passing obstacles.

A spinner knob must not be attached to a steering hand wheel of a truck unless: it was originally equipped with such; the truck is equipped with power steering or the truck is equipped with an anti-kickback device on the steering mechanism. If installed, the knob must be placed within the periphery of the hand wheel.

Platforms

An employee must not be lifted or transported on a forklift, except when a platform is attached to the forks by enclosed sleeves, a safety chain or a mechanical device that prevents the platform from tipping or slipping.
Personnel on a platform must have a means to shut off power to the truck. Protection from falling objects must be provided to personnel on a platform as necessitated by the environment and operating conditions.

A platform must be equipped with a railing not less than 36 inches or more than 42 inches high, and a toeboard. The railing must consist of one of the following materials:

- Wood posts of at least 2x4-inch nominal stock; the top rail must be made of two right-angle pieces of not less than 1x4-inch nominal stock and an intermediate rail of 1x4-inch nominal stock
- Steel or aluminum pipe posts and rails of not less than one inch inside diameter, and an intermediate rail of ¾-inch inside diameter pipe
- Structural steel or aluminum posts, rails, and an intermediate rail of angle iron of not less than 1x1x 3/16 inch size, or other shapes of equal strength

The intermediate rail may be omitted from one side.

A toeboard must be made of not less than 1x4-inch nominal wood stock, or a material of equal strength.

**Other Safety Guards**

Forklifts may be equipped with a range of other devices designed to contribute to safe operation. Employees will maintain all safety equipment in good repair, and all operators must understand the use of such safety equipment and devices. These include, but are not limited to the following: horns, flashing warning lights, backup alarms, directional signals, fire extinguisher and mirrors.

**Forklift Classes**

Forklifts come in a range of sizes and configurations; the industrial truck association classifies industrial trucks into eight categories that suggest the utility of the truck. Each class is subdivided by lift codes. Table 1 outlines the classifications and lift codes of forklifts.
### Table 1: Forklift Classes and Lift Codes

<table>
<thead>
<tr>
<th>Classes</th>
<th>Lift codes</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class I: electric motor rider trucks</td>
<td>1</td>
<td>Counterbalanced rider type, stand up</td>
</tr>
<tr>
<td>Class I: electric motor rider trucks</td>
<td>4</td>
<td>Three wheel electric truck, sit down</td>
</tr>
<tr>
<td>Class I: electric motor rider trucks</td>
<td>5</td>
<td>Counterbalanced rider type, cushion tires, sit down</td>
</tr>
<tr>
<td>Class I: electric motor rider trucks</td>
<td>6</td>
<td>Counterbalanced rider, pneumatic or either tire type, sit down</td>
</tr>
<tr>
<td>Class II: electric motor narrow aisle trucks</td>
<td>1</td>
<td>High lift straddle</td>
</tr>
<tr>
<td>Class II: electric motor narrow aisle trucks</td>
<td>2</td>
<td>Order picker</td>
</tr>
<tr>
<td>Class II: electric motor narrow aisle trucks</td>
<td>3</td>
<td>Reach type outrigger</td>
</tr>
<tr>
<td>Class II: electric motor narrow aisle trucks</td>
<td>4</td>
<td>Side loaders, turret trucks, swing mast and convertible turret/stock pickers</td>
</tr>
<tr>
<td>Class II: electric motor narrow aisle trucks</td>
<td>6</td>
<td>Low lift pallet and platform (rider)</td>
</tr>
<tr>
<td>Class III: electric motor hand trucks</td>
<td>1</td>
<td>Low lift platform</td>
</tr>
<tr>
<td>Class III: electric motor hand trucks</td>
<td>2</td>
<td>Low lift walkie pallet</td>
</tr>
<tr>
<td>Class III: electric motor hand trucks</td>
<td>3</td>
<td>Tractors</td>
</tr>
<tr>
<td>Class III: electric motor hand trucks</td>
<td>4</td>
<td>Low lift walkie/center control</td>
</tr>
<tr>
<td>Class III: electric motor hand trucks</td>
<td>5</td>
<td>Reach type outrigger</td>
</tr>
<tr>
<td>Class III: electric motor hand trucks</td>
<td>6</td>
<td>High lift straddle</td>
</tr>
<tr>
<td>Class III: electric motor hand trucks</td>
<td>7</td>
<td>High lift counterbalanced</td>
</tr>
<tr>
<td>Class III: electric motor hand trucks</td>
<td>8</td>
<td>Low lift walkie/rider pallet</td>
</tr>
<tr>
<td>Class IV: internal combustion engine trucks (cushion tires only)</td>
<td>3</td>
<td>Fork, counterbalanced (cushion tire)</td>
</tr>
<tr>
<td>Class V: internal combustion engine trucks (pneumatic tires only)</td>
<td>4</td>
<td>Fork, counterbalanced (pneumatic tire)</td>
</tr>
<tr>
<td>Class VI: electric and internal combustion engine tow tractors</td>
<td>1</td>
<td>Sit-down rider</td>
</tr>
<tr>
<td>Class VII: rough terrain fork lift trucks</td>
<td>1</td>
<td>All rough-terrain lift trucks</td>
</tr>
<tr>
<td>Class VIII: personnel and burden carriers</td>
<td>1</td>
<td>All personnel and burden carriers</td>
</tr>
</tbody>
</table>
High-Lift, Order-Picker Trucks

All of the following apply to high-lift, order-picker trucks:

- A removable operator platform (device) must directly attach to the lifting means (the forks themselves or unattached boards, planks, etc. are prohibited from serving as a platform)
- The operator platform must be equipped with side guardrails
- When the platform is elevated, the horizontal travel speed of the truck must be automatically reduced to a degree necessary to maintain stability under maximum braking load and turning

When the high-lift truck is equipped with vertical-only or vertical and horizontal controls traveling with the lifting carriage or forks for lifting an employee, employers must assure that the following is provided:

- A platform equipped with a railing or other limiting device, including but not limited to a chain, strap, or tether
- A control device that allows the employee on the platform to shut off power to the truck
- Protection from falling objects, as indicated necessary by the operating conditions

INDUSTRIAL TRUCK DESIGNATIONS AND OPERATING LOCATIONS

Workplace hazards may limit the types of forklifts permitted in the workplace. Internal combustion engines and electric motors may ignite flammable atmospheres. This Company will follow all restrictions on trucks in potentially hazardous environments. OSHA provides guidelines based on NFPA standards to establish the types of safeguards that must be present in trucks used in such environments.

Designations

In addition to classification based on the configuration, use and features of the truck, forklifts are categorized based on safety features and power sources to indicate in which potentially hazardous locations the truck may be used. Table 2 lists the designations of industrial trucks based on their power sources and safeguards.
### Table 2: Designations of Forklifts

<table>
<thead>
<tr>
<th>Power Source</th>
<th>Class</th>
<th>Safeguards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diesel</td>
<td>D</td>
<td>minimum</td>
</tr>
<tr>
<td></td>
<td>DS</td>
<td>exhaust, fuel and electrical systems</td>
</tr>
<tr>
<td></td>
<td>DY</td>
<td>exhaust, fuel and electrical systems; no electrical equipment including the ignition; temperature limitation features</td>
</tr>
<tr>
<td>Electric</td>
<td>E</td>
<td>minimum</td>
</tr>
<tr>
<td></td>
<td>ES</td>
<td>electrical system (prevent emission of hazardous sparks, limit surface temperatures)</td>
</tr>
<tr>
<td></td>
<td>EE</td>
<td>electrical system; electric motors and all other electrical equipment completely enclosed</td>
</tr>
<tr>
<td></td>
<td>EX</td>
<td>electrical system; electric motors and all other electrical equipment completely enclosed; electrical fittings and equipment designed, constructed and assembled to be used in certain atmospheres containing flammable vapors or dusts</td>
</tr>
<tr>
<td>Gasoline</td>
<td>G</td>
<td>minimum</td>
</tr>
<tr>
<td></td>
<td>GS</td>
<td>exhaust, fuel and electrical systems</td>
</tr>
<tr>
<td>Liquefied Petroleum Gas</td>
<td>LP</td>
<td>minimum</td>
</tr>
<tr>
<td></td>
<td>LPS</td>
<td>exhaust, fuel and electrical systems</td>
</tr>
</tbody>
</table>

### Internal Combustion Engines

Forklifts powered by internal combustion engines run on a variety of fuels, including gasoline, diesel fuel, liquid petroleum gas (LPG), and compressed natural gas. Forklifts with internal combustion engines can be quickly refueled but require regular maintenance checks for leaks of fuel or oil and worn parts to keep systems working properly. Forklifts powered by internal combustion engines used indoors may increase worker exposure to exhaust and noise.

Safeguards to exhaust, fuel and electrical systems, as well as electrical equipment limitations and temperature limitation features allow internal combustion engine trucks in certain designated locations.

### Electric

Electric-powered forklifts are most commonly used indoors in warehouses. Unlike internal combustion forklifts, electric forklifts are quiet and generally non-polluting but present other hazards to address, specifically related to batteries and their charging.
Safeguards to the electrical system, motors, fittings and equipment, and special construction must still be in place for operation of such trucks in certain locations.

**Locations**

OSHA and NFPA classify environments to define which designations of industrial trucks are appropriate to use with the hazards present. Table 3 indicates hazardous location classifications and indicates which types of industrial trucks have sufficient safeguards for such locations.

**OTHER OPERATING ENVIRONMENT CONCERNS**

Any environment where employees operate forklifts will provide the necessary protection to allow safe use.

**Lighting**

If lighting is less than two lumens/ft\(^2\), the truck will be equipped with directional lighting.

**Noxious Gases and Fumes**

Trucks with internal combustion engines produce exhaust and fumes that may be hazardous to forklift operators and other employees. The concentration of carbon monoxide gas must not exceed 50ppm or the levels specified by OSHA, whichever is less. Trucks powered by an internal combustion engine require well-ventilated areas.

**Loading Trucks, Trailers, and Railroad Cars**

Operators must take the following precautions when loading or unloading from trucks or railroad cars to ensure safety:

- The brakes of highway trucks must be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling when boarded with forklifts
- Wheel stops or other recognized positive protection must prevent railroad cars from moving during loading or unloading operations (including while dockboards or bridge plates are in position)
- Provisions must be made to isolate rail cars during switching operations
- Fixed jacks may be necessary to support a semitrailer and prevent upending during the loading or unloading when the trailer is not coupled to a tractor
- The landing gear of all semi-trailers must be visually inspected immediately before the trailer is uncoupled from the tractor to assure the landing gear is fit to support the imposed load
- Employers must ensure that the flooring of trucks, trailers, and railroad cars is safe, free from breaks and weakness, before it is driven onto
## SUMMARY TABLE ON USE OF INDUSTRIAL TRUCKS IN VARIOUS LOCATIONS

### Classes

<table>
<thead>
<tr>
<th>Description of classes</th>
<th>Class I Locations</th>
<th>Class II Locations</th>
<th>Class III Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Locations not possessing atmosphere as described in other columns</td>
<td>Locations in which flammable gases or vapors are, or may be, present in the air in quantities sufficient to produce explosive or ignitable mixtures</td>
<td>Locations which are hazardous because of the presence of combustible dust</td>
<td>Locations where easily ignitable fibers or flyings are present but not likely to be in suspension in quantities sufficient to produce ignitable mixtures</td>
</tr>
</tbody>
</table>

### Examples of locations or atmospheres in classes or groups

- **Acetylene**
- **Hydrogen**
- **Ethyl ether**
- **Gasoline, Naptha, Alcohol, Acetone, Lacquer solvent, Benzene**
- **Metal dust**
- **Carbon black coal dust, coke dust**
- **Grain dust, flour dust, starch dust, organic dust**
- **Baled waste, cocoa fiber, cotton, excelsior, hemp, flax, jute, jute, oakum, asil, Spanish moss, synthetic fibers, tow**

### Classes

<table>
<thead>
<tr>
<th>Classes</th>
<th>Unclassified</th>
<th>Class I Locations</th>
<th>Class II Locations</th>
<th>Class III Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Divisions</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Nature of hazardous conditions</td>
<td>Above condition exists continuously, intermittently, or periodically under normal operating conditions.</td>
<td>Above condition may occur accidentally as due to a puncture of a storage drum.</td>
<td>Explosive mixture may be present under normal operating conditions, or where failure of equipment may cause the condition to exist simultaneously with arcing or sparking of electrical equipment, or where dusts of an electrically conducting nature may be present.</td>
<td>Explosive mixture not normally present, but where deposits of dust may cause heat rise in electrical equipment, or where such deposits may be ignited by arcs or sparks from electrical equipment.</td>
</tr>
</tbody>
</table>

### Authorized uses of trucks by types in groups of classes and divisions

### Divisions

<table>
<thead>
<tr>
<th>Classes</th>
<th>Unclassified</th>
<th>Class I Locations</th>
<th>Class II Locations</th>
<th>Class III Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Divisions</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Gasoline</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type G</td>
<td>G**</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type GS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type LP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type LPS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LP-Gas</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type LP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type LPS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Para. Ref. in No. 505</td>
<td>210.211</td>
<td>201(a)</td>
<td>203(a)</td>
<td>205(a)</td>
</tr>
</tbody>
</table>

** Trucks conforming to these types may also be used — see subdivision (d)(3)(a) and (c)(2)(d)(b)**
Dockboards and Bridgeplates

Dockboards and bridgeplates must:

- Be strong enough to carry the load driven over them
- Include a carrying capacity that is clearly marked
- Be secured in position by anchoring or devices that will prevent it from slipping
- Include handholds or other means for placement that will protect the employee during handling; where a fork truck is used, fork loops, pockets, or lugs will be provided for safe handling
- Have a slip-resistant surface, such as a tread plate
- Be designed so that the edges have sufficient contact with the dock or loading platform to prevent the board or plate from rocking or sliding out of position
- Have curbs if it is used by a forklift to bridge an opening more than 18 inches wide; the height of the curbs must be at least 15% the diameter of the largest tire of the truck, but need not exceed three inches

A positive means such as, but not limited to, chocks, blocks or brakes must be used to restrict a vehicle or rail car from moving while a dockboard/plate is in position

MAINTENANCE AND RELATED CONCERNS

Policy requires all equipment to remain in good repair and for operators to use equipment in an always-safe manner. Any power-operated industrial truck not in safe operating condition must be removed from service so authorized personnel may repair it. All maintenance, refueling and battery charging will be performed in a way to ensure the safety of employees.

Pre-Operation Inspection

Industrial trucks must be examined daily or after each shift if used around the clock, and before being placed in service. Operators must report any defects immediately after they are found so that an authorized person can service the truck appropriately. An example pre-operation daily checklist is included at the end of this chapter, but one specific to the truck in service should be available from its manufacturer.

Visual Check

Before starting the vehicle, an operator must conduct a pre-operation (or pre-start) inspection to check a variety of items, including but not limited to:

- Fluid levels — oil, water, and hydraulic fluid
- Leaks, cracks or any other visible defect including hydraulic hoses and mast chains. Operators should not place their hands inside the mast. Use a stick or other device to check chain tension
- Tire condition and pressure including cuts and gouges
- Condition of the forks, including the top clip retaining pin and heel
- Load backrest extension
- Finger guards
Safety decals and nameplates. Ensure all warning decals and plates are in place and legible. Check that information on the nameplate matches the model and serial numbers and attachments.

- Operator manual and legible nameplate
- Operator compartment. Check for grease and debris
- All safety devices are working properly including the seat belt

In addition to this general inspection, operators must check forklift-specific (electric or internal combustion, including liquid propane) features.

**Operational Check**

After completing the pre-operation inspection, operators should conduct an operational inspection with the engine running. This inspection includes:

- Accelerator linkage
- Brakes
- Drive control: forward and reverse
- Hoist and lowering control
- Horn (mandatory, except for motorized hand trucks)
- Back-up alarm (if equipped)
- Inch control (if equipped)
- Steering
- Tilt control: forward and back
- Attachment control
- Lights
- Hour meter

**REPORTING**

Employees/operators must report to their supervisor immediately:

- All defects, physical or operational, related to forklifts, including unusual noises or vibrations, leaks, broken parts, deficiencies in operation, etc.

Note: The defect must be fully repaired before the forklift is returned to service.

- All accidents or near misses, regardless of whether or not they were the cause of injury or death. A review of these incidents must take place, and employees must be instructed on safe operating procedures in order to prevent the same or similar events from happening again.
- All damage to Company property or the property of others, including the forklift itself, buildings, trailers, rail cars, equipment, products or inventory, etc.

**GASOLINE, DIESEL, AND LIQUID PETROLEUM GAS**

**Handling and Storage**

Liquid petroleum gas: Liquid petroleum gas (LPG) is a commonly used fuel for forklifts. It is a safe fuel when handled properly. However, LPG is extremely flammable and extremely cold when exposed to atmosphere. When handled improperly, it can cause serious injury or death. Areas to refuel LPG-powered trucks must permit vapors to dissipate and must be away from heat sources. Only authorized personnel will replace LPG containers. LP gas must be used and stored as specified in 1910.110, “Storage and Handling of Liquefied Petroleum Gases.”
Gasoline and diesel fuel: Refueling with gasoline or diesel presents the potential hazard of exposure to explosive fumes. Handling and storage of gasoline and diesel fuel must adhere to the provisions in 1910.106, “Flammable and Combustible Liquids.”

**Refueling**

Refueling will be restricted to safe, designated locations that are posted as such, preferably outdoors, and not less than 25 feet from a source of open flame or spark. Safety fuel cans must be provided where forklifts are refueled with gasoline at any location other than a gas pump area.

Forklift operators will adhere to the following requirements and recommended practices:

- Stop the engine during refueling
- Don’t smoke while refueling, and do not check the fuel level with an open flame
- Don’t allow the forklift to become low on fuel or run out of fuel. Sediment or other impurities in the tank drawn into the fuel system can cause difficulties in starting and damage internal components
- Fill the fuel tank at the end of each day
- Don’t fill the tank to the top; it may overflow because fuel expands as it is heated
- Follow correct refueling procedures:
  - Park the forklift in the designated refueling area
  - Place the transmission in neutral
  - Lower the forks to the ground
  - Engage the parking brake
  - Shut off the engine
  - Open the filler cap
  - Fill the tank slowly (if spillage occurs, wipe off and wash area with water)
  - Close the filler cap

Employers must ensure that employees are protected from exposure to airborne contaminants created in exhaust gases (e.g., carbon monoxide) of fossil fuel forklifts when levels approach permissible exposure limits.

**CHANGING AND CHARGING BATTERIES**

The lead-acid batteries that power electric trucks require routine charging and infrequent changing. If battery-powered forklifts are used, the Safety Committee or the safety coordinator will work with the appropriate personnel to develop facility-specific safety procedures based on manufacturer’s recommendations and the following guidelines:

- The operator will position the truck and apply breaks before the battery may be changed or charged
- Appropriate lifting equipment must be used to lift the battery (a conveyor, overhead hoist, or equivalent), ensuring the safe handling and servicing of the battery
- An employee must not place their body under a forklift or its component(s) unless the truck or component(s) is supported by properly arranged blocks or jack stands capable of supporting, in total, a minimum of 1½ times the weight of the truck or component(s) that is above the employee
• Authorized personnel should only pour acid into water when charging batteries, never the other way around
• Care must be taken to assure that vent caps are functioning. The battery (or compartment) cover(s) must be open to dissipate heat
• Individuals should remove metal jewelry before charging or servicing batteries, and keep all other metallic objects from the top of uncovered batteries
• Appropriate PPE should be worn
• Check the water level. Do not add water before recharging. Record in service log
• Check the voltage. If the battery has sealed vents, do not recharge with a current greater than 25 amperes
• Unplug and turn off the charger before connecting or disconnecting the clamp connections
• Attach the positive clamp (+, usually colored red) to the positive terminal first and then the negative clamp (−, usually colored black) to the negative terminal, keeping the proper polarity
• Turn off the charger if the battery becomes hot or the electrolyte fluid comes out of the vents. Restart charging at a lower charging rate
• Check water level after charging. Add distilled water or de-ionized water if water level is below level indicator. Record in service log
• Return battery to forklift with lifting beam and secure in place after charging
• Check the indicator on the hour meter to see if the battery is fully charged

A spreader bar or equivalent must be used with any overhead battery hoist so that the lifting stresses are vertical.

When a chain-type or hand hoist is used, the battery must be covered to prevent the cell connectors or terminals from shorting on the chain, or on other tools and metallic objects.

Under normal operating conditions, forklift batteries remain in service for 2,000 charge/discharge cycles. The battery maintenance program is designed to increase the life of the batteries and help protect employees.

Battery failure could lead to mechanical breakdowns and possible accidents involving forklift operators and/or other personnel. Therefore:

• Don’t continue a battery in service merely because it continues to deliver power
• Don’t exceed the service hours in the manufacturer’s recommendations
• Don’t overcharge or undercharge batteries
• Avoid discharging batteries beyond the manufacturer’s discharge level. This can result in permanent battery damage and shorten battery life considerably
• Observe and act upon the warning signs of a low battery, including slow starting, dim headlights, and the ammeter indicating discharge at high RPM
• Recycle or properly dispose of batteries. Spent batteries are a hazardous waste unless properly reclaimed at a lead smelter or battery recycler

Appropriate precautions to control the hazards from battery acid include personal protective equipment and a detailed safety procedure formulated by the safety committee to respond to an acid splash or spill.
Battery Charging and Changing Areas

Trained and authorized employees will charge and change batteries only in designated areas. Smoking and other ignition source are forbidden in battery charging areas, including but not limited to open flames, sparks or electric arcs.

Facilities will be provided as needed for flushing and neutralizing spilled electrolyte, for fire protection, for protecting charging apparatus from damage by trucks, and for adequate ventilation for dispersal of fumes from gassing batteries.

Employers will assure that their properly equipped battery charging area will have:

- No smoking
- Warning signs posted
- Adequate fire protection
- Ample and readily available water supply for flushing and neutralizing spilled electrolyte
- Adequate protection from corrosive electrolyte solutions, if present, including: any necessary PPE such as eye protection, suitable facilities for the quick drenching or flushing of the eyes and body (an eyewash station should be able to provide a 15-minute flow, and large installations should include a plumbed drench shower) within the work area
- Any necessary PPE, as well as to provide protection from electrolyte solutions
- A phone or other means of communication in the event of an emergency
- Adequate ventilation to avoid the buildup of hydrogen gas during battery charging
- Soda ash or other neutralization materials in the immediate area
- A dry chemical, CO₂ or foam fire extinguisher
- Means to protect charging apparatus from damage from trucks
- Chock blocks, support blocks, or safety/jack stands, for use when there is a hazard from movement, or for support when forklifts are elevated by a hoist or chain

Other Maintenance Concerns

Following are requirements of OSHA regarding the maintenance of forklifts:

- Make repairs to forklifts only in designated locations, away from fire hazards, never in class I, II or III locations
- Replacement parts for trucks must be equivalent to the original parts in terms of safety and the truck’s configuration will not be altered
- Keep open flames away from batteries and fuel tanks and disconnect the battery before making any electrical system repair
- Any alteration, removal or addition of parts, or change in their configuration must be in accordance with manufacturer recommendations, and should generally not be undertaken
- The truck manufacturer must approve additional counterweighting of fork trucks
- Water mufflers must be filled daily or as frequently as is necessary to prevent depletion of the supply of water below 75 percent of the filled capacity
- Vehicles with mufflers having screens or other parts that may become clogged will not be operated while such screens or parts are clogged
Personnel will immediately remove from service (and repair) any vehicle if:
- It emits hazardous sparks or flames from the exhaust system
- The service and parking brakes do not perform their intended function
- The fuel system leaks
- A lift cylinder of a load-engaging means allows a downward drift of the load-engaging means, loaded or unloaded, in excess of 5 inches in 5 minutes
- A tilt cylinder of a mast allows a forward drift of the mast in excess of 2 degrees in 5 minutes with the mast in a vertical position and a capacity load on the fork or load engaging means
- The steering mechanism allows free play of the steering wheel of more than ¼ turn on trucks capable of speeds up to 8 miles per hour and more than ⅛ turn on trucks capable of speeds over 8 miles per hour
- A hydraulic system leaks and creates a hazard for employees or equipment in the area
- It exhibits a part for which the temperature exceeds normal operating temperature (allow the part to cool)
- It is found to have any part in need of repair, or if the truck exhibits any defect that would render it unsafe or unfit for efficient and capable use

Employees must keep trucks in a clean condition, free of lint, excess oil and grease. Employees will use only noncombustible agents to clean trucks.

Industrial trucks approved for gasoline may be converted to use liquefied petroleum gas fuel provided the complete conversion results in a truck that embodies the features specified for LP or LPS designated trucks.

TRUCK OPERATIONS

OSHA requires forklift operators to safeguard other employees at all times and to adhere to the following rules to ensure safe operation.

- Don’t drive trucks up to anyone standing in front of a bench or other fixed object
- Don’t stand or pass under the elevated portion of any truck, whether loaded or empty
- Don’t permit unauthorized personnel to ride on forklifts. Regulations permit passengers only when there is a seat under an overhead guard
- Keep arms and legs away from between the uprights of the mast or outside the running lines of the truck
- Maintain a safe distance from the edge of ramps or platforms while on any elevated dock, or platform or freight car. Don’t use trucks to open or close freight doors
- Ensure that there is sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
- Keep fire aisles, access to stairways, and fire equipment clear
- Don’t use a forklift to tow or push railroad cars, unless it is specifically designed for it. Don’t open or close freight car doors with a forklift unless it’s equipped with attachments designed for that purpose
- When operating a forklift in a hazardous area, only a truck specifically equipped for those types of operations will be used
Maneuvering and Traveling

- Observe all traffic regulations, including speed limits, and maintain a safe distance (approximately three truck lengths) from the truck ahead. Keep the truck under control at all times.
- Yield right of way to ambulances, fire trucks, or other vehicles in emergencies.
- Do not pass other vehicles traveling in the same direction at intersections, blind spots, or other dangerous locations.
- Slow down and sound the horn at cross aisles and other locations where vision is obstructed. If the load obstructs forward view, the driver must travel with the load trailing.
- Cross railroad tracks diagonally where possible. Park no closer than 8½ feet from the center of railroad tracks.
- Look in the direction of, keep a clear view of, and survey the path of travel before moving and stacking in order to avoid obstacles.
- Ascend or descend grades slowly.
- When ascending or descending grades in excess of 10 percent, drive at a speed no more than 2 miles per hour.
- When ascending or descending grades in excess of 10 percent, or if the grade exceeds the back-tilt of the mast, loads must face upgrade.
- On grades, tilt back the load-engaging means and safely raise the load to clear the road surface.
- Unloaded trucks must be driven, on all grades, with the load-engaging means downgrade, tilted back, and raised only as far as necessary to clear the floor or road surface.
- Under all travel conditions, operate the truck at a speed that will permit it to be brought to a stop in a safe manner.
- Don’t engage in stunt driving or horseplay.
- Slow down for wet and slippery floors.
- Drive over dockboard or bridgeplates carefully and slowly, maintaining a safe distance from the edges of ramps and platforms, especially on elevated docks.
- Approach elevators slowly, entering them squarely only after the elevator car is properly leveled. Once on the elevator, neutralize controls, shut off power and set brakes. Ensure the weight of the load and truck does not exceed the load capacity of the elevator.
- Avoid running over loose objects on the roadway surface.

**SLOW YOUR ROLL!**

Forklift operators must slow down in the following situations:

- When approaching within three truck lengths of another truck.
- At cross aisles and anywhere vision is obstructed.
- On grades.
- When going too fast to come to a safe stop.
- On wet or slippery floors.
- On dockboards or bridgeplates.
- Approaching elevators.
- Negotiating turns.
While negotiating turns, reduce speed 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, turn the hand steering wheel only at a moderate, even rate

Motorized hand trucks must enter confined areas with load end forward

**Load Handling**

- All loads will be within the rated capacity of the truck. Never exceed rated capacity
- Handle only stable or safely arranged loads. Exercise caution when handling off-center loads which cannot be centered
- Long or high loads that may affect vehicle load capacity when lifted beyond a certain height must be handled with care. Divide the load into smaller quantities or use heavier equipment as necessary
- Ensure that operational safety is maintained when carrying larger loads
- When not handling a load, operate trucks with attachments as partially loaded trucks
- Place the load engaging means under the load as far as possible; carefully tilt the mast backward to stabilize the load
- Use extreme care when tilting the load forward or backward, particularly when high tiering. Don't tilt load-engaging means forward while elevated except to pick up a load. Don't tip an elevated load forward unless the load is in a deposit position over a rack or stack. When stacking or tiering, use only enough backward tilt to stabilize the load

**Parking**

A forklift operator will adhere to the following procedures (see Figure 1) to dismount the truck:

- A forklift is unattended when the operator is 25 ft. or more away from the vehicle in his view, or whenever the operator leaves the vehicle and it is not in his view
- When the operator of an industrial truck is dismounted and within 25 ft. of the truck still in his view, the load engaging means must be fully lowered, controls neutralized (shut off), and the brakes set to prevent movement. The wheels must be blocked if the truck is parked on an incline
- The parking brake must be capable of holding the truck on the maximum grade that the truck can negotiate with a rated load, or on a 15% grade, whichever is less
Parking Your Forklift

Will operator dismount truck?

- Fully lower load engaging means.
- Neutralize controls
- Set brakes to prevent movement.
- Dismount truck.

Is truck parked on an incline?

- Yes
  - Block wheels.
- No
  - Will truck be in view of operator?
    - Yes
      - Truck will be unattended. Operator must shut off power before leaving unattended.
    - No
      - Truck is still attended. It is not required to shut off power.

Will operator be 25 ft. or more away?

- Yes
- No
FORMS AND ATTACHMENTS

On the following pages, please find the following document(s):

- Performance Evaluation for Forklift Operators
- Forklifts Training Record Sheet
PERFORMANCE EVALUATION FOR FORKLIFT OPERATORS

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- ☐ Shows familiarity with truck controls.
- ☐ Gave proper signals when turning.
- ☐ Slowed down at intersections.
- ☐ Sounded horn at intersections.
- ☐ Obeyed signs.
- ☐ Kept a clear view of direction of travel.
- ☐ Turned corners correctly—was aware of rear-end swing.
- ☐ Yielded to pedestrians.
- ☐ Drove under control and within proper traffic aisles.
- ☐ Approached load properly.
- ☐ Lifted load properly.
- ☐ Maneuvered properly.
- ☐ Traveled with load at proper height.
- ☐ Lowered load smoothly/slowly.
- ☐ Stops smoothly/completely.
- ☐ Load balanced properly.
- ☐ Forks under load all the way.
- ☐ Carried parts/stock in approved containers.
- ☐ Checked bridge-plates/ramps.
- ☐ Did place loads within marked area.
- ☐ Did stack loads evenly and neatly.
- ☐ Did drive backward when required.
- ☐ Did check load weights.
- ☐ Did place forks on the floor when parked, controls neutralized, brake on set, power off.
- ☐ Followed proper instructions for maintenance—checked both at beginning and end.

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**Daily Inspection Checklist for Forklifts**

### Key-Off Procedures
- Overhead guard
- Hydraulic cylinders
- Mast assembly
- Lift chains and rollers
- Forks
- Tires
- Gas gauge
- Check the engine oil level
- Examine the battery
- Inspect the hydraulic fluid level
- Check the engine coolant level

### Key-On Procedures
- Front, tail, and brake lights
- Fuel gauge (if diesel)
- Windshield wiper
- Heater

### Engine Running Procedures
#### Gauges
- Oil pressure indicator lamp
- Ammeter indicator lamp
- Ammeter
- Hour Meter
- Water Temperature Gauge

#### Standard Equipment
- Steering
- Brakes
- Horn
- Safety seat (if equipped)
- Check the operation of load-handling attachments
- Check the transmission fluid level
# Forklift Training Record Sheet

**Trainer (include qualifications):**

**Date:**

**Content of Training:**

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(Retain at least 3 years)
SCOPE

This chapter covers the use of hand tools, portable electric tools, and fuel powered tools. This information complies with the requirements of OSHA 1910, Subpart P for general industry, or for the construction industry 1926, Subpart I. It does not cover hydraulic, pneumatic or powder-actuated tools; information on these tools are provided in separate chapters.

NOTE: This chapter does not cover electric or fuel powered lawn mowers, chainsaws, or other landscaping equipment. These are covered in separate chapters.

POLICY

The company, to ensure the safe use of tools, has created this policy. This policy is intended to ensure safety for employees who use power and hand tools, and must be followed.

EMPLOYER RESPONSIBILITIES

It is the company’s responsibility to:

- Maintain all tools and equipment used by employees in safe, working condition
- Remove unsafe equipment from the worksite
- Ensure employees are properly trained in the safe use and operation of tools and equipment before using or operating the tools and equipment on the job
- Provide personal protective equipment to prevent injury and adverse health effects
- Select and use only tools with appropriate safety guards
- Ensure every job hazard analysis and safe job procedure considers the hazards introduced by power tools and hand tools

EMPLOYEE RESPONSIBILITIES

All company employees are expected to:

- Be aware of hazards presented by tools where they work
- Follow company safety policy and the instructions of the supervisor
- Comply with safe operating procedures for all equipment
- Properly use and maintain personal protective equipment
- Attend and participate in appropriate safety training
- Inspect tools and equipment daily to ensure they are in proper working order
- Report defective tools and equipment, and other safety concerns, and provide safety recommendations as appropriate

SAFE PRACTICES

- All hand and electrically power tools, whether furnished by the employer or the employee, will be maintained in a safe condition
- When power-operated tools are designed to have safety guards, the guards must be installed while the tool is in use
- Never carry a tool by its cord
- Never yank the cord of a tool to disconnect it from the receptacle
- Don't raise or lower a power tool by its cord
- Keep cords away from heat, oil, and sharp edges
- Disconnect tools when not using them, before servicing and cleaning them, and when changing accessories such as blades, bits, and cutters
- Keep all people not involved with the work at a safe distance from the work area
- Secure work with clamps or a vise, freeing both hands to operate the tool
- Avoid accidental starting. Do not hold fingers on the switch button while carrying a plugged-in tool
- Maintain tools with care; keep them sharp and clean for best performance
- Follow instructions in the user's manual for lubricating and changing accessories
- Be sure to keep good footing and maintain good balance when operating power tools
- Follow good housekeeping procedures to keep floors free of debris and hazards
- Don't allow dust, shavings, or other scraps to accumulate on or near machines, causing an operational hazard
- Wear proper apparel for the task. Do not wear loose clothing, sleeves, neckties, scarves, and jewelry that can become caught in moving parts
- Sharp tools such as chisels, drill bits, and awls must be carried in one of the following ways: with the edges or points protected; in a tool tray; in a cart; in a sheath; in the hand with the sharp edges turned away from the body
- Sharp or pointed tools, when stored in a rack or bin, must have the sharp edges or points inward or otherwise protected or stored to prevent injury
- Anti-kickback aprons must be provided to employees at no expense to the employees, and must be used where material can be kicked back
- Gloves should not be worn while operating machines
- Stationary tools and machines must be located where there is enough space for workers to handle material without interference from, or to, employees or machines. Operators should never have to stand in an aisle while operating a machine unless protection is provided
- Machines designed for a specific location must be secured to a floor, foundation, bench, table, or stand of sufficient strength and design to prevent overturning or unintentional movement
- Tools and machinery must be located so that light with the intensity of at least 50-foot candles from both natural and artificial light falls on the work. Supplementary illumination at the point of operation must be provided where necessary
- Any tool or machine, or component of a tool or machine that is not in proper working order must be immediately removed from service
- Tools and machines must be inspected at regular intervals and will be repaired in accordance with the manufacturer’s specifications. Untrained or unauthorized people must not modify them, and they cannot be returned to service until properly repaired
- Utilize a machine only if it is appropriate for the given task
• Employers must ensure that the height of tables and working surfaces of machines, auxiliary tables, and supports are appropriate and promote the safety of the operator; tables and supports must be large enough so that unwieldy pieces can be handled safely
• All circular saws 20 inches or more in diameter must be etched or otherwise permanently marked to include the manufacturer’s designated operating speed; a saw blade must not be operated at a higher speed than shown on the blade. When a marked saw blade is re-tensioned for a different speed, the marking must be corrected to show the new speed

Guards

The exposed moving parts of power tools must be safeguarded. All tools must be used with the correct shield, guard, or attachment recommended by the manufacturer. Belts, gears, shafts, pulleys, sprockets, spindles, drums, flywheels, chains or other reciprocating, rotating or moving parts of equipment must be guarded.

Guards, as appropriate, must be provided to protect the operator and others from the following:

• Point of operation
• In-running nip points
• Rotating parts
• Flying chips and sparks

Safety guards must never be removed or made inoperable when a tool is being used. Machines must not be used for operations of such variety as to necessitate the removal of safeguards.

Portable circular saws must be equipped at all times with guards. They must have guards above and below the base plate or shoe. The upper guard must 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 must 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 must immediately return to the covering position.

Switches and Controls

The following hand-held power tools must be equipped with a constant-pressure switch or control that shuts off the power when pressure is released:

• Drills
• Tappers
• Fastener drivers
• Disc sanders with discs greater than 2 inches
• Horizontal, vertical, and angle grinders with wheels more than 2 inches in diameter
• Belt sanders
• Reciprocating saws
• Saber saws, scroll saws, and jigsaws with blade shanks greater than ¼-inch wide
• Other similar tools
These tools also may be equipped with a “lock-on” control, provided it allows the worker to shut off the control in a single motion using the same finger or fingers.

The following hand-held power tools must be equipped with either a positive “on-off” control switch, a constant pressure switch, or a “lock-on” control:

- Grinders with wheels 2 inches or less in diameter
- Disc Sanders with discs 2 inches or less in diameter
- Platen Sanders, routers, planers laminate trimmers, nibblers, shears, and scroll saws
- Jigsaws, saber and scroll saws with blade shanks a ¼-inch (± .05 in.) or less in diameter

A constant-pressure control switch is the preferred device. Other hand tools such as the following hand-held power tools must be equipped with a constant-pressure switch:

- Circular saws having a blade diameter greater than two inches
- Chain saws
- Percussion tools with no means of holding accessories securely

PERSONAL PROTECTIVE EQUIPMENT

Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases must be provided with the particular personal protective equipment necessary to protect them from the hazard. All personal protective equipment (PPE) will meet NIOSH protective, maintenance requirements and OSHA regulations.

The required PPE when working with hand and power tools can include, but is not limited to:

- Snug-fitting clothing
- Hearing protection
- Eye and face protection
- Heavy-duty leather gloves
- Respiratory protection

HAND TOOLS

Wrenches, including adjustable, pipe, end and socket wrenches must not be used when jaws are sprung, cracked, or distorted to the point that slippage occurs. Impact tools, such as drift pins, wedges and chisels, must be kept free of mushroomed heads.

The wooden handles of tools must be kept free of splinters or cracks and must be kept tight in the tool. When hammering, use a hammer, not a tool designed for other purposes. All damaged or cracked tools, including saws, will be removed from service. Knives and scissors must be kept sharp.

When using saw blades, knives or other tools, direct tools away from aisle areas and other employees in close proximity.

Iron or steel hand tools may produce sparks that can ignite nearby flammable substances. Spark-resistant tools made of non-ferrous materials must be used where flammable gases, highly volatile liquids, and other explosive substances are stored or used.
Try to avoid prying, pulling, wedging, or lifting at sharp angles or overhead
Wear eye protection and, where necessary, face protection

Use the following safe practices when working with hand tools.

**Axes and Hatchets**
- Unless it has a striking face, don’t use the hatchet as a hammer. The head or the wooden handle can crack and break
- Hatchets with striking faces will only be used for driving common nails, not for striking chisels, punches, drills, or other hardened metal tools
- Never use an axe or hatchet as a wedge or chisel and strike it with a hammer
- Most carpenters prefer a hatchet with a solid or tubular steel handle and a hammerhead with a slot for pulling nails

**Claw Hammers**
- Start with a good quality hammer of medium weight (16 ounces) with a grip suited to the size of your hand
- Rest your arm occasionally to avoid tendinitis. Avoid overexertion in pulling out nails. Use a crow bar or nail puller when necessary
- When nailing, start with one “soft” hit, that is, with fingers holding the nail. Then let go and drive the nail in the rest of the way
- Strike with the hammer face at right angles to the nail head. Glancing blows can lead to flying nails. Clean the face with sandpaper to remove glue and gum. Don’t use nail hammers on concrete, steel chisels, hardened steel-cut nails, or masonry nails
- Discard any hammer with a dented, chipped, or mushroomed striking face or with claws broken, deformed, or nicked inside the nail slot

**Crow Bars**
The tools include pry bars, pinch bars and wrecking bars. Shorter ones usually have a curved claw for pulling nails and a sharp, angled end for prying. Loads levered, lifted, or shifted by bars can land on fingers and toes.
- Make sure to clear the area and maintain control of the load
- Have enough rollers and blocking ready
- Never put fingers or toes under the load

**Cold Chisels**
Cold chisels are used to cut or shape soft metals as well as concrete and brick. In time the struck end will mushroom. This should be ground off. Don’t use chisels with mushroomed heads. Fragments can fly off and cause injury.

**Hand Planes**
- Use only a plane that is suited to the job, and keep the iron sharp
For long surfaces like door edges, use a fore plane 18” long and 2 ¾” wide or a jointer plane 24” long and 2 ¾” wide.

Square cutting heads must not be used on jointers and planers.

For shorter surfaces, use a jack plane 15” long and 2 ¾” wide or a smoothing plane 10” long and 2 ¾” wide.

Remember that sharp tools require less effort and reduce the risk of fatigue, overexertion, and back strain.

Work can also be easier with a door jack and supports on your workbench.

Hand Saws

Select the right saw for the job.

A 9 point is not meant for crosscutting hardwood. It can jump up and severely cut the worker’s hand or thumb. Use an 11 point (+) saw for this kind of work.

When starting a cut, keep your thumb up high to guide the saw and avoid injury.

For cutting softwood, select a 9 point (-). The teeth will remove sawdust easily and keep the saw from binding and bucking.

Ripping requires a ripsaw.

Plumb Bobs

Designed for use in windy conditions, a mercury-filled plumb bob has considerable weight in proportion to its surface area.

The weight and point of the bob can make it dangerous.

Ensure that all is clear below when you lower the bob.

Don’t let it fall out of your pocket, apron, or tool bag.

Screwdrivers

Do not use screwdrivers for prying, scraping, chiseling, scoring, or punching holes.

Only use a screwdriver that fits or matches the fastener.

Do not hold an object being worked on with a screwdriver in your hand, in your lap, or under your arm, except when protection is afforded by the object or other means.

A screwdriver used for electrical work must be equipped with a nonconductive handle.

Always make a pilot hole before driving a screw. Power drivers present obvious advantages when screws must be driven frequently or repeatedly.

Sledgehammers

When using a sledgehammer to drive thick tongue-and-groove planking tightly together, use a block of scrap wood to prevent damage to the planks.

Use sledgehammers carefully, serious bruises and broken bones have been caused by sledgehammers off-target and out of control.

Always check handle and head. Make sure head is secure and tight. Replace damaged handles.

Always wear eye protection.
Utility Knives

- Use knives with retractable blades only. If used, fixed-blade knives must be carried in a protective sheath or equivalent.
- Always cut away from your body, especially away from your free hand. When you’re done with the knife, retract or sheathe the blade at once. A blade left exposed is dangerous, particularly in a toolbox.

Wood Chisels

- Keep your hand that holds the work behind, not in front of, the chisel.
- Keep chisels sharpened.
- Keep chisels stored in a toolbox with protective caps when not in use.
- Never use a chisel for prying.
- Repeatedly striking the chisel with the palm of your hand may lead to repetitive strain injury.
- With chisels and other struck tools, always wear eye protection.
- Gloves are recommended to help prevent cuts and bruises.

ELECTRIC TOOLS

- Operate electric tools within their design limitations according to manufacturer’s instructions.
- Use gloves and appropriate safety footwear when using electric tools.
- Store electric tools in a dry place when not in use.
- Do not use electric tools in damp or wet locations unless they are approved for that purpose.
- Keep work areas well lighted when operating electric tools.
- Ensure that cords from electric tools do not present a tripping hazard.
- Unplug the tool before making adjustments or changing attachments.
- The use of electric cords for hoisting or lowering tools must not be permitted.
- Remove all damaged portable electric tools from use and tag them: “Do Not Use.”

Electric Safety Features

To protect the user from shock and burns, electric tools must have a three-wire cord with a ground and be plugged into a grounded receptacle, be double insulated, or be powered by a low-voltage isolation transformer. Three-wire cords contain two current-carrying conductors and a grounding conductor. Any time an adapter is used to accommodate a two-hole receptacle, the adapter wire must be attached to a known ground. The third prong must never be removed from the plug.

Double-insulated tools are available that provide protection against electrical shock without third-wire grounding. On double-insulated tools, an internal layer of protective insulation completely isolates the external housing of the tool.

In the construction industry, employees who use electric tools must be protected by ground-fault circuit interrupters (GFCI) or an assured equipment-grounding conductor program (AEGCP).
SAWS

The general safe practices listed below must be followed when operating any type of saw.

**General Safety**

The practice of inserting wedges between the saw disk and the collar to form what is commonly known as a wobble saw is prohibited.

**Blade Guards**

All portable, power-driven circular saws having a blade diameter greater than 2 in. must be equipped with guards above and below the base plate or shoe. The upper guard must 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 must 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 must automatically and instantly return to covering position.

Never operate an electric saw with the lower guard tied or wedged open. The saw may kick back and cut you, or another worker who uses the saw.

An exposed blade, still in motion, will force the saw to move, cutting anything in its path. Make sure that the lower guard returns to its proper position after a cut. Never operate a saw with a defective guard-retracting lever.

On most saws, the lower guard is spring-loaded and correct tension in the spring will automatically close the guard. However, a spring weakened by use and wear can allow the guard to remain open after cutting. Maintain complete control of the saw until the blade stops turning. Note: The guard may also be slow to return after 45° cuts.

**Brake**

An electric brake on some circular saws stops the blade from coasting once the switch is released. This greatly reduces the danger of accidental contact.

**Trigger Safety**

On some light-duty saws, a latch prevents the operator from accidentally starting the motor. The trigger on the inside of the handle cannot be pressed without first pressing a latch on the outside of the handle. On heavy-duty saws, a bar under the trigger switch helps to prevent accidental starting.

**Clutch**

Some worm-drive saws are equipped with a clutch to prevent kickback. Kickback occurs when a saw meets resistance and violently backs out of the work. The clutch action allows the blade shaft to continue turning when the blade meets resistance. The blade stud and friction washer can be adjusted to provide kickback protection for cutting different materials. Check friction washers for wear.
Blades

Understand the different designs, types and uses of blades, and only use blades suited for the job. Blades should be sharpened or changed frequently. The teeth on a dull or abused blade will turn blue from overheating. Cutting will create a burning smell. Such blades should be discarded or reconditioned.

Re-sharpened blades can be substantially reduced in diameter. Make sure that the blade diameter and arbor diameter are right for the saw.

- Before changing or adjusting blades, disconnect the saw from the power source
- Ensure that arbor diameter and blade diameter are right for the saw
- Make sure it is clean and free of nails, concrete and other foreign objects. This precaution not only prolongs blade life but may also prevent serious injury
- Ensure that blades are installed in the proper rotational direction
- Do not strike metal when using a carbide-tipped blade. The tips can come loose and fly off, ruining the blade and injuring the operator. Inspect the blade regularly for cracked or missing tips

Changing, Adjusting, and Setting Blades: when changing blades, take the following precautions:

- Disconnect the saw from the power source
- Place the saw blade on a piece of scrap lumber and press down until the teeth dig into the wood. This prevents the blade from turning when the locking nut is loosened or tightened
- Make sure that keys and adjusting wrenches are removed before operating the saw

Proper adjustment of cutting depth keeps blade friction to a minimum, removes sawdust from the cut and results in cool cutting.

- The blade should project the depth of one full tooth below the material to be cut
- Carbide-tipped blades or miter blades should project only half a tooth below the material

If the blade is to run freely in the kerf (saw cut), teeth must be set properly, that is, bent alternate. The setting of teeth differs from one type of blade to another. Finer toothed blades require less set than rougher-toothed blades. Generally, teeth should be alternately bent ½ times the thickness of the blade. Sharp blades with properly set teeth will reduce the chance of wood binding. They will also prevent the saw from overheating and kicking back.

Safe Saw Practices

- Place the material to be cut on a rigid support such as a bench or two or more sawhorses
- Make sure that the blade will clear the supporting surface and the power cord
- The wide part of the saw shoe should rest on the supported side of the cut if possible
- Plywood is one of the most difficult materials to cut with any type of saw. The overall size of the sheet and the internal stresses released by cutting are the main causes of difficulty
  - Large sheets should be supported in at least three places, with one support next to the cut
  - Short pieces of material should not be held by hand. Use some form of clamping to hold the material down when cutting it
• NEVER use your foot or leg to support the material being cut
• Place the material to be cut with its good side down, so that if any splintering occurs, will be on the upper side
• Use just enough force to let the blade cut without laboring
• Never place a handheld saw in a fixed, upside-down position and feed material into it. Use a table saw instead
• When cutting, don’t force the saw back onto line. Withdraw the blade and either start over on the same line or begin on a new line
• Keep the cord on the same side of your body as your cutting hand
• Stand to one side of the cutting line
• Never reach under the material being cut
• Always keep your free hand on the long side of the lumber and clear of the saw
• Maintain a firm, well-balanced stance, particularly when working on uneven footing

Plywood, wet lumber and lumber with a twisted grain tend to tighten around a blade and may cause kickback. Kickback occurs when an electric saw stalls suddenly and jerks back toward the operator. The momentarily exposed blade may cause severe injury.

**Pocket Cutting**

• Tilt saw forward
• Rest front of shoe on wood
• Retract lower guard
• Lower saw until front teeth almost touch wood
• Release guard to rest on wood
• Switch on the saw
• Keep the saw tilted forward, push it down, and forward with even pressure gradually lowering it until shoe rests flat on wood

**DRILLS**

**Types**

• Light duty drills are usually ¼ or ⅜ inch trigger-controlled variable speed drill
• Heavy duty drills are usually select the slower but more powerful one- or two-speed reversible ⅜ or ¼ inch drill
• Size of the drill is determined by the maximum opening of the chuck. For instance, a ⅜ inch drill will take only bits or attachments with a shank up to ⅜ inch wide
• For drywall screws, a drywall screw gun should be used. The driving bit should be replaced when worn

**Attachments**

Attachments such as speed-reducing screwdrivers, disk sanders and buffers can help prevent fatigue and undue muscle strain. A right-angle drive attachment is very useful in tight corners and other hard-to-reach places.
Cutting and drilling attachments must be kept sharp to avoid overloading the motor. Never crowd or push the tool beyond capacity. Some attachments, such as hole saws, spade bits, and screwdrivers, require considerable control by the operator. If you do not feed the attachment slowly and carefully into the material, the drill can stop and severely twist or break your arm. Stock should be clamped or otherwise secured to prevent it from moving. Restrain the drill just before the bit or cutting attachment emerges through the material, especially when oversized spade bits are used. Select the bit or attachment suitable to the size of the drill and the work to be done. Make sure that the bit or attachment is properly seated and tightened in the chuck.

Some operations require the use of an impact or hammer drill. For instance, drilling large holes in concrete or rock with a carboloy bit should be done with an impact drill. Follow manufacturer’s instructions when selecting and using a bit or attachment, especially when working with drills or performing unfamiliar work.

SAFE DRILL PRACTICES

General Safety

Working with Small Pieces

- If a small piece starts to twist or spin with the drill, you can be injured.
- Small work pieces should be properly secured and supported.
- Never try to drill with one hand and hold a small piece of material with the other.

Drilling from Ladders

- The top and bottom of the ladder must be secured to prevent the ladder from slipping or sliding.
- Never reach out to either side. Overreaching can cause the ladder to slide or tip.
- Never stand on the top step or paint shelf of a stepladder. Stand at least two steps down from the top.
- When working from an extension ladder, stand no higher than the fourth rung from the top.
- Never support yourself by holding onto a pipe or any other grounded object.

Operation

- Always plug in the drill with the switch OFF.
- Before starting to drill, turn on the tool for a moment to make sure that the shank of the bit or attachment is centered and running true.
- Punch a layout hole or drill a pilot hole in the material so that the bit won’t slip or slide when your start drilling. A pilot hole is particularly important for drilling into hard material such as concrete or metal.
- With the drill OFF, put the point of the bit in the pilot hole or punched layout hole.
- Hold the drill firmly in one hand or two hands, as necessary, at the correct drilling angle.
• Turn on the switch and feed the drill into the material with the pressure and control required by the size of the drill and the type of material
• Don’t enlarge a hole by reaming it out with the sides of the bit. Switch to a larger bit
• While drilling deep holes, especially with a twist bit, withdraw the drill several times with the motor running to clear the cuttings
• Never support material on your knee while drilling. Material should be firmly supported on a bench or other work surface for drilling
• Unplug the drill and remove the bit as soon as the work is finished
• When drilling into floors, ceilings, and walls, beware of wiring and plumbing
• Rotary and hammer drills generate extreme torque and must be handled with caution. Take occasional breaks to relax your arms and shoulders

Drilling Timbers
• When drilling timbers with a self-feeding auger bit, use a heavy-duty, low-rpm drill, ½ or ¼ inch in size
• Never attempt to drill heavy timbers by yourself, especially when working on a scaffold or other work platform

Other Materials
The main hazard in drilling materials other than wood is leaning too heavily on the tool. This can not only overload and burn out the motor but also cause injury.

• Always use a drill powerful enough for the job and a bit or attachment suited to the size of the drill and the nature of the work
• Punch a layout hole or drill a pilot hole can make the job safer and more efficient
• Use a drill press stand for drilling holes in metal accurately and safely
• Clamp small pieces in a vise and bolted to the table
• A drill press can also be used for cutting large holes in wood with a hole saw or speed bit

PLANES
Electric planes are available in various types and sizes, and are operated in similar ways. Depending on specific features, adjustments between models may differ.

Planes may be equipped with:

• Outfeed tables (back shoes) that are either fixed or movable
• Infeed tables (front shoes) that move straight up and down or move up and down on an angle to keep the gap between cutter head and table as small as possible
• Cutter heads with two or more straight blades (also called knives or cutter blades) or cutter heads with two curved blades

Never operate an electric plane while wearing a scarf, open jacket, or other loose clothing. Keep long hair tied up. Always wear eye protection and practice good housekeeping.
Standard Plane

- Hold with both hands to avoid contact with cutter blades
- Always keep both hands on the plane until motor stops
- Use the edge guide to direct the plane along the desired cut
- Never try to guide the plane with your fingers

Block Plane (Electric)

Designed for use on small surfaces, the block plane is operated with only one hand. It is more dangerous than the larger, standard plane. Keep your free hand well out of the way, in case the plane slips accidentally.

Plane Maintenance

- Make sure the work is free of obstructions: staples, nails, sand, or other foreign objects
- Keep blades in good condition and sharp
- Use a fine-grit oilstone when sharpening blades. Blades can be re-sharpened several times if they are not nicked or cracked

Changing Blades

Time and patience is required when raising or replacing cutter blades. Blades must be the same weight and seated at the same height to prevent the cutter head from vibrating. Any deviation can cause the head to run off balance. Blades can fly out and injure you or fellow workers.

Removing Blades

- Disconnect the plane from the power source. Turn the plane upside down and secure it in a fixed position
- Hold the cylinder head stationary by tapping a softwood wedge between the cutter head and the bearing (some tools are equipped with a locking device)
- Loosen all the screws and lift out one blade and throat piece. Turn the cutter head and repeat this procedure with other blades
- If necessary, clean parts thoroughly with recommended solvent

Installing Blades

- Replace one throat piece and blade. Tighten the two end screws lightly
- Take a hardwood straight edge and use the outfeed table (back shoe) as a gauge. Raise or lower the blade until both ends are level with the outfeed table at the blade’s highest point of revolution
- Tighten up the remaining screws. Set the rest of the blades in the same way. Turn the cylinder head and make sure that all blades are the same height
- Tighten up all the screws. Double-check the height of all blades. Tightening can sometimes shift the set. Double-check all the screws
- Turn the tool right side up and plug it in. Hold the tool in both hands with the cutter blades facing away from you and switch it on
Safe Plane Practices

- Always disconnect the plane from the power source before adjusting or changing blades or the cutter head
- For safe operation, make sure that blades (at their highest point of revolution) are exactly flush with the outfeed table
- Make sure to support work securely for safety and accuracy
- Use a jack (e.g. when planing doors and large pieces of plywood) to secure material and keep edges clear of dirt and grit
- When using an electric block plane, clamp or fasten the workpiece whenever possible. Keep your free hand well away from plane and material
- When using the standard power plane, adjust edge guide to desired guidance
- Adjust depth of cut to suit the type and width of wood to be planed
- To start a cut, rest the infeed table (front shoe) firmly on the material with cutter head slightly behind the edge of the material
- After finishing a cut, hold both hands on the plane until motor stops

RADIAL ARM SAWs

The motor and blade of the radial arm saw are suspended above the table. Because the motor and blade assembly can be locked in different positions, and can travel during the cut, you must pay special attention to keeping fingers and hands clear.

Injuries involving radial arm saws tend to be serious. By using appropriate guards and procedures, however, you can safely use the saw for crosscuts, miter cuts, ripping and dadoes.

Set-Up

- The saw must be adequately powered for the work
- Only use a radial arm saw in a well-lit area out of the way of traffic, with enough space to store and handle long lengths of wood
- Mark the floor with yellow warning lines to keep other personnel back from the saw
- Make sure all safety guards and devices are in place
- Choose the right blade for the job. A sharp tungsten carbide combination blade is good for both crosscutting and ripping without frequent re-sharpening

General Procedures

- Follow basic saw safety
- If you don’t have someone to help with long stock, use a roller stand or extension table to support the work
- Always return the motor head to the column stop
- When crosscutting or mitering, keep hands at least six inches away from the blade. Do not adjust length of cut until the motor is back at column
- Slope the tabletop back slightly to keep the blade at the column, to prevent it from contacting stock being placed in position
- Do not allow the blade to cut too quickly when crosscutting or mitering
- Avoid drawing the blade completely out of the cut. The cut piece, whether large or small, often moves. When the saw is rolled back towards the column, the teeth can grab the piece and shoot it in any direction
- Do not cut by pushing the saw away from you into the stock. The material can lift up and fly over the fence

**Ripping and Crosscutting**

- For regular ripping, turn the motor away from the column to the in-rip position. Feed stock into the saw from the right side
- To cut wide stock, change the saw to the out-rip position. Feed stock into the saw from the left side. Remember – the blade must turn up and toward you when feeding the stock
- Do not force the cut. Allow the blade through the wood at its own pace
- To avoid kickback, take the following precautions:
  - Maintain proper alignment of the blade with the fence
  - Adjust the anti-kickback device to ½ inch below the surface of stock being fed
  - Use a sharp blade, free of gum deposits and with teeth properly set
- When binding occurs, stop the saw and open the kerf with a wedge
- After completing the cut, remove the stock from the rotating blade to prevent overheating and possible kickback
- Always push the stock all the way through past the blade
- Do not leave the machine with the motor running
- Use a push stick when ripping narrow pieces. Have suitably sized and shaped push sticks for other jobs as well. See more information on push sticks and feather boards under “Table Saws”

**Jigs**

- Keep commonly used jigs on hand. Jigs such as those for making stair and doorframe wedges and tapers are designed to carry stock past the blade with the saw locked in the rip position
- When you are drawing the saw into the stock, clamp or nail jigs to the table to prevent slipping

**Re-Sawing with Blade Horizontal**

The rip fence on the radial arm saw is too low to support material to be re-sawn on edge. Therefore, the material must be placed flat on the table and the motor must be turned so the blade is parallel to the table. The closeness of the arbor requires an auxiliary tabletop and fence to re-saw thin stock.

Because the kickback fence can’t be used, and controlling stock is sometimes difficult, re-sawing on the radial arm saw can be hazardous.

- If no other equipment is available, rip the stock halfway through, then turn it around, and complete the cut
- On the second cut, be sure to push the two halves well past the blade once they have been cut apart. Push sticks and feather boards clamped to the table can reduce hazards
Dadoes
A dado head is an essential tool for cutting grooves, rabbets and dadoes. A groove is cut with the grain; a dado is cut across the grain; and a rabbet is a shoulder cut along the edge of a board.

- Dado heads do not run at the peripheral feed speed on a big radial arm saw. Which can result in either stopping the motor or lifting the work and throwing it back
- To prevent this, make several light passes, lowering the dado head ⅛ to ¼ inch each time
- Always make sure guards are in place before starting dado work
- Proper rotation of the teeth is up and toward you

Other Accessories
Rotary accessories of various types are advertised as turning the radial arm saw into a multi-function machine. Remember that the saw has its limitations.

Possible problems include the following:

- Shaper heads run too slowly for safe and smooth work. Templates, jogs, and fixtures that remove the operator’s hands from the points of operation of shapers must be used when the nature of the work permits such use
- Grinding stones may run too fast or slow, and are not recommended
- Sanding drums tend to run too fast and may burn the wood

ROUTERS
A portable electric router can be used to cut dadoes, grooves, mortises, dovetail joints, moldings and internal or external curves. The router motor operates at very high speed (up to 25,000 rpm) and turns clockwise.

General Safety

- When starting a router with a trigger switch in the handle, keep both hands on the tool to absorb the starting torque
- When starting a router with a toggle switch on top of the motor, hold the router firmly with one hand and switch on power with the other, then put both hands on the tool for control and accuracy
- Always wear eye protection. Hearing protection may also be required. Remember, the speed and power of a router requires that it be operated with both hands
- The pulleys, spindles and cutting tools on routers must be guarded. Turn plates, jigs, and fixtures requiring the operator’s hands to be removed from the point of operation may be used as a point of operation guard

Safe Router Practices

- Always support and secure the work with a vise or clamps. Never try to hold the work down with your hand or knee. Never rely on a second person to hold the material
- Make sure that the bit is securely mounted in the chuck and the base is tight
- Set the base on the work, template, or guide and make sure that the bit can rotate freely before switching on the motor
- Make sure that the cutting edge of the router bit contacts the material to the left of the cutting direction. Otherwise, the router will kick back or fly away from you
- Guide the router around the work counter-clockwise. Splinters left at corners by routing across the grain will be removed by the next pass with the grain
- Feed the router bit into the material at a firm but controllable speed appropriate to the type of material being cut

**SABER, SCROLL AND JIGSAWS**

The saber saw (or portable jigsaw) is designed for cutting external or internal contours. The saw should not be used for continuous or heavy cutting that can be done more safely and efficiently with a circular saw.

The reciprocating saw is a heavier type of saber saw with a larger and more rugged blade. This tool is often used by drywall and acoustical workers to cut holes in ceilings and walls. Equipped with a small swivel base, the saw can be used in corners or free hand in hard-to-reach places. The reciprocating saw must be held with both hands to absorb vibration and to avoid accidental contact.

Eye protection is required. Depending on conditions, you may also need respiratory protection.

**Choosing the Proper Blade**

Various blades, ranging from 7 to 32 teeth per inch, are available for cutting different materials. For the rough cutting of stock such as softwood and composition board, a blade with 7 teeth per inch will cut the fastest. For all-round work with most types of wood, a blade with 10 teeth per inch is satisfactory.

**Safe Jigsaw Practices**

**Cutting**

- Clamp the material as close to the cutting line as possible
- Before starting a cut, make sure that the saw will not contact the clamps, vise, workbench, or other support
- Never reach under the material being cut. Never lay down the saw until the motor has stopped
- Do not try to cut curves so tight that the blade will twist and break
- Always hold the base or shoe of the saw in firm contact with the material being cut

Note: When sawing into floors, ceilings, or walls, always check for plumbing and wiring.

**External Cut**

To start an external cut (from the outside in):

- Place the front of the shoe on the material
- Make sure that the blade is not in contact with the material or the saw will stall when the motor starts
- Hold the saw firmly and switch it on
- Feed the blade slowly into the material and maintain an even pressure
- When the cut is complete, do not lay down the saw until the motor has stopped

**Inside Cuts**

To start an inside cut (pocket cut):

- Drill a lead hole slightly larger than the saw blade
- With the saw switched off, insert the blade into the hole until the shoe rests firmly on the material
- Do not let the blade touch the material until the saw has been switched on

It is possible to start an inside cut without drilling a lead hole first — but only when it’s necessary. To do this:

- Rest the front edge of the shoe on the material with the saw tipped backward. Keep the blade out of contact with the material
- Switch on the saw and slowly feed the blade into the material while lowering the back edge of the shoe
- When the shoe rests flat on the material and the blade is completely through, proceed with the cut
- Never try to insert a blade into, or withdraw a blade from, a cut or a lead hole while the motor is running
- Never reach under the material being cut

**TABLE SAWS**

The table saw most often used in construction is the 10-inch belt-driven tilting arbor saw. The dimension refers to the diameter of the saw blade recommended by the manufacturer.

**General Safety**

**Basket Guards**

- Basket guards may be fastened to the splitter, or hinged to either side of the saw on an L-shaped or S-shaped arm
- Keep the basket guard in place for normal operations such as straight and bevel ripping and miter cutting
- When the guard is removed to permit cutting of tenons, finger joints, rabbets, and similar work, use accessories such as feather boards, holding jigs, push sticks, and saw covers
- Some split basket guards have a see-through cover. Sheet metal baskets fastened to the splitter are less effective because you cannot see the saw blade

**Kickback**

To avoid kickback of the stock when cutting:

- Never stand directly behind the blade when cutting. Stand to one side. See that other workers stand clear as well
- Make sure the rip fence is aligned for slightly more clearance behind the blade than in front. This will help prevent binding.
- Use a sharp blade with teeth properly set for the wood being cut. A dull or badly gummed blade will cause friction, overheating, and binding.
- Install a splitter to keep the kerf (cut) open behind the blade. Also effective are anti-kickback fingers attached to the splitter.

**Splitters**

Splitters prevent the kerf from closing directly behind the blade. Ideally, they should be slightly thinner than the saw blade and manufactured from high tensile steel. Splitters are not always needed with carbide-tipped saw blades, whose relatively wide kerf may provide the desirable clearance.

Disappearing splitters with anti-kickback fingers can be pushed down when in the way of a workpiece and pulled up if necessary after the machine has been shut off.

**Roller Stand**

A roller stand provides support when working with long pieces of stock. When using a roller stand:
- Adjust the height slightly lower than the saw table to allow for sagging of the material.
- Set up the stand so the roller axis is at 90 degrees to the blade.

Whatever the design, a support stand should be standard equipment in every carpentry and millwork shop. It can be used as an extension to a workbench, jointer or band saw and is especially important with the table saw.

**Extensions**

Made of wood or metal, tabletop extensions installed behind and to both sides of the machine can make the cutting of large sheets of plywood and long stock safer and more efficient.

In most cases, a space must be provided between extension and saw top for adjusting the basket guard and allowing scrap to fall clear.

**Rip Fence**

The rip fence is used mainly to guide the stock and maintain correct width of cut.

Adjust the fence slightly wider at the back to let the wood spread out behind the cut and reduce the risk of kickback.

You can add a piece of hardwood to the rip fence in order to rip thin pieces of wood and make dadoes and rabbets. The auxiliary fence can be set close to the cutters without the risk of contact between the blade and the steel fence.

**Push Sticks and Feather Boards**

Push sticks and feather boards are used when cutting narrow pieces of stock.
- Push sticks should be painted or otherwise marked to prevent loss.
The heel of the push stick should be deep enough to prevent it from slipping and strong enough to feed the stock through the saw. 
A feather board clamped immediately in front of the saw blade will provide side pressure to the stock without causing binding and kickback. Use a push block to feed stock all the way through the saw.

**Safe Table Saw Practices**

- Follow basic saw safety
- Keep the floor around the saw clear of scrap and sawdust to prevent slipping and tripping
- Always stop the machine before making adjustments. Before making major adjustments, always disconnect the main power supply
- Select a sharp blade suitable for the job
- Use the safety devices such as push sticks and feather boards
- Make sure nobody stands in line with a revolving blade
- Don’t let anyone or anything distract you when you are operating the saw
- Keep your fingers folded in a fist rather than extended as you feed work into the saw
- Never reach around, over, or behind a running blade to control the stock
- Follow the manufacturer’s recommendations in matching the motor size to the saw.
- Table saws must be properly grounded
- Check the power supply for ground and always use a ground fault circuit interrupter
- Extension cords must be of sufficient wire gauge for the voltage and amperage required by the saw and for the length of the run

**JOINTERS**

Jointers, also known as planers, used to make flat edges on boards are generally hand feed devices, and for that reason, use extreme care when feeding stock into or out of the cutting area.

**Safe Jointer Practices**

- Hand-fed planers and jointers with a horizontal or vertical head must have a cylindrical cutting head, and the knife projection must not extend more than 1/8-inch beyond the body of the head
- Square cutting heads must not be used on jointers and planers
- The opening in the jointer table must be kept as small as possible. The clearance between the edge of the rear table and the cutter head must not be more than 1/8 inch
- The table throat opening must not be more than 2½ inches when tables are set for zero cut
- A proper push block must be used when jointing short or narrow stock
- A hand-fed jointer with a horizontal or vertical cutting head must have an automatic guard covering all the sections of the cutting head on the working side of the fence or gauge; it must also have a guard covering the section of the head in back of the gauge or fence
- Each wood jointer with vertical head must have either an exhaust hood or other guard to enclose the revolving head, except for a slot wide enough for the application of the material to be jointed
• The minimum length of the piece jointed must not be less than four times the distance between the two tables. Neither half of the jointer table should be adjusted horizontally so that the clearance between the edge of the table and revolving knives is more than ¼ inch

QUICK-CUT SAWS

Hand-held portable circular cut-off saws are commonly known as “quick-cut saws.” They are widely used for cutting concrete, masonry products, sheet metal products (both steel and aluminum), and light steel sections such as angles and channels.

Hazards

Quick-cut saws are high-powered compared to similar tools. Hazards include high-speed blade rotation, blade exposure during operation, and exhaust from the internal combustion engine (the usual power source).

The saws create clouds of dust when dry-cutting masonry and showers of hot sparks when cutting metal products, especially steel.

These hazards can result in cuts, kickbacks, exposure to carbon monoxide fumes, exposure to dusts (silica from concrete and masonry products in particular), burns, flying particles hitting the eye, and other injuries from flying material when work is not secured for cutting or when blades fly apart.

These hazards can be controlled by:

• Using quick-cut saws properly and wearing the right protective equipment such as eye, hearing, and respiratory protection as well as face shields and gloves
• Securing work to keep it from shifting during cutting
• Being cautious around sharp edges left by cuts
• Keeping saws in good working condition, equipped with proper blades or disks, and used with all guards in place

A cut-off saw that strokes automatically without the operator’s control of each stroke must have a guard to keep the operator’s hands from coming in contact with a blade.

Care

• Quick-cut saws must be serviced and maintained in accordance with the manufacturers’ instructions
• Replacement parts should be those recommended by the manufacturer
• Cracked, broken, or worn parts should be replaced before the saw is used again
• Guards and air-intakes should be cleaned regularly and often
• Abrasive disks should be checked before installation and frequently during use
• Correct any excessive blade vibration before trying to make a cut
• In confined areas, make sure that ventilation is adequate
Safe Quick-Cut Saw Practices

Most of the following procedures are for gasoline-powered quick-cut saws.

Fueling

- Always shut off saw before fueling. Keep fuel container clear of work area
- Use caution when preparing the oil/gasoline mixture and when fueling the saw
- No smoking or ignition sources are allowed in the area where fuel is mixed or tanks are filled
- Fill the tank outdoors in a well ventilated space at least 10 feet from the area where the saw will be used. Spilled fuel should be wiped off the saw
- Avoid fueling the saw on or near formwork
- Don’t overfill the saw or run it without securing the fuel tank cap
- Check the saw for leaks

Starting

- Start the saw in an area clear of people and obstacles
- Put the saw on a smooth hard surface for starting
- Set the guard for the type of cut before starting
- Assume a solid well-balanced stance
- Set one foot on the rear handle
- Put one hand on the top handle to lift the blade off the surface, and use the other hand to pull the starter cord
- Once the saw is running, release the throttle and make sure the engine drops to idle without the disk or blade moving
- Run the engine at full throttle and let the disk or blade run freely to make sure it turns on the arbor without wobbling or vibrating

Operation

One of the major hazards with quick-cut saws is failure to support and secure the work to be cut. The saw is powerful enough to throw material around unless it is securely held and supported. Standing on material to hold it down is not recommended.

For repeated cuts of masonry or metal pieces, a jig is ideal for efficiency and safety. The jig should be designed and built to hold material in place after measurement without further manual contact.

Stance and Grip

- The quick-cut saw is a heavy, powerful tool that must be held by hand
- Operators need a secure stance with legs apart for balance and support
- Hold the saw at a comfortable, balanced location in front of you
- Grip the saw firmly with one hand on each handle
- Hold your forward arm straight to keep the saw from kicking back or climbing out of the cut
Cutting

- Support the material being cut so that the disk or blade will not bind
- Support heavy materials on both sides of the cut so the cut piece will not drop or roll onto the operator’s foot
- Make cuts as close as possible to the supporting surface
- When cutting, keep the throttle wide open. Ease the blade down onto the cut line. Don’t drop or jam the blade down hard. Move the saw slowly back and forth in the cut
- Hold the saw so that disk or blade is at right angles to the work and use only the cutting edge of the disk or blade
- Beware of blade run-on. The blade may continue to rotate after the cut and run away with a saw set down too soon
- Don’t force the saw to one side of the cut. This will bend the disk or blade and cause it to bind, possibly to break
- Water cooling is recommended for cutting masonry materials
- Keep pressure on the saw reasonably light
- Don’t carry the saw any distance with the engine running
- Stop the engine and carry the saw with the muffler away from you

Disks and Blades

Disks and blades for quick-cut saws are available in three basic types:

- Abrasive disks
- Diamond-tipped blades
- Carbide-tipped blades

Use only the disks and blades compatible with the saw and rated for its maximum rpm. Blades or disks may fly apart if their rpm is not matched to saw rpm. If you have any doubts, consult the operating manual or a reputable supplier.

**ABRASIVE DISKS – TYPES AND USES**

<table>
<thead>
<tr>
<th>Type</th>
<th>Uses</th>
<th>Materials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concrete</td>
<td>All-around use, most economical for cutting concrete and masonry. Water-cooling recommended to increase disk life and to reduce dust.</td>
<td>Concrete, stone, masonry products, cast iron, aluminum, copper, brass, cables, hard rubber, plastics</td>
</tr>
<tr>
<td>Metal</td>
<td>Primarily for steel, not suited for masonry products. Water-cooling is not recommended with metal abrasive disks</td>
<td>Steel, steel alloys, other hard metals such as cast iron</td>
</tr>
</tbody>
</table>

**Diamond Disks and Blades – Types and Uses**

Diamond disks are normally used with water-cooling. They are now available for dry cutting, which may be necessary to avoid staining some masonry products.
When dry cutting with a diamond blade, let the blade cool for 10-15 seconds every 40-60 seconds. This can be done simply by pulling the saw out of the cut.

### DIAMOND DISKS AND BLADES — TYPES AND USES

<table>
<thead>
<tr>
<th>Type</th>
<th>Uses</th>
<th>Materials</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diamond Abrasive Disk</td>
<td>Cuts faster than other abrasive disks and creates less dust. Water-cooling is necessary to prevent heat build-up that can make disk disintegrate.</td>
<td>Stone, all masonry and concrete products. Not recommended for metal</td>
</tr>
<tr>
<td>Dry-Cut Diamond Blade</td>
<td>Fast cuts, lots of dust, very expensive. Let blade cool for 10-15 seconds every 40-60 seconds. Continuous cutting will damage the blade.</td>
<td>Stone, all masonry and concrete products. Not recommended for metal</td>
</tr>
</tbody>
</table>

**Carbide-Tipped Blades**

These blades must be used with care. If a carbide-tipped blade encounters material harder than what it is designed to cut, the tips may fly off.

A carbide-tipped blade used with a quick-cut saw must be designed for that purpose. It must also be used only to cut the materials specified by the manufacturer.

**Inspection / Installation**

- Inspect disks and blades before installing them
- Make sure that contact surfaces are flat, run true on the arbor, and are free of foreign material
- Check that flanges are the correct size and not warped or sprung
- Check the label to make sure that the disk or blade is approved for use on high-speed quick-cut saws and has a rated rpm suitable to the saw being used
- Inspect the disk or blade for damage. Abrasive disks tapped lightly with a piece of wood should ring true. If the sound is dull or flat, the disk is damaged and should be discarded
- Make sure that diamond or carbide tips are all in place. Do not use diamond or carbide-tipped blades or disks if any tips are missing
- Do not drop abrasive disks. Discard any disk that has been dropped
- Use the proper bushing on the arbor so that the disk runs true on the shaft without wobbling or vibrating
- Discard badly worn disks that are uneven or “out of round”

**TRAINING**

The company will ensure every employee who uses hand and power tools is provided proper training on those tools before using them on the job. This training will be provided during working hours at no cost to the employee.
Training Components

The company’s safety coordinator will ensure every employee will be trained on, and adhere to the requirements of, the following minimum elements:

- Proper storage, maintenance and use of any tool the employee will use in his or her job
- A description and identification of the hazards associated with tools
- The safeguards, including PPE, to protect the employee from tools and the hazards for which they are intended
- How to use tool safeguards and why
- Safety precautions necessary for working with the tool
- How to inspect tools for damage and what to do (e.g., contact the supervisor) if a tool is damaged, missing safeguards or other pieces, or otherwise unable to provide adequate protection
- Limitations of tools being used and the how to select the right tool for the job
- How to replace blades, change accessories, lubricate, charge and other similar activities associated with using power tools
- Where to find the manufacturer’s instructions for power tools the employee is expected to use

Training Records

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.
# Hand and Power Tools Safety Training

<table>
<thead>
<tr>
<th>Trainer (include qualifications):</th>
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<tbody>
<tr>
<td>Date:</td>
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<tr>
<td>Content of Training:</td>
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## Attendees

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(Retain at least 3 years)
SCOPE
This chapter covers the requirements and safe practices for providing our employees with hearing protection. It complies with OSHA regulations 1926.101 and 1910.95, whichever is applicable.

POLICY
This Company is committed to ensuring a safe, healthy work environment. This commitment includes monitoring the workplace for noise levels that may damage hearing and includes protecting the hearing of those who work in high-noise environments and implementing a hearing conservation program (HCP) if necessary.

EMPLOYER RESPONSIBILITIES
This Company will:

- Protect employees from work-related hearing loss
- Use engineering and/or administrative controls to keep noise levels below the OSHA action level (AL) and permissible exposure level (PEL) whenever possible
- Implement an HCP when necessary

EMPLOYEE RESPONSIBILITIES
Company employees are expected to:

- Participate in training
- Wear hearing protection devices when appropriate
- Report any problems or concerns about noise levels
- Report any injuries or loss of hearing to appropriate supervisor

NOISE CONTROL
When employees are exposed to noise level above the PEL of 90 dBA or more over an 8-hour time weighted average, noise controls must be in place.

Before requiring hearing protection for workers, other control systems using engineering and administrative controls need to be in place to reduce exposure to hazardous noise levels.

Noise Measurement
Where noise exposure levels are reasonably expected to be above the OSHA action level of 85 dBA, over an 8-hour time weighted average, exposure measurements will be taken to determine the extent of hearing protection necessary and identify tools or processes where sound abatement opportunities exist.

Identifying high-noise activity, tools and equipment at a work site is the first step to lowering site-wide noise levels and reducing noise exposure.
Engineering Controls

Engineering controls can abate noise hazards whenever practicable. Examples include, but are not limited to the following:

- Low-noise tools and machinery
- Appropriate maintenance of all equipment
- Barriers between noise sources and employees
- Enclosure or isolation of noise sources

Strategy Overview

Applying effective, practical, affordable engineering controls to a noise problem is challenging because there are no ready-to-order solutions. You are more likely to find an engineering-control solution when you have accomplished the following:

- Understand what is causing the noise
- Determine how the noise is reaching the listener
- Identify the most appropriate point, or points, at which to control the noise: at the source, along the sound path, or at the listener
- Establish acoustical enclosures and barriers around generators
- Use sound absorbing material and vibration isolation systems on hand tools
- Quiet work practices — use rubber mallets to erect and dismantle formwork

Administrative Controls

Administrative controls also can reduce worker exposure to noise. Examples of such controls include, but are not limited to:

- Scheduling regular maintenance activities
- Operating noisy machines in shifts when fewer workers are present
- Limiting time employees are exposed to a noise

Administrative and work-practice controls are usually less expensive to carry out than engineering controls; that is because there are no significant capital costs involved in changing or modifying equipment. In some cases, administrative controls have reduced employee exposure to noise and increased productivity by rotating employees through a demanding, noisy task. Work-practice controls also improve employee performance by emphasizing safe work practices.

On the other hand, administrative controls and work-practice controls usually are not as effective as engineering controls because they don’t control the noise source. Noisy machines are still noisy and the hazard is still present.

Applying Administrative Controls

Examples of administrative and work-practice controls include the following:

- Reducing the time employees spend working in noisy areas — for example, rotating two or more employees so that each is exposed to noise levels less than 85 decibels, averaged over an eight-hour day
SAFE PRACTICES

Any workplace sound that is not wanted is noise. Workplace noise may be present in a number of ways, each of which has a different potential impact on workers’ hearing, and demands different controls to prevent damage to hearing.

### TABLE 1: PERMISSIBLE NOISE EXPOSURE

<table>
<thead>
<tr>
<th>Duration per day, hours</th>
<th>Sound level dBA slow response</th>
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<tbody>
<tr>
<td>8</td>
<td>90</td>
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<tr>
<td>6</td>
<td>92</td>
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<td>1</td>
<td>105</td>
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<td>½</td>
<td>110</td>
</tr>
<tr>
<td>≤ ¼</td>
<td>115</td>
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</tbody>
</table>

Footnote: When the daily noise exposure is composed of two or more periods of noise exposure of different levels, their combined effect should be considered, rather than the individual effect of each.

Unacceptable levels of noise that may warrant a hearing conservation program are often present on construction sites. OSHA mandates an effective hearing conservation program when sound levels exceed the values shown in table 1.

If a worker needs to raise his voice for someone within arm’s reach to hear, the site is probably noisy enough to require workers to wear hearing protection.

Further, exposure to impulsive or impact noise needs to stay below 140 dB peak sound pressure level.
The following trades are routinely overexposed to noise and should practice hearing protection as a matter of course: carpenters, plumber pipefitters, sprinkler installers, mobile equipment operators, welders/fabricators, sandblasters, drillers, electricians, steel erectors, drywallers shooting tracks or boarding.

Engineering and administrative noise controls should be implemented to reduce sound sufficiently. Where such controls fail to sufficiently reduce sound levels, The Company will provide appropriate personal protective equipment for hearing.

HEARING CONSERVATION PROGRAM

If an acceptable noise level can’t be maintained through engineering and/or administrative controls, this Company will implement an HCP that will include noise monitoring, the use of hearing protection devices (HPD) and audiometric testing.

- Ensure employee participation in hearing protection training program
- Ensure proper initial fitting of hearing protection devices
- Make hearing protectors available, and replace them as necessary
- Ensure hearing protectors are worn
- Notify employees exposed to high-noise activities and equipment
- Employ an audiologist, otolaryngologist or physician if audiometric evaluations and follow-up are provided
- Maintain and retain all records necessary for proper implementation of the HCP
- Review the hearing protection program according to changes in workplace noise levels, personnel changes and technological changes to ensure that the hearing protection program is providing the most possible protection to employees

Noise Monitoring

Sound level measurement and dosimetry are valuable tools to measure possible exposure over the course of the day and for specific equipment, but they have their limitations on a construction site.

Attaching the sound level information for a piece of equipment onto the equipment itself can help inform workers about the hazards they face when working with or around that equipment.

Sound monitoring should be repeated when there has been a change that may increase noise exposures and:

- More employees may be exposed
- Hearing protectors in use may no longer provide adequate protection to hearing

Sound Level Meter and dosimeter can be used to perform exposure monitoring according to manufacturer’s instructions should be calibrated to ensure accuracy, and operators should follow manufacturer’s instructions to conduct sampling.

Hearing Protection

HPDs are the least preferred option to control problematic noise exposure. HPDs will be used in the time it takes to establish engineering or administrative noise controls, or if these controls fail to provide sufficient protection.
This Company will provide and replace HPDs at no cost to all employees who work in the following situations:

- Where other controls fail to reduce noise exposure below an 8-hour TWA of 90 dBA
- Where employees are exposed to noise at or above an 8-hour TWA of 85 dBA, and have experienced hearing loss

In-ear protective devices may not be plain cotton and must be fitted or determined by a competent person to ensure adequate fit.

When using hearing protectors it is important that workers not overprotect. Devices shouldn’t lower noise levels below 70 dBA to ensure workers can hear instructions and ambient sounds to ensure safety.

There are many types of hearing protection. Each type is designed for certain noise conditions. However, remember — unless worn properly and all the time in high noise areas, the devices will not be effective. The Company will consider the “three c’s” of hearing protection selection — comfort, convenience and compatibility — to ensure the devices will be worn correctly 100% of the time when needed.

Hearing protectors available on the market will be labeled with a noise reduction rating (NRR), which indicates how much noise the protective device can block according to laboratory testing. Workers in trades subject to more noise should wear a HPD with a higher NRR.

**Audiometric Testing**

Audiometric testing monitors an employee’s hearing over time. It also provides an opportunity for employers to educate employees about their hearing and the need to protect it.

Although OSHA does not require it for construction activities, all employees exposed to an 8-hour TWA of 85 Db or more should have free audiometric testing as part of the hearing conservation program.

The difficulty in establishing a baseline hearing threshold level and tracking hearing over time for employees in the construction industry, even with the availability of mobile testing facilities, is a well-known challenge in the construction industry. Still, preventing damage to the hearing of employees is of paramount importance, and all appropriate steps should be taken to provide employees the protection they need.

A licensed or certified audiologist, otolaryngologist or other physician should be responsible for the audiometric testing program and oversee all aspects of such testing. Trained technicians may conduct testing without immediate physician oversight if they are appropriately qualified to conduct such tests and they are accountable to an audiologist, otolaryngologist or physician.

**Audiogram**

A baseline audiogram should be established for each employee within 6 months of his or her first exposure at or above the 85-dBA 8-hour TWA action level.
Baseline audiograms should be preceded by 14 hours free of workplace noise exposure (or hearing protector use) and be conducted according to NIOSH or OSHA guidelines by a competent technician or doctor. Audiometric testing should be performed in an appropriate setting with a calibrated, ANSI-approved audiometer.

**Evaluation**

A physician or appropriate technician should compare each employee's annual audiogram to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred.

A standard threshold shift according to OSHA is a change in hearing threshold relative to the baseline audiogram of an average of 10 dB or more at 2000, 3000, and 4000 Hz in either ear (excepting an allowance for age as specified by OSHA in 1910.95 Appendix F: Calculation and Application of Age Correction to Audiograms). However, guidelines that are more stringent may also be followed.

The audiologist, otolaryngologist or physician will review problem audiograms and shall determine whether there is a need for further evaluation.

**Audiogram Evaluation Follow-Up**

This Company will inform the employee in writing within 21 days of an annual audiogram indicating a standard threshold shift to the baseline audiogram.

Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, the Company shall ensure the following steps when a standard threshold shift occurs:

- Employees not using hearing protectors shall be fitted with hearing protectors, trained in their use and care, and required to use them
- Employees already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary
- We will refer the employee for a clinical audiological evaluation or an otological examination as appropriate if additional testing is necessary or if the employer suspects a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors
- Inform the employee of the need for an otological examination with suspicion of a medical pathology of the ear unrelated to the use of hearing protectors

If later audiometric testing of an employee whose exposure to noise is less than an 8-hour TWA of 90 decibels indicates that a standard threshold shift is not persistent, the Company:

- Shall inform the employee of the new audiometric interpretation
- May discontinue the required use of hearing protectors for that employee
An annual audiogram may be substituted for the baseline audiogram when, in the judgment of the audiologist, otolaryngologist or physician who is evaluating the audiogram:

- The standard threshold shift revealed by the audiogram is persistent
- The hearing threshold shown in the annual audiogram indicates significant improvement over the baseline audiogram

RECORDKEEPING

The Company should maintain accurate records of employee exposure measurements and audiometric test records pursuant to this policy. This audiometric test record should include the following:

- Name and job classification of the employee
- Date of the audiogram
- Examiner’s name
- Date of the last acoustic or exhaustive calibration of the audiometer
- Employee’s most recent noise exposure assessment

The following records will be maintained for at least the following periods:

- Noise exposure measurement records for two years
- Audiometric test records for the duration of the affected employee’s employment

All HCP records should be maintained for the duration of the affected worker’s employment and be provided upon request to employees, former employees, representatives designated by the individual employee, and any authorized government official.

If the Company ceases to do business, it will transfer HCP records to the successor employer.

Record a hearing loss on the OSHA 300 log if the following are true:

- A standard threshold shift is indicated by an audiometric examination
- The employee’s overall hearing level is at 25 dB or more above audiometric zero averaged at 2000, 3000 and 4000 Hz in the affected ear(s)
- The hearing loss is work related

TRAINING

The Company will ensure every employee is provided training on hearing protection. This training will be provided at no cost to the employee during working hours.

The Company will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.

Training will be repeated annually with an updated training program that reflects changes in protective equipment and work processes.
Training Components

The Safety Coordinator will ensure that every employee will be trained in the following minimum elements:

- Use and care of all hearing protectors provided
- Effects of noise on hearing
- Purpose of hearing protectors, advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use and care
- The purpose of audiometric testing and an explanation of test procedures (if offered)
- Steps an employee can take in the workplace and outside of the workplace to protect hearing

Training Records

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

FORMS AND ATTACHMENTS

On the following pages, please find the following document(s):

- Audiometric and Identification Information
- Hearing Conservation Program Employee Enrollment
- Hearing Protection Training Record Sheet
# Audiometric and Identification Information

<table>
<thead>
<tr>
<th>Name</th>
<th>ID#</th>
<th>Birth Date</th>
<th>Gender</th>
<th>Test Date</th>
<th>Time</th>
<th>Time since last exposure</th>
<th>hrs</th>
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</table>

<table>
<thead>
<tr>
<th>Exposure Level</th>
<th>dBA</th>
<th>Hearing Protection Devices Used (choose)</th>
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<tbody>
<tr>
<td></td>
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<td><img src="image" alt="Hearing Protection Devices" /></td>
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</table>

## Hearing Protector Activity

- [ ] Issue
- [ ] Reissue
- [ ] Training
- [ ] Retraining

## Medical History

- [ ] Medical history
- [ ] Diabetes
- [ ] Ear Surgery
- [ ] Head Injury
- [ ] High Fever
- [ ] Measles
- [ ] Mumps
- [ ] Hypertension
- [ ] Ringing in Ears
- [ ] Ear Infection
- [ ] Other:

## Hearing Protector Activity

- [ ] Medical history
- [ ] Diabetes
- [ ] Ear Surgery
- [ ] Head Injury
- [ ] High Fever
- [ ] Measles
- [ ] Mumps
- [ ] Hypertension
- [ ] Ringing in Ears
- [ ] Ear Infection
- [ ] Other:

## Additional Information

- [ ] Medical history
- [ ] Diabetes
- [ ] Ear Surgery
- [ ] Head Injury
- [ ] High Fever
- [ ] Measles
- [ ] Mumps
- [ ] Hypertension
- [ ] Ringing in Ears
- [ ] Ear Infection
- [ ] Other:

## Audiogram

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<th>Test Frequency</th>
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<th>Left Ear</th>
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<table>
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<th>Test Reliability</th>
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<tr>
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<th>Biological Cal. Date</th>
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<table>
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<th>Employee Name</th>
<th>Date enrolled</th>
<th>Noise exposure at or above action level</th>
<th>Reason for Enrolling</th>
<th>Enrolled w/o exposure monitoring</th>
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<th>Date of Removal from Hearing Conservation Program</th>
<th>Date of Employee Separation</th>
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<td>Content of Training:</td>
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</table>

| Attendees |  |
| Print Name | Signature |
SCOPE

OSHA does not have its own heat illness regulation but has interpretations that refer to the General Duty Clause and a technical manual (OTM Sect. III Ch. 4) that has heat illness information and guidelines.

Employers that have work environments with recognizable heat-related hazards can be cited for ignoring a recognized hazard like heat illness. This chapter provides information on Cal/OSHA’s heat illness prevention program, which is recognized as an industry standard across the country.

POLICY

Operations, indoor and outdoor, that involve working where there are high air temperatures, radiant heat sources, high humidity, direct physical contact with hot objects, or strenuous physical activities, have a high potential for causing heat-related illness.

This policy is the written plan to establish, implement, and maintain heat illness protection. It will be available at the worksite so that any employee can see it upon request.

This policy has been developed to address these issues. All employees will receive training relating to the causes and effects of, the personal and environmental factors that may lead to, and the prevention measures to fight, heat-related illnesses.

STANDARDS AND REGULATIONS

This company will ensure that all procedures and safe work practices adhere to the following applicable rules and regulations:

- OSHA General Duty Clause, Section 5(a)(1)
- OSHA sanitation regulation CFR 1926.51
- Title 8 of California Code of Regulations Section 3395

RESPONSIBILITIES

Preventing heat-related illness is a cooperative effort between this company and its employees.

This policy incorporates Cal/OSHA’s updates of its heat-related illness regulations effective May 1, 2015 and addresses: training, shade, water, preventative breaks, first-aid response, acclimatization, and emergency procedures.

The following provides appropriate steps for both employers and employees.

**General Responsibilities – Employer**

It is the responsibility of the company to:

- Conduct a risk assessment for all worksites to identify heat risks and safe work procedures
- Establish and implement safe work practices to lessen the effects of heat stress as much as reasonably practical
- Establish and implement supervisor and employee training so everyone can recognize and respond to heat illness symptoms
- Ensure that all relevant risk factors, health, first aid, and emergency response procedures are communicated to all employees and supervisors
- Adjust work practices as necessary when workers complain of heat illness
- Use engineering controls as the primary means of limiting employees' exposure to high heat conditions wherever possible;
- Oversee heat illness prevention training and acclimatization for new workers and for workers who have been off the job for a while
- Establish and implement emergency communication procedures to ensure quick access to first aid and emergency responders

**Employee Responsibilities**

Employees are expected to:

- Follow established safe work policy and procedures
- Know about and recognize initial heat illness symptoms in yourself and others
- Know how to appropriately respond to heat illness symptoms
- Participate in all required training
- Find out whether any prescription medications you are required to take can increase the risk of heat illness
- Get adequate rest and sleep
- Drink small amounts of water regularly to maintain fluid levels and avoid dehydration
- Report signs and symptoms of heat-related illness to supervisor immediately

**HAZARDS**

The body regulates its temperature through sweat and circulating blood to the skin; however, high temperatures and high humidity make this process more difficult. As the body’s ability to cool itself decreases, it must store the excess heat, raising the body’s core temperature. If the body’s temperature becomes too high, it ceases to be able to regulate itself which could result in death.

This company will ensure that all relevant risk factors, health, first aid, and emergency response procedures are communicated to all employees and supervisors. These include, but are not limited to, heat illness prevention (drinking fluids, rest, acclimatization, heat stress factors) and heat illness symptoms; procedures (high heat procedures).

Employees are expected to report symptoms to their supervisor, designated first aid responder, or outside emergency response personnel.
Risk Factors

Many factors determine the total risk a worker faces from excessive heat while at work. At the core of temperature-related risk factors is the basic question of how hot a worker feels. The factors that must be considered when assessing a worker's risk of heat illness include:

- **Temperature** - The apparent temperature can be affected by:
  - The season
  - Reflected heat
  - Heat from equipment
  - Working in direct sunlight

Keeping track of the temperature at the workplace is a critical element of any program to prevent heat-related illness.

- **Humidity** - As humidity rises, sweat tends to evaporate less. As a result, body cooling decreases and body temperature increases.

- **Air Movement** - As long as the air temperature is less than the worker's skin temperature, air movement can help workers stay cooler by increasing both the rate of evaporation and the heat exchange between the skin and the air.

- **Job-specific Exertion** – The body generates more heat during heavy physical work. Heavy physical work requires careful evaluation, even at temperatures as low as 75° F, to prevent heat disorders. This is especially true for workers who are not acclimated to the heat.

- **Clothing and PPE** - Heat illness can be caused or aggravated by wearing PPE such as fire or chemical retardant clothing. Coated and non-woven materials used in protective garments block the evaporation of sweat and can lead to substantial heat stress. The more or heavier clothing worn, the longer it takes evaporation to cool the skin.

- **Time** - Working for long stretches of time and during the heat of the day exposes workers to a higher risk of heat illness. Workers should cycle through light work and heavy work, taking breaks as necessary.
### Work According to Level of Exertion

<table>
<thead>
<tr>
<th>Level of Exertion</th>
<th>Activities</th>
</tr>
</thead>
</table>
| **Light Work**    | Using a table saw  
|                   | Some walking about  
|                   | Operating a crane, truck, or other vehicle  
|                   | Welding |
| **Moderate Work** | Laying brick  
|                   | Walking with moderate lifting or pushing  
|                   | Hammering nails  
|                   | Tying rebar  
|                   | Raking asphalt  
|                   | Sanding drywall |
| **Heavy Work**    | Carpenter sawing by hand  
|                   | Shoveling dry sand  
|                   | Laying block  
|                   | Ripping out asbestos  
|                   | Scraping asbestos fireproofing material |
| **Very Heavy Work** | Shoveling wet sand  
|                   | Lifting heavy objects |

### Equipment and Processes

Equipment and processes at the work site contribute greatly to the heat stress a worker faces. Hot engines and work that involves high temperature processes can significantly raise temperature and put workers at risk. Contact with hot surfaces can also present the danger of burns.

#### Personnel-Specific

It is difficult to predict who will be affected by a heat illness and when, because individual susceptibility varies. There are, however, certain physical conditions that can reduce the body’s natural ability to withstand high temperatures.

**Age**

As the body ages, its sweat glands become less efficient. Workers over the age of 40 may therefore have trouble with hot environments. Acclimatization to the heat and physical fitness can offset some age-related problems.

**Weight**

Workers who are overweight lose heat less efficiently and are more easily subject to heat-related illness.

**Skin Pigmentation**

Persons with lighter complexions are at a higher risk of sunburn and heat illnesses than those with higher levels of skin pigmentation, because skin with less pigmentation absorbs approximately 20% more heat.
Fitness

Being physically fit increases your ability to cope with the increased demands that heat places on your body.

Caffeine and Alcohol

Alcohol consumption within 24 hours of work leads to dehydration and increased risk of heat illness. While recent research suggests that caffeine may not be as detrimental to hydration as formerly believed, in large amounts it does act as a diuretic and can contribute to dehydration.

Medical Conditions

In order to pump blood to the skin and cool the body, the heart rate increases. This can cause stress on the heart, which is particularly hazardous to those with heart disease or high blood pressure.

Certain medications may cause heat intolerance by reducing sweating or increasing urination. People who work in a hot environment should consult their physician or pharmacist before working while taking certain medications.

Workers with recent illnesses involving diarrhea, vomiting, or fever have an increased risk of dehydration and heat illnesses because their bodies have lost salt and water.

HEAT ILLNESS HAZARDS

There are varying degrees of heat related illness and all company employees and supervisors will be trained on the symptoms of them and the procedures to follow in case of an emergency.

The effects of heat illnesses can range from mild discomfort to life threatening and consist of the following types. All company employees will be trained to recognize the symptoms of each.

Sunburn

Although sunburn is not classified as a heat illness, it can make it more difficult for the body to release heat in addition to causing pain and discomfort. A severe sunburn can cause blistering and become infected. Sunscreen and appropriate clothing can prevent sunburn.

Heat Rash

Heat rash is a skin irritation caused by excessive sweating during hot, humid weather.

Workers experiencing heat rash should:

- Try to work in a cooler, less humid environment when possible
- Keep the affected area dry
- Dusting powder may be used to increase comfort

Heat Cramps

Heat cramps usually affect workers who sweat a lot during strenuous activity. This sweating depletes the body's salt and moisture levels. Low salt levels in muscles causes painful cramps. Heat cramps may also be a symptom of heat exhaustion.
Workers with heat cramps should:

- Stop all activity, and sit in a cool place
- Drink clear juice or a sports beverage
- Not return to strenuous work for a few hours after the cramps subside because further exertion may lead to heat exhaustion or heat stroke
- Seek medical attention if any of the following apply:
  - The worker has heart problems
  - The worker is on a low-sodium diet
  - The cramps do not subside within one hour

**Heat Syncope**

Heat syncope is a fainting (syncope) episode or dizziness that usually occurs in a warm environment when the body’s blood pressure drops while attempting to dissipate heat. The result is less blood to the brain, causing light-headedness and fainting when a person stands up quickly or stands for a long period. Those who perform strenuous work outside in warm climates are at particular risk.

Workers with heat syncope should:

- Sit or lie down in a cool place when they begin to feel symptoms
- Slowly drink water, clear juice, or a sports beverage

**Heat Exhaustion**

Heat exhaustion is the body's response to an excessive loss of the water and salt, usually through excessive sweating. Workers most prone to heat exhaustion are those that are elderly, have high blood pressure, and those working in a hot environment.

**Heat Stroke**

Heat stroke is the most serious heat-related disorder. It occurs when the body becomes unable to control its temperature, the body's temperature rises rapidly, the sweating mechanism fails and the body is unable to cool down. When heat stroke occurs, the body temperature can rise to 106 degrees Fahrenheit or higher within 10 to 15 minutes. Heat stroke can cause death or permanent disability if emergency treatment is not given.

Take the following steps to treat a worker with heat stroke:

- Call 911 and notify their supervisor
- Move the sick worker to a cool shaded area
- Cool the worker by either:
  - Soaking their clothes with water
  - Spraying, sponging, or showering them with water
  - Fanning their body
HEAT ILLNESS SYMPTOMS

Symptoms of Sunburn

Typically, there is initial redness, followed by varying degrees of pain, depending on the duration and intensity of exposure. Other symptoms can include swelling, itching, peeling skin, rash, nausea, fever, chills and fainting. Sunburns may be first or second degree burns.

Symptoms of heat rash include:

- A red cluster of pimples or small blisters
- More likely to occur on the neck and upper chest, in the groin, under the breasts, and in elbow creases

Symptoms of Heat Cramps Include:

- Muscle pain or spasms usually in the abdomen, arms, or legs
- Severe, sometimes disabling, cramps that typically begin suddenly in the hands, calves, or feet
- Hard, tense muscles

Symptoms of Heat Syncope Include:

- Light-headedness
- Dizziness
- Fainting

Symptoms of Heat Exhaustion Include:

- Heavy sweating and/or cold, clammy skin
- Nausea
- Pale or flushed complexion
- Slightly elevated body temperature
- Chills
- High body temperature
- Extreme weakness or fatigue
- Dizziness, confusion, or hallucinations
- Slowed or weakened heartbeat
- Muscle aches and cramps
- Fast and shallow breathing
- Throbbing headache
- Slurred speech
- Excessive thirst
- Dizziness, confusion, or hallucinations
- Slowed or weakened heartbeat
- Muscle aches and cramps
- Fast and shallow breathing
- Throbbing headache
- Slurred speech

NOTE: Pesticide poisoning has similar symptoms as heat exhaustion.

Symptoms of Heat Stroke Include:

- Nausea and vomiting
- Dizziness and fainting
- Hot, flushed, dry skin
- Decreased sweating
- Decreased urination
- Increased body temperature (104 to 106ºF)
- Convulsions
- Headache
- Fatigue
- Rapid or slowed heart rate
- Shortness of breath
- Blood or urine in stool
- Confusion, delirium, loss of consciousness
- Slurred speech
- Pale or flushed complexion
- Slightly elevated body temperature
- Chills
- High body temperature
- Extreme weakness or fatigue
- Dizziness, confusion, or hallucinations
- Slowed or weakened heartbeat
- Muscle aches and cramps
- Fast and shallow breathing
- Throbbing headache
- Slurred speech

Heat stroke can occur suddenly, without any symptoms of heat exhaustion. If a person is experiencing any symptoms of heat exhaustion or heat stroke, GET MEDICAL CARE IMMEDIATELY. Any delay could be fatal.
Emergency Response

The company will provide emergency medical services as quickly as possible if a worker suffers from heat illness.

All employees may contact 9-1-1 when necessary, but at least one accessible person for each crew will be designated responsible for initiating an emergency response. The emergency response can include immediate first aid, continued monitoring, contacting 9-1-1 and transporting the victim to emergency responders. An appropriately trained and equipped first aid provider at the worksite can decide on the appropriate response. If that person does not exist, then 9-1-1 will be called for any employee showing heat related illness symptoms.

A risk assessment will be conducted for all worksites that consider heat illness a risk factor: if 9-1-1 can be accessed from the worksite, whether the work site is served by the 9-1-1 system, and ensure emergency responders can access any victims. All employees will have access to a map of their location or clear, detailed and precise directions.

Employees and supervisors will know the basic first aid to stop the progression of heat illness.

REQUIREMENTS

Access to Shade

- When the outdoor temperature in the work area is expected to exceed 80 degrees Fahrenheit, the company must provide and maintain one or more shaded areas for employees that are either open to the air or supplied with ventilation or cooling. The amount of shade present must be at least enough to accommodate all of the employees on rest or recovery periods, allowing them to sit in a normal posture, fully in the shade, without being in physical contact with each other. The shaded area will be located as close as practicable to the employees work area
- Shaded areas must also be available during meal periods and be capable of accommodating all employees on meal periods who remain onsite
- When the outdoor temperature in the work area does not exceed 80 degrees, employers will either provide shade or provide timely access to shade if requested by an employee
- Employees will be allowed and encouraged to take a preventative cool-down rest in the shade when they feel the need to do so to protect themselves from overheating. Access to shade must be permitted at all times
- Employees who take a preventative cool-down rest will be:
  - Monitored and asked if they are experiencing any symptoms of heat illness
  - Encouraged to remain in the shade
  - Not ordered back to work until any signs of heat illness have subsided, or for at least five minutes once they have accessed the shade
- Employees who exhibit or report signs or symptoms of heat illness will take a cool-down period and will be provided with the necessary first aid or emergency response
• Exceptions
  o Where the company can demonstrate that it is infeasible or unsafe to have a shade structure, or otherwise to have shade present on a continuous basis, the employer may utilize alternative equivalent procedures for providing access to shade
  o Except for employers in the agricultural industry, cooling measures other than shade (e.g., use of misting machines) may be provided instead of shade if the employer can demonstrate that these measures are at least as effective as shade in allowing employees to cool

High-Heat Procedures
The company will implement high-heat procedures when the temperature equals or exceeds 95 degrees Fahrenheit. These procedures will include the following:

• Observing employees for alertness and signs or symptoms of heat illness by one of the following:
  o Having a supervisor or designated person observe employees for groups of 20 or less
  o Implementing a mandatory buddy system
  o Having regular communication with an employee by radio, phone, or other reliable method
• Authorizing at least one employee at the worksite to summon emergency services if no qualified first aid provider is available
• Reminding employees throughout the work shift to drink plenty of water
• Conducting pre-shift meetings before the start of work to review the high heat procedures with employees, including the need to drink water frequently and the right to take cool-down rests

Potable Water
An adequate supply of potable water will be provided continuously in all places of employment, along with single-service cups (unless the source is a drinking fountain). The water should be kept cool or cold if supplied in a hot environment. Potable water is defined as water that meets the drinking water standards of the state or local authority having jurisdiction, or water that meets the quality standards prescribed by the EPA's drinking water regulations.

Fluid Intake
In a day's work in the heat, a worker may produce as much as 2 to 3 gallons of sweat. Because so many heat disorders involve excessive dehydration of the body, it's essential that water intake during the workday be about equal to the amount of sweat produced. Most workers exposed to hot conditions drink less than needed because of an insufficient thirst drive.

A worker, therefore, should not depend on thirst to signal when and how much to drink. Instead, the worker should drink 5 to 7 ounces of fluids every 15 to 20 minutes to replenish the necessary fluids in the body. There is no optimum temperature of drinking water, but most people tend not to drink warm or very cold fluids as readily as they will cool ones. Whatever the temperature of the water, it must be agreeable and readily available to the worker. Individual drinking cups should be provided, unless a drinking fountain is used. OSHA sanitation standards prohibit the use of a common drinking cup.
Heat acclimatized workers lose much less salt in their sweat than do workers who are not adjusted to the heat. The average American diet contains sufficient salt for acclimatized workers even when sweat production is high. If, for some reason, salt replacement is required, the best way to compensate for the loss is to add a little extra salt to the food. Salt tablets should not be used.

**Number and Duration of Exposures**

Rather than be exposed to heat for extended periods during the course of a job, workers should, wherever possible, be permitted to distribute the workload evenly over the day and incorporate work-rest cycles. Work-rest cycles give the body an opportunity to rid itself of excess heat, slow down the production of internal body heat, and provide greater blood flow to the skin.

Workers employed outdoors are especially subject to weather changes. A hot spell or a rise in humidity can create overly stressful conditions. The following practices can help reduce the risk of heat illness:

- Postponement of nonessential tasks
- Permit only those workers acclimatized to heat to perform the more strenuous tasks
- Provide additional workers to perform the tasks keeping in mind that all workers should have the physical capacity to perform the task and that they should be accustomed to the heat

**Engineering Controls**

A variety of engineering controls can be introduced to minimize exposure to heat. For instance, improving the insulation on a furnace wall can reduce its surface temperature and the temperature of the area around it. In a laundry room, exhaust hoods installed over those sources releasing moisture will lower the humidity in the work area. In general, the simplest and least expensive methods of reducing heat and humidity can be accomplished by:

- Opening windows in hot work areas
- Using fans
- Using other methods of creating airflow such as exhaust ventilation or air blowers

**Rest**

Providing cool rest areas in hot work environments considerably reduces the stress of working in those environments. There is no conclusive information available on the ideal temperature for a rest area. However, a rest area with a temperature near 76°F appears to be adequate and may even feel chilly to a hot, sweating worker, until acclimated to the cooler environment.

The rest area should be as close to the workplace as possible. Individual work periods should not be lengthened in favor of prolonged rest periods. Shorter but frequent work-rest cycles are the greatest benefit to the worker.

The revised Cal-OSHA heat Illness regulation requires agricultural employers to ensure that employee takes a minimum ten minute net preventative cool-down rest period every two hours when temperatures reach 95 degrees or above.
Acclimatization

A supervisor or designee will closely observe employees who have been newly assigned to a high heat area or job for the first 14 days of the employee’s employment.

When exposed to heat for a few days, the body will adapt and become more efficient in dealing with raised environmental temperatures. This process is called acclimatization. Acclimatization can take from 4 to 14 days, depending on the individual, of working at least two hours a day in the heat.

Acclimatization may be lost in as little as three days away from work. Employees, and supervisors, who return to work after a holiday or long weekend, need to understand this. Workers should be allowed to re-acclimatize to work conditions gradually.

PROCEDURES

This policy is the written plan to establish, implement and maintain heat illness protection. This policy will also be made available at the worksite so that any employee, who requests to, can see it.

Each worksite will have procedures in place that document how to provide:

- Enough refreshing, pure, and cool drinking water for all employees
- Available shade to encourage preventative cool down rests
- Acclimatization in high heat
- Weather condition monitoring and associated safety precautions
- Adjustments needed in high temperatures
- Training employees and supervisors
- Communicating this policy
- First Aid
- Emergency response
- Specific knowledgeable person(s) designated to implement these procedures

HIGH-HEAT PLANNING

The National Weather Service issues heat-related notifications that can help ensure work planning includes appropriate controls and processes to prevent heat-related illness and treat them as they arise:

Excessive Heat Outlook

Excessive Heat Outlooks are issued when the potential exists for an excessive heat event in the next 3-7 days.

Excessive Heat Watch

Excessive Heat Watches are issued by the National Weather Service when the heat is expected to be in excess of 105°F during the day combined with nighttime low temperatures of 80°F or higher are forecast to occur for two consecutive days.
Excessive Heat Warning and Advisories

Excessive Heat Warning/Advisories are issued within 12 hours of when the heat index is expected to be at least 105° F for more than 3 hours per day for 2 consecutive days, or more than 115° F for any length of time. These notices are issued when an excessive heat event is occurring, is imminent or has a very high probability of occurring. The warning is used for conditions posing a threat to life or property. An advisory is for less serious conditions that cause significant discomfort or inconvenience and, if caution is not taken, could lead to a threat to life and/or property.

Outdoor Working Procedures

When employees are working outdoors during high heat periods, steps will be taken to limit the effects of heat exposure when temperatures exceed an action level depending on the type of clothing being worn.

<table>
<thead>
<tr>
<th>All other clothing</th>
<th>89° F</th>
</tr>
</thead>
<tbody>
<tr>
<td>Double-layer woven clothes including coveralls, jackets and sweatshirts</td>
<td>77° F</td>
</tr>
<tr>
<td>Non-breathing clothes including vapor barrier clothing or PPE such as chemical resistant suits</td>
<td>52° F</td>
</tr>
</tbody>
</table>

These steps include

- Supplying at least one quart of drinking water per employee per hour throughout the shift
- Encouraging workers to frequently drink water and other hydrating beverages
- Monitoring workers for heat illness symptoms
- Hold pre-shift meeting to remind workers of high heat hazards

Workers with heat related illness symptoms will be relieved from duty and given a way to reduce their body temperature and monitored to determine if they need medical attention.

Workers are considered to be working outdoors when they are outside for more than 15 minutes in an hour. Work environments are considered outdoors when the factors affecting the temperature are not managed by engineering controls (e.g. air conditioning). Some examples include vehicle cabs, sheds, and tents.

Heat Protection

Employees working in areas that present heat hazards should follow these recommendations:

- When working in the heat, clothing should be loose fitting, lighter color to reflect sun, and should contain as much cotton as possible.
- Wear sunscreen
- Wear a hat
- Use UV eye protection (if possible)
- Change out of wet clothing when working in high humidity conditions
PPE

Employees who are required to wear specific types of PPE in high heat environments should consider the use of the following additional equipment:

- Cooling pad inserts for hardhats
- Insulated gloves
- Insulated suits
- Reflective clothing
- Infrared reflecting face shields

For extremely hot conditions, thermally conditioned clothing is available. One such garment carries a self-contained air conditioner in a backpack, while another is connected to a compressed air source that feeds cool air into the jacket or coveralls through a vortex tube. Another type of garment is a plastic jacket that has pockets that can be filled with dry ice or containers of ice.

Employees should discuss these options with their supervisor to determine if the provision of the items by the company is warranted.

BUDDY SYSTEM

A worker may not recognize his own signs and symptoms of heat-related illness. Workers should be encouraged to look after each other to ensure the team stays safe and healthy. A buddy system assigns each worker to one other worker to ensure there is at least one other person monitoring the heat health of every worker.

**Actions to Prevent Heat-Related Illness Based on Temperature**

<table>
<thead>
<tr>
<th>Temperature</th>
<th>Risk Level</th>
<th>Protective Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;91°F</td>
<td>Lower Caution</td>
<td>Basic heat safety and planning</td>
</tr>
<tr>
<td>91°F – 103°F</td>
<td>Moderate</td>
<td>Implement precautions and heighten awareness</td>
</tr>
<tr>
<td>103°F – 115°F</td>
<td>High</td>
<td>Additional precautions to protect workers</td>
</tr>
<tr>
<td>&gt;115°F</td>
<td>Very high/Extreme</td>
<td>Even more aggressive measures</td>
</tr>
</tbody>
</table>

As temperatures rise, managers and supervisors need to take responsibility for ensuring appropriate procedures are being followed to reduce the ill effects of heat on workers.

**Lower Caution**

- Adequate drinking water
- Available medical services
- Acclimatize new and returning workers who perform strenuous work
- Check forecast regularly
- Encourage workers to wear sunscreen and use other protections from direct sunlight
- Depending on site conditions, take actions for moderate risk conditions

**Moderate Caution**

- Follow “Lower Caution” precautions.
- Alert workers to index, identify additional precautions necessary
- Remind workers to drink small amounts of water through the day
- Respond to heat-related illnesses and medical emergencies immediately
- Review heat-related illness symptoms and signs and the established site-specific precautions
- Schedule frequent breaks in cool, shaded areas
- Acclimatize new and returning workers
- Set up a buddy system
- Instruct supervisors to watch workers for signs of heat-related illness

**High Caution**

- Follow “Moderate” precautions
- Have a knowledgeable person onsite to modify work activities and the work/rest schedule as necessary
- Establish and enforce work/rest schedules
- Adjust work activities
- Take extra precautions for workers in clothing that may add to a heat hazard
- Maintain effective communication with crew

**Very High to Extreme**

- Follow “High” precautions
- Reschedule non-essential outdoor work
- Move essential outdoor work to coolest part of work shift
- Stop work if necessary

**EMERGENCY RESPONSE PROCEDURES**

Our company has implemented heat illness emergency response procedures that include:

- Ensuring there is reliable communication method between employees and supervisors and/or emergency services in the event assistance for heat illness is needed
- Responding to the signs and symptoms of heat illness, including the procedures for providing first aid and additional emergency services as needed. These procedures will include:
  - Authorizing qualified supervisors or designated employees to provide first aid and/or contact emergencies services
  - Implement emergency procedures in cases of severe heat illnesses
  - Monitoring any employee displaying the signs and symptoms of heat illness, and not leaving them unattended or releasing them to leave the worksite without offering to provide first aid or emergency services
• Contacting emergency medical services, and/or transporting the employee to a medical provider or facility
• Ensuring that the personnel responsible for contacting emergency services are capable of providing the responders with clear and precise directions to the worksite

TRAINING

We will ensure every employee is provided training on preventing heat-related illness. This training will be provided at no cost to the employee during working hours.

Training will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

Training Elements

Training will be provided to employees and supervisors before being assigned to any outdoor work for the first time and then at least annually on the following topics:

Employee Training Components

The safety coordinator will ensure all employees are trained in the following minimum elements:

• Heat related illness environmental factors
• Personal factors that increase susceptibility (e.g. age, acclimatization, medical conditions, water consumption, alcohol, caffeine, nicotine, and medical conditions)
• The company’s heat illness procedures including but not limited to:
  o The company's methods of providing water, shade, cool-down rests and access to first aid
  o The employees right to request heat illness relief without fear of retaliation
• The importance of frequent consumption of small quantities of water, up to four 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 body’s ability to adjust to high temperatures over time), how it is developed, and how worksite procedures address it
• Symptoms of types of heat related illness, and the treatment for them
• The procedures that can be taken to prevent heat-related illness
• The importance of removing heat retaining PPE during breaks
• The importance of immediately reporting to the employer/supervisor, symptoms or signs of heat illness in themselves, or in co-workers
• The danger of rapid progression of heat illness form mild to life threatening
• The employer's procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary
• The employer's procedures for contacting emergency medical services, and if necessary, for transporting employees to an emergency medical service provider
• The employer's procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site will be provided as needed to emergency responders. These procedures must include designating a person to be available to ensure that emergency procedures are initiated when appropriate
Supervisor Training

Supervisor training will cover:

- What employees need to know
- Procedures to implement this program
- Emergency response procedures (e.g. transportation, reaching an emergency medical service provider)

When it’s reasonable to expect that workers will be exposed to the risk of heat illness, supervisors will be trained on the following topics before being permitted to supervise those workers.

- The information required to be provided to employees in the section immediately above
- The procedures the supervisor is to follow to implement the applicable provisions in this chapter
- The procedures the supervisor is to follow when an employee exhibits symptoms of possible heat illness, including emergency response procedures
- How to monitor weather reports and how to respond to hot-weather advisories

Training Records

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

FORMS AND ATTACHMENTS

Please find the following document on the pages below:

- Heat Illness Training Documentation

This form may be reproduced for the purposes of implementing and maintaining a safety and health program.
# Heat Illness Training

<table>
<thead>
<tr>
<th>Trainer (include qualifications):</th>
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<td>Date:</td>
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## Content of Training:

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## Attendees

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<th>Signature</th>
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(Retain at least 3 years)
Hygiene and Dress

SCOPE

The Company requires all employees to present themselves in a professional manner, with regard to attire, personal hygiene and appearance. These standards are commensurate with our organizational practices of appropriate business conduct, professionalism and dress code.

POLICY

Our Company has implemented this policy to ensure a safe and professional workplace. This Policy covers:

- Work-appropriate hygiene
- Acceptable levels of personal grooming
- Appropriate business attire
- Distribution employees
- Workplace inappropriate attire
- Personal protective equipment
- Policy compliance

EMPLOYER RESPONSIBILITIES

All managers, supervisors and employees will abide by the policies set forth in the personal hygiene and dress policy. Failure to do so will result in disciplinary action.

EMPLOYEE RESPONSIBILITIES

This Company’s employees are expected to meet hygiene requirements during regular business hours for the duration of their employment.

- Maintain personal cleanliness by bathing daily
- Oral hygiene (brushing of teeth) required
- Use deodorant/anti-perspirant to minimize body odors
- Do not wear heavily scented perfumes, colognes and lotions; these can cause allergic reactions, migraines, and respiratory difficulty for some employees
- Keep fingernails clean and trimmed (¼ inch long or less)
- Wash hands after eating, or using the restrooms

PERSONAL GROOMING

- Clothing must be clean, pressed, in good condition and fit appropriately
- Socks or hose must be worn with shoes
- Neat and well-groomed hair, sideburns, mustaches, and beards (no artificial colors e.g. pink, green, etc. are permitted that would be deemed unprofessional)
- Moderate make-up
PERSONAL HYGIENE AND DRESS

- Secured long hair (hair must be tied back to prevent the potential for being caught in equipment)
- Clothing must not interfere with the safe operation of equipment
- No dark glasses (unless prescribed by a physician)
- Limited jewelry and no dangling or large hoop jewelry that may create a safety hazard to self or others. A general rule of thumb is that if a pencil can be passed through a hoop earring it is not safe to wear near operating equipment
- Body piercing must be limited to three per ear. Other visible body piercing is unacceptable, unless demanded by religion/culture
- Tattoos perceived as offensive, hostile or that diminish the effectiveness of the employee’s professionalism must be covered, and not visible

ATTIRE

Any Company staff that maintains regular, in-person contact with customers will be required to wear appropriate attire.

<table>
<thead>
<tr>
<th>Men</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Women</th>
</tr>
</thead>
</table>

Inappropriate Attire

The following items are not permitted in any area during normal working hours:

- Sweat pants
- Jogging pants
- Pants that expose the midriff, underwear or leggings
- Gym shorts
- Bicycle shorts or other athletic shorts
- Low-cut tops
- Halter tops
- Spaghetti strap tops
- Tops that expose the midriff or underwear
- Mini-skirts
• Any form of clothing that is mesh, sheer, see-through or otherwise revealing
• Any form of clothing that is generally offensive, controversial, disruptive or otherwise distracting
• Any form of clothing that is overtly commercial, contains political, personal or offensive messages
• Plastic flip-flops or sandals
• Beach footwear

**CLARIFICATION**

Every Company employee is responsible for using good judgment and common sense for his or her attire at all times. If an employee is deemed to be wearing inappropriate attire, his/her Manager is responsible for coaching the employee accordingly.

Individual situations relating to appropriate workplace attire may be addressed on a case-by-case basis. If you have questions about these guidelines or particular dress requirements, contact your manager.

**COMPLIANCE**

Departure from appropriate grooming, hygiene and attire standards will result in employee counseling and/or disciplinary action up to and including termination of employment. Theme days are occasionally approved by the Company and/or appropriate department, when a deviation from these guidelines is appropriate, and when the business necessities will not be affected. Personal appearance standards may be reviewed periodically and updated as deemed necessary.
SCOPE

This chapter provides information on the safe practices when working with ladders and/or stairs. The policy and procedures covered where will comply with the requirements of the OSHA ladder and stairway regulations in 1926 Subpart X and/or 1910 Subpart D, whichever is applicable.

It does not address working at elevations or fall protection, those items are addressed in separate chapters.

POLICY

Ladders are valuable tools, but they present a range of hazards that workers need to understand in order to use them safely. This Company has created this policy to ensure employees understand how to use ladders safely, how to select the right ladder for a job, how to store and maintain ladders and how to recognize ladders that may be hazardous.

EMPLOYER RESPONSIBILITIES

This Company is responsible for:

- Making sure all ladders meet safety requirements and are maintained in safe, working condition
- Selecting ladders to purchase according to needs of operations
- Ensuring employees are trained in safe ladder selection and use
- Removing ladders from service when they are no longer safe to be used
- Requiring employees use ladders as safely as possible

EMPLOYEE RESPONSIBILITIES

Employees will:

- Participate actively in ladder safety training
- Recommend safety improvements and report safety hazards to supervisor, safety team or other appropriate personnel
- Report damaged or otherwise unsafe ladders
- Follow safe practices when using ladders
- Transport and store ladders according to best safe practices

HAZARDS

Most ladder falls involve portable ladders that move, tilt or shift while a worker is climbing or descending. Unstable or slippery base surfaces are the primary reasons ladders fail. Other reasons include a misstep or a slip of the foot, loss of balance, an overreach and being struck by a vehicle or another object.
LADDER TYPES

Portable Ladders

Workers can reduce ladder fall risks by doing the following:

- Frequently inspecting and maintaining ladders
- Matching tasks to appropriate ladders
- Setting up ladders correctly
- Climbing and descending ladders properly

Any portable ladder used during construction activities: must be meet the following specifications

- Non-self-supporting and self-supporting portable ladders must support at least four times the maximum intended load; extra heavy-duty type 1A metal or plastic ladders must be able to support 3.3 times the maximum intended load. The ability of a self-supporting ladder to sustain loads must be determined by applying the load to the ladder in a downward vertical direction. The ability of a non-self-supporting ladder to sustain loads must be determined by applying the load in a downward vertical direction when the ladder is placed at a horizontal angle of 75.5 degrees
- The minimum clear distance between side rails for portable ladders must be 11.5 inches
- The rungs and steps of portable metal ladders must be corrugated, knurled, dimpled, coated with skid-resistant material, or treated to minimize slipping

Non-Self-Supporting Ladders

Single Portable or Straight Ladders

The single portable or straight ladder is indispensable for general use. It is the most common type of portable ladder and has the widest range of applications. When used on slippery surfaces, this ladder must have slip-resistant feet or be secured to prevent it from sliding.

Rubber or neoprene ladder shoes are recommended for smooth, dry surfaces, and spikes are recommended for snow or ice. Single portable ladders must not be longer than 30 feet and be used by only one worker at a time.

Extension or Section Ladder

Extension ladders consist of two or more sections that travel in guides or brackets, allowing adjustable lengths. The sections must be assembled so that the sliding upper section is on top of the lower section. Each section must overlap its adjacent section a minimum distance, based on the ladder’s overall length. See Table 2.

The overall length of an extension ladder is determined by adding the lengths of the individual sections, measured along the side rails.

Note: Install positive stops on individual ladder sections to ensure the required overlap.
### Table 1

<table>
<thead>
<tr>
<th>Number of Sections for metal ladders</th>
<th>Maximum Length (in feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>one section (or any section of a multiple-section ladder)</td>
<td>30</td>
</tr>
<tr>
<td>two-section ladder</td>
<td>48</td>
</tr>
<tr>
<td>more than two sections</td>
<td>60</td>
</tr>
</tbody>
</table>

### Table 2

<table>
<thead>
<tr>
<th>Normal Length of Ladder (in feet)</th>
<th>Overlap (in feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Up to and including 36</td>
<td>3</td>
</tr>
<tr>
<td>Over 36, up to and including 48</td>
<td>4</td>
</tr>
<tr>
<td>Over 48, up to 60</td>
<td>5</td>
</tr>
</tbody>
</table>

Extension ladders are made of wood, metal, or reinforced fiberglass. Wood ladders cannot have more than two sections and must not exceed 60 feet. Metal and fiberglass ladders can have as many as three sections; however, the overall length must not exceed 72 feet. See Table 1. Individual sections of any extension ladder must not be longer than 30 feet.

Extension ladders are for use by only one person at a time.

Make sure extension ladders have non-slip bases if there is a chance the ladder can slip. Cord-face ladder shoes are recommended for wet surfaces, rubber or neoprene ladder shoes for smooth dry floor surfaces, and steel spikes for ice or snow. Be careful if you use an extension ladder on oily, metal or concrete surfaces. Place the ladder securely and tie it off to prevent it from slipping.

**Self-Supporting Ladders**

**Standard Stepladder**

The standard stepladder, a general-purpose ladder, has flat steps and a hinged back. It is self-supporting and nonadjustable. An industrial model, designed for heavy service demands, has oversize back legs, heavy-duty flat steps, and knee braces that increase rigidity and durability.

Standard stepladders should be used only on surfaces that offer firm, level footing such as floors, platforms and slabs. They are available in metal, wood, or reinforced fiberglass versions, and are intended to support only one worker at a time. Remember not to stand on, or work from, the top step. The ladders must have a metal spreader or locking arms. They cannot be longer than 20 feet, measured along the front edge of the side rails.
Two-Way Stepladder

The two-way stepladder is similar to the industrial standard stepladder; however, each side of this ladder has a set of steps. The extra set of steps offers convenience and versatility: One person can work from either side or two people can work from the ladder at the same time — one on each side.

Platform Ladder

The platform ladder is a special-purpose ladder that has a large stable platform from which you can work at the highest standing level. The ladder's length is determined by the length of the front edge of the side rail from the bottom of the ladder to the base of the platform. The length of a platform ladder cannot exceed 20 feet.

Trestle Ladder

A trestle ladder is a self-supporting portable ladder that has two sections hinged at the top, forming equal angles with the base. A variation of the trestle ladder, the extension trestle ladder, includes a vertically adjustable single ladder that can be locked in place. (The single extension section must lap at least three feet into the base section.) Trestle ladders are used in pairs to support planks or staging. The rungs are not intended to be used as steps.

The angle of spread between open front and back legs must be 5 ½ inches per foot of length. The length cannot be more than 20 feet, measured along the front edge of the side rails. Rails must be beveled at the top and have metal hinges to prevent spreading. Metal spreaders or locking devices are also required to keep the rails in place.

Ladder Storage

The storage area should be well ventilated. Wood ladders should not be exposed to moisture or excessive heat. Avoid storing ladders near stoves, steam pipes or radiators.

Store straight or extension ladders in flat racks or on wall brackets. Make sure there are enough brackets to support the ladder so that it does not sag. If the ladder rails have a lateral curve, the wall brackets should match the curve.

Store stepladders vertically, in a closed position, to reduce the risk of sagging or twisting. Secure stored ladders so that they will not tip over if they are struck.

Store ladders, especially wood ladders, promptly after using them. Exposure to moisture and sun will shorten the life of a wood ladder.

Transporting Ladders

When you hand-carry a ladder, keep the front end elevated, especially around blind corners, in aisles, and through doorways. You will reduce the chance of striking another person with the front of the ladder.

When you transport a ladder in a truck or trailer, place it parallel to the bed. Avoid tossing, throwing or dropping it in the bed. If you transport a long ladder on a short truck bed over long distances, support the ladder so it will not sag or bend.
Drive slowly over rough terrain. Tie the ladder securely to eliminate nicking, gouging, chafing and road shock.

**Fixed Ladders**

A fixed ladder must be capable of supporting at least two loads of 250 pounds each, concentrated between any two consecutive attachments. Fixed ladders also must support added anticipated loads caused by ice buildup, winds, rigging and impact loads resulting from the use of ladder safety devices.

Individual rung/step ladders must extend at least 42 inches above an access level or landing platform, either by the continuation of the rung spacing as horizontal grab bars, or by providing vertical grab bars that must have the same lateral spacing as the vertical legs of the ladder rails.

Each step or rung of a fixed ladder must be capable of supporting a load of at least 250 pounds applied in the middle of the step or rung.

The minimum clear distance between the sides of individual rung/step ladders and between the side rails of other fixed ladders must be 16 inches.

The rungs of individual rung/step ladders must be shaped to prevent slipping off the end of the rungs. The rungs and steps of fixed metal ladders must be corrugated, knurled, dimpled, coated with skid-resistant material or treated to minimize slipping.

The minimum perpendicular clearance between fixed ladder rungs, cleats and steps, and any obstruction behind the ladder must be 7 inches, except that the clearance for an elevator pit ladder must be 4.5 inches.

The minimum perpendicular clearance between the centerline of fixed ladder rungs, cleats and steps, and any obstruction on the climbing side of the ladder must be 30 inches. If obstructions are unavoidable, clearance may be reduced to 24 inches, provided a deflection device is installed to guide workers around the obstruction.

The step-across distance between the center of the steps or rungs of fixed ladders and the nearest edge of a landing area must be no less than 7 inches and no more than 12 inches. A landing platform must be provided if the step-across distance exceeds 12 inches.

Fixed ladders must have cages, wells, ladder safety devices or self-retracting lifelines where the length of climb is less than 24 feet but the top of the ladder is at a distance greater than 24 feet above lower levels. Fixed ladders without cages or wells must have at least a 15-inch clear width to the nearest permanent object on each side of the centerline of the ladder.

If the total length of a climb on a fixed ladder equals or exceeds 24 feet, at least one of the following items is required:

- Ladder safety devices
- Self-retracting lifelines, and rest platforms at intervals not to exceed 150 feet
- A cage or well, and multiple ladder sections, each ladder section not to exceed 50 feet in length, these ladder sections must be offset from adjacent sections, and landing platforms must be provided at maximum intervals of 50 feet
The side rails of through or side-step fixed ladders must extend 42 inches above the top level or landing platform served by the ladder. For a parapet ladder, the access level must be at the roof if the parapet is cut to permit passage through it; if the parapet is continuous, the access level is the top of the parapet.

Steps or rungs for through-fixed-ladder extensions must be omitted from the extension; and the extension of side rails must be flared to provide between 24 inches (61 cm) and 30 inches clearance between side rails.

When safety devices are provided, the maximum clearance between side rail extensions must not exceed 36 inches.

**Cages for Fixed Ladders**

Horizontal bands must be fastened to the side rails of rail ladders, or directly to the structure, building or equipment for individual-rung ladders.

Vertical bars must be on the inside of the horizontal bands and must be fastened to them.

The inside of the cage must be clear of projections.

Horizontal bands must be spaced at intervals not more than 4 feet apart measured from centerline to centerline.

The bottom of the cage must be between 7 feet and 8 feet above the point of access to the bottom of the ladder.

The top of the cage must be at least 42 inches above the top of the platform, or the point of access at the top of the ladder.

**Wells for Fixed Ladders**

- Wells must completely encircle the ladder
- Wells must be free of projections
- The inside face of the well on the climbing side of the ladder must extend between 27 inches and 30 inches from the centerline of the step or rung
- The inside width of the well must be at least 30 inches
- The bottom of the well above the point of access to the bottom of the ladder must be between 7 feet and 8 feet

**SAFE PRACTICES**

Anytime there is a break in elevation of 19 inches or more, and no ramp, runway, embankment or hoist is provided, the Company will provide either a stairway or a ladder.

The point of access between levels must always allow free passage. If there is work being performed that limits free access, another point of access must be provided.

All employees will use the following safe practices when working with or on ladders:

- Inspect ladders for damage or wear before use
- Ladders must be maintained free of oil, grease, and other slipping hazards
• Ladders will not be loaded beyond the maximum intended load or the manufacturer’s rated capacity
• Ladders may only be used for the purpose for which they were designed
• If a work area for 25 or more employees can be accessed only by a ladder (or anytime two-way traffic relies on a ladder), the Company will provide either a double-cleated ladder or two or more separate ladders to serve two-way traffic
• Ladder rungs, cleats and steps must be parallel, level, and uniformly spaced when the ladder is in position for use
• Ladders must not be tied or fastened together to create longer sections unless they are specifically designed for such use
• A metal spreader or locking device must be provided on each stepladder to hold the front and back sections in an open position when the ladder is being used
• When splicing side rails, the resulting side rail must be equivalent in strength to a one-piece side rail made of the same material
• Two or more separate ladders used to reach an elevated work area must be offset with a platform or landing between the ladders, except when portable ladders are used to gain access to fixed ladders
• Ladder components must be constructed to prevent injury from punctures or lacerations, and prevent snagging of clothing
• Wood ladders must not be coated with any opaque covering, except for identification or warning labels, which may be placed only on one face of a side rail
• Ladders with conductive metal sides will be marked with the words “WARNING — Do not use around energized electrical equipment” and must not be used around energized electrical equipment.
• Non-self-supporting ladders must be used at an angle where the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder. Wood job-made ladders with spliced side rails must be used at an angle where the horizontal distance is one-eighth the working length of the ladder
• Fixed ladders must be used at a pitch no greater than 90 degrees from the horizontal, measured from the backside of the ladder
• Ladders must be used only on stable and level surfaces unless secured to prevent accidental movement
• Ladders may not be used on slippery surfaces unless secured or provided with slip-resistant feet to prevent accidental movement. Slip-resistant feet must not be used as a substitute for the care in placing, lashing, or holding a ladder upon slippery surfaces
• Ladders placed in areas such as passageways, doorways, or driveways, or where they can be displaced by workplace activities or traffic, must be secured to prevent accidental movement, or a barricade must be used to keep traffic or activities away from the ladder
• The area around the top and bottom of the ladders must be kept clear
• The top of a non-self-supporting ladder must be placed with two rails supported equally unless it is equipped with a single support attachment
• Ladders must not be moved, shifted, or extended while in use
• Ladders must have nonconductive side rails if they are used where the worker or the ladder could contact exposed energized electrical equipment
• The top or top step of a stepladder must not be used as a step
• Cross bracing on the rear, section of stepladders must not be used for climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections.
• Ladders must be inspected by a competent person for visible defects on a periodic basis and after any incident that could affect their safe use
• Single-rail ladders must not be used
• When ascending or descending a ladder, the worker must face the ladder
• Each worker must use at least one hand to grasp the ladder
• A worker on a ladder must not carry any object or load that could cause the worker to lose balance and fall

Structural Defects of Ladders

Portable ladders with structural defects—such as broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components—must immediately be marked defective, or tagged with "Do Not Use" or similar language and withdrawn from service until repaired.

Fixed ladders with structural defects—such as broken or missing rungs, cleats, or steps, broken or split rails, or corroded components—must be withdrawn from service until repaired. Ladder repairs must restore the ladder to a condition meeting its original design criteria, before the ladder is returned to use.

Defective fixed ladders are considered withdrawn from use when they are:

• Immediately tagged with "Do Not Use" or similar language
• Marked in a manner that identifies them as defective
• Blocked (such as with a plywood attachment that spans several rungs)

STAIRWAYS

Landings for stairways that will not be a permanent part of the structure must be at least 30 inches in the direction of travel and extend at least 22 inches in width at every 12 feet or less of vertical rise.

Stairs will be installed between 30 deg. and 50 deg. from horizontal. Riser height and tread depth shall be uniform within each flight of stairs, including any foundation structure used as one or more treads of the stairs. Variations in riser height or tread depth shall not be over ¼-inch in any stairway system.

Where doors or gates open directly on a stairway, a platform must be provided, and the swing of the door cannot reduce the width of the platform to less than 20 inches.

Metal pan landings and metal pan treads, when used, will be secured in place before filling with concrete or other material.
All parts of stairways must be free of hazardous projections, such as protruding nails.

Slippery conditions on stairways must be eliminated before the stairways are used to reach other levels.

**Temporary Service**

Except during construction of the actual stairway, stairways with metal pan landings and treads will not be used where the treads and/or landings have not been filled in with concrete or other material, unless the pans of the stairs and/or landings are temporarily filled in with wood or other material. All treads and landings must be replaced when worn below the top edge of the pan.

Except during construction of the actual stairway, skeleton metal frame structures and steps must not be used (where treads and/or landings are to be installed later) unless the stairs are fitted with secured temporary treads and landings. Temporary treads must be made of wood or other solid material and installed the full width and depth of the stairs.

**Stair Rails**

Stairways having four or more risers, or rising more than 30 inches in height, whichever is less, must have at least one handrail. A stair rail also must be installed along each unprotected side or edge. When the top edge of a stair rail system also serves as a handrail, the height of the top edge must not be more than 37 inches nor less than 36 inches from the upper surface of the stair rail to the surface of the tread.

- Winding or spiral stairways must be equipped with a handrail to prevent using areas where the tread width is less than 6 inches
- Stair rails must not be less than 36 inches in height
- Screens or mesh, when used, must extend from the top rail to the stairway step, and along the opening between top rail supports
- Intermediate vertical members, such as balusters, when used, must not be more than 19 inches apart
- Other intermediate structural members, when used, must be installed so that there are no openings of more than 19 inches wide

**Handrails**

- Handrails and the top rails of the stair rail systems must be capable of withstanding, without failure, at least 200 pounds of weight applied within 2 inches of the top edge in any downward or outward direction, at any point along the top edge
- The height of handrails must not be more than 37 inches nor less than 30 inches from the upper surface of the handrail to the surface of the tread
- The height of the top edge of a stair rail system used as a handrail must not be more than 37 inches nor less than 36 inches from the upper surface of the stair rail system to the surface of the tread
- Stair rail systems and handrails must be surfaced to prevent injuries such as punctures or lacerations and to keep clothing from snagging
Handrails must provide an adequate handhold for employees to grasp to prevent falls.

The ends of stair rail systems and handrails must not have dangerous projections such as rails protruding beyond the end posts of the system.

Temporary handrails must have a minimum clearance of 3 inches between the handrail and walls; stair rails systems, and other objects.

Unprotected sides and edges of stairway landings must have a standard 42-inch guardrail system.

**Midrails**

Midrails, screens, mesh, intermediate vertical members or equivalent intermediate structural members must be installed between the top rail and stairway steps of the stair rail system.

Midrails, when used, must be located midway between the top of the stair rail system and the stairway steps.

**TRAINING**

The Company will ensure every employee receives training on ladder and stair safety. This training will be provided at no cost to the employee during working hours.

This Company will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of its employees.

**Training Components**

Our safety coordinator will ensure that employees receive training from a competent person in the following:

- Nature of fall hazards in the work area
- Correct procedures for erecting, maintaining, and disassembling the fall protection systems to be used
- Proper construction, use, placement, and handling of stairways and ladders;
- Maximum load-carrying capacities of ladders used. In addition, retraining must be provided for each employee, as necessary, so that the employee maintains the understanding and knowledge acquired through compliance with the standard.

**Training Records**

Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions

The Company will maintain all employee training records for the length of their employment.
FORMS AND ATTACHMENTS

On the following pages, please find the following document(s):

- General Ladder Setup Procedure
- Ladders and Stairs Safety Training Documentation
GENERAL LADDER SETUP PROCEDURE

- Move the ladder near your work. Get help if it is too difficult to handle alone
- Make sure there are no electrical wires overhead
- Carefully “walk” the ladder up until it is vertical. Keep your knees bent slightly and your back straight
- The ladder should be closed. Position the ladder with the base section on top of the fly section. Block the bottom of the ladder against the base of the structure
- Set up the ladder on a secure, level surface or secure it so that it can’t be displaced
- Firmly grip the ladder, keep it vertical and carefully move back from the structure about one quarter the distance of the ladder’s working length. This allows you to place it at the correct angle against the structure.
- Lock the spreaders on a stepladder. Secure the lock assembly on extension ladders
- Use traffic cones or other barriers to protect the base of the ladder if vehicles or pedestrians could strike it
- Make sure that a non-self-supporting ladder extends at least three feet above the top support point for access to a roof or other work level
  
  1. Raise the fly section. After the bottom rung of the fly section clears the bottom rung of the base section, place one foot on the base rung for secure footing
  
  2. Lean the ladder against the structure. The distance from the base of the ladder to the structure should be one quarter the distance of the ladder’s working length. Both rails should rest firmly and securely against the structure.

Quick tip — 4:1 Ladder Setup

A non-self-supporting ladder should have a set-up angle of about 75 degrees — a 4:1 ratio of the ladder’s working length to setback distance.

Here’s how to achieve it: Stand at the base of the ladder with your toes touching the rails. Extend your arms straight out in front of you. If the tips of your fingers just touch the rung nearest your shoulder level, the angle of your ladder has a 4:1 ratio.
## Ladders and Stairs Safety Training

<table>
<thead>
<tr>
<th>Trainer (include qualifications):</th>
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<tbody>
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<td>Date:</td>
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### Content of Training:

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### Attendees

<table>
<thead>
<tr>
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<th>Signature</th>
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(Retain at least 3 years)
SCOPE

This chapter provides the safe practices and regulations regarding the transportation of cargo on all highways and thoroughfares. It covers the practices to be followed for securing loads on commercial vehicles. These practices will comply with the Department of Transportation (DOT) and Federal Motor Carrier Safety Administration (FMCSA) Subpart 393.100. This chapter does not address the operation, inspection or maintenance of commercial vehicles.

POLICY

This Company has developed this policy to ensure that all employees work safely when loading, securing and transporting cargo on a commercial motorized vehicle (CMV). The Safety Coordinator is responsible for implementing and enforcing this policy.

EMPLOYER RESPONSIBILITIES

This Company will:

- Verify that all CSV operators and employees responsible for loading and securing cargo are trained on the safe practices to be used
- Provide all necessary securement equipment as necessary

EMPLOYEE RESPONSIBILITIES

All employees involved with the loading, unloading and securing of cargo on commercial vehicles will:

- Follow all Company safe practices regarding load securement
- Demonstrate a working knowledge on the proper use of securement equipment
- Inspect and report any unsafe or overweight cargo loaded by others
- Report all unsafe conditions or acts immediately

HAZARDS

Improperly or unsecured loads can result in:

- Citations/fines to driver/carrier
- Loss of load
- Damage to the cargo
- Damage to the vehicle
- A crash
- The vehicle being placed Out-of-Service
- Loss of life

SECUREMENT SYSTEMS

A securement system will be used to keep the cargo stationary and must be done carefully to protect the truck operator and the motorists traveling on the same roadway.
Cargo securement devices and systems will be designed, installed and maintained to ensure that the maximum forces acting on the devices or systems don’t exceed the working load limit (WLL) for the devices.

Vehicle structures, floors, walls, decks, tiedown anchor points, headerboards, bulkheads, stakes, posts and associated mounting pockets used to contain or secure articles of cargo must not have any cracks or cuts, and must be strong enough to meet the performance criteria. These items will not have any damaged or weakened components that will adversely affect their performance for cargo securement purposes, including reducing the WLL.

A securement system is a securement method that uses one or a combination of the following elements:

- Vehicle structure
- Securing devices
- Blocking and bracing equipment

**VEHICLE STRUCTURE**

The vehicle portion of a securing system can consist of any or all of the following:

- Floors
- Walls
- Decks
- Tiedown anchor points
- Headboards
- Bulkheads
- Stakes
- Posts
- Anchor points

Trucks should be provided with headboards (headache racks) to protect the driver from the load moving forward, and a tailboard to protect other drivers from loose material.

Generally, the cab shield is not part of the cargo-securement system. However, a front-end structure could be used to provide some restraint against forward movement if the cargo is in contact with it.

**Anchor Points**

All elements of the vehicles structure and anchor points must meet the requirements of the FMCSA standard. Be strong enough to withstand the forces listed below:

If loads are not contained within the vehicle, the securement system must provide a downward force equivalent to at least 20 percent of the weight of the article of cargo. If the article is fully contained within the vehicle, it can be secured by securement equipment of adequate strength, dunnage or dunnage bags, shoring bars, tiedowns or a combination of these.

All elements of the vehicle structure and anchor points must be in good working order and have no signs of:

- Obvious damage
- Weakened parts
- Distress
- Weakened sections
SECURING DEVICES

Securing devices include a variety of specifically manufactured equipment used to attach or secure cargo to a vehicle or trailer. These are often grouped under the category called tiedowns and can consist of:

- Synthetic webbing
- Manila rope
- Clamps and latches
- Grab hooks
- Winches
- Pocket
- Friction mat
- Chain
- Synthetic rope
- Blocking
- Binders
- Stake pockets
- Webbing ratchet
- Wire rope
- Steel strapping
- Front-end structure
- Shackles
- D-rings
- Bracing

TIEDOWNS

The cargo securement system used to restrain loads against movement must meet the requirements for the minimum number of tiedowns. This requirement is in addition to the rules concerning the minimum WLL.

Tiedowns are used to:

- Attach cargo to, or restrain cargo on, a vehicle
- Attach to anchor point(s)
Tiedown Assemblies

Tiedown assemblies (including chains, wire rope, steel strapping, synthetic webbing and cordage) and other attachment or fastening devices must conform to the following applicable standards:

<table>
<thead>
<tr>
<th>Assembly Component Materials</th>
<th>Must Conform to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steel strapping 1,2</td>
<td>Standard Specifications for Strapping, Flat Steel, and Seals, American Society for Testing and Materials (ASTM) D3953-97</td>
</tr>
<tr>
<td>Chain</td>
<td>National Association of Chain Manufacturers’ Welded Steel Chain Specifications</td>
</tr>
<tr>
<td>Webbing</td>
<td>Web Sling and Tiedown Association’s Recommended Standard Specification for Synthetic Web Tiedowns, WSTDA-T1</td>
</tr>
<tr>
<td>Cordage</td>
<td>Cordage Institute rope standard:</td>
</tr>
<tr>
<td></td>
<td>- PETRS-2, Polyester Fiber Rope, 3-Strand and 8-Strand Constructions</td>
</tr>
<tr>
<td></td>
<td>- PPRS-2, Polypropylene Fiber Rope, 3-Strand and 8-Strand Constructions</td>
</tr>
<tr>
<td></td>
<td>- CRS-1, Polyester/Polypropylene Composite Rope Specifications, 3-Strand and 8-Strand Standard Construction</td>
</tr>
<tr>
<td></td>
<td>- NRS-1, Nylon Rope Specifications, 3-Strand and 8-Strand Standard Construction</td>
</tr>
<tr>
<td></td>
<td>- C-1, Double Braided Nylon Rope Specifications</td>
</tr>
</tbody>
</table>

1. Steel strapping not marked by the manufacturer with a WLL will be considered to have a WLL equal to ¼ of the breaking strength listed in ASTM D3953-97.

2. Steel strapping 1 inch or wider must have at least two pairs of crimps in each seal and, when an end-over-end lap joint is formed, must be sealed with at least two seals.

3. Wire rope not marked with a WLL by the manufacturer will be considered to have a WLL equal to ¼ of the nominal strength listed in the manual.

When an article of cargo is not blocked or positioned to prevent movement in the forward direction, the number of tiedowns needed depends on the length and weight of the articles. There must be one tiedown for articles 5 ft. or less in length, and 1,100 lbs. or less in weight and two tiedowns if the article is:

- 5 ft. or less in length and more than 1,100 lbs. in weight
- Greater than 5 ft. but less than 10 ft., regardless of weight

When an article of cargo is not blocked or positioned to prevent movement in the forward direction, and the item is longer than 10 ft. in length, it must be secured by two tiedowns for the first 10 ft. of length, and one additional tiedown for every 10 ft. of length, or fraction thereof, beyond the first 10 ft.
If an article is blocked, braced or immobilized to prevent movement in the forward direction by a headerboard, bulkhead, other articles that are adequately secured, it must be secured by at least one tiedown for every 10 ft. of article length, or fraction thereof.

**Exceptions to The Minimum Tiedown Requirements**

Vehicles carrying one or more articles of cargo such as machinery, steel or concrete beams, crane booms or girders and trusses may need to be fastened by special methods. However, any article of cargo carried on that vehicle must be securely fastened to the vehicle.

**Attaching Tiedowns**

**Tiedown placement**

- Place the tiedown as close as possible to the spacer
- Position the tiedowns as symmetrically as possible over the length of the article
- Position the tiedowns to preserve the integrity of the article

Tiedowns can be used in two ways:

- Attached to the cargo
  - Tiedowns attached to the vehicle and attached to the cargo
  - Tiedowns attached to the vehicle, pass through or around an article of cargo, and then are attached to the vehicle again
- Pass over the cargo
  - Tiedowns attached to the vehicle, passed over the cargo, and then attached to the vehicle again

**Tiedowns Attached to The Cargo**

- Tiedowns attached to the cargo work by counteracting the forces acting on the cargo
- The angle where the tiedown attaches to the vehicle should be shallow, not deep (ideally less than 45°)
- To counteract forward movement, attach the tiedown so it pulls the cargo toward the rear of the vehicle
- To counteract rearward movement, attach the tiedown so it pulls the cargo toward the front of the vehicle
- To counteract movement to one side, attach the tiedown so it pulls the cargo toward the opposite side of the vehicle

**Tiedowns That Pass Over the Cargo**

- Tiedowns that pass over the cargo work by increasing the effective weight of the cargo (make the cargo seem heavier). This increases the pressure of the cargo on the deck or friction mat and keeps the cargo from shifting
- Tension these tiedowns to as high an initial tension as possible
- The steeper the tiedown angle, the less shifting (ideally more than 45°)
Tiedown Construction and Maintenance

Except for steel strapping, tiedowns must be designed, constructed and maintained so that the driver can tighten it.

All components of a tiedown must be in proper working order and have no:

- Knots and obvious damage
- Distress
- Weakened parts
- Weakened sections
- Distress
- Weakened sections

Tiedown Use

All tiedowns and other components of a cargo securement system used to secure loads on a trailer equipped with rub rails must be located inboard of the rub rails whenever practical. This requirement does not apply when the width of the load extends to or beyond the rub rails.

If a tiedown is repaired, it must be repaired according to the applicable standards or the manufacturer's instructions.

Edge Protection

Edge protection must be used if a tiedown could be cut or torn when touching an article of cargo. The edge protection itself must also resist crushing, cutting and abrasion.

BLOCKING AND BRACING EQUIPMENT

Equipment in this category can include:

- Dunnage
- Chocks
- Cradles
- Shoring bars
- Blocking and bracing

Material used as dunnage or dunnage bags, chocks, cradles, shoring bars or used for blocking and bracing, must not have damage or defects that would compromise the effectiveness of the securement system.

The material used for blocking or bracing, and as chocks and cradles, must be strong enough to withstand being split or crushed by the cargo or tiedowns.

This requirement also applies to any material used for dunnage.

If wood is used:

- Hardwood is recommended
- It should be properly seasoned
- It should be free from rot or decay, knots, knotholes, and splits
- The grain should run lengthwise when using wood for blocking or bracing

LOADING CARGO PROPERLY

When articles of cargo are placed beside each other and secured by side-to-side tiedowns, they must either be placed in direct contact with each other or prevented from shifting toward each other during transit by using blocking, friction mats or filling the space with dunnage or other cargo.
Articles of cargo that are likely to roll must be restrained by chocks, wedges, a cradle, or other equivalent means to prevent rolling. The means of preventing rolling must not be capable of becoming unintentionally unfastened or loose while the vehicle is in transit.

**Containing, Immobilizing, And Securing Cargo**

To correctly contain, immobilize or secure cargo, you need to know about:

- The three ways to transport cargo
- Loading cargo properly
- Restraining the cargo correctly
- Using adequate securing devices
- The Aggregate WLL

These requirements cover all types of cargo except:

- Commodities in bulk that lack structure or fixed shape (for example, liquids, gases, grain, sand, gravel, aggregate, liquid concrete)
- Commodities that are transported in the structure of a commercial motor vehicle, such as a tank, hopper, or box

The FMCSA standard identifies specific securement requirements for certain loads. When transporting these commodities, you must use the specific requirements for that commodity.

- Logs
- Metal coils
- Concrete pipe loaded crosswise on a platform vehicle
- Flattened or crushed vehicles
- Large boulder
- Dressed lumber and similar building products
- Paper rolls
- Autos, light trucks, and vans, heavy vehicles, equipment, and machinery
- Roll-on/roll-off and hook-lift containers

**Three Ways to Transport Cargo**

All types of cargo that are transported must meet one of three conditions:

- Condition 1: The cargo is fully contained by structures of adequate strength
  - Cargo cannot shift or tip
  - Cargo is restrained against horizontal movement by vehicle structure or by other cargo. Horizontal movement includes forward, rearward, and side to side
- Condition 2: Cargo is immobilized by structures adequate in strength, or a combination of structure, blocking, and bracing, to prevent shifting or tipping
- Condition 3: To prevent shifting or tipping, the cargo is secured on or within a vehicle by tiedowns along with:
  - Blocking
  - Bracing
  - Friction mats
  - Other cargo
  - Void fillers
  - Combination of these
Transporting Compressed Gas Cylinders

If employees are required to transport compressed gas cylinders, the Company will determine that the cylinders are in a safe condition by performing a visual inspection. Visual and other inspections are required by the Hazardous Materials Regulations of the Department of Transportation. Where those regulations are not applicable, visual and other inspections will be conducted according to the Compressed Gas Association requirements.

- When transporting cylinders in a horizontal position, special compartments, racks or adequate blocking must be provided to prevent cylinder movement. Regulators must be removed or guarded before a cylinder is transported unless the cylinders are secured on a special truck.
- Cylinders must not be dropped, struck, or permitted to strike each other violently.
- All portable cylinders used for the shipment of compressed gases must be constructed and maintained according to the U.S. Department of Transportation regulations.
- When loading or moving cylinders by crane or derrick, a cradle or suitable platform must be used, slings or electric magnets must not be used for this purpose.
- Valve-protection caps must not be used for lifting cylinders from one vertical position to another. Bars must not be used under valves or valve-protection caps to pry cylinders loose when frozen to the ground or otherwise fixed. The use of warm (not boiling) water is recommended.
- Valves of all cylinders, whether empty and full, must be closed before moving cylinders.
- Never use cylinders as rollers or supports, whether full or empty.

Cargo articles that have a tendency to tip must be secured by bracing.

ADEQUATE SECURING DEVICES

WLL for Cargo Securement Devices and Systems

The aggregate WLL of any securement system used to secure a load against movement must be at least one-half the weight of the article or group of articles.

WLL for Tiedowns

The WLL of a tiedown, associated connector, or attachment mechanism is the lowest WLL of any of its components (including tensioner), or the WLL of the anchor points to which it is attached, whichever is less.

The WLL of tiedowns can be determined either by using the tiedown manufacturer’s markings or by using the tables contained in the FMCSA regulations.

The WLL listed in the tables are to be used when the tiedown material is not marked by the manufacturer.

Synthetic cordage (e.g., nylon, polypropylene and polyester) that’s not marked or labeled will be considered to have a WLL equal to that for polypropylene fiber rope.

Welded steel chain that is not marked will be considered to have a WLL equal to that for grade 30 proof coil chain.
Wire rope that is not marked by the manufacturer will be considered to have a WLL equal to ¼ of the nominal strength listed in the Wire Rope User's Manual.

Wire that is not marked or labeled with its construction type will be considered to have a WLL equal to that for 6 x 37-fiber core wire rope.

Manila rope that is not marked by the manufacturer will be considered to have a WLL based on its diameter.

Friction mats not marked with their rating will be considered to provide a resistance to horizontal movement equal to 50 percent of the weight placed on the mat.

Stanchion pins suitable to the load must be placed in the rail-post pockets to guard against sideways movement.

Trucks used to transport steel will have a catwalk that has grab rails between the cab and the headboard to provide a safe vantage point to direct loading and unloading operations.

Chains used to secure the load and tiedown the steel material for transport must be properly load rated.

**WLL for Blocking Systems**

The WLL of all components used to block cargo from forward movement must be 50% (or more) of the weight of the article being blocked.

**WLL Unmarked Components**

Any securing device, not marked by the manufacturer, is considered to have a WLL equal to that of grade 30 proof coil, and other types of unmarked tiedowns are considered to have a WLL equal to the lowest rating for that type in the table of WLLs in the FMCSA regulations.

This Company will purchase and use components that are rated and marked by the manufacturer, so that driver, shipper and inspector can all verify that the proper equipment is being used for the job.

**SAFE PRACTICES**

The Company will ensure that all personnel involved in the loading of trucks are trained in the procedures for safe loading, and securing loads using binders, chains, straps and accessories.

- Do not load heavy equipment on transports unless trained to operate the particular loading machine
- Tie-down methods used must provide adequate means to prevent the load from moving during transit
- Chains or binding straps must not be thrown over the load until personnel are clear
- Ensure that the binder is firmly locked in the secured position before releasing the extension
- Do not use a binder with a bent handle, which may prevent it from locking down
- Binder handles should be wired in the locked position when transporting loads
- Cargo should have at least one tie-down every 10 feet of length. At least two tie-downs are required on all loads
If securing a load over 27 feet long, such as pipe or logs, a minimum of 4 equally spaced binders must be used, with two bindings near the ends of the load.

- Machines must be loaded, secured, and unloaded so they do not create a hazard for personnel.
- Within 15 minutes of leaving the loading area with a bound load, the operator should recheck the binders, chains, or straps, to ensure that the load is secure and no shifting of the load or loosening of the bindings has occurred. Bindings should be checked regularly in transit to ensure the security of the load.
- Ensure that hooks, shackles, and other accessories used to secure loads are not bent, gapped, or cracked.
- The combined strength of all tie-downs must be strong enough to lift 1 ½ times the weight of the load being hauled.
- Do not exceed the rated weight limit for accessories, chains, straps, or binders.

Requirements for chains and binding straps:

- Do not use straps that have broken stitching, are frayed, or show any signs of wear, damage, or deterioration.
- Ensure that all straps used are rated to handle the weight of load they are securing.
- Chains in securing loads must be inspected before initial use and weekly thereafter.
- Chains must be normalized or annealed periodically as recommended by the manufacturer.
- If at any time any 3-foot length of chain is found to have stretched one-third the length of a link, it must be discarded.
- Bolts or nails must not be placed between two links to shorten or join chains.
- Broken chains will not be spliced by inserting a bolt between two links with the head of the bolt and nut sustaining the load, or by passing one link through another and inserting a bolt or nail to hold it.
- Required chains or straps and binders must be in place and hooked prior to tightening any of the binders.

**Proper Securement Requirement**

- Cargo must be restrained in all directions (forward, side-to-side, rearward, vertically) using a minimum of four (4) tiedown systems.
- Tie-downs attached to the cargo must be attached at the front and rear of the vehicle, or at mounting points on the cargo.
- Accessory equipment (blades, buckets, etc.) must be completely lowered to the deck and secured with a separate system.
- Articulated vehicles must be secured with a separate system that prevents articulation while in transit.
- Accessories that are not attached must also be properly secured to the deck with a separate system.
- Any tiedown system used to secure heavy equipment must have a minimum WLL of at least 4,700 lbs.
- Tiedowns preventing forward movement must be strong enough to restrain 80% of the cargo’s weight.
- The calculated aggregate WLL of all systems used to secure cargo against movement during transit must be at least 50% of the weight of the cargo
- Direct Attachment (vehicle to cargo) calculates at 50% of the WLL of the tiedown system used
- Indirect Attachment (vehicle to cargo to opposite-side vehicle) calculates at 100% of the WLL of the tiedown system used
- At least 80% of a transported vehicle’s tire or track must be supported on the transporting vehicle, utilizing deck wideners or extensions for proper support as necessary

**INSPECTIONS**

The driver is responsible for the following cargo-securement inspection activities.

<table>
<thead>
<tr>
<th>Driver Action Required</th>
<th>Pre-Trip</th>
<th>Within first 50 mi</th>
<th>When Duty Status of Driver Changes</th>
<th>At 3-Hour Intervals or Every 150 mi, Whichever Is First</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspect Cargo and Securing Devices</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Inform Carrier if Packaging Is Not Adequate</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Adjust Cargo and/or Securing Devices</td>
<td>As Necessary</td>
<td>As Necessary</td>
<td>As Necessary</td>
<td>As Necessary</td>
</tr>
<tr>
<td>Add Additional Securing Devices</td>
<td>As Necessary</td>
<td>As Necessary</td>
<td>As Necessary</td>
<td>As Necessary</td>
</tr>
</tbody>
</table>

These inspection rules do not apply to the driver of a sealed commercial motor vehicle who has been ordered not to open it to inspect its cargo, or to the driver of a commercial motor vehicle that has been loaded in a manner that makes inspection of its cargo impracticable.

**Pre-Trip**

- Make sure that cargo is properly distributed and adequately secured
- Make sure that all securement equipment and vehicle structures are in good working order and used consistent with their capability
- Stow vehicle equipment
- Make sure that nothing obscures front and side views or interferes with the ability to drive the vehicle or respond in an emergency
- Inform carrier if packaging is not adequate. For example:
  - Banding is loose or not symmetrical on package
  - Banding attachment device(s) are inefficient
  - Wrapping is broken or ineffective
  - Pallets are broken
Periodic Inspections During Transit

- Inspect cargo and securing devices
- Adjust cargo or load securement devices as necessary to ensure that cargo cannot shift on or within, or fall from, the commercial motor vehicle
- As necessary, add more securing devices

**NOTE**: Failure to follow instructions and warnings, and/or proper use, care and inspection criteria may result in cargo damage, severe personal injury or death. The Safety Coordinator will ensure that all employees responsible for loading, securing or transporting cargo have an understanding of the risks involved.

Never unload material with the transport truck parked on an uneven surface. If the facilities at the destination are not suitable for unloading, the driver should notify supervision and ensure that safe arrangements can be made for unloading.

When unloading steel, especially pipe or coil, stanchion pins should be left in place and binders loosened slowly, one at a time, but not entirely removed, until all binding chains are loosened and there are no signs that shifting of the load has occurred. While unloading, material should be re-secured between lifts to prevent load-shift hazards.

**Chains**

- Inspect the entire chain before each use. Do not use the chain if it is elongated or has nicks, cracks, and gouges in any link
- Do not expose the chains to temperatures outside the -40 °F to 400 °F temperature range or to chemically active environments such as acids and corrosive liquids
- Remove the chain from service if the material thickness at any location of the chain link is less than the minimum thickness listed in the National Association of Chain Manufacturers (NACM) welded-chain specifications
- Each chain is only as strong as its weakest link, including the point of attachment
- Never exceed the WLL

**Load Binders**

Load-binding systems store energy that can release suddenly, causing serious injury or death. Stay clear of binders, as they may suddenly release with force.

- Inspect before use. Remove from service if cracked, worn or deformed. Do not repair or attempt to repair; immediately remove the binder from service
- Do not use binder components for overhead lifting
- Operate only by hand from a firm standing point
- Operate handle cautiously. Stay clear of handle path. Handle may release suddenly. Secure handle down with a positive retaining method. Release handle/load with extreme care. Make sure everyone is clear. Lever binder handle can snap back over center. Use open palm under handle and push up
- Follow DOT Federal Motor Carrier Safety Regulations S392.9, S393.100 and S393.102.
**US TRADES, LLC IIPP**

- Do not operate with anyone on the load
- Always apply binder in a straight-line, hook-to-hook manner without bending, and such that handle goes down when securing load
- Tighten binders before moving and re-check frequently
- Follow manufacturer's instructions
- Select the load binder that meets the WLL, grade of the chain, grab hook, and anchor point intended to be used with the binder
- Do not use lever bars, “cheater bars” or extenders when tightening chain binders. Hand tightening will load the binder to its specified WLL
- Load binders must be secured in a manner that prevents them from becoming loose, opened, or released while vehicle is in transit. Latches, chain wrap, or other means should be used to secure the load binder handle
- Periodically clean and lubricate all moving parts of the chain binder

**Overhead Lifting Slings**

- Synthetic slings can fail if damaged, misused or overloaded. Inspect slings before each use. Slings are NOT for use by untrained personnel
- Synthetic slings can be cut if contacted by load edges. Use padding or protection of sufficient strength and thickness to protect the sling from damage
- Do not use slings to pull on objects in a snagged or constrained condition
- Keep your body out of the path between the sling and the load. Stand clear of suspended loads
- Never use slings when the load may possibly slip or slide. This loss of control can result in sling failure, serious injury or death. Always control the load
- Do not use if the red core warning yarns or any inner core fibers are visible. Do not use if cuts, abrasions, knots, or other defects are present
- Never overload the sling beyond the WLL. Always take into account the effect that angles have on reducing sling capacity
- Never expose slings to alkalis, acids, caustics, or temperatures above 194 °F or below -40 °F
- Do not expose slings to extensive sunlight or ultraviolet light. Store slings in a cool and dry place when not in use
- Do not use slings if the attached fittings are damaged, stretched, distorted or corroded

**Rubber or EPDM Tarp Straps**

Tarp straps are designed solely to hold tarps in place. Tarp straps must not be used for restraining or securing cargo.

- Do not use tarp straps for any lifting, raising, or lowering applications
- Discard all tarp straps with nicks, cuts, cracks or if the "S" hooks are bent, damaged, or corroded
- Eye protection during connection and disconnection of tarp straps is required. Keep both feet firmly on the ground and position body out of the potential strap rebound path
- Tarp strap should not be stretched to more than 50% of the original length. Over tensioning may cause the tarp strap to break, causing serious injury, or death
Do not anchor tarp straps around sharp edges or pulled over any abrasive surfaces
Sudden rupture or sudden disconnection of a tarp strap while it is in the stretched position may cause serious personal injury or death
Protect tarp straps from exposure to heated environments and hot surfaces
Always fasten tarp straps to a load in a clear space that is free of any moving vehicles or objects

Tracks
To achieve optimal WLL of a complete tie-down system that includes a sliding winch track, the track must be attached to a structurally sound frame element.

Webbing Strap Assemblies
Inspect webbing strap assemblies before each use. Do not use if hardware is defective; if webbing is burnt, melted, cut, frayed, abraded or altered; or if any damage to assembly is seen.

NOTE: Do not exceed the WLL. Do not use for lifting, towing or personal restraint.

- Ratchets, buckles cams, or other tensioning or locking devices must be closed and in locked position when used
- Strength is significantly reduced if load path is not in a straight line
- Avoid sharp edges. Use corner protectors per federal law
- Protect webbing from heat, hot surfaces and acids. Do not store in sunlight
- Do not repair webbing, hardware or stitching. Remove from service immediately if any damage or defect is discovered
- Anchor points must be rated equal to or greater than the cargo control assembly strength
- Do not use 'cheater bars' or lever bars on hardware when tensioning
- The aggregate WLL of tiedowns used to secure an article or group of articles against movement must be at least one-half times the weight of the article or group of articles

Winch Bars
- Inspect winch, chain binder and winch bar for defects and damage before each use. Do not use if defective, broken, worn, cracked, or deformed. Do not repair; remove from service immediately
- Never extend or alter the winch bar. Position the body properly and keep both feet flat on ground during use
- Refer to the applicable federal, provincial, state, and local regulations for loading and transportation procedures and requirements

Using A Winch Bar with Winches
- Winch bar must be properly engaged or the winch bar point must be inserted through two holes in the winch cap during use. Failure to properly engage the winch bar or insert the winch bar point through two holes may cause damage or failure of the winch or winch bar
• Position the body out of the rotation path in case of winch bar slippage. Maintain control of the winch bar to keep bystanders out of the winch bar handle rotation path
• During tightening and before releasing the tiedown assembly, the winch pawl must be checked for correct engagement

Using A Winch Bar with Optional Chain Binder Cradle with Chain Binders

• Follow chain binder manufacturer’s recommendations
• Chain binder handle must be fully inserted and securely locked in winch bar cradle. Failure to properly secure chain binder handle in the winch bar may cause damage or failure of the winch bar or chain binder
• Position the body out of the winch bar handle rotation path in case of winch bar slippage

Winches

Winches will be installed so the pawl can readily be seen, to ensure proper engagement. Do not install winches where the user must hold the pawl to engage the gear/sprocket tooth. All winches except bolt on, portable and slider winch designs must be welded to the trailer frame or sound structural element. Minimum welding requirements are 1/4-inch fillet weld, 4 inches long on both sides of the winch frame and 1/8-inch penetration.

To ensure user safety when tightening or loosening winches, always keep a firm grip on the winch-tightening bar. Never release a winch bar from its leveraged position without checking the pawl to make sure it’s fully engaged into the gear/sprocket teeth. Releasing a winch bar without the pawl being properly engaged can cause serious injury to the user or bystanders.

Use a slip-resistant handle winch bar to tighten or loosen winches. Winches should never be used as pulling or lifting devices.

All binders should be checked frequently during cargo transit and re-tensioned as required by DOT Regulations, 49 CFR Part 392.9(b) and the FMCSA Part 396 396.3.

GENERAL DRIVER SAFETY

• Stay alert when driving. Make sure there is enough room ahead and behind to pass or stop safely. Leave enough space between you and the vehicle ahead of you to allow for a sudden stop. If you are following too closely, you may not be able to stop in time
• Remember, you can help the driver behind you maintain a safe following distance by driving at a constant speed and using your signaling maneuvers in advance
• Inspect each vehicle prior to performing any transporting operations and ensure that it is maintained in serviceable condition. Repair any defect or damage or replace the vehicle before use. Check the brakes, lights, signal indicators and tires daily before heading out on the road
• Position the transport vehicle to provide working clearance between the vehicle and the deck
• Ensure that only the loading, or unloading machine operator, and other necessary personnel, are in the loading, or unloading work area
• Vehicle operators will not remain in the cab during loading and unloading where loads are moved over the truck cab, unless the employer demonstrates that it is necessary for the operator to do so
- If the transport vehicle operator remains in the cab, the employer must provide the operator protection, such as cab reinforcement
- Determine that the operating and maintenance instructions are available in each vehicle
- All operators and maintenance employees will follow the operating and maintenance instructions
- All vehicle operators must have a valid license for the class of vehicle being operated
- These safety requirements apply to all vehicles used to transport any employee for job purposes, including any vehicle provided by an employee
- Inspect vehicles for functioning audible warning signals and, where practicable, spark arrestors
- Inspect vehicles that operate at night to make sure they're equipped with working head and tail lights
- All vehicles operating where overhead hazards exist will be equipped with an overhead guard
- Where the operator is exposed to hazards from backing the vehicle into objects, a platform guard must be provided, and so arranged, so that it doesn’t impede the exit of the driver from the vehicle
- Never operate a vehicle with loads exceeding its safe load capacity. Check the brakes before proceeding down any steep incline
- Make sure all loads are positioned to prevent slippage, or loss, during handling and transport. (Stakes and chocks used to trip loads must be built so that the tripping mechanism is activated on the side opposite the release of the load)
- Verify that each tiedown is tight before transporting the load. While en-route, the operator shall check and tighten the tiedowns whenever there is reason to believe that the tiedowns have loosened, or the load has shifted

TRAINING

This Company will ensure that all employees engaged in cargo loading, unloading and securement have been trained on the following:

- How to determine the WLL of securing equipment
- How to determine load placement and balancing requirements
- The safe installation and removal on securing devices
- The methods of securement to be used based on the type of load being transported
SCOPE

This Company is committed to protecting the safety and health of all employees, and to complying with OSHA 1910.147 (The control of hazardous energy) and all applicable state and/or local regulatory requirements, laws and industry best practices in the effort to provide an accident, injury and illness free workplace.

POLICY

Accordingly, the Company has adopted this Lockout/Tagout Program (also referred to as Hazardous Energy Control) to establish engineering controls and work practices to prevent the unintentional release of hazardous energy during maintenance and servicing of machinery and equipment.

EMPLOYER RESPONSIBILITIES

This Company will:

- Establish a program for affixing lockout or tagout devices to energy isolating devices and otherwise disable equipment to prevent unexpected release of energy
- Ensure the use of safe lockout/tagout procedures by authorized employees
- Provide all hardware for isolating, securing or blocking equipment from energy sources
- Conduct and certify inspections of the lockout/tagout procedures at least annually
- Provide training to ensure the purpose and function of the lockout/tagout program are understood by employees and the knowledge and skills required for the safe application, use, and removal of the energy controls are acquired by authorized employees
- Ensure training includes limitations of tags in the energy control program (if applicable)
- Inform outside employers who may have employees engaged in activities involving hazardous energy about the lockout or tagout procedures
- Certify that employees complete and repeat training as needed

EMPLOYEE RESPONSIBILITIES

Authorized employees (employees who perform maintenance or servicing on equipment that must be locked out or tagged out) are expected to:

- Participate in training related to lockout/tagout procedures
- Comply with all lockout/tagout procedures when maintaining or servicing equipment that requires such controls
- Review lockout/tagout procedure with inspector during periodic evaluation

Affected employees (employees who operate or use equipment for which maintenance and servicing requires lockout or tagout) must participate and comply with the following:

- Training on the purpose and use of the lockout/tagout procedure
- Training about the procedure and the prohibition to attempt to restart or reenergize equipment that has been locked out or tagged out
SAFE PRACTICES

Intended Use of Procedure

This procedure establishes the minimum requirements for the lockout of energy-isolating devices on machines or equipment. Any main electrical power disconnect that controls a source of power or material flow must be locked out with a lockout device when employees are maintaining, cleaning, adjusting, or servicing machinery or equipment, if the disconnect is not in clear sight of the employee. Employees must also affix a "Do Not Start" tag to all operating controls.

The process stops, isolates from potentially hazardous energy sources, and locks out equipment before employees proceed with their work. It also prevents unexpected the start-up or energizing of the machine or equipment from causing injury.

All employees are required to comply with the restrictions and limitations imposed upon them during the use of lockout. Authorized employees must perform the lockout in accordance with this procedure. No employee will attempt to start, energize or use a piece of locked out equipment.

These procedures do not apply when servicing or maintaining equipment during normal production operations unless:

- The activity involves removing guards or other safety devices
- An employee places him/herself in an area where work is actually being performed
- An employee places him/herself in a dangerous area during the normal operating cycle

Authorized Employees

Any employee whose job requires him or her to perform lockout/tagout to service or maintain a piece of equipment is an “authorized employee” and must comply with all expectations of authorized employees regarding safe lockout/tagout procedures.

Other employees who use equipment that require lockout/tagout for maintenance and service, work in areas where such work is being performed, or will be affected by lockout/tagout procedures will require training regarding lockout/tagout procedures, but are forbidden to perform the work of an authorized employee. They may not implement lockout/tagout procedures without appropriate training authorized by management.
Lockout/Tagout Procedures

See Figure 1 for an outline of the lockout/tagout procedure.

Notify Employees

Before an authorized employee applies lockout or tagout devices, he or she must notify affected employees to prevent unexpected changes to work conditions that could introduce needless risk and to allow affected employees to clear areas that may be hazardous.

Prepare for Shutdown

Before any employee turns off any equipment, the authorized employee will be aware of the type and magnitude of the energy, the hazards of the energy and the means to control it.

Authorized personnel will review lockout/tagout procedures for the piece of equipment and all the possible hazardous energy sources to help ensure an understanding of the controls that are necessary to prevent an injury.

The authorized employee will be especially mindful of energy that can be stored or accumulated after a shutdown.

Equipment Shutdown

Shutdown of machinery and equipment must occur in an orderly manner using the shutdown procedures on the lockout/tagout procedures associated with each machine or piece of equipment.

Equipment Isolation

All energy isolation devices necessary to control energy to the equipment will be located and operated to completely de-energize the equipment and isolate it from energy sources. The authorized employee or team leader will verify operation of each energy isolation device.

- Disconnect or shut down engines or motors
- De-energize electrical circuits
- Eliminate the pressure from the line and lock out the valve holding back the activating substance in hydraulic or pneumatic systems
- Block machine parts against motion
Lockout/Tagout

The authorized employee will affix a lockout and tagout device to each energy-isolating device. Lockout devices will hold the energy-isolating device in a “safe” position, and the authorized employee must affix tag-out devices to indicate the prohibition on moving energy isolating devices from a safe position. If it is possible to lock the device, but only tags are used, attach the tag where the lock would have been; otherwise, locate the tag as close as possible so that it is clear to anyone who might want to operate the equipment.

OSHA has stated that companies must have adequate lockout/tagout procedures for each specific machine or piece of equipment. These should be written procedures that are on site and readily available to employees. Training must be provided on lockout/tagout to both authorized and affected employees. Interlocks may not be used as lockout or as equivalent lockout protection.

Release Stored Energy

Immediately after applying lockout or tagout devices, the authorized employee will ensure all potentially hazardous stored or residual energy is relieved, disconnected, restrained and otherwise rendered safe.

- Discharge capacitors
- Block, clamp, secure in position, or totally relieve the compression or tension in applicable mechanisms
- Lower to the lowest position all suspended mechanisms or parts that normally cycle to a lower position, and clamp, block, or otherwise secure the mechanism or parts in position
- Vent fluids from pressure vessels, tanks, or accumulators — but never vent toxic, flammable, or explosive substances directly into the atmosphere

If stored energy can be re-accumulated, the authorized employee will verify that the energy is isolated until maintenance is complete or the energy no longer exists.

Verify Isolation

The authorized employee will verify the machinery or equipment is actually isolated and de-energized before starting work on locked out or tagged out equipment.

Steps for Release from Lockout/Tagout

See Figure 2 for an outline of the steps to release equipment from lockout/tagout.

Check Equipment

Make sure machinery or equipment is properly re-assembled. Inspect machinery or equipment to ensure removal of nonessential items.
Check Employees
Make sure all employees are safely outside danger zones. Notify affected employees about the removal of lockout/tagout devices and that energy is going to be re-applied.

Remove Devices
Only the authorized employee who applied the lockout/tagout device may remove the device.

Notify Employees
The authorized employee will notify all affected employees that the lockout or tagout devices have been removed from the equipment.

SPECIAL CASES

Employee Leaves Before Releasing Lockout/Tagout Device
If the authorized employee isn’t available to remove their lockout/tagout device, another authorized employee may begin the following procedure:
1. Verify that authorized employee who applied the device is off premises
2. Make all reasonable efforts to inform them that their lockout or tagout device has been removed
3. Ensure the authorized employee is aware of the removal of the device before they resume work

Temporary Lockout/Tagout Removal
Whenever authorized employees remove lockout/tagout devices to test or position machines and equipment, or their components, the authorized employee will complete the following procedures in the sequence presented:
- Clear the machine or equipment of tools and materials
- Remove employees from danger zones
- Remove lockout/tagout devices
- Energize and proceed with testing or positioning
- De-energize all systems and re-apply lockout/tagout devices

Outside Personnel
Employees of another Company engaged in servicing or maintenance of equipment that requires lockout or tagout will follow lockout/tagout procedures that provide at least as much protection as our Company’s established procedures for that equipment. To ensure safety, management from our Company and representatives from the outside employer will inform one another of their respective lockout or tagout procedures.

The owner also will ensure employees understand and comply with contracted personnel lockout/tagout procedures as appropriate.
Group Lockout/Tagout

When a group performs servicing, the group will use a procedure that provides protection equivalent to the protection provided by the personal lockout or tagout.

Shift Changes

Procedures during shift changes or changes to personnel will provide for an orderly transfer of lockout or tagout device protection and minimize exposure to hazards from the unexpected energizing or start-up of the machine or equipment, or the release of stored energy for both the oncoming and off-going personnel.

PROTECTIVE MATERIALS

Employees will be provided with any device or hardware for isolating, securing or blocking equipment from energy sources. If a device is altered, damaged or destroyed in a way that compromises its ability to protect the authorized employee, the authorized employee will inform a supervisor immediately and not attempt to use the device.

Singularly Identified

Devices used in lockout and tagout procedures will not be used for any purpose other than for isolating, securing or blocking equipment from energy sources, and no devices other than those specified in the lockout/tagout procedure will be used to that end.

Durable

The devices used for lockout/tagout will be able to withstand the environmental and weather conditions present during use. Tagout devices need to remain legible and not deteriorate regardless of weather conditions or corrosive environments.

Standardized

At the worksite, devices used to isolate, secure or block equipment from energy sources will be consistent in color, shape or size. Tagout devices will have a standardized design.

Substantial

Lockout devices must have structural integrity to require excessive force or specialized tools to remove them. Tagout devices and their means of attachment need to prevent inadvertent removal. The means of attachment will not be reusable, and need to have an unlocking strength of at least 50 lbs. The general design and basic characteristics of tagout attachment means will be at least equivalent to a one-piece, all environment-tolerant nylon cable tie.

Identifiable

Any device used to isolate, secure or block equipment from energy sources will indicate the identity of the employee applying the device.
PERIODIC INSPECTIONS AND PROGRAM REVIEW

The safety coordinator, or designee, will conduct regular inspections of the lockout/tagout procedure to ensure the employees are following procedure and meeting all applicable standards. If the safety coordinator uses the inspected energy control procedure, another authorized employee who does not use the energy control procedure will perform the inspection.

The inspector will review with each authorized employee that employee’s responsibilities under the lockout/tagout procedure and correct any identified deviation or inadequacy in the procedure.

Where tagout systems are used, the review will include a detail of the limitations of tags relative to locks in hazardous energy control.

Certification

Each periodic inspection must be certified. The certification shall identify the following:

- The machine or equipment on which the Lockout/Tagout procedure was used
- The date of the inspection
- The employees included in the inspection
- The person performing the inspection

TRAINING

Every employee will be trained on lockout/tagout procedures as appropriate to the employee’s duties at no cost to the employee during working hours.

All training material will be appropriate in content and vocabulary to the educational level, literacy and language of employees.

Training Components

Employees whose work operations are in an area where energy control procedures may be used must be trained in the following minimum elements:

- The purpose and function of the lockout/tagout program
- The prohibition of attempts to restart or reenergize locked out or tagged out equipment
- When tag-out systems are used, the following limitations of tags for hazardous energy control must be considered:
  - 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 may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program. Tags must be attached securely to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.

Training for employees authorized to service and maintain equipment will include the following:

- The recognition of hazardous energy sources
- The type and magnitude of energy available in the workplace
- The methods and means necessary for energy isolation and control

**Training Records**

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

**Retraining**

Retraining will reestablish proficiency and introduce new or different control measures whenever the following occur:

- A change in job assignment, equipment or process present a new hazard
- There is a change in the lockout/tagout procedures
- A periodic inspection reveals deviations from or inadequacies in employee knowledge or use of the lockout/tagout procedures

**FORMS AND ATTACHMENTS**

On the following pages, please find the following documents:

- Lockout/Tagout Procedure
- Lockout/Tagout Inspection Certification Form
- Lockout/Tagout Training Record Sheet

These forms may be reproduced freely for the purposes of implementing and maintaining a safety and health program.
Company: This procedure establishes the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is done on machines or equipment. It shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources, and locked out before employees perform any servicing or maintenance where the unexpected energization or start-up of the machine or equipment or release of stored energy could cause injury.

1. Notify Employees: Notify all affected employees that servicing or maintenance is required on a machine or equipment and that the machine or equipment must be shut down and locked out to perform the servicing or maintenance. (Document name or job title of authorized and affected employees)

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<th>Affected Employees</th>
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2. Prepare for Shutdown: The authorized employee shall refer to the Company procedure to identify the type and magnitude of the energy that the machine or equipment utilizes, shall understand the hazards of the energy, and shall know the methods to control the energy.

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<th>Type(s) of Energy</th>
<th>Magnitude</th>
<th>Type of Operating Controls:</th>
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<td>Shutdown Procedure:</td>
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<td>□ Chemical</td>
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3. Equipment Shutdown: If the machine or equipment is operating, shut it down by the normal stopping procedure (depress the stop button, open switch, close valve, etc.).

4. Equipment Isolation: Set the energy isolating device(s) so that the machine or equipment is isolated from the energy source(s).

<table>
<thead>
<tr>
<th>Type(s) of energy isolating device(s)</th>
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5. Lock out the energy isolating device(s) with individual locks
6. Release Stored Energy: Stored or residual energy (such as that in capacitors, springs, elevated machine members, hydraulic systems, etc.) must be dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down, etc.

<table>
<thead>
<tr>
<th>Type(s) of Energy</th>
<th>Method(s) to dissipate or restrain</th>
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7. Verify Isolation: Ensure that the equipment is disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the equipment by operating the push button or other normal operating control(s) or by testing to make certain the equipment will not operate.

Method to verify isolation:

Caution: Return operating control(s) to neutral or "off" position after verifying the isolation of the equipment.

8. The machine or equipment is now locked out.
RESTORING EQUIPMENT TO SERVICE

When the servicing or maintenance is completed and the machine or equipment is ready to return to normal operating condition, the following steps will be taken:

1. **Check the machine or equipment** and the immediate area around the machine to ensure that nonessential items have been removed and that the machine or equipment components are operationally intact

2. **Check the work area** to ensure that all employees have been safely positioned or removed from the area

3. **Verify** that the controls are in neutral

4. **Remove the lockout devices** and reenergize the machine or equipment

Note: The removal of some forms of blocking may require re-energizing of the machine before safe removal

5. **Notify affected employees** that the servicing or maintenance is completed and the machine or equipment is ready for use
**LOCKOUT/TAGOUT INSPECTION CERTIFICATION**

I certify that ____________________________ was inspected on this date using lockout/tagout procedures. The inspection was performed while working on ________________________.

<table>
<thead>
<tr>
<th>Authorized Employee (Print)</th>
<th>Signature</th>
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<th>Inspector (Print)</th>
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**LOCKOUT/TAGOUT TRAINING RECORD SHEET**

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SCOPES
This chapter covers the requirements machine guarding and complies with the OSHA Machine and Machinery Guarding regulations in 1910 Subpart O. It does not address safeguards for hand held power tools or lockout/tagout procedures, which are covered in other chapters of this manual.

POLICY
It is the policy of this Company to ensure safe operation of machines and equipment. The following policy provides the safe practices and procedures to protect employee’s safety through hazard identification and evaluation, safeguarding and training.

EMPLOYER RESPONSIBILITIES
This Company will:

- Correct identified safety hazards with appropriate engineering and administrative controls
- Provide all affected employees with training on machine safe operating methods, based on each of their job duties
- Encourage employees to perform their jobs with safety and health as their priority
- Conduct periodic hazard analyses of work areas to assess equipment safety
- Establish and follow a program of periodic and regular inspections of all machine guards, parts and auxiliary equipment are in safe operating condition properly adjusted, maintained and repaired or replaced as needed
- Maintain records of inspections and maintenance

EMPLOYEE RESPONSIBILITIES
Employees are expected to:

- Be aware of hazards presented by equipment and machinery where they work
- Follow Company safety policy and the instructions of the supervisor
- Comply with safe operating procedures for all equipment
- Attend and participate in appropriate safety training
- Report safety concerns and provide safety recommendations as appropriate

HAZARDS
Moving machine parts have the potential to cause severe workplace injuries, such as crushed fingers or hands, amputations, burns, or blindness. Safeguards are essential for protecting workers from these preventable injuries. Any machine part, function or process that could cause injury must be safeguarded.

Hazardous Motions
A wide variety of mechanical motions and actions can present hazards to workers. These can include the movement of rotating members, reciprocating arms, moving belts, meshing gears, cutting teeth and any parts that impact or shear.
Rotating motion can be dangerous; even smooth, slowly rotating shafts can grip clothing or skin and force an arm or hand into a dangerous position. Injuries due to contact with rotating parts can be severe.

Collars, couplings, cams, clutches, flywheels, shaft ends, spindles, meshing gears and horizontal or vertical shafting are examples of common rotating mechanisms that may be hazardous. The danger increases when projections such as setscrews, bolts, nocks, abrasions, and projecting keys or setscrews are exposed on rotating parts.

Hazardous Actions

A wide variety of mechanical actions can present hazards to the worker. These can include:

- Cutting
- Punching
- Shearing
- Bending

These different types of hazardous mechanical actions are basic in varying combinations to nearly all machines, and recognizing them is essential to protecting workers from the dangers they present.

Where Mechanical Hazards Are Present

Three basic areas requiring safeguarding:

- Point of Operation: The point of operation is where the work is actually done on the material. The type of work being done can include the following:
  - Cutting
  - Shaping
  - Grinding
  - Forming
  - Turning
  - Shearing
  - Punching
  - Boring
  - Bending
  - Drilling

- Power Transmission Apparatus: The power transmission apparatus includes components of mechanical systems that transmit energy to parts of the machine including the following:
  - Flywheels
  - Couplings
  - Chains
  - Sprockets
  - Pulleys
  - Cams
  - Cranks
  - Shafts
  - Belts
  - Spindles
  - Gears
  - Rods

Other Moving Parts: there are ranges of parts in a mechanical system that may move during operation. These parts include moving parts that feed material, reciprocate, rotate or move transversely.

Non-Mechanical Hazards

Machines obviously present a variety of other hazards that cannot be ignored. Remember that things other than safeguarding moving parts can affect the safe operation of machines.
All power sources for machines are potential sources of danger. When using electrically powered or controlled machines, for instance, the equipment as well as the electrical system itself must be properly grounded. Replacing frayed, exposed or old wiring will also help to protect the operator and others from electrical shocks or electrocution. High-pressure systems also need careful inspection and maintenance to prevent possible failure from pulsation, vibration or leaks. Such a failure could cause, among other things, explosions or flying objects.

Machines often produce noise that can result in a number of hazards to workers. Noise can startle and disrupt concentration and interfere with communications, thus hindering the worker’s safe job performance.

Engineering controls such as the use of sound-dampening materials can help control the harmful effects of noise. In addition, administrative controls that involve removing the worker from the noise source can be an effective measure when feasible.

Because some machines require the use of cutting fluids, coolant, and other potentially harmful substances, operators, maintenance workers, and others in the vicinity may need protection. These substances can cause ailments ranging from dermatitis to serious illnesses and disease. Specially constructed safeguards, ventilation, and protective equipment and clothing are possible temporary solutions to the problem of machinery-related chemical hazards until these hazards can be better controlled or eliminated from the workplace.

**PROTECTIVE CLOTHING AND PPE**

When engineering controls are not available or are not fully capable of protecting employees from hazards, protective clothing or PPE will be used.

To provide adequate protection, the protective clothing and equipment selected must always be:

- Appropriate for the particular hazards
- Maintained in good condition
- Properly stored when not in use, to prevent damage or loss
- Kept clean, fully functional, and sanitary

The necessary PPE can include, but is limited to:

- Hardhats
- Face shields, safety goggles or glasses
- Hearing protection
- Coveralls, jackets, vests, aprons, full-body suits
- Special sleeves and gloves
- Safety shoes and boots or other acceptable foot guards

It's important to note that protective clothing and equipment can create hazards. A protective glove can become caught between rotating parts, or a respirator face-piece can hinder the wearer’s vision, for example, require alertness and continued attentiveness whenever they are used.
Other parts of the worker's clothing may present additional safety hazards. For example, loose-fitting shirts might possibly become entangled in rotating spindles or other kinds of moving machinery. Jewelry, such as bracelets and rings, can catch on machine parts or stock and lead to serious injury by pulling a hand into the danger area.

SAFE PRACTICES

Safeguards are essential for protecting workers from preventable injuries. Remember, any machine part, function or process that could cause an injury must be safeguarded. When the operation of a machine or accidental contact with it can injure the operator or others nearby, the hazards must be either controlled or eliminated.

This information describes the various hazards of mechanical motion and describes some techniques for protecting workers from these hazards. General information includes where mechanical hazards occur, the hazards created by different kinds of motions and the requirements for effective safeguards, as well as a brief discussion of non-mechanical hazards.

Installation of Machines

- Electrically powered machines must be grounded as prescribed in the National Electrical Code
- A machine must be placed so that the operator or other employee tending the machine doesn’t need to stand in an aisle
- A machine must be located so that there’s enough space for the operator to handle the material and run the machine without interference to or from another employee or machine
- A machine installed on a bench, table or stand must be secured to prevent unintentional movement or tipping
- A stationary machine must be anchored or provided with anti-slip pads to prevent unintentional movement

In-running nip point hazards are caused by the rotating parts on machinery. There are three main types of in-running nips.

Parts can rotate in opposite directions while their axes are parallel to each other. These parts may be in contact or in close proximity. In the latter case, the stock fed between the rolls produces the nip points. This danger is common on machines with intermeshing gears, rolling mills and calendars.

Nip points are also created between rotating and tangentially moving parts. Some examples would be the point of contact between a power transmission belt and its pulley, a chain and a sprocket, and a rack and pinion.

Nip points can occur between rotating and fixed parts that create a shearing, crushing or abrading action. Examples are spoked handwheels or flywheels, screw conveyors or the periphery of an abrasive wheel and an incorrectly adjusted work rest.
• Reciprocating: Reciprocating motions may be hazardous because, during the back-and-forth or up-and-down motion, a worker may be struck by or caught between a moving and a stationary part
• Transverse: Transverse motion (movement in a straight, continuous line) creates a hazard because a worker may be struck or caught in a pinch or shear point by the moving part

SAFEGUARD REQUIREMENTS
Safeguards must meet these minimum general requirements:
• Prevent contact: The safeguard must prevent hands, arms, and any other part of a worker’s body, from making contact with dangerous moving parts. A good safeguarding system eliminates the possibility of the operator or another worker placing parts of their bodies near hazardous moving parts
• Secure: Workers should not be able to easily remove or tamper with the safeguard, because a safeguard that can easily be made ineffective is no safeguard at all. Guards and safety devices should be made of durable material that will withstand the conditions of normal use. They must be firmly secured to the machine
• Protect from falling objects: The safeguard should ensure that no objects could fall into moving parts. A small tool that is dropped into a cycling machine could easily become a projectile that could strike and injure someone
• Create no new hazards: A safeguard defeats its own purpose if it creates a hazard of its own such as a shear point, a jagged edge, or an unfinished surface that can cause a laceration. The edges of guards, for instance, should be rolled or bolted in such a way that they eliminate sharp edges
• Create no interference: Any safeguard that impedes a worker from performing the job quickly and comfortably might soon be overridden or disregarded. Proper safeguarding can actually enhance efficiency since it can relieve the worker’s apprehensions about injury
• Allow safe lubrication: If possible, one should be able to lubricate the machine without removing the safeguards. Locating oil reservoirs outside the guard, with a line leading to the lubrication point, will reduce the need for the operator or maintenance worker to enter the hazardous area

Machine Controls
Engineering controls, which eliminate the hazard at the source and don’t rely on the worker’s behavior for their effectiveness, offer the best and most reliable means of machine safeguarding. Therefore, engineering controls must be the employer’s first choice for eliminating machine hazards.
• Powered electrical equipment must have an on-off switch
• When unexpected motion would cause injury, an actuating machine control, except for an emergency device for a powered fixed or transportable machine must be guarded or located to prevent accidental actuation
• Unless its function is self-evident, each operating control device must be identified as to its function
A powered machine that is attended by more than one employee must be equipped with an actuation device for each employee who is exposed to a point-of-operation hazard. The machine will activate only after concurrent use of all actuation devices.

When unexpected motion would cause injury, precautions must be taken to prevent a machine from automatically restarting upon the restoration of power after a power failure.

Where a machine workstation is remotely located from the machine controls, either a red emergency stop device must be provided at the machine workstation if a hazard exists that could cause an injury, or the actuation of the controls must require continuous depression during the hazardous portion of the machine cycle.

Equipment that is operated in series so that one piece of equipment automatically supplies another must be interlocked so that when any equipment in the series is stopped for any reason, the initial stopping causes the upstream equipment to stop if continued operation would create a hazard.

Reactivation must require a separate positive action by the employee who initiated the stop.

**MACHINE SAFEGUARDING**

There are many ways to safeguard machines. The type of operation, the size or shape of stock, the method of handling, the physical layout of the work area, the type of material and production requirements or limitations will help to determine the appropriate safeguarding method for the individual machine. As a rule, power transmission apparatus is best protected by fixed guards that enclose the danger areas. For hazards at the point of operation, where moving parts actually perform work on stock, several kinds of safeguarding may be possible. One must always choose the most effective and practical means available. Safeguards can be grouped under five general classifications:

- Guards
- Devices
- Location/Distance
- Feeding/Ejection Mechanisms

**GUARDS**

Guards prevent access to danger areas. There are four general types of guards:

- Fixed: As its name implies, a fixed guard is a permanent part of the machine. It is not dependent upon moving parts to perform its intended function. It may be constructed of sheet metal, screen, wire cloth, bars, plastic or any other material that is substantial enough to withstand whatever impact it may receive and to endure prolonged use. This guard is usually preferable to all other types because of its relative simplicity and permanence.
- Interlocked: When this type of guard is opened or removed, the tripping mechanism and/or power automatically shuts off or disengages and the machine cannot cycle or be started until the guard is back in place. An interlocked guard may use electrical, mechanical, hydraulic or pneumatic power or any combination of these. Interlocks should not prevent "inching" by remote control if required. Replacing the guard should not automatically restart the machine. To be effective, all movable guards should be interlocked to prevent occupational hazards.
• Adjustable: Adjustable guards are useful because they allow flexibility in accommodating various sizes of stock
• Self-Adjusting: The openings of these barriers are determined by the movement of the stock. As the operator moves the stock into the danger area, the guard is pushed away, providing an opening that is only large enough to admit the stock. After the stock is removed, the guard returns to the rest position. This guard protects the operator by placing a barrier between the danger area and the operator. The guards may be constructed of plastic, metal or other substantial material. Self-adjusting guards offer different degrees of protection

## REQUIRED GUARDING

<table>
<thead>
<tr>
<th>Method of Feeding Machine</th>
<th>Safeguarding Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Automatic feed</td>
<td></td>
</tr>
<tr>
<td>• Automatic roll feed</td>
<td>Fixed barrier guard, or die enclosure guard, or gate or moveable barrier device, or interlocked press barrier, or an operating device that assures machine action will be stopped before the operator can reach into the point of operation.**</td>
</tr>
<tr>
<td>• Automatic push pull</td>
<td></td>
</tr>
<tr>
<td>• Transfer</td>
<td></td>
</tr>
<tr>
<td>• Dial feed</td>
<td></td>
</tr>
<tr>
<td>B. Semiautomatic feed</td>
<td>Fixed barrier guard, or die-enclosure guard, or gate or moveable barrier device, or 2-hand control.</td>
</tr>
<tr>
<td>Chute feed (both gravity and follow feed)</td>
<td></td>
</tr>
<tr>
<td>Slide or push feed</td>
<td></td>
</tr>
<tr>
<td>Dial feed</td>
<td></td>
</tr>
<tr>
<td>Sliding dies</td>
<td></td>
</tr>
<tr>
<td>Revolving dies</td>
<td></td>
</tr>
<tr>
<td>C. Manual feed</td>
<td>Fixed barrier guard, or die-enclosure guard, or gate or moveable barrier device, or sweep device, or pullout device, or restraint device, or electronic control device, or two-hand control.</td>
</tr>
</tbody>
</table>

** Where two or more machines are used in inline operations, with automatic loading and unloading equipment, either the safeguards required in “A” above, or an interlocked enclosure, must be used in conjunction with each machine.

### Guard Construction

Many builders of single-purpose machines provide point-of-operation and power transmission safeguards as standard equipment. However, not all machines in use have built-in safeguards provided by the manufacturer.

Guards designed and installed by the builder offer two main advantages:

- They usually conform to the design and function of the machine.
- They can be designed to strengthen the machine in some way or to serve some additional functional purposes.
User-built guards are sometimes necessary for a variety of reasons. They have these advantages:

- Often, with older machinery, they are the only practical safeguarding solution
- They may be the only choice for mechanical power transmission apparatus in older plants, where machinery is not powered by individual motor drives
- They permit options for point-of-operation safeguards when skilled personnel design and make them
- They can be designed and built to fit unique and even changing situations
- They can be installed on individual dies and feeding mechanisms
- Design and installation of machine safeguards by plant personnel can help to promote safety consciousness in the workplace

However, they also have disadvantages:

- User-built guards may not conform well to the configuration and function of the machine
- There is a risk that user-built guards may be poorly designed or built

**Point-of-Operation Guards**

Although point-of-operation safeguarding is complicated by the number and complexity of machines, and by the different uses for individual machines, it is still extremely important.

Poorly designed, built or installed guards may create a hazard rather than eliminating one. To be effective, the guards must safeguard the employee while allowing the work to continue with minimum disruption to the production process.

Where operator exposure exists, machines must be equipped and operated with a point-of-operation guard or a point-of-operation protection device for every operation performed, except where the point of operation is limited to an opening of ¼ inch or less.

Point-of-operation guards must:

- Be reliable in construction, application, and adjustment
- Be attached to the machine, die, etc. (check stability of mounting)
- Not introduce any hazards
- Be designed, constructed, and located to facilitate inspection
- Minimize the possibility of removing or misusing essential parts

A barrier guard may have feed holes for the stock, which must be of such size and distance from the die as to prevent entry of a hand or finger of the operator into the point of operation or other nip points.

All guards must be installed, maintained and adjusted to provide safe operation.
Mechanical Power Transmission Apparatus Guarding

A significant difference between power transmission guards and point-of-operation guards is that the former type needs no opening for feeding stock. The only openings necessary for power transmission guards are those for lubrication, adjustment, repair and inspection. These openings should be provided with interlocked covers that cannot be removed except by using tools for service or adjustment.

Power transmission guards will cover all moving parts so that no part of the operator's body can be exposed to them.

Die-Enclosure and Fixed Barrier Guards

- A die-enclosure guard must be attached to the machine in a fixed position and must be so designed and constructed that the operator cannot reach over, under, or around the guard and into the point of operation.
- At least a 1-inch clearance must be provided between the top edge of the guard and the slide or any projection thereon, to prevent a shearing hazard caused by slide travel. The guard must extend at least 1 inch above the bottom of the slide at the top of the stroke in order to prevent a shearing hazard.
- The guard must afford at least 50% visibility where visibility is necessary for proper placement of materials, and permit easy feeding of the stock through openings. Where rods are used, they must be vertical.
- A fixed barrier guard must enclose the point of operation and must be secured to the machine by fasteners that would discourage removal by unauthorized personnel.

Interlocked Press-Barrier Guards

An interlocked press-barrier guard, when utilized, must enclose the die space or work area and be interlocked such that the slide cannot be actuated unless the guard or hinged or movable section is in position.

Guard Material

Under many circumstances, metal is the best material for guards. Guard framework is usually made from structural shapes, pipe, bar, or rod stock. Filler material generally is expanded, perforated or solid sheet metal or wire mesh. It may be feasible to use plastic or safety glass where visibility is required.

Guards made of wood generally are not recommended because of their flammability and lack of durability and strength. However, in areas where corrosive materials are present, wooden guards may be the better choice.

Fans

Blades of a fan, located within 7 feet of a floor or working level and used for ventilation or the cooling of an employee, must be guarded with a firmly affixed or secured guard. Any opening in the guard must not have any of its dimensions more than 1 inch, and the distance to the blade must be at least as shown in Table 1.
A fan used for cooling whose blade is less than 7 feet above the floor or working level must meet the distance requirements of Table 2 below. Where the openings are larger than those shown in the table, the distance from the guard to the blade must prevent any part of the employee's body from making contact with the blade.

### Table 1: Fans: Safety-Related Dimensions

<table>
<thead>
<tr>
<th>Smallest Dimension in Guard</th>
<th>Minimum Distance from Guard to Blade</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater than 0 up to ¼ inclusive</td>
<td>½ inch</td>
</tr>
<tr>
<td>Greater than ¼ up to ⅜ inclusive</td>
<td>1 ½ inches</td>
</tr>
<tr>
<td>Greater than ⅜ up to ½ inclusive</td>
<td>2 ½ inches</td>
</tr>
<tr>
<td>Greater than ½ up to ¾ inclusive</td>
<td>4 inches</td>
</tr>
<tr>
<td>Greater than ¾ up to 1 inclusive</td>
<td>6 times the smallest dimension</td>
</tr>
</tbody>
</table>

### Table 2: Fans: Safety-Related Dimensions

<table>
<thead>
<tr>
<th>Distance of Opening from Point-of-Operation Hazard (Inches)</th>
<th>Minimum Width Opening (Inches)</th>
</tr>
</thead>
<tbody>
<tr>
<td>½ to 1½</td>
<td>¼</td>
</tr>
<tr>
<td>1½ to 2½</td>
<td>¾</td>
</tr>
<tr>
<td>2½ to 3½</td>
<td>½</td>
</tr>
<tr>
<td>3½ to 5½</td>
<td>¾</td>
</tr>
<tr>
<td>5½ to 6½</td>
<td>¾</td>
</tr>
<tr>
<td>6½ to 7½</td>
<td>¾</td>
</tr>
<tr>
<td>7½ to 12½</td>
<td>1 ¼</td>
</tr>
<tr>
<td>12½ to 15½</td>
<td>1 ½</td>
</tr>
<tr>
<td>15½ to 17½</td>
<td>1 ¾</td>
</tr>
<tr>
<td>17½ to 31½</td>
<td>2 ⅛</td>
</tr>
</tbody>
</table>

### Powered Rotating Equipment

Saws and other powered rotating equipment must be guarded unless state standards supersede them. The worker must be protected from contact with all points of operation. See the "Hand and Power Tools" chapter for more information on saw operation.
If a machine or tool with rotating parts or components exposes employees to dust or particles, it must be connected to an exhaust/ventilation system.

**Pinch Points**

When an employee is exposed to a hazard created by a pinch point other than point of operation, the hazard must be guarded or the employee otherwise protected.

**Machines with Cylinders**

An extractor, parts washer, or tumbler, manually controlled and equipped with an inside revolving cylinder, must be equipped with a cover or door interlocked in such a manner as to prevent opening the door when the inside cylinder is in motion, and to prevent power operation of the inside cylinder when the cover or door is open. An inch control or constant pressure control that bypasses the interlock may be used to aid loading and unloading.

**Avoiding Crushing Accidents**

Employees will not place their body beneath equipment, such as vehicles, machines, or materials, supported only by a jack, overhead hoist, chain fall, or any other temporary single supporting means, unless safety stands, blocks, or other support system capable of supporting the total imposed weight is used to protect the employee in case of failure of the supporting system.

**DEVICES**

A safety device may perform one of several functions.

- Stop the machine if a hand or any part of the body is inadvertently placed in the danger area
- Restrain or withdraw the operator's hands from the danger area during operation
- Require the operator to use both hands-on machine controls, thus keeping both hands and body out of danger
- Provide a barrier that is synchronized with the operating cycle of the machine in order to prevent entry to the danger area during the hazardous part of the cycle

Devices must not create a hazard to the operator.

**Presence Sensing**

A presence-sensing device must be designed and installed so that, when the operator's hands or any other part of his body, disturb the sensing field, the downward travel of the machine’s cycle is prevented or stopped. This type of device must not be used as a tripping means. In addition, to protect all areas of entry to the point of operation not protected by the presence-sensing device, a partial enclosure must be used that does not create a pinch point or shear hazard.
The photoelectric (optical) presence-sensing device uses a system of light sources and controls that can interrupt the machine's operating cycle, if the light field is broken, the machine stops and will not cycle. This device must be used only on machines that can be stopped before the worker can reach the danger area. Equipment must be installed so that failure of the light/photoelectric relay/other energy source makes the machine inoperative. The design and placement of the device depends upon the time it takes to stop the mechanism and the speed at which the employee's hand can reach across the distance from the guard to the danger zone.

The radiofrequency (capacitance) presence-sending device uses a radio beam that is part of the machine control circuit. When the capacitance field is broken, the machine will stop or will not activate. Like the photoelectric device, this device will only be used on machines that can be stopped before the worker can reach the danger area. This requires the machine to have a friction clutch or other reliable means for stopping.

The electromechanical sensing device has a probe or contact bar that descends to a predetermined distance when the operator initiates the machine cycle. If there is an obstruction preventing it from descending its full-predetermined distance, the control circuit does not actuate the machine cycle.

Pull-back/Pull-out Devices: This type of device is primarily used on machines with stroking action. The pull-back/pull-out device must include attachments for the operator's hands or arms. The attachments must be connected to the machine so that the operator's hands or fingers are removed from the point of operation as the machine cycles.

Authorized personnel must be trained on, and responsible for, proper adjustment of the device for each setup and operator change. If more than one operator is required, a set of pullout devices must be provided for each operator.

Each pullout device used must be visually inspected and checked for proper adjustment at the start of each shift, following a new set-up, and when operators are changed. Necessary maintenance or repair, or both, must be completed and documented before the machine is operated.

Restraint: The restraint (holdout) device generally utilizes cables or straps that are attached to the operator's hands and a fixed point. The cables or straps must be adjusted to let the operator's hands travel within a predetermined safe area. There is no extending or retracting action involved. Consequently, hand-feeding tools are often necessary if the operation involves placing material into the danger area.

**Safety Trip Controls**

Safety trip controls provide a quick means for deactivating the machine in an emergency. A pressure-sensitive body bar, when depressed, will deactivate the machine. If the operator or anyone trips, loses balance or is drawn toward the machine, applying pressure to the bar will stop the operation.

The positioning of the bar, therefore, is critical. It must stop the machine before a part of the employee's body reaches the danger area.
When pressed by hand, the safety deactivates the machine. Because the trip-rod has to be actuated by the operator during an emergency situation, its proper position is also critical.

Safety tripwire cables are located around the perimeter of or near the danger area. The operator must be able to reach the cable with either hand to stop the machine.

**Two-Hand Controls**

The two-hand control requires an operator to provide constant, concurrent pressure on both controls to activate a machine. Pressure must be maintained by both hands, which are located a safe distance from the danger area and any pinch points, until the machine completes its cycle. Otherwise, the machine stops or returns to its starting position.

Two-hand control devices must be the anti-tie down type and located in a manner to prevent bridging. If repeating would cause an injury, an anti-repeat device must be incorporated into the control system. This kind of control requires a part-revolution clutch, brake, and a brake monitor if used on a power press.

Controls for more than one operating station must be able to be activated and deactivated in complete sets of two-hand controls per operating station, and must be capable of being supervised by the employer.

Two-hand controls for single-stroke operation will be designed to require release of all operator’s hand controls before a second stroke can be initiated.

If foot control is provided, the selection method between hand and foot control must all be separated from the stroking selector, and must be designed so that the selection may be supervised by the employer.

A two-hand control may be a mechanically, pneumatically, or electrically controlled system.

**Two-Hand Trips**

The two-hand trip requires concurrent application of both the operator’s control buttons to activate the machine cycle, after which the hands are free. This device is usually used with machines equipped with full-revolution clutches. The trips must be placed far enough from the point of operation to make it impossible for the operator to move his or her hands from the trip buttons or handles into the point of operation before the first half of the cycle is completed. The distance from the trip button depends upon the speed of the cycle and the band speed constant.

To be effective, both two-hand controls and trips must be located so that the operator cannot use two hands or one hand and another part of his/her body to trip the machine. Thus, the operator's hands are kept far enough away to prevent them from being placed in the danger area prior to the slide/ram or blade reaching the full "down" position.
Gates

A gate is a moveable barrier that protects the operator at the point of operation; the gate must be interlocked so that the machine will not begin a cycle unless the gate guard is in place, and in the closed position. A gate or movable barrier device must enclose the point of operation before power can be transmitted to the machine. In many instances, gates are designed to be operated with each cycle.

This type of guard can be used where the gate is a component of a perimeter safeguarding system. Here the gate may provide protection not only to the operator but to pedestrian traffic as well.

Point-of-Operation Devices

A point-of-operation device differs from a guard in that it allows the operator access to the point of operation for loading and unloading the die in a press operation. It prevents actual operation either until the hands are removed, or removes the hands from the point of operation as the press slide descends. A point of operation device may be a barrier device.

A point-of-operation device must be designed, constructed and located so that it prevents, during normal operations, an employee’s hands or fingers from remaining within the point of operation during the downward movement of the slide/cycle.

Adjustable Press-Barrier Devices

An adjustable press-barrier device must be attached to the frame of the press or die shoe and must have front and side sections adjustable for dies or jobs of any size.

Adjustments must be verified by qualified and authorized personnel before the press is returned to production. With the use of an adjustable press-barrier device, authorized personnel must be instructed regarding proper adjustments of the device and that these adjustments are an important part of their jobs. An operator must not be allowed to make any change in the adjustments without approval of supervisory personnel.

Where the adjustable press-barrier device cannot be adjusted to give sufficient clearance (for example, for the insertion or removal of an irregularly shaped piece), mechanical feeds, ejectors and/or other point-of-operation devices must be used.

Holdout and Restraint Devices

A holdout or restraint device must be securely anchored and adjusted so that the operator is restrained from reaching into the point of operation. A set of restraints must be provided for each operator if more than one operator is required for the machine.

LOCATION AND DISTANCE

The examples mentioned below are a few of the numerous applications of the principle of safeguarding by location/distance. A thorough hazard analysis of each machine and particular situation is essential before attempting this safeguarding technique.
To consider a part of a machine to be safeguarded by location, the dangerous moving part of a machine must be positioned so that those areas are not accessible or do not present a hazard to a worker during the normal operation of the machine.

This may be accomplished either by locating a machine so that the hazardous parts of the machine are located away from operator workstations or other areas where employees walk or work, or by positioning a machine with its power transmission apparatus against a wall and leaving all routine operations conducted on the other side of the machine. Additionally, enclosure walls or fences can restrict access to machines. Another possible solution is to have dangerous parts located high enough to be out of the normal reach of any worker.

The feeding process can be safeguarded by location if a safe distance can be maintained to protect the worker’s hands. The dimensions of the stock being worked on may provide adequate safety. For instance, if the stock is several feet long and only one end of the stock is being worked on, the operator may be able to hold the opposite end while the work is being performed. An example would be a single-end punching machine. However, depending upon the machine, protection might still be required for other personnel.

The positioning of the operator’s control station provides another potential approach to safeguarding by location. Operator controls may be located at a safe distance from the machine if there is not a reason for the operator to tend it.

**Slide-Lock Devices**

When a slide-lock device or block is used, an additional point of operation guard or device must be used to protect the operator before the slide lock device is in position and secures the slide from closing. Visual indication of the operation of the slide lock device must be provided.

**FEEDING AND EJECTION**

Hand-feeding tools, such as but not limited to, pushers, pliers, pinchers, tweezers, suction discs or magnets, are intended for placing and removing materials in order to permit safe feeding of material by the operator.

Many feeding and ejection methods do not require the operator to place his or her hands in the danger area. In some cases, no operator involvement is necessary after the machine is set up. In other situations, operators can manually feed the stock with the assistance of a feeding mechanism. Properly designed ejection methods do not require any operator involvement after the machine starts to function.

Some feeding and ejection methods may even create hazards themselves. For instance, a robot may eliminate the need for an operator to be near the machine but may create a new hazard itself by the movement of its arm.

These feeding and ejection methods must not be accepted in lieu of other guards or devices. Guards and devices must still be used where they are necessary and where they can serve to provide protection from exposure to hazards.
Types of Feeding and Ejection Methods

Automatic Feed: Automatic feeds reduce the exposure of the operator during the work process, and sometimes do not require any effort by the operator after the machine is set up and running.

Semi-automatic Feed: With semi-automatic feeding, as in the case of a power press, the operator uses a mechanism to place the piece being processed under the ram at each stroke. The operator does not need to reach into the danger area, and the danger area is completely enclosed.

Automatic ejection: Automatic ejection may employ either an air-pressure or a mechanical apparatus to remove the completed part from a press. It may be interlocked with the operating controls to prevent operation until part ejection is completed. This method requires additional safeguards for full protection of the operator.

Semi-automatic Ejection: Semi-automatic ejection employs mechanical means initiated by the operator to remove the completed part from a press.

Robot: Essentially, robots perform work that would otherwise have to be done by an operator. They are best used in high-production processes requiring repeated routines where they prevent other hazards to employees. However, they may create hazards themselves, and if they do, appropriate guards must be used.

Hand-Operated Levers

A hand lever-operated press or machine must be equipped with a spring latch on the operating lever to prevent premature, accidental tripping. The operating lever on a hand-tripped machine having more than one operating station must be so interlocked as to prevent operation of the press except by concurrent action of all levers. A guard or device must be used in conjunction with the hand-operated lever to safeguard the point of operation, or the lever must be located so that the operator cannot reach into the point of operation.

Foot Pedals and Protection

All foot pedals must be guarded or otherwise protected to prevent unintended operation from falling or moving objects, or by accidental stepping onto the pedal.

Mechanical pedal return springs must be the compression type operated on a rod or guided within a hole or tube. If operated on a rod, the inside diameter of the spring must be no greater than the diameter of the rod, plus ⅛ inch. If guided within a hole or tube, the inside diameter of the hole or tube shall be no greater than the outside diameter of the spring coil, plus ⅛ inch. A spring, in its initial compressed position, must be wound so that the space between coils is less than the diameter of the wire.

A pedal counterweight, if provided, must have the path of the travel of the weight enclosed or guarded. A mechanical foot pedal must be securely mounted on a press leg where the pedal is an integral part of the press.
Applications

While these aids do not give complete protection from machine hazards, they may provide the operator with an extra margin of safety. Sound judgment is needed in their application and usage. Following are several examples of possible applications:

- **Awareness Barriers:** An awareness barrier does not provide physical protection, but serves to remind a person that he or she is approaching the danger area. Generally, awareness barriers are not considered adequate when continual exposure to the hazard exists.

- **Although the barrier does not physically prevent a person from entering the danger area, it calls attention to it. For an employee to enter the danger area an overt act must take place, that is, the employee must either reach or step over, under or through the barrier.**

- **Miscellaneous Protective Shields:** Shields, another aid, may be used to provide protection from flying particles, splashing cutting oils, or coolants.

- **Holding Fixtures and Hand-Feeding Tools:** Although special hand tools may be used to place or remove stock, particularly from or into the point of operation of a machine, hand tools must not be substituted for the required guarding or point-of-operation devices. Where hand tools are used for placing materials into and removing them from a point of operation, the employer will ensure the tools are designed so that the operator is not required to place a hand within the point of operation.

**Exceptions:**

- **A bending operation on a press brake involving less than 25 pieces of 1 bend, if not guarded, will use of a hand tool when the operator must hold the work piece within 4 inches of the point of operation, and a conspicuous sign must be posted on the machine stating: “Hand tools must be used to hold stock.”**

- **A guard or device for the point of operation of a non-production arbor press or straightening press is not required if the machine is equipped with a hand control that is designed to stop the ram action or return the ram to the up position when released.**

- **A push stick or block may be used when feeding stock into a saw blade.**

**MACHINERY MAINTENANCE AND REPAIR – LOCK-OUT/TAG-OUT**

If possible, machine design should permit routine lubrication and adjustment without removal of safeguards. However, when safeguards must be removed, and the machine serviced, the Company lockout/tagout procedure must be followed. The maintenance and repair crew must never fail to replace the guards before the job is considered finished and the machine released from lockout.

If maintenance or repair workers would be exposed to electrical elements or hazardous moving machine parts in the performance of the job, all power sources must be shut off and locked out before work begins. Warning signs or tags are inadequate insurance against the untimely energizing of mechanical equipment.

Please refer to the Lockout/Tagout chapter of this manual for specific lockout/tagout requirements and procedures.
TRAINING

We will ensure every employee is provided training on machine and equipment safety. This training will be provided at no cost to the employee during working hours.

Training will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

**Training Components**

The safety coordinator will ensure every employee is trained in the following minimum elements:

- A description and identification of the hazards associated with particular machines
- The safeguards themselves, how they provide protection, and the hazards for which they are intended
- How to use the safeguards and why
- How and under what circumstances safeguards can be removed, and by whom (in most cases, repair or maintenance personnel only)
- What to do (e.g., contact the supervisor) if a safeguard is damaged, missing, or unable to provide adequate protection

**Training Records**

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions

Employee training records will be maintained for 3 years from the date on which the training occurred.

**FORMS AND ATTACHMENTS**

Please find the following documents on the pages below:

- Machine Guarding Checklist
- Machine Guarding and Equipment Safety Training Documentation

These forms may be reproduced for the purposes of implementing and maintaining a safety and health program.
MACHINE GUARDING CHECKLIST (PAGE 1 OF 3)

Answers to the following questions will help determine the safeguarding needs of the workplace by drawing attention to hazardous conditions or practices requiring correction.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Requirements for All Safeguards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Do the safeguards provided meet the minimum OSHA requirements?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Do the safeguards prevent workers’ hands, arms, and other body parts from making contact with dangerous moving parts?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Are the safeguards firmly secured and not easily removable?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Do the safeguards ensure that no objects will fall into the moving parts?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Do the safeguards permit safe, comfortable and relatively easy operation of the machine?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Can the machine be oiled without removing the safeguard?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is there a system for shutting down the machinery before safeguards are removed?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Can the existing safeguards be improved?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Point of operation:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Is there a point-of-operation safeguard provided for the machine?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Does it keep the operator’s hands, fingers and body out of the danger area?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is there evidence that the safeguards have been tampered with or removed?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Could you suggest a more practical, effective safeguard?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Could changes be made on the machine to eliminate the point-of-hazard?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Power transmission apparatus:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Are there any unguarded gears, sprockets, pulleys or flywheels on the apparatus?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Are there any exposed belts or chain drives?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Are there any exposed setscrews, key ways, collars, etc.?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Are starting and stopping controls within easy reach of the operator?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>If there is more than one operator, are separate controls provided?</td>
</tr>
</tbody>
</table>
### Machine Guarding Checklist (Page 2 of 3)

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Other moving parts:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>- Are safeguards provided for all hazardous moving parts of the machine, including auxiliary parts?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Non-mechanical Hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>- Have appropriate measures been taken to safeguard workers against noise hazards?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Have special guards, enclosures, or personal protective equipment been provided, where necessary, to protect workers from exposure to harmful substances used in machine operation?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Electrical Hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>- Is the machine installed in accordance with National Electrical Code requirements?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Are there loose conduit fittings?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Is the machine properly grounded?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Is the power supply correctly fused and protected?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Do workers occasionally receive minor shocks while operating any of the machines?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Training</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>- Do operators and maintenance workers have the training on how to use the safeguards and why?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Have operators and maintenance workers been trained in where the safeguards are located, how they provide protection and what hazards they protect against?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Have operators and maintenance workers been trained in how and under what circumstances guards can be removed?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Have workers been trained in the procedures to follow if they notice guards that are damaged, missing or inadequate?</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Protective Equipment and Proper Clothing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>- Is protective equipment required?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- If protective equipment is required, is it appropriate for the job, in good condition, kept clean and sanitary, and stored carefully when not in use?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Is the operator dressed safely for the job (i.e., no loose-fitting clothing or jewelry)?</td>
</tr>
</tbody>
</table>
### MACHINE GUARDING CHECKLIST (PAGE 3 OF 3)

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Machinery Maintenance and Repair</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Have maintenance workers received up-to-date instruction on the machines they service?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Do maintenance workers lock out the machine from its power sources before beginning repairs?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Where several maintenance persons work on the same machine, are multiple lockout devices used?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Do maintenance persons use appropriate and safe equipment in their repair work?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Is the maintenance equipment itself properly guarded?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Are maintenance and servicing workers trained in the requirements of lock-out/tag-out hazard, and do the procedures for lock-out/tag-out exist before they attempt their tasks?</td>
</tr>
</tbody>
</table>

Evaluator's Name  Signature  Date
# MACHINE GUARDING AND EQUIPMENT SAFETY TRAINING

<table>
<thead>
<tr>
<th>Trainer (include qualifications):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date:</td>
</tr>
<tr>
<td>Content of Training:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Attendees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Print Name</td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td></td>
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</tr>
</tbody>
</table>
SCOPE

This chapter provides information for working on scaffolds and elevated walking and working surfaces. The information contained here will comply with OSHA 1926 Subpart L – Scaffold Specifications and 1910 Subpart D Walking-Working Surfaces.

POLICY

This Company has implemented this policy to ensure that employees are not exposed to hazards while working on or with scaffolding or elevated work platforms. The Company’s designated competent scaffolding person is responsible for ensuring the following engineering controls, training requirements, and safe work practices are enforced to protect our employees from hazards associated with the erecting, use, and dismantling of scaffolds.

EMPLOYER RESPONSIBILITIES

It is the responsibility of the Company to:

- Ensure employees are trained appropriately to their level of responsibility regarding scaffolds
- Acquire appropriate scaffolding for the job to be performed
- Keep all equipment, including scaffolds, safe for use by employees
- Have at least one qualified person at every job that requires scaffolding

QUALIFIED PERSON RESPONSIBILITIES

It is the responsibility of the qualified person to:

- Be competent in fall protection
- Review work plans to determine if scaffolds are necessary
- Design scaffolds to the required specifications
- Ensures the onsite scaffolding meets requirements of the job and all safety guidelines
- Train employees who perform work on scaffolds and work platforms to recognize the hazards specific to that type of work and understand the procedures necessary to control them

COMPETENT PERSON

It is the responsibility of the competent person to:

- Take prompt measures to eliminate conditions that may pose harm to employees
- Ensure scaffold components from different manufacturers do not intermix
- Evaluate direct connections and confirm the supporting surfaces are capable of supporting the loads imposed on them
- Inspect all suspension scaffold ropes before each shift and after anything that might affect a rope’s integrity
- Supervise the erection, moving, dismantling, and altering of scaffolds
EMPLOYEE RESPONSIBILITIES

All Company employees are expected to:

- Complete all requisite training before using scaffolds
- Follow Company safety policy and best industry practices
- Perform pre-use inspection before accessing the scaffold
- Report any unsafe condition to the appropriately qualified person

SCAFFOLD PLATFORM CONSTRUCTION

Capacity

Scaffolds and their components must be able to support their own weight and 4 times the maximum intended load.

Counterweights used to balance adjustable suspension scaffolds, must be able to resist at least four times the tipping moment imposed by the scaffold operating at either the rated load of the hoist, or one-and-a-half (minimum) times the tipping moment imposed by the scaffold operating at the stall load of the hoist, whichever is greater.

Suspension rope and connecting hardware must be able to support 6 times the maximum intended load of non-adjustable suspension scaffolds.

On adjustable suspension scaffolds, the suspension rope and connecting hardware must support twice the stall load of the hoist if that is greater than 6 times the maximum intended load of the scaffold.

Planking and Decking

Platforms on working levels of scaffolds must be planked or decked between the front uprights and the guardrail supports as follows:

- Platforms will be entirely planked and decked with space not more than one-inch wide between the platforms and uprights
- The platform will not deflect more than 1/60 of the span when loaded
- All platforms will be kept clear of debris or other obstructions
- Wood planks will be inspected to see that there are graded for scaffold use, are sound and in good condition, straight grained, free from saw cuts, splits and holes
- Platforms and walkways will be at least 18 inches in width. When the work area is less than 18 inches wide, guardrails and/or personal fall arrest systems will be used
- Where platforms are overlapped to create a long platform, the overlap will occur only over supports, and will not be less than 12 inches unless the platforms are nailed
- The front edge of all platforms will not be more than fourteen inches from the face of the work without guardrails or PFAS
- A platform greater than 10 feet in length will not extend over its support more than 18 inches, unless it is designed and installed so that the cantilevered portion of the platform is able to support employees without tipping, or has guardrails which block employee access to the cantilevered end
- Don’t cover wood with opaque finishes, other than the edges for making identification
- Coatings will not obscure the top or bottom wood surfaces
- Each end of the platform, unless cleated or otherwise restrained by hooks or equivalent means, will extend over the centerline of its support at least six inches
- Scaffold components manufactured by different manufacturers will not be intermixed unless the components fit together without force and the scaffold's structural integrity is maintained. Scaffold components made of dissimilar metals will not be used together unless a competent person has determined that galvanic action will not reduce the strength of any component

**Distance from Work Face**

The front edge of all platforms must be within 14 inches of the face of the work unless guardrail and/or personal fall arrest systems are used to prevent employees from falling, except the following:

- Outrigger scaffolds may be no more than 3 inches from the face of work
- For plastering and lathing operations, the maximum distance from the face is 18 inches

**SUPPORTED SCAFFOLDS**

Supported scaffolds are platforms supported by legs, outriggers beams, brackets, poles, uprights, posts, frames or similar rigid support. The structural members, poles, legs, posts, frames and uprights, must be plumb and braced to prevent swaying and displacement.

Supported scaffolds with a height to base width ratio of more than 4:1 must be restrained by guying, tying, bracing or an equivalent means.

The following placements must be used for guys, ties and braces;

- Install guys, ties, or braces at the closest horizontal member to the 4:1 height and repeat vertically with the top restraint no further than 4:1 height from the top
- Vertically – every 20 feet or less for scaffolds less than three feet wide and every twenty-six feet or less for scaffolds more than three feet wide
- Horizontally – at each end; at intervals not to exceed 30 feet from one end

Supported scaffold poles, legs, posts, frames and uprights will bear on base plates and mudsills or other adequate firm foundation and will include the following;

- Footings will be level, sound, rigid, and capable of supporting the loaded scaffold without settling or displacement
- Unstable objects will not be used to support working platforms
- Front-end loaders and similar pieces of equipment will not be used to support scaffold platforms unless specifically designed by the manufacturer for such use
- Forklifts will not be used to support scaffold platforms unless the platform is attached to the fork and the fork-lift is not moved horizontally while the platform is occupied

Supported scaffold poles, legs, posts, frames, and uprights will be plumb and braced to prevent swaying and displacement.
Erection and Dismantling

- A safe means of access must be provided for employees erecting or dismantling a scaffold where the provision of safe access is feasible and does not create a greater hazard. A competent person will determine whether it is feasible or would pose a greater hazard to provide, and have employees use a safe means of access. This determination must be based on site conditions and the type of scaffold being erected or dismantled.
- Hook-on or attachable ladders must be installed as soon as scaffold erection has progressed to a point that permits their safe installation and use.
- When erecting or dismantling tubular welded frame scaffolds, (end) frames, with horizontal members that are parallel, level and are not more than 22 inches apart vertically may be used as climbing devices for access, provided they are erected in a manner that creates a usable ladder and provides good hand hold and foot space.

SUSPENSION SCAFFOLDS

A suspension scaffold contains one or more platforms suspended by ropes or other non-rigid means from an overhead structure such as single-point, multi-point, multi-level, two-point, adjustable, boatswain's chair, catenary, chimney hoist, continuous run, elevator false car, go-devils, interior hung, masons' and stone setters' scaffolds.

- All support devices must rest on surfaces that can support four times the scaffold load when operating at the rated load of the hoist, or at least one-and-a-half times the load imposed on them by the scaffold at the stall capacity of the hoist, whichever is greater.
- A competent person must evaluate all direct connections prior to use to confirm that the supporting surfaces are able to support the imposed load.
- Suspension scaffolds must be secured to prevent them from swaying.
- Guardrails, a personal fall-arrest system or both must protect employees more than 10 feet above a lower level from falling.
- A competent person must inspect ropes for defects before each shift and after every occurrence that could affect a rope's integrity.
- When scaffold platforms are more than 24 inches above or below a point of access, ladders, ramps, walkways, or similar surfaces must be used.
- When using direct access, the surface must be less than 24 inches above or 14 inches horizontally from the surface.
- When lanyards are connected to horizontal lifelines or structural members on single-point or two-point adjustable scaffolds, the scaffold must have additional independent support lines equal to the suspension lines and have automatic locking devices.
- Outrigger beams must be placed perpendicular to their bearing support.
- Emergency escape and rescue devices must not be used as working platforms, unless designed to function as suspension scaffolds and emergency systems.
• Tiebacks must be secured to a structurally sound anchorage on the building or structure. Sound anchorages do not include standpipes, vents, other piping systems or electrical conduit. A single tieback must be installed perpendicular to the face of the building or structure. Two tiebacks installed at opposing angles are required when a perpendicular tieback cannot be installed.
• Only those items specifically designed as counterweights must be used.
• Counterweights must be secured by mechanical means to the outrigger beams.
• Vertical lifelines must not be fastened to a counterweight.
• Sand, masonry units or rolls of roofing felt may not be used for counterweights.
• The suspension ropes must be long enough to allow the scaffold to be lowered to the level below without the rope passing through the hoist, or the end of the rope configured to prevent the end from passing through the hoist.
• Repaired wire may not be used.
• Drum hoists must contain no less than four wraps of the rope at the lowest point.
• The Company will replace wire rope when the following conditions exist:
  • Six randomly broken wires in one rope lay or three broken wires in one strand in one lay
  • One third of the original diameter of the outside wires is lost
  • Evidence that the secondary brake has engaged the rope
  • Kinks
  • Heat damage
  • Any other physical damage that impairs the function and strength of the rope
• Suspension ropes supporting adjustable suspension scaffolds must be a diameter large enough to provide sufficient surface area for the functioning of brake and hoist mechanisms.
• Suspension ropes must be shielded from heat-producing processes.
• Power-operated hoists used to raise or lower a suspended scaffold must be tested by a qualified testing laboratory.
• The stall load of any scaffold hoist must not exceed three times its rated load.
• The stall load is the load at which the motor or engine of a power-operated hoist stalls or the power to the prime-mover is automatically disconnected.
• The use of gasoline power-operated hoists or equipment are not permitted.
• Drum hoists must have at least four wraps of suspension rope at the lowest point of scaffold travel.
• Gears and brakes must be enclosed.
• An automatic braking and locking device, in addition to the operating brake, must engage when a hoist makes instantaneous change in momentum or an accelerated overspeed.
• Manually operated hoists used to raise or lower a suspended scaffold must be tested and listed by a qualified testing laboratory.
• These hoists require a positive crank force to descend.
Welding Safety

To reduce the possibility of welding current arcing through the suspension wire rope when performing welding from suspended scaffolds, the following precautions must be taken, as applicable:

- An insulated thimble must be used to attach each suspension wire rope to its hanging support. Excess suspension wire rope and any additional independent lines that is in contact with the scaffold must be insulated.
- The suspension wire rope must be covered with insulating material extending at least 4 feet above the hoist. If there is a tail line below the hoist, it must be insulated to prevent contact with the platform. The portion of the tail line that hangs free below the scaffold must be guided or retained, or both, so that it does not become grounded.
- Each hoist must be covered with insulated protective covers.
- If the scaffold grounding lead is disconnected at any time, the welding machine must be shut off.
- An active welding rod or uninsulated welding lead must not be allowed to contact the scaffold or its suspension system.
- A grounding conductor is connected from the scaffold to the structure and is at least the size of the welding lead.
- The grounding conductor is not attached in series with the welding process or the work piece.
- The tail line is guided, retained, or both, so that it does not become grounded.
- Each suspension rope and any other independent lines are insulated from grounding.

ACCESS TO ALL SCAFFOLDS

When scaffold platforms are more than 2 feet above or below a point of access, portable ladders, hook-on ladders, attachable ladders, stair towers (scaffold stairways/towers), stairway-type ladders, ramps, walkways, integral pre-fabricated scaffold access, or direct access from another scaffold, structure, personnel hoist, or similar surface must be used. Do not use crossbraces as a means of access.

Type of accesses that are permitted: portable ladders tied off to the structure; hook-on ladders; attachable ladders; stairways; stair towers; ramps and walkways; or integral prefabricated frames.

When erecting or dismantling supported scaffolds, a safe means of access will be provided when a competent person has determined the feasibility and analyzed the site conditions.

FALL PROTECTION

Fall protection includes guardrail systems and personal fall arrest systems.

Guardrails

All scaffolds more than six feet above the lower level will protect employees with guardrails on each open side of the scaffold. Guardrails will be installed along the open sides and ends before releasing the scaffold for use by the employees, other than erection or dismantling crews.
Guardrails are not required when:

- The front end of all platforms are less than 14 inches from the face of the work
- When employees are plastering and lathing 18 inches or less from the front edge

Materials such as steel or plastic banding will not be used for toprails or midrails.

**Fall Arrest Systems**

Personal fall arrest systems include harnesses, components of the harness/belt such as Dee-rings, and snap hooks, lifelines, and anchorage point. Employees working on scaffolds 10-feet or more above ground/floor level will use fall protection in accordance with the Company’s Fall Protection Program.

The following chart illustrates the type of fall protection required for specific scaffolds.

<table>
<thead>
<tr>
<th>Type of Scaffold</th>
<th>Fall Protection Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aerial lifts</td>
<td>Personal fall-arrest system</td>
</tr>
<tr>
<td>Boatswains’ chair</td>
<td>Personal fall-arrest system</td>
</tr>
<tr>
<td>Catenary scaffold</td>
<td>Personal fall-arrest system</td>
</tr>
<tr>
<td>Crawling board (chicken ladder)</td>
<td>Personal fall-arrest system, or a guardrail system, or a ¾ inch diameter grabline or equivalent handhold securely fastened beside each crawling board</td>
</tr>
<tr>
<td>Float scaffold</td>
<td>Personal fall-arrest system</td>
</tr>
<tr>
<td>Ladder jack scaffold</td>
<td>Personal fall-arrest system</td>
</tr>
<tr>
<td>Needle beam scaffold</td>
<td>Personal fall-arrest system</td>
</tr>
<tr>
<td>Self-contained scaffold</td>
<td>Both a personal fall-arrest system and a guardrail system</td>
</tr>
<tr>
<td>Single-point and two-point suspension scaffolds</td>
<td>Both a personal fall-arrest system and a guardrail system</td>
</tr>
<tr>
<td>Supported scaffold</td>
<td>Personal fall-arrest system or guardrail system</td>
</tr>
<tr>
<td>All other scaffolds not specified above</td>
<td>Personal fall-arrest system or guardrail systems that meet the required criteria</td>
</tr>
</tbody>
</table>

**Fall Protection for Scaffold Erectors and Dismantlers**

The Company will have a competent person determine the feasibility and safety of providing fall protection for employees erecting or dismantling supported scaffolds, and will provide fall protection where the installation and use of such protection is feasible and does not create a greater hazard.
SAFE PRACTICES

Scaffolds will be constructed and loaded according to the design of a qualified person.

- Stationary scaffolds over 125 feet in height and rolling scaffolds over 60 feet in height will be designed by a professional engineer.
- All scaffolding systems, components and fall protection systems will be inspected by a qualified person before first use, before each work shift begins, after erecting or moving and periodically through the work day to ensure the system is erected properly, that there is no damage to components of the system and that the system is being used properly and safely.
- Damaged or deteriorated equipment will not be used.
- Modifications of scaffold by non-qualified employees are prohibited. Only qualified and competent personnel are permitted to modify scaffolding systems. Disciplinary action for non-qualified modifications will be enforced.
- Any system or component of a system that is found to have a defect in manufacturing or design, damage, excessive wear, weathering or corrosion, will be immediately removed from service and tagged to indicate that it is not to be used with a prominent tag, as shown below, which states:

```
DANGER
DO NOT USE
Defective Equipment - Repair or Replace
```

- Any repairs or modifications to a scaffold system or component of a system must be approved by the designated qualified person before implementation.
- Any violation of the above policy, misuse of scaffolds or misconduct while working on scaffolds will be subject to disciplinary action within the scope of Company policy, up to and including termination of employment.

Use of Scaffolds

- Never load scaffolds or their components in excess of their maximum intended loads or rated capacities, whichever is less.
- Don’t use shore or lean-to scaffolds.
- A competent person must inspect scaffolds and scaffold components for visible defects before use and after any occurrence that could affect a scaffold’s structural integrity.
- Unless a registered professional engineer designed the scaffolds specifically for movement, no scaffold may be moved horizontally while employees are on them.
- Only experienced and trained employees will erect, move or dismantle scaffolds, and only under the supervision and direction of a competent person.
- Employees may not work on scaffolds covered in slippery material like ice or snow (except as needed to remove it)
- Use tag lines to control swinging loads from making unintentional contact while being hoisted
- Ropes that support adjustable suspension scaffolds must be large enough in diameter to provide enough surface area for the functioning of brake and hoist mechanisms
- Employees may not work on or from scaffolds during storms or high winds, unless a competent person has determined it is safe, and the employees are protected by a personal fall arrest system or wind screens
- Stationary manufactured scaffolding must be tied to and braced against a building at least every 30 feet horizontally and 26 feet vertically, unless otherwise guyed
- Adjusting screws on stationary manufactured scaffolding must have an adjustment of less than 18 inches from baseplate to bottom of frame with a minimum of 6 inches retained within the frame
- Suspension ropes must be shielded from heat-producing processes and corrosive substances
- No debris can be allowed to accumulate on platforms to cause a hazard

### Clearance Distances Between Scaffolds and Powerlines
The following table provides the clearance distances between scaffolds and powerlines, or any other conductive material, while being erected, used, dismantled, altered or moved.

<table>
<thead>
<tr>
<th>Insulated Lines Voltage</th>
<th>Minimum Distance</th>
<th>Alternatives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 300 volts</td>
<td>3 feet</td>
<td></td>
</tr>
<tr>
<td>300 to 50 kv</td>
<td>10 feet</td>
<td></td>
</tr>
<tr>
<td>More than 50 kv</td>
<td>10 feet plus 0.4 inches for each 1 kv over 50 kv</td>
<td>Two times the length of the line insulator, but never less than 10 feet</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Uninsulated Lines Voltage</th>
<th>Minimum Distance</th>
<th>Alternatives</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 50 kv</td>
<td>10 feet</td>
<td></td>
</tr>
<tr>
<td>More than 50 kv</td>
<td>10 feet plus General Rule: 0.4 inches for each 1 kv over 50 kv</td>
<td>Two times the length of the line insulator, but never less than 10 feet</td>
</tr>
</tbody>
</table>

However, scaffolds can be moved closer if necessary to perform the work, provided the power lines are de-energized or protective coverings are installed to help prevent accidental contact.

### Ladder Safety on Scaffolds
Employees may not increase the working level on top of scaffold platforms with makeshift devices like boxes or barrels.
Ladders may not be used to increase the working level height of an employee unless the following criteria are met:

- When the ladder is placed against a structure that’s not a part of the scaffold, the scaffold must be secured against the sideways thrust exerted by the ladder
- The platform units must be secured to the scaffold to prevent their movement
- The ladder legs must be on the same platform or other means must be provided to stabilize the ladder against unequal platform deflection
- The ladder legs must be secured to prevent them from slipping or being pushed off the platform

**Falling Object Protection**

Where there is a danger of tools, materials or equipment falling from a scaffold and striking employees below, the following provisions apply:

- The area below the scaffold to which objects can fall must be barricaded, and employees must not be permitted to enter the hazard area
- A toeboard must be erected along the edge of platforms more than 10 feet above lower levels for a distance sufficient to protect employees below, except on float (ship) scaffolds where an edging of ¾ x 1 ½ inch wood or equivalent may be used in lieu of toeboards
- Where tools, materials, or equipment are piled to a height higher than the top edge of the toeboard, paneling or screening extending from the toeboard or platform to the top of the guardrail must be erected for a distance sufficient to protect employees below
- A guardrail system must be installed with openings small enough to prevent passage of potential falling objects
- A canopy structure, debris net, or catch platform strong enough to withstand the impact forces of the potential falling objects must be erected over the employees below

Canopies, when used for falling object protection, must comply with the following criteria:

- Canopies must be installed between the falling object hazard and the employees
- When canopies are used on suspension scaffolds for falling object protection, the scaffold must be equipped with additional independent support lines equal in number to the number of points supported, and equivalent in strength to the strength of the suspension ropes
- Independent support lines and suspension ropes must not be attached to the same points of anchorage

Where used, toeboards must be:

- Capable of withstanding, without failure, a force of at least 50 pounds applied in any downward or horizontal direction at any point along the toeboard
- At least three and ½ inches high from the top edge of the toeboard to the level of the walking/working surface. Toeboards must be securely fastened in place at the outermost edge of the platform and have less ¼-inch clearance above the walking/working surface. Toeboards must be solid or with openings not over one inch in the greatest dimension
Stilts

OSHA does not prohibit the use of stilts for scaffold work; however, some states have limitations and requirements for their use. Companies should consult state and local authorities to ensure compliance with all regulations.

An employee may wear stilts on a scaffold only if it is a large area scaffold.

When an employee is using stilts on a large area scaffold where a guardrail system is used to provide fall protection, the guardrail system must be increased in height by an amount equal to the height of the stilts being used by the employee.

Surfaces on which stilts are used must be flat and free of pits, holes and obstructions, such as debris, as well as other tripping and falling hazards.

Stilts must be properly maintained. Any alteration of the original equipment must be approved by the manufacturer.

POWERED PLATFORMS

Powered platforms must comply with the design and manufacturing requirements prescribed in ASME standard A120.1, “Safety requirements for powered platforms for exterior building maintenance.”

Powered platforms must comply with the requirements of OSHA 1910.66, “Powered platforms for building maintenance,” in addition to the following:

Intermittent Stabilization Systems

- A powered platform must be suspended by 2 or more cables. Where 2 cables are used, each employee on the work platform must use a safety harness and lanyard that is attached to an individual lifeline. The lifeline must be secured to the building structure and must be independent of any cable and structures that support the powered platform.
- Where thrustouts are used in place of a roof car, they must be anchored to the building structure with fasteners that are capable of sustaining the imposed load.

Roof Cars

- A roof car must be used when it is necessary to move a working platform horizontally to a work or storage position.
- Movements of a roof car must be restricted to a designated path of travel. Mechanical stops must be provided to prevent the roof car from travelling outside the intended path of travel. The stops must be capable of withstanding a force equal to 100% of the inertial effect of the roof car under power and must be designed to prevent a crushing or shearing hazard.
- The stability factor against overturning must not be less than 5 for horizontal traversing of the carriage, including the effects of impact and wind.
- Where a roof car is used, safety interlocks must be provided to ensure that the working platform will not leave the stored position until the required positive position anchor is engaged and to ensure that the roof car cannot move when the working platform is not in the stored position.
Safety Factors

All the parts of a powered platform that are subject to stress, except for the wire rope, must have a design safety factor of not less than 5. Wire rope must have a design safety factor of not less than 10.

Working Platforms

A working platform that is used on the exterior of a building must be equipped with rollers that will be in contact with the building face. Where the vertical working travel of a working platform is more than 130 feet, the platform must be equipped with guide rollers or guide shoes, which must positively engage guides, such as “t” rails or indented mullions. The guide rollers or guide shoes must enter the guides at the lowest possible speed and must not require any manual assistance from an employee while the work platform is in motion.

Inspections and Tests

An employer that has a powered platform under the employer’s control must do all of the following:

- Provide operating instructions and a checklist for a visual inspection that must be used by the operator before each daily use of the platform. The visual inspection must include a check of the platform controls and safety interlocks
- Provide for a physical inspection and service and repair when required, of the platform by a trained and authorized employee or an outside service every 30 days, or before each use cycle if the equipment is used less often than every 30 days. The inspection, service, or repair must be logged to show the date and the signature of the authorized employee or outside service and the work done
- Provide for inspections and operating tests not less than annually or after major alterations to determine that all components of the platform, including safety and operating equipment, comply with the provisions of these rules. Such inspections and operating tests must be made by a trained and authorized employee or outside service

A special inspection of platform governors and secondary brakes must be made at least annually by an authorized and trained employee or outside service to verify that the initiating device for the secondary brake operates at the proper overspeed. If a test can’t be made in the field, the initiating device or hoisting machine, or both, must be sent to a shop that’s equipped to perform the test. When the tested parts are reinstalled, the powered platform must be re-inspected before returning it to service.

MAINTENANCE

The following maintenance must be performed, as required, during the regular, 30-day inspection:

- Replacement of any worn or defective parts noted during the inspections noted above
- Electrical connections must be tightened and controller contacts and relays must be cleaned
- Gears, shafts, bearings, brakes, and hoisting drums must be aligned
In addition:

- Hoisting ropes must be inspected, and replaced when there are 6 or more broken wires in any 1 lay or when the wire rope becomes damaged or deteriorated.
- Hoisting ropes must be reshackled at the non-drum ends at least once every 2 years. In reshackling a rope, enough must be cut from the end to remove damaged or fatigued portions. The rope must be retagged and the limit switches reset, if necessary.

**Wire Rope**

Wire rope for a scaffold must be replaced if any of the following conditions exists:

- In any length of 8 diameters, the total number of visible broken wires is more than 6 in 1 rope lay or 3 wires in 1 strand.
- It has been kinked, crushed, or bird-caged or has sustained any other damage that distorts the wire rope structure.
- It shows heat or corrosive damage.
- It contains a broken wire within 18 inches (460.8 mm) of the end attachment.
- It shows evidence of core failure. A lengthening of rope lay, protrusion of the rope core, and a reduction in rope diameter suggests core failure.
- Outer wire wear is more than 1/3 of the original outer wire diameter.
- Any other condition that a competent person determines has significantly affected the integrity of the rope.

In addition:

- Wire rope that is bent to form an eye over a bolt or rod, which has a diameter that is less than 4 times the rope diameter, must be equipped with a metal thimble.
- End fittings should be swaged or zinc-poured sockets.
- Where wire clips are used, industry safety standards must be followed and the U-bolts must be installed on the dead end or short end of the wire rope.
- Wire rope must be stored in a manner to prevent damage or deterioration.
- Before cutting wire rope, a seizing must be placed on each side of the cut on preformed wire rope, 2 seizings must be placed on each side of 7/8-inch size or smaller non-preformed wire rope, and 3 seizings must be placed on each side of 1-inch or larger size non-preformed wire rope.
- Wire rope must be maintained in a lubricated condition over its entire length with the same type of lubricant that is used by the manufacturer.
Fiber Rope

A fiber rope must be inspected visually before the start of each daily use as follows (a rope that has any of the conditions specified below must be replaced or returned to the manufacturer for repair):

- Externally for any of the following conditions:
  - Abrasions
  - Decay
  - Lack of strength
  - Variation in size or roundness of the strands
- Cut or broken fibers
- Burns
- Softness

- Internally, by separating the strands at 3-foot intervals, for any of the following conditions:
  - Broken fibers
  - Mildew or mold
  - Powdering
- Presence of grit
- Color change of the fibers
- Short loose fibers

- A fiber rope that is subjected to an impact load that is equal to or more than its rated capacity must also be replaced
- A fiber rope must be stored in a dry room in coils or on a reel
- A wet fiber rope must be dried by placing it in the sunshine or a warm room hanging loosely over a rounded peg or hook
- A fiber rope must not be kinked or run over sharp corners, must not be used when frozen, and must not be left in freezing temperatures when wet
- A thimble must be used with fiber rope if the rope is bent to form an eye over a bolt or rod that has a diameter that is less than 4 times the rope diameter

Synthetic Rope

A synthetic rope shall be inspected visually before the start of each job for all of the following conditions (a rope that has any of these conditions shall be replaced or returned to the manufacturer for repair):

- Abrasions
- Cut or broken fibers
- Burns
- Melted fibers
- Variation in size or roundness of the strands
- Because of the variance in manufacturing methods, the manufacturer's recommendations will be followed
- A synthetic rope shall not be kinked, run over sharp corners, used when frozen, or left in freezing temperatures when wet
- A synthetic rope that is subjected to an impact load that is equal to or more than its rated capacity shall be replaced
- A thimble shall be used with synthetic rope if the rope is bent to form an eye over a bolt or rod that has a diameter that is less than 4 times the rope diameter
AERIAL LIFTS

Aerial lifts include the following types of vehicle-mounted aerial devices used to elevate personnel to job-sites above ground:

- Extensible boom platforms
- Aerial ladders
- Articulating boom platforms
- Vertical towers
- A combination of any such devices

Aerial equipment may be made of metal, wood, fiberglass reinforced plastic (FRP), or other material; may be powered or manually operated; and are deemed to be aerial lifts whether or not they are capable of rotating about a substantially vertical axis.

For additional information on the use of aerial lifts, please refer to the Elevating Work Platforms chapter (if applicable) in this manual.

TRAINING

The Company will ensure all employees are trained on scaffold safety. This training will be provided at no cost to the employee during working hours.

Only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees will be used.

Training Components

The Company’s designated competent scaffolding person will ensure that every employee who performs work from a scaffold receives training in the following minimum elements:

- The nature of any electrical hazards, fall hazards, and falling object hazards in the work area
- 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 proper use of the scaffold and the proper handling of materials on the scaffold
- The maximum intended load and the load-carrying capacities of the scaffolds used
- Any other safety topics deemed pertinent to the particular work-site, scaffold system, or fall protection systems being used

The Company’s designated competent scaffolding person will ensure that all employees involved in erecting, disassembling, moving, operating, repairing, maintaining or inspecting a scaffold will be trained in the following minimum elements:

- The nature of scaffold hazards
- The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold being used
- The design criteria, maximum intended load-carrying capacity, and intended use of the scaffold
- Any other safety topics deemed pertinent to the particular work-site, scaffold system, or fall protection systems being used
Retraining is required when the Company’s designated competent scaffolding person has reason to believe an employee lacks the skill or understanding needed to perform work that involves the erection, use, or dismantling of scaffolds safely. The employee will be retrained so that the required proficiency is regained. Retraining is required in all the following situations:

- When changes at the worksite create new hazards about which an employee has not been previously trained
- When 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 required skill, knowledge, and proficiency for the work involved

**Training Records**

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
- The names and qualifications of persons conducting the training
- The names and job titles of all persons attending the training sessions

The Company will retain all employee training records for the length of their employment.

**FORMS AND ATTACHMENTS**

On the following pages, please find the following documents:

- Summary of Training Requirements for Scaffold users
- Fall Hazard Assessment Checklist
- Scaffolds and Work Platforms Training Record Sheet

These forms may be reproduced freely for the purposes of implementing and maintaining a safety and health program.
# Summary of Training Requirements for Scaffold Users

<table>
<thead>
<tr>
<th>Critical Scaffold Issues</th>
<th>Those Who Work from Scaffolds</th>
<th>Those Who Erect and Dismantle Scaffolds</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Falling objects</td>
<td></td>
<td>• Scaffold design criteria</td>
</tr>
<tr>
<td>• Fall protection</td>
<td></td>
<td>• Scaffold erecting, disassembling, moving, and maintenance procedures</td>
</tr>
<tr>
<td>• Material handling on scaffolds</td>
<td></td>
<td>• Scaffold erecting, disassembling and, moving hazards</td>
</tr>
<tr>
<td>• Scaffold load capacities</td>
<td></td>
<td>• Scaffold load capacities</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What They Need to Know</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>• How to use appropriate fall protection systems</td>
<td></td>
<td>• Hazards involved in erecting/dismantling</td>
</tr>
<tr>
<td>• How to control scaffold hazards</td>
<td></td>
<td>• Erection/dismantling planning procedures</td>
</tr>
<tr>
<td>• How to use scaffold walkways, platform components, and access areas</td>
<td></td>
<td>• How to deal with electrical hazards</td>
</tr>
<tr>
<td>• Maximum-intended and load-carrying capacities of scaffolds</td>
<td></td>
<td>• How to inspect components</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Appropriate design criteria</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Maximum-intended and load-carrying capacities of scaffolds</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Who Can Train Them</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Those Who Work from Scaffolds</td>
<td>Any qualified person who has training and experience in the above critical scaffold issues and who can teach the issues to scaffold users.</td>
<td>Any competent person who has training and experience in the above critical scaffold issues who can teach the issues to erectors/dismantlers, and who has authority to control scaffold hazards.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>How Often to Train Them</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Those Who Work from Scaffolds</td>
<td>Before beginning a new job, Whenever changes at the worksite present new hazards, Whenever they fail to demonstrate skills related to any of the critical scaffold issues</td>
<td>Before they begin a new job, Whenever changes at the worksite present new hazards, Whenever they fail to demonstrate skills related to any of the critical scaffold issues</td>
</tr>
</tbody>
</table>
# Fall Hazard Assessment

<table>
<thead>
<tr>
<th>Job Name:</th>
<th>Location:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Assessed:</td>
<td>Related Operating Procedures Reviewed:</td>
</tr>
<tr>
<td></td>
<td>Location Marked and Entry Controlled:</td>
</tr>
<tr>
<td></td>
<td>☐ YES ☐ NO</td>
</tr>
</tbody>
</table>

## FALL HAZARD ASSESSMENT CHECKLIST

1. Can an employee enter the area without restriction and perform work? ☐ YES ☐ NO
2. Are fall prevention systems such as cages, guardrails, toeboards, and manlifts in place? ☐ YES ☐ NO
3. Have slipping and tripping hazards been removed or controlled? ☐ YES ☐ NO
4. Have visual warnings of fall hazards been installed? ☐ YES ☐ NO
5. Can the distance a worker could fall be reduced by installing platforms, nets etc.? ☐ YES ☐ NO
6. Are any permanently installed floor coverings, gratings, hatches, or doors missing? ☐ YES ☐ NO
7. Does the location contain any other recognized safety and or health hazards? ☐ YES ☐ NO
8. Is the space designated as a Permit Required Confined Space? ☐ YES ☐ NO
9. Have anchor points been designated and load tested? ☐ YES ☐ NO

### Assessment Information:

<table>
<thead>
<tr>
<th>Initials</th>
<th>Hazard</th>
<th>Remarks/Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total potential fall distance:</td>
<td></td>
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<tr>
<td></td>
<td>Number of workers involved:</td>
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<tr>
<td></td>
<td>Frequency of task:</td>
<td></td>
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<tr>
<td></td>
<td>Obtainable anchor point strength:</td>
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<tr>
<td></td>
<td>Required anchor point strength: (not less than 5000 lbs)</td>
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</tbody>
</table>

### Additional Requirements:

**Potential environmental conditions that could impact safety:**

<table>
<thead>
<tr>
<th>Initials</th>
<th>Condition</th>
<th>Remarks/Recommendations</th>
</tr>
</thead>
</table>

**Possible required structural alterations:**

<table>
<thead>
<tr>
<th>Initials</th>
<th>Alteration</th>
<th>Remarks/Recommendations</th>
</tr>
</thead>
</table>

**Possible task modification that may be required:**

<table>
<thead>
<tr>
<th>Initials</th>
<th>Task</th>
<th>Remarks/Recommendations</th>
</tr>
</thead>
</table>

**Training requirements:**

<table>
<thead>
<tr>
<th>Initials</th>
<th>Requirement</th>
<th>Remarks/Recommendations</th>
</tr>
</thead>
</table>

**Personal protective equipment required:**

<table>
<thead>
<tr>
<th>Initials</th>
<th>Requirement</th>
<th>Remarks/Recommendations</th>
</tr>
</thead>
</table>

### Comments:

☐ Approved

## AUTHORIZATION:

I certify that I have conducted a Fall Hazard Assessment of the above designated location and have detailed the findings of the assessment on this form. ☐ YES ☐ NO

<table>
<thead>
<tr>
<th>Title:</th>
<th>Date:</th>
<th>Time:</th>
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</table>

Name:

Signature:
### SCAFFOLDS AND WORK PLATFORMS TRAINING RECORD SHEET

<table>
<thead>
<tr>
<th>Trainer (include qualifications):</th>
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<tbody>
<tr>
<td>Date:</td>
</tr>
<tr>
<td>Content of Training:</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>Attendees</th>
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<tbody>
<tr>
<td>Print Name</td>
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</table>
SCOPE

This Silica Dust policy meets the new Silica regulation requirements for both General Industry and Construction work, including the compliance timetables from 2016 up to 2021.

The policy covers occupational risk, health effects, and symptoms training for employees to understand how to take control of their own health.

Also covered are the permissible exposure levels (PEL) with air monitoring and medical surveillance to identify hazards and employee exposure.

Engineering and administrative controls along with safe work practices to be employed to protect workers such as: dust reduction, restricted areas and personal hygiene. Also included are personal protective equipment (PPE) steps, especially respiratory protection to be used when necessary, along with: first aid, spill and disposal procedures, recordkeeping requirements, and the table to control common construction tasks without monitoring workers’ silica exposure.

POLICY

This company policy implements the necessary procedures for employees, safety personnel and supervisors to provide the OSHA required protection for employees who could be exposed to an unsafe level of airborne silica.

EMPLOYER RESPONSIBILITIES

- Prevent employees from being exposed to an airborne silica level above the Permissible Exposure Level (PEL) of 50 (µg/ m³) Establish a written exposure control plan to identify high exposure tasks and protection methods.
- Designate a competent person to implement the written exposure control plan
- Enforce housekeeping practices that limit workers silica exposure.
- Offer medical exams—including chest X-rays and lung function tests—every three years for workers who are required by the standard to wear a respirator for 30 or more days per year
- Appropriately train workers and supervisors before starting work.
- Keep records of workers’ silica exposure and medical exams

EMPLOYEE RESPONSIBILITIES

- Attend all silica exposure training
- Follow all safe practices established by the company
- Use and maintain all necessary PPE provided by the company
- Report any unsafe conditions or acts immediately

SILICA INFORMATION

Crystalline silica, also called alpha silica or free silica, is silicon dioxide (SiO₂). In pure, natural form, SiO₂ crystals are tiny, very hard, translucent and colorless. The most common types of crystalline silica encountered in industry are quartz and cristobalite.
Quartz content can vary greatly among different rock types. Granite can contain anywhere from 10 to 40% quartz; shales have been found to average 22%, and sandstone averages almost 70% quartz.

Silicates, composed of $\text{SiO}_2$, are also a source of silica. Silicates include mica, soapstone, talc, tremolite and Portland cement.

**OCCUPATIONAL RISK**

Silica is present in almost every process where natural minerals are handled. In construction work, employees who are handling rock, brick, sand or drilling, quarrying or tunneling through the earth’s crust may be exposed to silica.

In general industry work, employees are exposed to silica dusts from cleaning, etching, polishing or the manufacture of asphalt or cement.

**HEALTH EFFECTS**

Silicosis: Silicosis is lung damage caused by breathing dust containing fine particles of crystalline silica that become embedded in the lungs, causing the lungs to develop fibrotic nodules and scarring. The scar tissue makes the lungs hard and stiff. The scarring can greatly reduce the function of the lungs making it difficult and sometimes painful to breathe.

Silica also reduces the body’s ability to fight off infections making workers more susceptible for developing other lung illnesses and infections. If workers smoke, silica exposure may greatly increase the risk of developing lung cancer. The incidence of tuberculosis is high among silicosis victims.

Silica dust can also irritate a worker’s eyes. Goggles or safety glasses should be worn if eye irritation is a problem.

**SYMPTOMS**

Early stages of the disease may go unnoticed, but symptoms can include: shortness of breath during physical exertion; fever; occasionally bluish skin at the ear lobes or lips.

Progression of silicosis can lead to:

- Fatigue
- Labored breathing
- Loss of appetite
- Pain in the chest
- Respiratory failure, which may cause death

In severe cases, fibrous tissue can hinder the flow of blood in vessels of the lung, and the heart can enlarge in an effort to pump more blood.

**Types of Silicosis**

**Chronic silicosis**: The most common form of the disease; may go undetected for years in the early stages. Chest x-rays may not reveal an abnormality until after 15 or 20 years of exposure. If you believe you are overexposed to silica dust, visit a doctor who knows about lung diseases. The progress of silicosis can only be stopped; but cannot be cured.
**Accelerated silicosis:** A form of silicosis that shows symptoms within five to 10 years.

**Acute silicosis:** A form of silicosis that develops in workers exposed to very high levels of crystalline silica. Symptoms may appear within only a few weeks of an initial exposure.

## EXPOSURE LEVELS

On June 23, 2016 two new OSHA regulations, (1910.1053 for General Industry work and 1926.1153 for Construction work) and exposure limits took effect.

This new silica regulation establishes the following provisions:

- Establishes an action level for airborne respirable crystalline silica of 25 micrograms per cubic meter of air (μg/m³) averaged over an 8-hour shift
- Reduces the permissible exposure limit (PEL) for respirable crystalline silica to 50 (μg/m³), averaged over an 8-hour shift
- Requires employers to: use engineering controls (such as water or ventilation) to limit worker exposure to the PEL; provide respirators when engineering controls cannot adequately limit exposure; limit worker access to high exposure areas; develop a written exposure control plan, offer medical exams to highly exposed workers, and train workers on silica risks and how to limit exposures
- Requires medical exams to monitor highly exposed workers and gives them information about their lung health

After this date, companies will have one to five years to comply with most requirements, based on the following schedule:

**Construction** - June 23, 2017, one year after the effective date.

**General industry and maritime** - June 23, 2018, employers must comply with all requirements of the standard, except for the following:

- Medical surveillance must be offered to employees who will be exposed at or above the action level for 30 or more days a year starting on June 23, 2020. (Medical surveillance must be offered to employees who will be exposed above the PEL for 30 or more days a year starting on June 23, 2018.)

**Hydraulic Fracturing** - June 23, 2018, two years after the effective date for all provisions except

- Engineering Controls, which have a compliance date of June 23, 2021

## PERSONAL PROTECTIVE EQUIPMENT

Personal Protective Equipment (PPE) will only be used when engineering and administrative controls do not provide adequate worker protection and reduce to at least the PEL. PPE is the last line of defense for limiting silica exposure and may include:

- Hardhats
- Gloves
- Coveralls
Eye Protection
Safety Shoes or Boots
Dust Masks or Respirators

Respiratory Protection

Only when all engineering or administrative controls have been implemented, and the level of respirable silica still exceeds the PEL, may an employer rely on a respirator program to protect workers.

When respirators are required to protect employees for silica dust exposure the company’s Respirator Program will be strictly followed.

Copies of the Respirator Program will be made available to all employees upon request.

- The respirator program will comply with the OSHA standards for respiratory protection, this includes proper respirator selection, medical evaluations, fit testing, cleaning and maintenance procedures, and training
- The company must select and provide an appropriate respirator that will effectively protect their employees
- Respirators must be approved by NIOSH for protection against the silica PEL and provide the require APF
- When abrasive blasting is done, the type C supplied-air, positive pressure, demand type abrasive blasting respirator will be worn
- An abrasive-blasting respirator must cover the wearer’s head, neck, and shoulders to protect from rebounding abrasives

EMERGENCY FIRST AID

Eye Exposure

If crystalline silica dust gets into the eyes, wash immediately with large amounts of water, lifting the lower and upper lids occasionally.

If irritation is present after washing, get medical attention.

Portable eyewashes will be kept at jobsites in the field away from the company locations.

Breathing

- If a person breathes in large amounts of crystalline silica dust, move the exposed person to fresh air immediately
- If breathing has stopped, perform chest compressions (if trained)
- Keep the person warm and at rest
- Get medical attention as soon as possible

SPILL AND DISPOSAL PROCEDURES

If crystalline silica is spilled or released in hazardous concentrations, the following steps will be taken:
- Ventilate the area
- Wear respirators during clean-up
- Collect spilled material in the most convenient and safe manner for reclamation or disposal in a secured sanitary landfill

**RECORDKEEPING**

Training, medical records, air monitoring, engineering control maintenance records, and injury records will be kept by the company and made available upon request.

The site safety coordinator or their designee is responsible for the recordkeeping program.

**CONTROL OF SILICA DUST IN CONSTRUCTION WORK**

The table below lists some of the most common construction tasks and dust control methods, so employers know exactly what they need to do to limit worker exposures to silica. The dust control measures listed in the table include methods known to be effective, like using water to keep dust from getting into the air or using ventilation to capture dust. In some operations, respirators may also be needed.

Employers who follow the recommendations shown in Table 1 (below) correctly do not need to monitor workers’ silica exposure and get it below the PEL.

**Table 1: Job/Task Specific Silica Exposure Control Methods**

<table>
<thead>
<tr>
<th>Equipment / Task</th>
<th>Engineering and Work Practice Control Methods</th>
<th>Required Respiratory Protection and Minimum Assigned Protection Factor (APF)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>≤ 4 hours /shift</td>
</tr>
<tr>
<td>Stationary masonry saws</td>
<td>Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</td>
<td>None</td>
</tr>
<tr>
<td>Handheld power saws (any blade diameter)</td>
<td>Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>When used outdoors</td>
<td></td>
</tr>
<tr>
<td></td>
<td>When used indoors or in an enclosed area</td>
<td>APF 10</td>
</tr>
<tr>
<td>Handheld power saws for cutting fiber-cement board (with blade diameter of 8 inches or less)</td>
<td>For tasks performed outdoors only: Use saw equipped with commercially available dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the airflow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency.</td>
<td>None</td>
</tr>
<tr>
<td>Equipment / Task</td>
<td>Engineering and Work Practice Control Methods</td>
<td>Required Respiratory Protection and Minimum Assigned Protection Factor (APF)</td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td>≤ 4 hours /shift</td>
</tr>
<tr>
<td>Walk-behind saws</td>
<td>Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>When used outdoors</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>When used indoors or in an enclosed area</td>
<td>APF 10</td>
</tr>
<tr>
<td>Drivable saws</td>
<td>For tasks performed outdoors only:</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Use saw equipped with integrated water delivery system that continuously feeds water to the blade. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Rig-mounted core saws or drills</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Use tool equipped with integrated water delivery system that supplies water to cutting surface. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Handheld and stand-mounted drills (including impact and rotary hammer drills)</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Use drill equipped with commercially available shroud or cowlign with dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Dust collector must provide the airflow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes.</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Dowel drilling rigs for concrete</td>
<td>APF 10</td>
</tr>
<tr>
<td></td>
<td>For tasks performed outdoors only:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Use shroud around drill bit with a dust collection system. Dust collector must have a filter with 99% or greater efficiency and a filter-cleaning mechanism. Use a HEPA-filtered vacuum when cleaning holes.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Vehicle-mounted drilling rigs for rock and concrete</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Use dust collection system with close capture hood or shroud around drill bit with a low-flow water spray to wet the dust at the discharge point from the dust collector. OR Operate from within an enclosed cab and use water for dust suppression on drill bit.</td>
<td>None</td>
</tr>
<tr>
<td>Equipment / Task</td>
<td>Engineering and Work Practice Control Methods</td>
<td>Required Respiratory Protection and Minimum Assigned Protection Factor (APF)</td>
</tr>
<tr>
<td>-----------------</td>
<td>-------------------------------------------------</td>
<td>----------------------------------------------------------</td>
</tr>
<tr>
<td>Jackhammers and handheld powered chipping tools</td>
<td>Use tool with water delivery system that supplies a continuous stream or spray of water at the point of impact.</td>
<td>≤ 4 hours /shift</td>
</tr>
<tr>
<td></td>
<td>When used outdoors.</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>When used indoors or in an enclosed area.</td>
<td>APF 10</td>
</tr>
<tr>
<td></td>
<td>OR</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Use tool equipped with commercially available shroud and dust collection system.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Operate and maintain tool in accordance with manufacturer’s instructions to minimize dust emissions.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Dust collector must provide the airflow recommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>When used outdoors.</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>When used indoors or in an enclosed area.</td>
<td>APF 10</td>
</tr>
<tr>
<td>Handheld grinders for mortar removal (i.e., tuckpointing)</td>
<td>Use grinder equipped with commercially available shroud and dust collection system.</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Operate and maintain tool in accordance with manufacturer’s instructions to minimize dust emissions.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.</td>
<td></td>
</tr>
<tr>
<td>Handheld grinders for uses other than mortar removal</td>
<td>For tasks performed outdoors only:</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Operate and maintain tool in accordance with manufacturer’s instructions to minimize dust emissions.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>OR</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Use grinder equipped with commercially available shroud and dust collection system.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Operate and maintain tool in accordance with manufacturer’s instructions to minimize dust emissions.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Dust collector must provide 25 cubic feet per minute (cfm) or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>When used outdoors.</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>When used indoors or in an enclosed area.</td>
<td>None</td>
</tr>
<tr>
<td>Equipment / Task</td>
<td>Engineering and Work Practice Control Methods</td>
<td>Required Respiratory Protection and Minimum Assigned Protection Factor (APF)</td>
</tr>
<tr>
<td>------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------</td>
</tr>
</tbody>
</table>
| Walk-behind milling machines and floor grinders       | Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface.  
Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.  
OR  
Use machine equipped with dust collection system recommended by the manufacturer.  
Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions.  
Dust collector must provide the airflow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.  
When used indoors or in an enclosed area, use a HEPA-filtered vacuum to remove loose dust in between passes.                                     | None                            | None             |
| Small drivable milling machines (less than half-lane) | Use a machine equipped with supplemental water sprays designed to suppress dust.  
Water must be combined with a surfactant.  
Operate and maintain machine to minimize dust emissions.                                                                                                               | None                            | None             |
| Large drivable milling machines (half-lane and larger) | For cuts of any depth on asphalt only:  
Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust.  
Operate and maintain machine to minimize dust emissions.  
For cuts of four inches in depth or less on any substrate:  
Use machine equipped with exhaust ventilation on drum enclosure and supplemental water sprays designed to suppress dust.  
Operate and maintain machine to minimize dust emissions.  
OR  
Use a machine equipped with supplemental water spray designed to suppress dust.  
Water must be combined with a surfactant.  
Operate and maintain machine to minimize dust emissions.                                                                                          | None                            | None             |

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The key to preventing silicosis is preventing silica dust from being in the air. Employers are required to provide and assure the use of appropriate controls for dusts containing crystalline silica.

When implementing the control measures specified in Table 1 above, the company will ensure:

- Tasks performed indoors or in enclosed areas have an exhaust method that minimizes the accumulation of visible airborne dust
- Tasks performed using wet methods will have enough water at flow rates to minimize release of visible dust
- Methods used for work performed in a cab or booth will:
  - Be maintained as free as practicable from settled dust
  - Have door seals and closing mechanisms that work properly
  - Have gaskets and seals that are in good condition and working properly
  - Be maintained with by continuous delivery of fresh air
  - Have intake air that is filtered through an approved filter
  - Have heating and cooling capabilities

If the company does not use the control methods in the above table, they must:

- Measure the amount of silica that workers are exposed to if it may be at or above an action level of 25 μg/ m³ averaged over an eight-hour day
- Protect workers from respirable crystalline silica exposures above the permissible exposure limit of 50 μg/ m³, averaged over an eight-hour day
• Use dust controls to protect workers from silica exposures above the PEL
• Provide respirators to workers when dust controls cannot limit exposures to the PEL

If employees use a respirator 30 or more days a year, they will need to be offered a medical exam.

The company will reassess exposures whenever a change in the production, process, control equipment, personnel, or work practices may reasonably be expected to result in new or additional exposures at or above the action level, or when the employer has any reason to believe that new or additional exposures at or above the action level have occurred.

CONTROLLING SILICA DUST IN GENERAL INDUSTRY WORK

The Table below lists some of the most common general industry businesses where employees may be exposed to silica dust

- Abrasive blasting
- Cement/Concrete product manufacturing
- Foundries
- Mineral Processing
- Pottery manufacturing
- Refractories
- Asphalt Paving Products
- Cut Stone
- Glass work
- Paint and Coatings
- Railroads
- Shipyard work
- Asphalt Roofing Materials
- Dental Laboratories
- Jewelry
- Porcelain Enameling
- Ready Mix Concrete
- Structural Clay

These tasks generally involve the use of pressurized abrasives, grinders, drills and saws. The dust control methods include the use of dust collection, ventilation, wetting methods (streaming water and misting), and if necessary respirators.

Where it can be shown that the action level will not be exceeded, no respiratory protection is required. When working in an enclosed area or when the length of exposure exceeds 4 hours, respiratory protection with an Assigned Protection factor (APF) of 10 may be required. This can be provided by a NIOSH approved N95 dust mask or another respirator type.

When performing general industry work, the company will use air monitoring test results to determine the level of respiratory protection necessary.

The key to preventing silicosis is to develop and enforce controls to prevent airborne silica dust.

When implementing a silica exposure program the company must:

• Measure the amount of silica that workers are exposed to if it might be at the action level of 25 μg/ m³.
• Protect workers from respirable crystalline silica exposures above the PEL (50 μg/ m³)
• Enforce controls to protect workers from silica exposures above the PEL
• Provide respirators to workers when dust controls cannot limit exposures to the PEL

If employees use a respirator 30 or more days a year, they will need a medical exam.

The company will reassess exposures whenever a change in the production, process, control equipment, personnel, or work practices may reasonably be expected to result in new or additional exposures at or above the action level, and when any exposure at or above the action level have occurred.
SILICA DUST EXPOSURE CONTROL PROGRAM

The Occupational Silica Dust Control Program includes the following parts:

- Hazard Identification
- Worksite Air Monitoring
- Respiratory Protection
- Engineering Controls
- Administrative Controls
- Safe Work Practices
- Medical Examinations and Evaluation
- Training and Informing Workers on Hazards of Silica Dust
- Personal Protective Equipment
- Recordkeeping
- Emergency First Aid Procedures for Silica Dust
- Spill and Disposal Procedures

HAZARD IDENTIFICATION

When a task presents a potential silica exposure hazard, the Safety Coordinator, or designee, is responsible for identifying silica dust exposure hazards and controls prioritizing feasible engineering and then administrative controls.

WORKSITE AIR MONITORING

When a silica dust hazard is identified, the process and the workers' breathing zone will be monitored for silica dust concentrations. Employee exposure measurements will represent actual breathing zone exposure conditions for a representative sample of each affected job description.

Hazardous tasks identified will be monitored at least every four months and whenever a change is made to the process. Engineering controls will be monitored for efficacy immediately after implementation and quarterly thereafter.

The company will ensure that all monitoring equipment is maintained in good working order, and that any analyzing laboratory meets OSHA regulations.

Employees will be able to view all air monitoring records; copies of the records can be obtained from the Safety Coordinator upon request.

Employees should be monitored, as necessary or required, to enforce developed administrative controls and safe work practices.

RESPIRATORY PROTECTION

When implementing respiratory protection measures, we will ensure:

- Tasks performed indoors or in enclosed areas have an exhaust method that minimizes the accumulation of visible airborne dust
• Wet method controls have enough water to minimize visible dust.
• Work performed in a cab or booth will:
  o Be maintained as free as practicable from settled dust
  o Have door seals and closing mechanisms that work properly
  o Have gaskets and seals in good condition and working properly
  o Have a continuous supply of fresh air
  o Have intake air filtered through an approved filter
  o Have heating and cooling capabilities

ENGINEERING CONTROLS

The company will use engineering controls whenever possible to control silica dust exposures. The company will not use abrasives that contain more than 1% crystalline silica during blasting.

The Safety Coordinator is responsible for inspecting and maintaining engineering controls at all jobs/tasks where silica exposure hazards have been identified.

Substitute with less hazardous materials: Do not use silica sand or other substances containing more than 1% crystalline silica as abrasive blasting materials.

Dust-reduction systems: When using powered tools or equipment to cut, grind, core, or drill concrete or masonry materials, a dust-reduction system will be used to effectively reduce airborne particulate. Exceptions include operations where it can be shown the PEL is not exceeded, roofing operations with tile, pavers or similar materials; and during the first 24 hours of an emergency operation.

Dust Extraction: Wherever possible, concrete cutting and drilling equipment should be fitted with collection devices to eliminate dust at the source. A vacuum with a high-efficiency particle air (HEPA) filter can be used to clean dust from work areas. Wear an appropriate respirator when exposure approaches PELs.

Wet work: Where dust extraction is not practical, airborne silica dust can be minimized or reduced by using water in the process Such as using saws and drills that provide water to the point of action. A respirator may still need to be worn during wet work.

Wet clean up may also be used to remove dust. Waste material will be stored at designated, clearly marked location and will be removed at least weekly.

Isolation: Use containment methods such as blast-cleaning cabinets when sandblasting. Cabs of vehicles or machinery cutting or drilling through rock that might contain silica should be enclosed and sealed.

Ventilation: Use local exhaust systems to remove silica dust from industrial processes at the point of operation. Dilution ventilation may be used to reduce the silica dust concentration to below the PEL in large areas.

Adequate measures will be taken to ensure that discharge does not produce health hazards to the outside environment. A dust collector will be set up so that accumulated dust can be removed without contaminating work areas.
• Ventilation systems will be inspected and maintained by a designated competent person
• Ventilation systems will be checked at least weekly to determine if they are functioning properly

**ADMINISTRATIVE CONTROLS**

**Air Monitoring**

Air monitoring is used to determine exposures, evaluate engineering controls, select respiratory protection, evaluate the efficacy of safe work practices, and determine the need for medical surveillance.

• Exposure measurements should be made in the employee’s breathing zone
• Long-term or short-term respirable samples can be used
• Total sampling time must be at least 7 hours
• Monitoring should be repeated at least quarterly

**Restricted Areas**

• Post warning signs in areas where silica exposure already exists or is possible restricting unauthorized employees
• Warning signs should contain one of the following:
  o WARNING SILICA DUST HAZARD: RESPIRATOR REQUIRED
  o SILICA DUST CAN CAUSE SILICOSIS: RESPIRATOR REQUIRED

**SAFE WORK PRACTICES**

Whenever practical, working where silica dust may be created should be done:

• In non-enclosed areas
• Downwind from other employees
• In regulated/restricted areas
• When other workers are not around

**Housekeeping Procedures**

Dry sweeping and using compressed air are prohibited for removing dust in jobs/tasks identified with silica exposure hazards.

Supervisors are responsible for ensuring that work areas are dust free at the end of each shift.

• Remove dust on overhead ledges, floors and equipment before it becomes airborne due to traffic, vibration and random air current
• Gentle wash down of surfaces is preferable if practical
• Never dry sweep or use compressed air for cleanup of dust that may contain silica
• Use wet methods or vacuums with a HEPA filter for clean-up

**Personal Hygiene**

Employees working at hazardous jobs/tasks will practice good personal hygiene to avoid unnecessary exposure.
Hand-washing facilities will be conveniently located throughout a worksite. Lockers will be provided for employees to store uncontaminated street clothes. Eating/lunch areas will be located away from exposure areas.

Employees will eat, smoke, or use smokeless tobacco in designated areas only.

Workers should park their cars where they will not be contaminated with silica.

Workers should shower (if possible) and change out of work clothes contaminated with silica dust before they leave the jobsite.

Work clothes must not be cleaned by blowing or shaking. They should be vacuumed with a HEPA filter vacuum before removal.

Contaminated clothing will be vacuumed with a HEPA filter vacuum to remove silica dust. Lockers or containers will be provided to store clean clothes at the jobsite. Employees are required to wash their hands and shower (when feasible) before leaving the worksite.

When worksites are located in the field away from normal operation the Company will provide water in portable containers to hand washing.

**MEDICAL SURVEILLANCE**

Employees who will work in hazardous jobs will be given free and reasonably convenient medical exams by an approved health care provider.

**Initial Testing**

An initial medical examination to establish a baseline will be given within 30 days of assignment unless they have received an acceptable examination within the last three years.

This examination will include:

- A medical and work history regarding exposure to respirable crystalline silica, dust, and other agents affecting the respiratory system
- A history of respiratory system dysfunction, including signs and symptoms of respiratory disease history of tuberculosis; and smoking status and history
- A physical examination with special emphasis on the respiratory system
- A chest X-ray
- A pulmonary function test
- Testing for latent tuberculosis infection
- Any other tests deemed appropriate by the health care provider

**Periodic Testing**

Employees who use a respirator for at least 30 days a year will have a medical examination when they start the job, and then every three years.

Medical examinations will include:

- Chest X-rays
- Pulmonary function tests
- Tuberculosis evaluation
Employees whose chest X-rays show the development of silicosis will be transferred or removed from the hazardous situation. Input from the attending physician will be considered in making this decision.

Medical records will be given to employees or their representatives who ask for them.

Silicosis cases will be reported to state health departments and recorded on OSHA logs.

TRAINING

Employees working in hazardous jobs will be trained to understand and recognize the risks of airborne silica exposure and how to control those risks by following safe work procedures before starting the work and then at least annually.

Training for Occupational Silica Dust Exposure Will Include the Following Topics:

- Health hazards of silica dust exposure (including signs and symptoms of silicosis, lung cancer, chronic obstructive lung disease (COPD) and decreased lung function)
- Operations and materials that can produce silica dust exposures
- Engineering and work practice controls used to protect employees from exposures
- The importance of proper use and maintenance of equipment, including dust-reduction systems, and other controls
- The importance of good personal hygiene and housekeeping practices when working near dust from concrete, cleaning up appropriately before eating, cleaning clothes appropriately, avoiding other activities that could cause exposure to airborne dusts
- Additional safe work practices and procedures, including: safe handling and disposal procedures; the safe use of hazardous substances; fire protection; emergency and first aid procedures; electrical safety; safety in confined spaces; and other training required under hazard-specific regulations
- Proper use of respirators and the respirator standard
- Recognition of poorly ventilated areas and confined spaces
- The details of the Occupational Silica Dust Exposure Program

In addition, supervisors must be trained:

- To know and understand the employee-related information outlined above in this section
- To identify tasks that may result in employee exposure to dust or other hazards, and, as necessary, initiate procedures that reduce employee exposure to dust or other hazards

Training will be performed by a competent person. Records of attendance, dates of training, and training material will be documented and retained by the company.

Additional training or reference material on silica dust exposure will be given to employees who ask for them.

ATTACHMENTS

The following page contains an agreement form that must be completed by all affected employees indicating their commitment to this program. Completed copies of this document will be retained by the Company for the length of employment.
**EMPLOYEE AGREEMENT**

I have read and understand the requirements of this Silica safety program and will participate in all training and safety precautions.

<table>
<thead>
<tr>
<th>Employee Signature</th>
<th>Employee Signature</th>
</tr>
</thead>
<tbody>
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<tr>
<td>Employee Signature</td>
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</tr>
</tbody>
</table>

Date | Time
SCOPE
This chapter provides the safe work practices and requirements for performing rigging operations, and complies with OSHA regulations 1910.184, 1926.251, and 1926.753 as applicable. This chapter does not cover crane use or operator certification, which are covered in a separate chapter.

POLICY
This Company has implemented the following policy to protect its employees from the hazards of working with and/or around slings, rigging, and hoisting equipment.

EMPLOYER RESPONSIBILITIES
This Company will:

- Ensure that cranes and crane operators are certified and qualified for the work being performed
- Verify that employees performing rigging operations are trained
- Enforce all rigging and lifting safe practices
- Provide all employees with the necessary PPE

EMPLOYEE RESPONSIBILITIES
- Follow all safe practices
- Use all required PPE
- Report any unsafe conditions or acts immediately

HAZARDS
The primary hazards associated with rigging and lifting operations include:

- Falling loads
- Electrocution from overhead power lines

PPE
All employees engaged in rigging and lifting operations will wear the necessary PPE, which will include:

- Hardhats
- Steel toes safety shoes or boots
- Heavy duty leather gloves
- Safety glasses or goggles
- Approved clothing

EQUIPMENT
This section provides information on the use of the tools and equipment associated with rigging and lifting operations.
LIFTING DEVICES

Cranes, derricks, hoists and other lifting devices will only be operated by trained qualified personnel.

**Chain Falls and Hoist and Pullers**

A chain fall or hoist and puller must be used at not more than its rated capacity, which must be permanently labeled or marked on it. An accessory, such as a chain or cable used to secure or support a chain fall or hoist and puller, will have a capacity of not less than the chain fall or hoist and puller. An object subject to a lift or pull by a chain fall will have the capacity to absorb the lift or pull without creating a hazard to an employee in the area.

A chain fall or hoist and puller must be secured to an anchorage, and the load must be attached to the chain fall or hoist and puller in a manner that will prevent inadvertent disengagement. When a chain fall or hoist and puller are under the tension of a load, a positive action must be required to release the tension.

In addition, the chain fall or hoist and puller must be visually inspected for observable defects before each shift by the employee using the tools. A hoist and puller lever handle must not be operated with an extension handle except as furnished by the manufacturer.

**SLINGS**

This Company will determine that all employees involved with rigging and lifting operations are trained on the proper use of sling and hitches before being allowed to their assigned tasks.

Cranes, derricks and hoists rely upon slings to hold their suspended loads; slings are the most commonly used materials-handling apparatus. This section provides information on the proper selection, maintenance and use of slings.

Slings can be made of chain, wire rope, metal mesh, natural fiber rope, synthetic fiber rope or synthetic web. In general, use and inspection procedures tend to place these slings into three groups: chain, wire rope and mesh, and fiber rope web. Each type has its own particular advantages and disadvantages. The determination of what sling to use for a lift will be based on the size, weight, shape, temperature and sensitivity of the material to be moved, as well as the environmental conditions under which the sling will be used.

**Chain Slings**

Alloy steel chain slings will have permanently affixed durable identification stating size, grade, rated capacity and reach.

**Sling Use**

Chain slings will be used because of their strength and ability to adapt to the shape of the load. Care must be taken, however, when using alloy chain slings because sudden shocks will damage them. Misuse of chain slings can damage the sling, resulting in sling failure and possible injury to an employee.

Alloy steel chain slings will not be used with loads in excess of the rated capacities. Slings will be used according to the manufacturer’s recommendations.
Safe Operating Temperatures

Alloy steel chain slings will be permanently removed from service if they are heated above 1000°F. When exposed to service temperatures in excess of 600°F, the maximum working load limits will be reduced according to manufacturer’s recommendations.

Inspection

Chain slings must be inspected before each use for stretching, binding, wear, or nicks and gouges. If a sling has stretched more than three percent of its original length, it is unsafe and must be discarded.

In addition to the regular inspection, a thorough periodic inspection of alloy steel chain slings in use will be made based on the frequency of use, the severity of service conditions the nature of lifts being made and the experience gained on the service life of slings used in similar circumstances. These periodic inspections will be conducted at least annually, and a record of the most recent inspection will be kept, and made available for examination upon request.

Deformed Attachments

- Steel chain slings with cracked or deformed master links, coupling links or other components will be removed from service
- Slings will be removed from service if hooks are cracked, have been opened more than 15 percent of the normal throat opening measured at the narrowest point or twisted more than 10 degrees from the plane of the unbent hook

Repairing and Reconditioning Steel Chain Slings

- Worn or damaged chain slings or attachments will not be used until repaired
- When welding or heat testing is performed, slings will not be used unless repaired, reconditioned and proof tested by the sling manufacturer or an equivalent entity
- Mechanical coupling links or low carbon steel repair links will not be used to repair broken lengths of chain

Attachments

- Hooks, rings, oblong links, pear shaped links, welded or mechanical coupling links or other attachments will have a rated capacity at least equal to that of the alloy steel chain with which they are used or the sling will not be used in excess of the rated capacity of the weakest component
- Makeshift links or fasteners formed from bolts or rods, or other such attachments, will not be used

Proof Testing

The employer will verify that each new, repaired or reconditioned alloy steel chain sling, including all welded components in the sling assembly, will be proof tested by the sling manufacturer or equivalent entity according to the ASTM Specification A391-65 and/or ANSI G61.1 before use. The employer will retain a certificate of the proof test and will make it available for examination.
Wire Rope

A second type of sling is made of wire rope. Wire rope is made of individual wires that have been twisted to form strands. Strands are then twisted to form a wire rope. Wire ropes with a fiber core are more flexible but are less resistant to environmental damage. Conversely, a core that is made of a wire rope strand has a greater strength and is more resistant to heat damage.

Sling Use

Wire rope slings will not be used with loads in excess of the rated capacities. Slings will be used according to the manufacturer’s recommendations.

Minimum Sling Lengths

- Cable laid and 6 x 19 and 6 x 37 slings will have a minimum clear length of wire rope 10 times the component rope diameter between splices, sleeves or end fittings
- Braided slings will have a minimum clear length of wire rope 40 times the component rope diameter between the loops or end fittings
- Cable laid grommets, strand laid grommets and endless slings will have a minimum circumferential length of 96 times their body diameter

Safe Operating Temperatures

Fiber core wire rope slings of all grades will be permanently removed from service if they are exposed to temperatures exceeding 200° F. When non-fiber core wire rope slings of any grade are used at temperatures above 400° F or below minus 60° F, recommendations of the sling manufacturer regarding use at that temperature will be followed.

Safety Factors

- The designed safety factor for the hoisting cable on:
  - A hot metal crane must not be less than 8
  - Any other crane must not be less than 5

End Attachments

- Welding of end attachments, except covers to thimbles, will be performed before the assembly of the sling
- Welded end attachments will not be used unless proof tested by the manufacturer or equivalent entity at twice their rated capacity prior to initial use. The employer will retain a certificate of the proof test, and make it available for examination

Requirements

- Wire rope for a crane bent to form an eye will be equipped with a metal thimble
- An eye in a wire rope sling must not be formed by using a knot. Michigan prohibits the use of wire rope clips to form an eye in a wire rope sling. Check state and local standards for specific provisions
- A wire rope end fitting must be a clamp, swage or a zinc or equivalent poured socket
Before cutting wire rope, seizings must be placed as follows:
- 1 seizing on each side of the cut on preformed wire rope
- 2 seizings on each side of ⅝ inch size or smaller non-preformed wire rope
- 3 seizings on each side of 1 inch or larger size non-preformed wire rope

Wire rope that has an independent wire rope core must be used on all molten metal applications and in areas where the environmental atmosphere will cause deterioration of a hemp center.

The unreeling or uncoiling of wire rope must be done as recommended by the rope manufacturer and with care to avoid kinking or inducing a twist.

Rope clips attached with U-bolts must have the U-bolts on the dead or short end of the rope. The spacing and number of all types of clips must adhere to manufacturer recommendations. Clips must be dropforged steel in all sizes manufactured commercially. When a newly installed rope has been in operation for an hour, all nuts on the clip bolts must be retightened.

If a load is supported by more than one part of rope, then the tension in the parts must be equal.

Removal from Service

Wire rope slings will be immediately removed from service (and not used again for load-carrying service) if any of the following conditions are present:
- In running ropes, there are 6 randomly distributed broken wires in 1 lay, or 3 broken wires on 1 strand in 1 lay.
- In rotation-resistant ropes, 2 randomly distributed broken wires in 6 rope diameters or 4 randomly distributed broken wires in 30 rope diameters.
- In standing ropes, there are more than 2 broken wires in 1 lay in sections beyond end connections or more than 1 broken wire at an end connection.
- There are reductions from nominal diameter of more than the following:
  - One sixty-fourth of an inch for a diameter to and including 5/16 of an inch
  - One thirty-second of an inch for a diameter ⅜ of an inch to and including ⅜ of an inch
  - Three sixty-fourths of an inch for a diameter 9/16 of an inch to and including ¾ of an inch
  - One sixteenth of an inch for a diameter ⅜ of an inch to and including 1¼ inches
  - Three thirtyseconds of an inch for a diameter 1¼ inches to and including 1½ inches
  - Wear or scraping of one-third the original diameter of outside individual wires
  - Kinking, crushing, bird caging or any other damage resulting in distortion of the running portion of the wire rope structure
  - Evidence of heat damage
  - Corrosion of the rope or end attachments
  - End attachments that are cracked, deformed, or worn
  - Hooks that have been opened more than 15 percent of the normal throat opening measured at the narrowest point or twisted more than 10 degrees from the plane of the unbent hook.

Wire Rope Sling Inspection

Wire rope slings must be visually inspected before each use. The operator and/or rigger will check the twists or lay of the sling. If ten randomly distributed wires in one lay are broken, or five wires in one strand of a rope lay are damaged, the sling must not be used. End fittings and other components will also be inspected for any damage that could make the sling unsafe.
Field Lubrication

Although every rope sling is lubricated when manufactured, it also must be lubricated in the field to increase the sling’s useful service life. There is no set rule on how much or how often this should be done. It depends on the conditions under which the sling is used. The heavier the loads, the greater the number of bends, or the more adverse the conditions under which the sling operates, the more frequently lubrication is required.

Storage

Wire rope slings will be stored in a well-ventilated, dry building. To avoid corrosion and rust, never store wire rope slings on the ground or allow them to be continuously exposed to the elements. If it is necessary to store wire rope slings outside, make sure that they are kept off the ground and protected.

Discarding Slings

Wire rope slings can provide a margin of safety by showing early signs of failure. The following factors indicate when a wire sling needs to be discarded:

- Severe corrosion
- Localized wear (shiny worn spots) on the outside
- A one-third reduction in outer wire diameter
- Damage or displacement of end-fittings by overload or misapplication
- Distortion, kinking, bird caging or other evidence of damage to the wire rope structure
- Excessive broken wires

Wire rope slings, like chain slings, must be cleaned before inspections because they are subject to damage hidden by dirt or oil. In addition, they must be lubricated according to manufacturer’s instructions. Lubrication prevents or reduces corrosion and wear due to friction and abrasion. Before applying any lubricant, however, make sure the sling is dry. Applying lubricant to a wet or damp sling traps moisture against the metal and hastens corrosion.

Corrosion may be indicated by pitting, but it is sometimes hard to detect. If a wire rope sling shows any sign of significant deterioration, that sling must be removed until it can be examined by a person who is qualified to determine the extent of the damage.

Many operating conditions affect wire rope life. They are bending, stresses, loading conditions, speed of load application (jerking), abrasion, corrosion, sling design, materials handled, environmental conditions and history of previous usage.

In addition to the above operating conditions, the weight, size and shape of the loads to be handled also affect the service life of a wire rope sling. Flexibility also is a factor, use ropes when smaller radius bending is required. Less flexible ropes will be used when the rope must move through or over abrasive materials.

Metal Mesh Slings

Metal mesh slings will be used for lifting objects with sharp edges, such as sheet metal. Metal mesh slings also make it easier to balance loads because of their wide load bearing surfaces.
Sling Marking
Each metal mesh sling will have permanently affixed to it a durable marking that states the rated capacity for vertical basket hitch and choker hitch loadings.

Handles
Handles will have a rated capacity at least equal to the metal fabric and exhibit no deformation after proof testing.

Attachments of Handles to Fabric
The fabric and handles will be joined so that:
- The rated capacity of the sling is not reduced
- The load is evenly distributed across the width of the fabric
- Sharp edges will not damage the fabric

Sling Coatings
Coatings that diminish the rated capacity of a sling will not be applied.

Sling Testing
No new and repaired metal mesh slings, including handles, will be used unless proof tested by the manufacturer or equivalent entity at a minimum of 1½ times their rated capacity. Elastomer impregnated slings will be proof tested before coating.

Proper Use of Metal Mesh Slings
Metal mesh slings will not be used to lift loads in excess of their rated capacities based on the manufacturer’s recommendations.

Safe Operating Temperatures
Metal mesh slings that are not impregnated with elastomers may be used in a temperature range from minus 20° F to plus 550° F without decreasing the working load limit.

Metal mesh slings impregnated with polyvinyl chloride or neoprene may be used only in a temperature range from zero degrees to plus 200° F. For operations outside these temperature ranges or for metal mesh slings impregnated with other materials, the sling manufacturer’s recommendations will be followed.

Repairs
- Metal mesh slings that have been repaired will not be used unless repaired by a metal mesh sling manufacturer or an equivalent entity
- Once repaired, each sling will be permanently marked or tagged, or a written record maintained, to indicate the date and nature of the repairs and the person or organization that performed the repairs
- Records of repairs will be made available for examination
Removal from Service

Metal mesh slings will be immediately removed from service if any of the following conditions are present:

- A broken weld or broken brazed joint along the sling edge
- Reduction in wire diameter of 25 percent due to abrasion or 15 percent due to corrosion
- Lack of flexibility due to distortion of the fabric
- Distortion of the female handle so that the depth of the slot is increased more than 10 percent
- Distortion of either handle so that the width of the eye is decreased more than 10 percent
- A 15 percent reduction of the original cross-sectional area of metal at any point around the handle eye
- Distortion of either handle out of its plane

Fiber Rope Web Slings

Fiber rope and synthetic web slings are used primarily for temporary work, such as construction and painting jobs, and in marine operations. They also are the best choice for use on expensive loads, highly finished parts, fragile parts and delicate equipment.

Fiber rope deteriorates on contact with acids and caustics. Fiber rope slings will not be used around these substances unless the manufacturer recommends them for that use.

Sling Use

- Fiber rope slings made from conventional three strand construction fiber rope will not be used with loads in excess of their rated capacities
- Fiber rope slings will have a diameter of curvature meeting at least the minimums specified
- Slings will be used only according to the manufacturer’s recommendations

Sling Operating Temperatures

Natural and synthetic fiber rope slings, except for wet frozen slings, may be used in a temperature range from minus 20° F to plus 180° F without decreasing the working load limit. For operations outside this temperature range and for wet frozen slings, the sling manufacturer’s recommendations will be followed.

Splicing

- Spliced fiber rope slings will not be used unless they have been spliced according to the following minimums:
  - In manila rope, eye splices will consist of at least three full tucks, and short splices will consist of at least six full tucks, three on each side of the splice center line
  - In synthetic fiber rope, eye splices will consist of at least four full tucks, and short splices will consist of at least eight full tucks, four on each side of the center line
  - Strand end tails will not be trimmed flush with the surface of the rope immediately adjacent to the full tucks. This applies to all types of fiber rope and both eye and short splices.
  - For fiber rope under one inch in diameter, the tail will project at least six rope diameters beyond the last full tuck.
For fiber rope one inch in diameter and larger, the tail will project at least six inches beyond the last full tuck.

Where a projecting tail interferes with the use of the sling, the tail will be tapered and spliced into the body of the rope using at least two additional tucks (which will require a tail length of approximately six rope diameters beyond the last full tuck)

- Fiber rope slings will have a minimum clear length of rope between eye splices equal to 10 times the rope diameter
- Knots will not be used in lieu of splices
- Clamps not designed specifically for fiber ropes will not be used for splicing
- For all eye splices, the eye will large enough to provide an included angle of less than 60° at the splice when the eye is placed over the load or support requirements, and according to any additional recommendations of the manufacturer

End Attachments

Fiber rope slings will not be used if end attachments in contact with the rope have sharp edges or projections.

Removal from Service

Natural and synthetic fiber rope slings will be immediately removed from service if any of the following conditions are present:

- Abnormal wear
- Powdered fiber between strands
- Broken or cut fiber
- Variations in the size or roundness of strands
- Discoloration or rotting
- Distortion of hardware in the sling

Repairs

Only fiber rope slings made from new rope will be used. Use of repaired or reconditioned fiber rope slings is prohibited.

Inspection

When inspecting a fiber rope sling, look first at its surface. Look for cuts, gouges or worn surface areas; dry, brittle, scorched or discolored fibers; or melting or charring of any part of the sling. If any of these conditions are found, the supervisor must be notified and a determination made regarding the safety of the sling. If the sling is found to be unsafe, it must be discarded.

Next, check the sling’s interior. It should be as clean as when the rope was new. A buildup of powder-like sawdust on the inside of the fiber rope indicates excessive internal wear and that the sling is unsafe.

Synthetic Web Slings

Each sling will be marked or coded to show the rated capacities for each type of hitch and type of synthetic web material.
Webbing
Synthetic webbing will be of uniform thickness and width and selvage edges will not be split from the webbing’s width.

Fittings
Fittings will be:
- Of a minimum breaking strength equal to that of the sling
- Free of all sharp edges that could in any way damage the webbing

Attachment of End Fittings to Webbing and Formation of Eyes
Stitching will be the only method used to attach end fittings to webbing and to form eyes. The thread will be in an even pattern and contain a sufficient number of stitches to develop the full breaking strength of the sling.

Sling Use
Synthetic web slings will not be used with loads in excess of the rated capacities.

Environmental Conditions
When synthetic web slings are used, the following precautions will be taken:
- Nylon web slings will not be used where fumes, vapors, sprays, mists or liquids of acids or phenolics are present
- Polyester and polypropylene web slings will not be used where fumes, vapors, sprays, mists or liquids of caustics are present
- Web slings with aluminum fittings will not be used where fumes, vapors, sprays, mists or liquids of caustics are present

Safe Operating Temperatures
Synthetic web slings of polyester and nylon will not be used at temperatures in excess of 180° F. Polypropylene web slings will not be used at temperatures above 200° F.

Repairs
- Synthetic web slings that have been repaired will not be used unless repaired by a sling manufacturer or an equivalent entity
- Each repaired sling will be proof tested by the manufacturer or equivalent entity to twice the rated capacity prior to its return to service. The employer will retain a certificate of the proof test and make it available for examination
- Slings, including webbing and fittings, which have been repaired in a temporary manner will not be used

The most commonly used synthetic web slings are made of nylon, polypropylene and polyester. They have the following properties in common:
- Strength – can handle a load of up to 300,000 pounds
- Convenience – can conform to any shape
- Safety – will adjust to the load contour and hold it with a tight, non-slip grip
- Load protection – will not mar, deface, or scratch highly polished or delicate surfaces
- Long life – are unaffected by mildew, rot, or bacteria; resist some chemical action; and have excellent abrasion resistance
- Economy – have a low initial cost plus a long service life
- Shock absorbency – can absorb heavy shocks without damage
- Temperature resistance – are unaffected by temperatures up to 180° Fahrenheit

Because each synthetic material has unique properties, it must be used according to the manufacturer’s instructions, especially when dealing with chemically active environments.

Synthetic web slings must be removed from service if any of the following defects exist:

- Acid or caustic burns
- Melting or charring of any part of the surface
- Snags, punctures, tears, or cuts
- Broken or worn stitches
- Wear or elongation exceeding the amount recommended by the manufacturer
- Distortion of fittings

Fiber ropes and synthetic webs are generally discarded rather than service or repaired. Operators must always follow the manufacturer’s recommendations.

**Hitches**

Hitches are used to attach slings to the load to be lifted. There are three basic type of hitches: vertical, choker and basket.

The type of hitch used will affect the working load limit (WLL) of the sling. The WLL is the maximum weight that the sling can handle, and is determined by the angle of the sling in reference to the load line.

**Vertical:** A vertical hitch is a single sling that attaches directly from the load line to the load. This hitch provides a lifting capability that matches the WLL of the sling, and is used for loads that have secure attachment points.

**Choker:** A choker hitch wraps around the load and through itself. The must be tightened around the load before the lift is attempted. Due to the stress created at the choke point, slings rigged with a choker hitch can only handle about 75% of their WLL.

**Basket:** Basket hitches can be used as a single or double lifting device. The cradle configuration of this hitch allows the two extending ends (legs) of the sling to function as if they were two separate slings. The capacity of the sling in this hitch is twice that of the same sling in a vertical hitch, but only if the sling angle of each leg is 90°. Lifting with both legs at 90° would normally require two lifting devices or a spreader bar.
When slings or sling legs are used at an angle during a lift, the sling capacity is reduced. How much it is reduced depends on the sling angle (see table.

Note that the rated capacity of a 30° Basket is only one half that of a 90° Basket. Sling angles below 30° will not be used. A sling angle of 60° or more is preferred

**GENERAL SAFE PRACTICES**

Cranes being used in steel erection activities will be visually inspected prior to each shift by a competent person, the inspection will include observation for deficiencies during operation.

If any deficiency is identified, an immediate determination will be made by the competent person as to whether the deficiency constitutes a hazard. If the deficiency is determined to constitute a hazard, the hoisting equipment will be removed from service until the deficiency has been corrected.

Whenever there is any doubt as to safety, the operator will have the authority to stop and refuse to handle loads until safety has been assured.

- A qualified rigger will inspect the rigging prior to each shift
- The headache ball, hook, or load will not be used to transport personnel
- Cranes or derricks may be used to hoist employees on a personnel platform provided that all provisions are met
- Safety latches on hooks will not be deactivated or made inoperable except:
  - When a qualified rigger has determined that the hoisting and placing of purlins and single joists can be performed more safely by doing so
  - When equivalent protection is provided in a site-specific erection plan

**Working Under Loads**

Routes for suspended loads will be pre-planned to ensure that no employee is required to work directly below a suspended load except for:

- Employees necessary for the hooking or unhooking of the load
- When working under suspended loads, the following criteria will be met:
  - Materials being hoisted will be rigged to prevent unintentional displacement
  - Hooks with self-closing safety latches or their equivalent will be used to prevent components from slipping out of the hook
  - All loads will be rigged by a qualified rigger

**Multiple Lift Rigging Procedure**

A multiple lift will only be performed if the following criteria are met:

- A multiple lift rigging assembly is used
- A maximum of five members are hoisted per lift
- Only beams and similar structural members are lifted
- All employees engaged in the multiple lift have been trained in these procedures
- No crane will be used for a multiple lift unless approved by the manufacturer's specifications
The components of the multiple lift rigging assembly will be designed and assembled with a maximum capacity for total assembly and for each individual attachment point. This capacity, certified by the manufacturer or a qualified rigger, will be based on the manufacturer's specifications with a 5-to-1 safety factor for all components.

The total load will not exceed:

- The rated capacity of the hoisting equipment specified in the hoisting equipment load charts
- The rigging capacity specified in the rigging rating chart

SAFE OPERATING PRACTICES

The operator and rigger will select slings based on their intended use, the size and type of load and the environmental conditions of the workplace. All slings must be inspected before use.

- Slings that are damaged or defective will not be used
- Slings will not be shortened with knots or bolts or other makeshift devices
- Sling legs will not be kinked
- Slings will not be loaded in excess of their rated capacities
- Slings used in a basket hitch will have the loads balanced to prevent slippage
- Slings will be securely attached to their loads
- Slings will be padded or protected from the sharp edges of their loads
- Suspended loads will be kept clear of all obstructions
- All employees will be kept clear of loads about to be lifted and of suspended loads
- Hands or fingers will not be inserted between the sling and its load while the sling is being tightened
- Shock loading is prohibited
- A sling will not be pulled from under a load when the load is resting on the sling

SAFE LIFTING PRACTICES

There are four primary factors to consider when safely lifting a load:

- The size, weight, and center of gravity to the load
- The number of legs and the angle the sling makes with the horizontal line
- The rated capacity of the sling
- The history of the care and usage of the sling

Size, Weight, and Center of Gravity of the Load

The center of gravity of an object is that point where the entire weight is considered balanced. To make a level lift, the crane hook must be directly above this point. While slight variations are usually permissible, if the crane hook is too far to one side of the center of gravity, dangerous tilting will result causing unequal stresses in the different sling legs. This imbalance must be compensated for at once. No lift will be performed if the load angle is more than 10°.
**Number of Legs and Angle with the Horizontal**

As the angle formed by the sling leg and the horizontal line decreases, the rated capacity of the sling also decreases. In other words, the smaller the angle between the sling leg and the horizontal, the greater the stress on the sling leg and the smaller (lighter) the load the sling can safely support. Larger (heavier) loads can be safely moved if the weight of the load is distributed among more sling legs.

**Rated Capacity of the Sling**

The rated capacity of a sling varies depending upon the type of sling, the size of the sling and the type of hitch. Operators must know the capacity of the sling. Charts or tables that contain this information generally are available from sling manufacturers. The values given are for new slings. Older slings must be used with additional caution. Under no circumstances will a sling’s rated capacity be exceeded.

**Sling Care and Usage**

The mishandling and misuse of slings are the leading cause of sling-related accidents. The majority of injuries and accidents, however, can be avoided by becoming familiar with the essentials of proper sling care and use.

Proper care and use are essential for maximum service and safety. Slings must be protected with cover saddles, burlap padding or wood blocking as well as from unsafe lifting procedures such as overloading to prevent sharp bends and cutting edges.

Before making a lift, check that the sling is properly secured around the load and that the weight and balance of the load have been accurately determined. If the load is on the ground, do not allow the load to drag along the ground. This could damage the sling. If the load is already resting on the sling, make sure there’s no sling damage before making the lift.

Make sure the hook is positioned directly over the load, and seat the sling squarely within the hook bowl. This will prevent bending of the hook or overstressing the sling.

Wire rope slings are subject to damage from contact with sharp edges of the loads being lifted. These edges can be blocked or padded to minimize damage to the sling.

After the sling is properly attached to the load, use these lifting techniques.

- Make sure that the load is not lagged, clamped or bolted to the floor
- Guard against shock loading by taking up the slack in the sling slowly. Apply power cautiously to prevent jerking at the beginning of the lift, and slowly accelerate or decelerate
- Check the tension on the sling. Raise the load a few inches, stop and check for proper balance and that all items are clear of the path of travel
- Keep all personnel clear while the load is being raised, moved or lowered. Crane or hoist operators must watch the load at all times when it is in motion
- Never allow more than one person to control a lift or give signals to a crane or hoist operator except to warn of a hazardous situation
- Never raise the load higher than necessary
- Never leave the load suspended in the air
- Never work under a suspended load or allow anyone else to

Once the lift has been completed, clean the sling, check it for damage and store it in a clean, dry, airy place. It is best to hang it on a rack or wall.

Remember, damaged slings cannot lift as much weight as new or older well cared for slings. Proper and safe use and storage of slings will increase their service life.

If using load blocks, they must be enclosed and guarded against rope jamming during normal operations.

Never allow anyone to ride on the hook or load. A hook must be equipped with a latch, unless the application makes the use of a latch impractical as determined by a qualified person. When required, a latch must be provided to bridge the throat opening of the hook for the purpose of retaining slings, chains, or other equipment, under slack conditions.

INSPECTIONS

Each day before being used, the sling and all fastenings and attachments will be inspected for damage or defects by a competent person designated by the employer. Additional inspections will be performed during sling use, where service conditions warrant. Damaged or defective slings will be immediately removed from service.

TRAINING

This Company will ensure that all employees engaged in rigging and lifting operations understand:

- The use of approved hand signals (see attachment)
- How to perform hook inspections
- The basics of weight capacity
- The different sling types
- The types of hitches and their use
- The use of padding
- The basics of sling and load angles

ATTACHMENTS

The following page illustrates the recommended hand signals for controlling cranes and other lifting devices.
Recommended Hand Signals for Controlling Crane Operations

- Use Main Hoist
- Use Whipline
- Hoist
- Lower Infrared
- Raise Boom
- Lower Boom
- Raise Boom and Lower Load
- Lower Boom and Raise Load
- Swing
- Extend Boom
- Retract Boom
- Extend Boom (One Hand)
- Retract Boom (One Hand)
- Move Slowly (i.e., Hoist Slowly)
- Stop
- Emergency Stop
- Travel (One Track)
- Travel (Both Tracks)
- Dog Everything
SCOPE

This chapter provides information on the hazards of slips, trips and falls, as well as the safe practices that will be used to prevent them. These practices will comply with the parts of OSHA Walking and Working Surfaces regulation 1910 Subpart D that apply to slip, trip and fall hazards. This chapter does not specifically cover working at elevations or fall protection systems; please refer to the Fall Protection and Walking and Working Surfaces chapters for information on those policies and safe practices.

POLICY

This company has established the following policies and practices to reduce the number of injuries and deaths due to slips, trips and falls.

EMPLOYER RESPONSIBILITIES

- Owners, managers, and supervisors must make a commitment to prevent accidental slips, trips, and falls
- Regular, frequent inspections of working and walking areas will be conducted to identify environmental and equipment hazards that could cause slips, trips, and falls. Special attention will be given to the working and walking surfaces, housekeeping, lighting, vision, stairways and ladders. Immediate corrective action will be taken to correct any problems that are identified
- Safety training on the prevention of slips, trips, and falls will be provided for all new employees
- Regular retraining will be provided for all employees
- Special attention will be given to proper techniques for walking, carrying loads, climbing and descending stairways, using ladders, mounting and dismounting vehicles and other equipment, etc. Unsafe practices will be corrected immediately
- All slips, trips, and falls, with or without injury, will be recorded and thoroughly investigated. Corrective action to prevent repeat occurrences will be taken immediately

EMPLOYEE RESPONSIBILITIES

- Are required to wear proper footwear for their work and environment whether in the office or field
- All slips, trips, and falls, with or without injury, must be reported immediately
- Will use proper tools, hand trucks, dollies, carts and hoists to lift and move heavy objects. Do not exceed the rated capacity of a hoist or lifting device
- Inspect items to be handled for slivers, jagged edges, burrs, and rough or slippery surfaces. Wear protective gloves
- Wipe off oily, wet, slippery or dirty items before trying to handle them. To adjust your grip, set the object down
- Never carry an object they cannot see over or around, plan your route of travel and be sure it is clear of obstacles
- When moving items on dollies or hand trucks, push rather than pull whenever possible
- Will avoid extreme and awkward postures by using adjustable fixtures and rotating tables, workstations, and delivery bins
SLIPS, TRIPS, AND FALLS

Slips and trips can happen anywhere, can result in falls, possible disability or death and can be very costly to both the company and the worker.

Slips, trips and falls are a leading cause of general industry accidents, ranking second behind motor vehicle accidents. Listed below are some basic definitions of slips, trips and falls.

**Slips**

Slips occur when there is too little friction or traction between feet (footwear) and a walking/working surface, resulting in loss of balance. Most slips are caused by:

- Wet product or spills on smooth floors or walking surfaces
- Dry product or spills making walking surfaces slippery
- Highly-polished or freshly waxed floors
- Transitioning from one surface to another such as carpet to vinyl or grid to smooth concrete
- Loose, irregular surfaces such as gravel
- Sloped, uneven or muddy terrain
- Weather hazards
- Leaves, pine needles and other plant debris (wet or dry)

**Trips**

Trips occur when a worker’s foot or lower leg hits an object and their upper body continues moving, resulting in loss of balance. Trips can be caused by:

- Uncovered hoses, cables, wires or extension cords across aisles or walkways
- Clutter, obstacles in aisles, walkway and work areas
- Open cabinet, file or desk drawers and doors
- Changes in elevation or levels
- Unmarked steps or ramps
- Rumpled or rolled-up carpets/mats or carpets with curled edges
- Irregularities in walking surfaces, such as thresholds or gaps
- Missing or uneven floor tiles and bricks
- Damaged steps
- Non-uniform, improper or irregular steps
- Debris, accumulated waste materials
- Trailing cables, pallets, tools in gangways
- Objects protruding from walking surface
- Sidewalk/curb drops
- Speed bumps
- Tire bumpers
- Wheelchair ramps and curbs
- Driveways
Falls

A fall occurs when a worker’s body becomes too far off its center of balance. There are two basic types of falls, same-level falls and elevated falls.

- Same-level falls: high frequency and low severity
- Elevated falls: lower frequency and high severity

Same-level falls are generally slips or trips. Injuries result when the individual hits a walking or working surface or strikes some other object during the fall.

**Same-Level Falls**

The force that allows you to walk without slipping is commonly referred to as traction or friction. The coefficient of friction (COF) is a measure of the traction workers have when working. Common experience shows that dry concrete sidewalks have good traction, while icy surfaces or freshly waxed floors can have low traction. A higher COF means more friction, and therefore more traction. The COF depends on two things, the quality of both the walking surface and the soles of your shoes. Slips are primarily caused by a slippery surface and compounded by wearing the wrong footwear. In normal walking, two types of slips occur:

- The first of these occurs as the heel of the forward foot contacts the walking surface. Then, the front foot slips forward, and the person falls backward
- The second type of fall occurs when the rear foot slips backward. The force to move forward is on the sole of the rear foot. As the rear heal is lifted and the force moves forward to the front of the sole, the foot slips back and the person falls
- To prevent slips and falls, a high COF between the shoe and walking surface is needed. On icy, wet and oily surfaces, the COF can be as low as 0.10 with shoes that are not slip-resistant. A COF of 0.40 to 0.50 or more is needed for good traction. To put these figures in perspective, a brushed concrete surface and a rubber heel will often show a COF greater than 1.0. Leather soles on a wet, smooth surface, such as ceramic tile or ice, may have a COF as low as 0.10
- Shoes with soft, rubber soles and heels with rubber cleats provide a high COF
- Providing dry walking and working surfaces, and slip-resistant footwear, will prevent slips and their resultant falls and injuries. In work areas where the walking and working surface is likely to be slippery, non-skid strips or floor coatings will be used. If the working surface is very slippery, no footwear will provide a safe COF
- “Fall-trips” occur when a worker’s front foot strikes an object and suddenly stops. The upper body is then thrown forward, and a fall occurs
- As little as a 3/8” rise in a walkway can cause a person to "stub" their toe, resulting in a trip and fall. The same thing can occur when going up a flight of stairs: only a slight difference in the height of subsequent steps, and a person can trip and fall
- Another type of working and walking surface fall is the "step and fall". This occurs when the front foot lands on a surface lower than expected, such as when unexpectedly stepping off a curb in the dark. In this type of fall, the person normally falls forward. A second type of “step and fall” occurs when a person steps forward or down, and either the inside or outside of the foot lands on an object higher than the other side. The ankle turns and one tends to fall forward and sideways
Elevated Falls

Most elevated falls occur when employees working on ladders or scaffolds lose their balance. More than 60 percent of elevated falls are from less than 10 feet.

Elevated falls, or falls from height, are normally due to:

- A lack of, or improper use of, fall protection
- Poor housekeeping practices
- Improper PPE
- Improper climbing techniques
- Accidental contact with objects or electricity

These accidents are avoidable if safe work practices are used.

Falls from Ladders

Ladders may be fixed or portable. They may be straight, extension or stepladders, and may be made of wood, metal, plastic or fiberglass. They can be light, medium, heavy or extra heavy-duty.

The materials from which ladders are constructed have advantages and disadvantages in weight, durability, flexibility, conductivity and strength. The intended use of the ladder should determine the type purchased, and only American National Standards Institute (ANSI)-approved ladders will be used.

Don't use metal ladders in locations where the ladder or its user could contact electrical equipment or circuits.

The lower ends of the siderails will be equipped with slip-resistant pads, particularly if the ladder is to be used on hard surfaces. The same is true for the upper ends of the siderails if they are to rest against a surface.

Ladders will be set at a 4:1 angle, or as near to that angle as possible. For each four feet of rise from the base to the upper resting edge of the ladder, the base should be one foot out from a vertical line from the upper resting edge of the ladder to the working surface.

The base of the ladder must be set so that it won’t slip or settle into soft ground. The resting edge of the ladder will have both siderails in contact with the supporting wall. Whenever there’s any question about the stability of the ladder, additional precautions will be taken to stabilize the ladder as it’s being climbed. Tying the top of the ladder to the supporting structure can also keep the ladder from slipping or sliding.

Ladders must be inspected before use: check for cracks, loose rungs, slivers and sharp edges.

Never paint ladders, as the paint can hide potentially dangerous conditions. Wooden ladders can be coated with linseed oil or an oil-based wood preservative to keep them from drying out and cracking. Allow ladders to dry thoroughly before using them or the rungs will be slippery.

The rungs and siderails of ladders must be kept free of oil, grease, and mud and must be kept dry.
Since the shoe has limited contact with the rung or step of a ladder, it is very important that both rungs and shoes have a high COF. Only shoes with heels may be worn when climbing ladders; users should be taught that the rung or step of the ladder should be just in front of the heel, under the arch of the foot. Stepping or standing on a ladder with the front part of the shoe is inviting a slip and fall. Always face the ladder when climbing or descending.

**Falls from Vehicles and Equipment**

Death or serious injury is a frequent result of extra riders falling from the bed of a truck. Far too many injuries occur in the simple process of getting in and out of trucks or truck beds. When the steps are metal, there is a low COF which becomes even lower if they are wet, muddy, or oily. Keep the steps clean and dry.

Whenever mounting or climbing on a vehicle or machine, have a good handhold before stepping up. Pulling yourself up reduces the force between your shoe and the step and reduces the danger of a slip. As with a ladder, the foot should be placed on the step or rung just in front of your heel, under the arch.

Always face the vehicle or equipment when mounting and dismounting. When stepping down backward, one steps down on the ball of the foot, which is best; when stepping down forward, however, one lands on the heel, thus increasing the chances of falling, twisting an ankle or knee, or suffering some other injury.

Practice the "Three-Point System". This system can significantly reduce the chances of injuring yourself through a slip or fall while climbing ladders or while entering or exiting a vehicle. The Three-Point System means that three of your four limbs are in contact with the ladder or vehicle at all times, either one hand and two feet, or two hands and one foot, only one limb is in motion at any one time.

**Falls from Loading Docks**

- Loading docks and ramps are dangerous areas. They are frequently congested, heavy-traffic areas, and working and walking surfaces are often wet. Metal dock plates can wear smooth and become very slippery; in particular, the edge of a dock plate invites trips and falls
- Accidental backward steps can result in a fall from the dock. Portable railings, which can be easily removed from the edge of the dock, could prevent many dangerous falls. They are removed when a truck is at the dock, and replaced as soon as the truck or trailer leaves
- Proper housekeeping, well-designed traffic patterns, and the use of abrasive, skid-resistant surface coatings will reduce the risk of slips, trips, and falls
- Ramps and gangplanks have hazards similar to loading docks. The slopes should be as gradual as possible, as wide as possible, and as dry as possible. They should also have skid-resistant surfaces

**Falls on Stairs**

Stairwells will be well lighted, with sturdy handrails on both sides. Persons using the stairwell should have one hand free to be able to use the handrail.
All the steps will have the same rise and depth, with visible edges. They must be kept free of grease, oil and obstacles that could cause slips and trips. Avoid carrying heavy or bulky objects that obscure your vision and/or require the use of both hands. Carry smaller, lighter loads, and make more trips, or obtain help with the load.

Fixed Ladders

Fixed ladders are mounted on buildings and other tall structures that require workers to climb to high levels to perform some functions. Such ladders must be securely attached to the structure and be capable of supporting a minimum of 250 pounds of concentrated live weight. The rungs should be a minimum of 16 inches wide and a maximum of 12 inches apart. There will be seven inches of toe space between the rung and the structure to which it is attached. Fixed ladders extending more than 20 feet above the ground or floor level will be surrounded by a cage, beginning at 7 to 8 feet above the ground.

If a catwalk or working area is provided at the top of the ladder, it must have a protective railing at least 42 inches high. A toeboard, four-inches high, around the edge of the work area will be provided. To reduce the risks of a person stepping off the edge or having tools fall from the work area.

Workers climbing or descending a fixed ladder must have both hands free. Small tools can be carried in a tool belt; rope and pulleys or some other mechanical system must raise other tools and materials.

INJURIES

The most common injuries resulting from slips, trips and falls are:

- Sprains and strains
- Bruises and contusions
- Fractures
- Abrasions and lacerations

These injuries usually occur to workers:

- Knee, ankle and/or foot
- Wrist and/or elbow
- Back and/or shoulder
- Hip
- Head

ENVIRONMENTAL FACTORS

Proper housekeeping in work and walking areas can contribute to safety and the prevention of falls. Not only is it important to maintain a safe working environment and walking surface, these areas must be kept free of obstacles that can cause slips and trips. One method that promotes good housekeeping in work environments is the painting of yellow lines to identify working and walking areas. Objects of any kind should never obstruct these areas.
Adequate lighting to ensure proper vision is also important in the prevention of slips and falls. Moving from a light to a dark area, or vice versa, could cause temporary vision problems that might cause a person to slip on an oil spill, or trip over a misplaced object.

Carrying an oversized object can also obstruct one’s vision and result in a slip or a trip. This is a particularly serious problem on stairs.

**HUMAN FACTORS**

Slips, trips and falls can also be caused by a number of physical factors such as:

- Failing eyesight and/or visual perception
- Age
- Physical condition and fatigue
- Stress or illness
- Medications, alcohol and drug effects

**BEHAVIORS THAT LEAD TO FALLS**

In addition to wearing the wrong footwear, there are specific behaviors that can lead to slips, trips and falls.

- Walking too fast or running can cause major problems. In normal walking, the most force is exerted when the heel strikes the ground, but in fast walking or running, one can land harder on the heel of the front foot and push harder off the sole of the rear foot; thus, a greater coefficient of friction (COF) is required to prevent slips and falls. Rapid changes in direction create a similar problem
- Other problems that can lead to slips, trips and falls are: distractions, not watching where one is going, carrying materials that obstruct the view of the pathway, wearing sunglasses in low-light areas, and failure to use handrails. These and other behaviors, caused by lack of knowledge, impatience, or bad habits developed over time, can lead to falls, injuries, or even death

**SAFE PRACTICES**

All Company employees are expected to follow these safe practices to avoid slip, trip and fall injuries:

- Wear footwear that is appropriate for the conditions inside and outside. On smooth or wet surfaces, wear slip-resistant soles. On snowy, icy, and rainy days, wear boots to work and change after arriving
- Clean footwear of mud, snow, etc., when entering a building
- Be aware of changes in elevation and changes in walking surfaces. When moving from carpet to tile or dry tile to wet tile, etc., the friction (grip) between the sole of the shoe and the floor surface lessens. Alter your stride to take shorter, slower steps
- Walk; don’t run through work areas. When possible, stay on marked travel aisles and paths. Don’t take shortcuts around machinery and equipment. Avoid areas that are cluttered or dimly lit
- When carrying a load, make sure you can see over and around it. Scan the area ahead and plan your travel path. Get help to carry heavy or awkward objects. Use carts or other mechanical aids
Clean up, correct, remove or report unsafe conditions such as spills, electric cords, frayed carpets, worn stairs and other hazards that could result in a slip/trip/fall injury.

- Warn others that a hazard exists by placing signs or cones, or by isolation with caution tape or barricades.
- Do not allow equipment, tools, materials or other obstacles to accumulate in aisles or walkways. Never store or place items on stairs.
- Keep desk and file cabinet drawers closed when they are not being used, or when unattended.
- Always use a ladder or step stool. Never stand on a chair, desk, shelf, crate, box or any other unstable items to try to reach something. If you must routinely reach items in high locations, purchase a ladder or steps to allow it to be done safely.
- Walk erect using even strides and good balance. Always use handrails when available.
- Use “three-point positioning” when entering or exiting trucks, equipment, or construction vehicles. Maintain three points of attachment at all times, both hands and one foot or both feet and one hand.
- Enter and exit equipment while facing it. Use all of the steps, never jump.
- Keep floors clean and free of water, oil or grease. Areas such as mechanics bays may be periodically steam-cleaned. Tiled floors that have been worn or filled smooth can be etched to restore a rougher surface.
- Apply non-slip surfacing such as adhesive-backed sheets, anti-slip paint, open-spaced grates, or mats to ramps, docks, platforms, or stairways recognized as hazardous.
- Paint edges where elevation changes occur with “caution-yellow” paint. Post signs to warn of dangerous areas.
- During winter months, remove snow and ice, and apply sand and salt before work and frequently after work begins. Note areas that drain poorly, retain snow, or are habitually slippery, and initiate permanent changes to eliminate the hazard.

**Safe Climbing**

Workers will have both hands free to hold the ladder’s siderails, not the rungs, when climbing or descending. Small tools can be carried in a tool belt, but a better choice is to raise tools and supplies with a rope. Never raise or lower power tools by the cord or while they are plugged into an electrical source.

Makeshift ladders, chairs, boxes and barrels may not be used as substitutes for a ladder.

**SLIP, TRIP AND FALL PROTECTION**

Our Company will take all practical measures to protect employees from slip, trip and fall hazards depending on the environment and the type of work being performed.

**Signs and Markings**

Safety signs of slip, trip and fall hazards will be posted to remind workers of the hazards, particularly where hazards cannot be removed or corrected.

Yellow striping to identify walking and working areas will be installed. Striped areas will indicate that no objects may be placed in these areas. Dropped and spilled materials must be removed immediately.
Slip-Resistant Materials
Slip resistant coatings will be applied to concrete, metal and wood surfaces to increase the COF and reduce the risks of slips and falls. These materials can consist of:

- Abrasive coatings formulated to resist grease, oil, water, and other chemicals
- Skid-resistant products for use on stair treads, ramps, and other hazardous walking and working surfaces
- Rubber or rubber-like mats

Fall Protective Devices
Workers at high elevations, such as ladders, platforms or catwalks, will be protected from falling by a fall protective device. This can be a protective cage, a lifeline, lanyard or safety harness.

The system will provide maximum protection, but will also be reasonably comfortable and not restrict a worker's necessary work activity. This Company will also provide instruction on the safe use of this protective equipment.

For additional information on the use of fall protection equipment, please refer to the Fall Protection chapter of this manual.

Shoes and Boots
It is very important to wear the proper footwear for your work and environment. Shoes or boots should provide three major types of protection:

- The soles and heels should be slip-resistant
- The toe of the shoe should resist crushing injuries
- The shoe should support the ankle

ANSI sets standards for shoes and boots. Never purchase work shoes that don’t meet these standards. A typical ANSI rating could be 1-75 C-25. This means the toe will withstand 75-foot pounds of impact and 2,500 pounds of compression.

Chevron-pattern or cleat-designed soles are best for slippery situations because of the suction or squeezing action they provide. The softer soles are better for slippery indoor conditions; the harder, more rugged cleat-type sole is preferred for tough outdoor use.

Leather that covers the foot and ankle portion of the foot is preferred in most work environments. Rubber is satisfactory for wet conditions, but not with pesticides or petroleum. However, when working in wet environments or around chemicals, oils, greases or pesticides, boots made of polyvinyl chloride (PVC), a blend of PVC and polyurethane, or neoprene will be used.

LEARNING HOW TO FALL
Naturally, the goal is not to slip, trip, and fall; however, the possibility of a fall still exists. There are correct ways to fall.
Recommended procedures are:

- Tuck your chin in, turn your head and throw an arm up/out. It is better-to land on your arm than on your head
- While falling, twist or roll your body to the side. It is better to land on your buttocks and side than on your back
- Keep your wrists, elbows and knees bent. Do not try to break the fall with your hands or elbows. When falling, the objective is to have as many square inches of your body contact the surface as possible, thus, spreading out the impact of the fall

SAFE LIFTING

Manually moving material can often be the cause of slips and falls. Attempting to move heavy or awkward shaped items can alter your center of gravity and result in slips or falls. These types of accidents often result in painful back injuries. In order to avoid these problems always follow safe lifting techniques.
SCOPE
This chapter contains information of the hazards associated with working on walking/working surfaces and working at heights. It also provides the procedures and safe practices to follow when working in those environments.

POLICY
This Company has implemented this policy based on an OSHA 1910 Subpart D – Walking-Working Surfaces – also known for covering “slip, trip, and fall” hazards. This policy incorporates technology advances, industry best practices and national consensus standards.

REFERENCES
• OSHA updated 1910 Subpart D – Walking-Working Surfaces
• 1910 Subpart I – Personal Protective Equipment.

EMPLOYER RESPONSIBILITIES
This company will provide training on:
• All company written procedures and safe practices
• Personal Fall Arrest systems (PFAs)
• The care and use of all required PPE
• Its emergency response plan

EMPLOYEE RESPONSIBILITIES
All affected company employees will:
• Follow all company procedures and safe practices
• Use and maintain all required PPE
• Report all injuries, unsafe conditions or acts immediately
Failure to comply with company procedures and/or safe practices may result in disciplinary actions, up to and including termination.

HAZARDS
Working at height and on walking/working surfaces presents a number of hazards to employees, these include:
• Slips, trips and falls
• Falling objects
• Impalement
To prevent injuries from these types of hazards, proper fall protection measures must be taken.
PPE
Employees required to work at heights on walking/working surfaces will be trained on the proper care and use of all PPE required for the job. This can include, but is not limited to:

- Hardhats
- Work gloves
- Personal fall arrest system (PFAS)
- A travel restraint system

REQUIREMENTS
OSHA requires that all elevated walking/working surfaces with open sides more than 4 feet above a lower level be protected by guardrails, safety nets or be barricaded.

PROCEDURES (SAFE PRACTICES)
All company employees will follow these procedures and safe practices when working at heights on walking/working surfaces.

WALKING WORKING SURFACES
All places of employment – passageways, storerooms, service rooms and walking-working surfaces - will be inspected and maintained as often as necessary to keep them in safe condition, particularly regarding the surface conditions, hazards, loads, access and egress, and repairs.

Places of employment will be kept in a clean, orderly, and sanitary condition, with the floor maintained in a clean and, where feasible, dry condition. When using wet processes, drainage will be maintained and, where feasible, dry standing places (e.g. platforms, mats) will be provided.

Walking-working surfaces will be kept free of sharp or protruding hazards, loose boards, corrosion, leaks, spills, snow and ice. The surface also must be able to support the maximum intended load. Employees must use the provided safe access and egress to and from the surface.

Identified hazards will be corrected immediately before an employee uses the walking-working surface again or the hazard will be guarded to prevent employees from being exposed to the hazard until it is corrected. A qualified person will perform or supervise any correction or repair that involves the walking-working surface’s structural integrity.

FALL PROTECTION
Employees will be protected from falls and falling object hazards according to the appropriate equipment and procedures in General Industry’s 1910 Subpart D and Subpart I.

Unless otherwise stated, the threshold for fall protection is to protect all employees from falling at least four feet to the next lower level by at least one of the following:

- Guardrail
- Safety net
Personal fall protection system such as:
- Personal fall arrest system (PFAS)
- Travel restraint system
- Positioning system

When fall protection systems or equipment are installed and available they will be used, even when inspecting, investigating, or assessing workplace conditions and the work at hand before starting the work or after completing it.

**Unprotected Sides and Edges**

Unprotected edges will be protected by at least one of the following:
- Guardrail
- Safety net
- Personal fall protection system such as:
  - Personal fall arrest system (PFAS)
  - Travel restraint system
  - Positioning system

If a written determination by a qualified person demonstrates that all of the above preferred systems are either infeasible or creates a greater hazard, a fall protection plan will be developed according to the requirements of 1926.502(k) with training developed according to the requirements of 1926.503(a) and (c).

Work can be done on a loading dock, loading rack, or teeming platforms without a fall protection system provided:
- A written determination by a qualified person demonstrates the fall protection systems are infeasible.
- Only the work in the determination is in process.
- Only authorized and properly trained employees can access the platform.

**Hoist Areas**

Hoist areas will be protected by at least one of the following:
- Guardrail
- Personal fall arrest system (PFAS)
- A travel restraint system

Guardrails will have any removable guardrail sections in place when employees are not doing any hoisting work. Gates or chains can be used instead of removable sections if a written determination by a qualified person demonstrates they provide an equal level of safety.

When any removable section or gate is removed during hoisting operations, employees will use a PFAS when leaning over the edge.

**Holes**

A hole is a gap or open space in a floor, roof, horizontal surface or a similar surface (e.g. skylight) that is at least two inches in its least dimension.

Holes less than four feet above a lower level will be protected by at least one of the following:
- Covers
- Guardrails

Holes more than four feet above a lower level will be protected by at least one of the following:

- Covers
- Guardrails
- Travel restraint systems
- Personal fall arrest systems (PFAS)

**Stairway Floor Holes**

Stairway floor holes will be protected by a fixed guardrail on all exposed sides except at the stairway entrance. A hinged floor hole cover and a removable guardrail system may be used for stairways that are used less than once a day and a permanent guardrail blocks traffic across the stairway hole.

**Ladderway Floor Holes**

Employees will be protected from falling into a ladderway floor hole or platform hole by a guardrail and toeboards on all exposed sides, except the entrance. The entrance will have a self-closing gate or offset.

**Hatchway and Chute Holes**

Hatchways, chute-floor holes and chute wall openings with a drop of more than 4 feet will be protected by at least one of the following:

- A hinged floor-hole cover and a fixed guardrail system with only one exposed side. When not used, the cover must be closed or a removable guardrail is provided on the exposed sides
- A fixed guardrail where no more than two of the exposed sides are removable. The removable guardrails must always be in place when the hole is not used

When the work involves employees passing material through a hatchway or chute floor hole, at least one of the following will be used:

- Guardrails
- Travel restraint system

**Dockboards**

Dockboards (e.g. bridge plates, dock plates, dock levelers) span gaps or elevation differences between a vehicle and the loading platform. They must be able to support the maximum intended load and be designed and maintained with transfer vehicle run-off protection where that is potential hazard.

Portable dockboards will be secured, when feasible, so they don't move out of position. If it can't be secured, then there must at least be enough contact with the surface so it won't move out of a safe position. They will also have handholds or another way to handle them safely.

When using the dockboard, the transport vehicle will be prevented from moving through measures such as wheel chocks or sand shoes.
Employees on dockboards are to be protected from fall hazards of at least four feet with a guardrail system or handrails unless only using motorized equipment on the dockboard or employees are properly trained according to 1910.30 and employees are not exposed to fall hazards more than 10 feet.

**Runways and Similar Walkways**

Runways and similar walkways will be protected by guardrails along each unprotected side.

If a written determination by a qualified person demonstrates that guardrails on both sides of a runway used exclusively for a special purpose are infeasible, a guardrail on one side can be left off if:

- The runway is at least 18 inches wide, and
- Each employee is given and required to use a PFAS or travel restraint system.

**Dangerous Equipment**

Dangerous equipment is anything that may harm an employee who falls into or on it such as vats, tanks, electrical equipment, and equipment or machinery with protruding parts.

Uncovered or unguarded dangerous equipment less than four feet below the walking-working surface will be protected by at least one of the following:

- Guardrail
- Travel restraint system

Uncovered or unguarded dangerous equipment at least four feet below the walking-working surface will be protected by at least one of the following:

- Guardrails
- Safety nets
- Travel restraint systems
- Personal fall arrest systems (PFAS)

**Openings**

An opening is a gap or open space in a wall, partition, vertical surface, or a similar surface at least 30 inches high and 18 inches wide that an employee can fall through to a lower level.

Openings will be protected by at least one of the following:

- Guardrails
- Safety nets
- Travel restraint systems
- Personal fall arrest systems (PFAS)

This specifically includes openings with chutes attached with the inside bottom edge opening is less than 39 inches above the walking working surface, and the outside bottom edge is at least four feet above a lower level.

Every temporary wall opening shall have adequate guards but these need not be of standard construction.
Repair Pits, Service Pits, and Assembly Pits Less Than 10 Feet Deep

Repair pits, service pits and assembly pits less than 10 feet deep will have the following precautions that limit access within six feet of the pit edge to properly trained and authorized employees:

- Readily visible caution signs posted that say “Caution – Open Pit” and meeting 1910.145 and at least one of the following:
  - Floor markings for the six foot barrier in a color that contrasts with the surrounding area
  - A warning line at least six feet from the pit edge with stanchions that meets OSHA requirements

Multiple pits in a common area less than 15 feet apart can be within the same barrier of contrasting six-foot wide floor markings around the entire area of the pits’ edge.

Low-Slope Roofs

Low slope roofs have a roof slope ratio that isn’t more than 4 in 12 (vertical to horizontal).

When working less than 15 feet from the edge, employees will be protected by at least one of the following:

- Guardrails
- Safety nets
- Travel restraint system
- PFAS

When performing infrequent and temporary work between six and 15 feet from the edge a designated area can be used instead.

When working at least 15 feet from the edge, employees will be protected by at least one of the following:

- Guardrails
- Safety nets
- Travel restraint system
- PFAS
- Designated area

When performing infrequent and temporary work, employees will not be allowed to go within 15 feet of the edge without using fall protection.

Slaughtering Facility Platforms

Unprotected sides of slaughtering facility platforms will be protected by at least one of the following:

- Guardrails
- Travel restraint systems

If a written determination by a qualified person demonstrates that these two preferred systems are infeasible for the type of work required, then properly trained and authorized employees don’t need fall protection as long as the platform is limited to those authorized employees only during work identified in the written determination.
GUARDRAIL SYSTEMS

Guardrail systems will be designed, constructed and maintained so they meet the OSHA specifications regarding the materials, height, intervals, opening size, overhang, thickness and strength of top rails, midrails, screens and mesh, intermediate vertical members, and other intermediate members.

Guardrails will be smooth to prevent catching or snagging on clothing as well as punctures or lacerations. Manila and synthetic rope top and mid rails will be inspected as necessary to ensure they meet the specified strength requirements.

Guardrails will be installed on all unprotected sides of holes. When passing material through the hole, only two sides of the guardrail will be removed.

Guardrail openings at access points (e.g. ladderways) will either have a self-closing gate with appropriate top and mid rails that swings away from the hole or the opening will be offset from the hole so employees are prevented from walking or falling into the hole.

Manholes and open pit door openings shall have standard railings, be protected by removable railings, or be constantly attended.

DESIGNATED AREAS

A designated area is safe to work in without additional fall protection with boundaries clearly marked by warning lines designed, constructed and maintained so they meet the specifications of 1910.29(d) regarding the materials, strength, lowest point, support, visibility and placement near unprotected edges.

The warning line must be clearly visible from 25 feet away outside the designated area and at all times inside the designated area, installed so that the sag at its lowest point is between 34 and 39 inches above the surface, and supported so that pulling on one section doesn’t affect its compliance in other sections.

Employees will remain inside the designated area without additional fall protection equipment.

Designated area warning lines will be erected as close to the work area as possible and:

- At least 15 feet from the unprotected edge or,
  - At least six feet from the unprotected edge for temporary and infrequent work

When using mobile mechanical equipment for temporary and infrequent work in a designated area, the warning lines will be erected:

- At least six feet from unprotected edges parallel to the direction the mobile equipment is operated
- At least 10 feet from unprotected edges perpendicular to the direction the mobile equipment is operated.
HOLE COVERS
Hole covers will support at least twice the maximum possible intended loads and will be secured against accidentally being moved. Floor holes into which persons cannot accidentally walk due to the presence of fixed machinery, equipment, or walls will be protected by a cover that leaves no openings more than 1 inch wide and is securely held in place to prevent tools or materials from falling through.

HANDRAILS AND STAIR RAIL SYSTEMS
Hand and stair rails will be designed, constructed and maintained so they meet the specifications of 1910.29(f) regarding height, minimum finger clearance, surface condition, minimum opening dimensions, handholds, projection hazards and strength.

FALLING OBJECTS
When employees could encounter falling objects hazard, they must wear appropriate head protection and will be protected by at least one of the next three methods:

- Toeboards, screens or guardrails that prevent objects from falling to a lower level
- Canopy structures and work practices that keep potential falling objects away from any edge far enough from the edge of an opening to keep them from falling to a lower level
- Barricading the area objects could fall and prohibiting employees from entering that area and work practices that keep potential falling object far enough from the edge of an opening to keep them from falling to a lower level

Toeboards for falling object protection will meet the specifications for minimum vertical height, clearance, opening size, and minimum force. Toeboards may be omitted around vehicle repair, service or assembly pits with a written demonstration that toeboards would prevent access to a vehicle over the pit.

Guardrail system openings must be small enough to prevent objects from falling through and canopies will be strong enough to prevent collapse and penetration from falling objects.

Tools, equipment, and materials must not be piled higher than the falling object protection. For example, if the items are higher than the toeboard, a paneling or screening to prevent falls must be installed either to the midrail or top rail so it’s above the piled material.

STAIRWAYS
This covers all types of stairways (e.g. spiral, ship, alternating tread) except for stairs:

- On scaffolds
- For floating roof tanks
- Designed into machines or equipment
- On self-propelled motorized equipment

Standard stairs will be used to provide access to different walking-working surfaces, including accessing equipment operating platforms, when there is regular and routine travel. Spiral, ship, or alternating tread stairs will only be used after demonstrating it’s not feasible to provide standard stairs. These different stairs will be installed, used, and maintained according to manufacturer’s instructions.
Stairways will be designed, constructed, and maintained so they meet the specifications of 1910.25(b) regarding vertical clearance, riser height and tread depth, stair width, a platform’s usable depth, load support, winding stairways, applicability of spiral, ship, or alternating tread stairs, and manufacturer’s instructions. For instance: vertical clearance above a stair tread will be at least six feet, eight inches; and the riser heights and tread depths must be uniform between landing.

**Stairway Fall Protection**

Each flight of stairs with at least three treads and four risers will have a stair rail system and handrails).

Landings will be protected by at least one of the following:

- Guardrail
- Stair rail system

Ship stairs and alternative tread type stairs will have handrails on both sides.

**LADDERS**

This covers ladders not used in emergencies (e.g. firefighting, rescue) or designed as an integral part of machines or equipment.

**Ladder Use**

Ladders are only to be used in the way they are designed. Face the ladder when climbing up and down it, using at least one hand to grasp the ladder and don’t carry a load or object that could cause you to lose balance and fall.

Inspect ladders at least at the beginning of each shift when they are used and then whenever necessary (e.g. after possible damage) for visible defects that could cause injury. Ladders with defects will be immediately tagged to indicate they are not to be used and removed from service until repaired or replaced.

**Ladder Design**

Ladders will be designed, constructed and maintained so they meet the OSHA requirements regarding spacing of ladder rungs, steps and cleats, the ladder’s minimum width, and covering stepstools. These include ensuring ladder rungs, steps, and cleats are parallel, level, and uniformly spaced when in use. The surface must not have any punctuation and laceration hazards. Wooden ladders must not be painted or coated in a material that obscures structural defects. Metal ladders must be protected against corrosion.

Mobile ladder stands and mobile ladder stand platforms will be designed, constructed and maintained so they meet OSHA requirements.

**Fixed Ladders**

Fixed ladders will be designed, constructed and maintained so they meet the specifications regarding distance from the structure, grab bars, side rails, through ladders, parapet ladders, side rails, rungs, and steps, pitch, minimum perpendicular distance and other construction details.
Cages, wells and platforms used with fix ladders will be designed, constructed and maintained so they meet the specifications regarding access, egress, transfer points, clearances and horizontal surfaces. Specifically, cages and wells will:

- Permit easy access to and egress from the ladder
- Run the length of the ladder except for access, egress, and transfer points
- Contain falling employees and direct them to a lower landing

Existing fixed ladders extending more than 24 feet will be protected by at least one of the following:

- PFAS
- Cage
- Well

New ladders installed after November 19, 2018 will be protected by at least one of the following:

- PFAS
- Ladder safety system

When replacing a section of a fixed ladder, cage, or well, that section will be protected by at least one of the following:

- PFAS
- Ladder safety system

By November 18, 2036, all fixed ladders will be protected by at least one of the following:

- PFAS
- Ladder safety system

**Personal Fall Protection Systems and Ladder Safety Systems**

A PFAS and Ladder Safety System will protect workers from falling for the entire vertical distance and all sections. There will also be rest platforms at least every 150 feet.

Components of personal fall protection systems used in PFAS, work positioning systems, and travel restraint systems (e.g. body belts, harnesses, lanyards, anchors) will be designed, constructed and maintained so they comply with OSHA regulations.

Ladder safety systems will be designed, constructed and maintained so they meet the requirements regarding connections, mountings for rigid and flexible carriers, and strength. Ladder safety systems will allow employees to climb up and down using both hands without having to continuously hold, push or pull any part of the system. Ladder safety systems will not reduce the designed strength of the ladder.

**Cages and Wells**

Ladder sections with a well or cage will be offset from adjacent sections with landing platforms at least every 50 feet. Cages and wells used with PFAS or ladder safety systems will not interfere with the systems’ operation.

**Billboards**

Workers climbing fixed ladders on billboards before November 19, 2018 that do not have a cage, well, PFAS, or ladder safety system will:
• Wear a body harness with an 18-inch rest lanyard
• Keep both hands free of tools or material when climbing.
• Be protected by a fall protection system when working.
• Demonstrate appropriate training and physical ability to climb the fixed ladder by successfully completing:
  o A physical examination or being observed performing climbing activities that show physical capability of climbing the ladder
  o Successfully completing a training or apprenticeship program with hands on ladder climbing training and necessary retraining
  o Formal classroom or on-the-job training with performance observations
  o Climbing duties as part of the routine work activity

**Portable Ladders**

Rungs and steps must be treated to minimize slipping (e.g. corrugated, coated with skid-resistant material). Step and combination ladders must have a device that securely holds the sections open when being used. Do not use portable single rail ladders.

Follow these rules when using portable ladders:

• Don’t exceed the maximum intended load
• Only use ladders on stable, level, non-slip surfaces, unless they are secured and stabilized against accidental displacement
• Don’t place ladders on unstable bases like boxes or barrels
• Don’t move, shift, or extend a ladder with an employee on it
• Secure and guard with a temporary barricade: ladders in passageways, doorways or driveways where they can be affected by traffic or activities
• Ladders must extend at least three feet above the upper landing surface to access that level
• Don’t use the cap and top steps as step
• Don’t tie or fasten together ladders and their sections if they aren’t specifically designed for it

**ROPE DESCENT SYSTEM**

A qualified person will direct the use of rope descent systems so they are used according to manufacturer instructions, warnings and design limitations. The rope descent system will be inspected at the start of each shift it will be used for damaged or defective equipment that will be tagged and removed from service and replaced immediately.

**Equipment**

Rope descent systems will have the proper rigging, anchorages and tiebacks when non-permanent anchorages are used such as counterweights and cornice hooks. Ropes will be protected from destructive conditions such as open flames, hot work, corrosive chemicals and where they may contact other surfaces that may cut or weaken them (e.g. building, anchorage or obstruction edges).

All parts of the rope descent system must be capable of sustaining at least 5,000 pounds, with the exception of seat boards, which must support a live load of 300 pounds.
Building owners are responsible for testing, certifying and maintaining anchorages so they are capable of supporting at least 5,000 pounds in any direction for each employee attached. This responsibility is based on an annual inspection and certification at least every 10 years by a qualified person. Employees will not use these anchorages unless their employer has written information from the building owner that the anchorages are certified.

Each person will use their own independent personal fall arrest system (PFAS) that meets the fall protection regulations.

**Use**

Employees using a rope descent system at least four feet above a lower level will be protected with a PFAS.

Rope descent systems will not be used higher than 300 feet without a written demonstration on why the area can’t be accessed another way or the rope descent system is the safest method. Stabilization will be used at heights of at least 130 feet. There will be a viable plan in place to rescue any employee who might fall promptly.

Rope descent systems will not be used when the weather conditions are hazardous such as storms, gusty, or excessive wind.

Tools and equipment (e.g. buckets, squeegees) will be secured so they won’t fall using methods like tool lanyards.

**WORKING AT A HOST LOCATION**

While on a host employer’s property, protection for fixed stairways, ladder openings, hatchway openings, manholes, skylights, ramps, and platforms will be not be compromised. Requests to make any changes shall not take place without direct permission from the host employer.

**STEP BOLTS AND MANHOLE STEPS**

Step bolts will be designed, constructed, and maintained so they meet the specifications of 1910.24(a) regarding: corrosion protection, uniform vertical distance spacing, minimum clear width, minimum perpendicular distance, maximum load, inspection, and replacement criteria.

Newly installed step bolts must support at least four times its maximum intended load. In addition, step bolts installed in a potentially corrosive environment will be protected against corrosion. Step bolts must prevent the employee’s foot from slipping off the end of the step bolt. A step bolt bent more than 15 degrees from perpendicular must be removed and replaced. Each step bolt will be inspected during initial use at the start of the work shift.

Manhole steps will be designed, constructed, and maintained so they meet the specification of 1910.24(b) regarding: load, slip prevention, corrosion protection, minimum clear step width, minimum uniform vertical spacing distance, minimum perpendicular distance, inspection, and maintenance.

Manhole steps will be designed and maintained to prevent slipping. Manhole steps in a potentially corrosive environment will be protected against corrosion. Each manhole step will be inspected during initial use at the start of the work shift.
TRAINING

The company will ensure training is provided to all employees who use personal fall protection and work in high hazard situations. Training will be conducted by a qualified person in fall hazards and fall protection systems so employees can correctly:

- Identify and minimize fall hazards
- Use personal fall protection systems and rope descent systems
- Maintain, inspect, and store fall protection equipment and systems
- Install, inspect, operate, maintain, and disassemble the provided personal fall protection systems
- Care for, inspect, store and use equipment and personal fall protection systems before they use it. This includes knowing:
  - The manufacturer specifications for equipment inspection and storage
  - Hook-up, anchoring, and tie-off techniques
  - How to properly place and secure dockboards against unintentional movement
  - The proper rigging and use of rope descent systems
  - The proper set up and use of fall protection equipment

Refresher Training

Refresher training will be conducted whenever:

- There are changes in workplace operations
- There are changes in equipment
- A worker can benefit from additional training because of a lack of knowledge or skill

Employees will be retrained whenever there is reason to believe they don’t have the understanding and skill to avoid fall hazards and safely use the equipment.

Training Records

This company will create and maintain records of all employee training. These records will be retained for the length of their employment.

POLICY REVIEW

The company will review this policy at least annually, and whenever there are changes to our processes that can affect the procedures and safe practices.
SCOPE

To ensure the safety and health of our employees, this Company has developed a comprehensive emergency action plan to prepare for weather emergencies likely in its geographic location. This chapter includes information on weather conditions that may require special emergency planning and specific workplace training.

POLICY

This Company has developed this weather emergency policy plan to prepare for natural disasters likely in its geographic location. The policy provides information on the following weather conditions and the actions the Company and its employees will need to take in the event of their occurrence:

- Hurricanes and tropical storms
- Tornadoes
- Electrical storms

Other weather emergencies that may require planning include blizzards, dust storms, and flooding. This Company will consider the likelihood and potential severity of harm of adverse weather and implement appropriate procedures to ensure the safety and well-being of all employees.

HURRICANES AND TROPICAL STORMS

The best time to address emergency plans for tropical weather and ensure appropriate preparations are being made is before the hurricane season starts in late spring.

PREPAREDNESS

Risk Assessment

A business in a coastal area should know whether it is located in an evacuation zone or contingency zone. If a business owner is uncertain of the level of threat at a place of business, the local emergency management office and the National Weather Service can provide information to determine the workplace’s vulnerability to strong winds and storm surges during a tropical weather event.

A business in the evacuation zone or contingency zone may need to be evacuated and should include as part of its emergency plans the specific evacuation routes and approximate travel times along those routes.

A number of other factors influence the risk a place of business faces as a hurricane approaches, including the building’s elevation, quality of construction and state of repair.
HURRICANE PREPARATIONS

Employees

Preparation for tropical weather events (and all emergencies) should include updating the list of employees and their contact information and assigning specific duties to personnel in the event of a hurricane watch or warning. Keep in mind that employees may not be familiar with their hurricane preparation tasks, and may require training accordingly.

While employees will want to spend the time leading up to a significant weather event preparing their own families and homes, some staff will be needed to ready the workplace for an approaching storm.

Determining who is responsible for what and how the tasks will be completed is best done before the start of the hurricane season to ensure readiness when an actual storm is likely to impact business.

Facility and Equipment

If evacuation of the facility is likely, be sure appropriate preparations are made for the safety of the business’s records, equipment and furniture. Preparations, depending on the outlook for the storm and the place of business, may include disconnecting power, securing equipment and storing items safely at a different location, perhaps offsite. Moving and securing equipment can be a cost- and labor-consuming process. Adequate planning helps ensure sufficient protection.

Each business has unique needs in this regard, and it is up to business owners and safety management to address these needs.

Another concern for hurricane preparation is collecting an appropriate stock of emergency supplies.

Consider including the following in a business’ hurricane preparation kit:

- Non-perishable food (don’t forget a can opener) and a gallon of water per person per day
- Flashlights and batteries
- Battery-powered or hand crank radio
- First aid kit
- Tools, lumber, sheeting, sandbags, etc. as needed to secure the facility
- Water cleanup supplies

It may be difficult to procure such supplies after a hurricane watch has been issued, so it is best to gather and restock the stockpile at the start of the hurricane season.
STORM CATEGORIZATION AND TROPICAL STORM ADVISORIES

The National Weather Service issues weather alerts to advise affected areas about approaching storms.

Hurricanes are assigned a category number based on their severity, shown in the table below.

**SAFFIR-SIMPSON HURRICANE SCALE**

<table>
<thead>
<tr>
<th>Scale Number (Category)</th>
<th>Sustained Winds (MPH)</th>
<th>Damage</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>74-95</td>
<td>Minimal: Unanchored mobile homes, vegetation and signs.</td>
</tr>
<tr>
<td>2</td>
<td>96-110</td>
<td>Moderate: All mobile homes, roofs, small crafts, flooding</td>
</tr>
<tr>
<td>3</td>
<td>111-130</td>
<td>Extensive: Small buildings, low-lying roads cut off.</td>
</tr>
<tr>
<td>4</td>
<td>131-155</td>
<td>Extreme: Roofs destroyed, trees down, roads cut off, mobile homes destroyed. Beach homes flooded</td>
</tr>
</tbody>
</table>

**Hurricane Watch**

When the National Weather Service issues a hurricane watch for a coastal area, it means that tropical-storm-force winds are possible there within 48 hours.

As soon as a watch is issued, preliminary preparations should be made while monitoring the news for more information as it becomes available.

Make sure the hurricane supply stockpile is completely stocked, and begin securing and protecting equipment and data according to hurricane readiness plans as soon as possible. After a warning has been issued, or an evacuation order made, supplies and fuel may be difficult to come by in the affected area.

**Hurricane Warning**

A hurricane warning is issued 36 hours in advance of tropical-storm-force winds and indicates that the affected coastal area may expect hurricane conditions.

If your business is in an evacuation zone, evacuation should occur according to the recommendation of local officials. Evacuation for businesses in a contingency zone may also be called for in the event of a stronger storm. It is imperative to keep up to date with storm information as the storm progresses to ensure your response is appropriate to the threat.

While it is important to take the appropriate steps to secure objects, it is more important to ensure the safety of personnel. All preparations must be completed in time for employees to evacuate before storm conditions make evacuation routes impassable.
If an evacuation is not called for, wind/rain damage and utility loss is still a possibility. Be ready to follow appropriate emergency protocols and make necessary repairs as needed.

**RESPONSE AND RECOVERY**

**Hurricane Landfall**

During the storm, when evacuation isn’t called for, employees should take shelter in interior rooms and hallways. Lower floors are safer, but basements may be subject to flooding. Some locations may not be suitable to provide workers shelter, and hurricane preparation plans must keep this in mind.

Monitor newscasts to respond appropriately as conditions change, and make sure everyone stays safely inside until dangerous conditions have passed.

**Hurricane Aftermath**

Returning to areas subject to evacuation may pose dangers and delays to drivers, as floods and high winds can leave roads in bad shape and officials may limit travel through the area for recovery efforts. Make sure to follow newscasts to hear official instructions.

When the worksite is reoccupied, it may be necessary to assess damage and identify hazardous situations that the storm may have caused.

Hazards that may be present include the following:

- Flooding
- Unsanitary water supply (use emergency water until officials give the okay to drink tap water)
- Structural damage and utility line breaks
- Hazardous wildlife
- Looting and similar crime

The emergency plan should include a process for handling the insurance Company after significant damage to facilities. Be sure to document storm damage thoroughly and wait until the adjuster has a chance to see damage before repairing it. Damages that create a hazard or subject the building to additional weather exposure, however, must be addressed to prevent further harm or damage.

**TORNADOES**

A tornado is a violently rotating column of air with circulation reaching the ground. They most often form from severe thunderstorms, beginning as a funnel cloud. On a local scale, it is the most destructive of all atmospheric phenomena. The wind in a tornado can reach speeds up to 300 miles per hour and can uproot trees, destroy buildings, and turn harmless objects into deadly missiles. Damage paths can be in excess of one mile wide and 50 miles long.

Just like hurricanes, tornadoes are assigned a Number based on their severity. The tornado scale, called the Fujita scale, is shown below.
**Fujita Scale of Tornado Intensity**

<table>
<thead>
<tr>
<th>Scale</th>
<th>Wind Speed Range (MPH)</th>
</tr>
</thead>
<tbody>
<tr>
<td>F0</td>
<td>&lt; 72</td>
</tr>
<tr>
<td>F1</td>
<td>73-112</td>
</tr>
<tr>
<td>F2</td>
<td>113-157</td>
</tr>
<tr>
<td>F3</td>
<td>158-206</td>
</tr>
<tr>
<td>F4</td>
<td>207-260</td>
</tr>
<tr>
<td>F5</td>
<td>261-318</td>
</tr>
</tbody>
</table>

While tornadoes can occur at any time during the year, they are most likely to occur between the April and July. “Tornado Alley” spans across the middle of the United States, but storms that spin off tornadoes can occur anywhere depending on weather conditions.

Tornadoes strike suddenly, often with little warning. It is important to prepare before weather conditions spawn a twister.

**Preparedness**

Ask your local emergency management office or the American Red Cross chapter about the tornado threat in your area. Ask about community warning signals.

- Purchase a NOAA Weather Radio with a battery backup and tone-alert feature that automatically alerts you when a Watch or Warning is issued (tone alert not available in some areas). Purchase a battery-powered commercial radio and extra batteries as well.
- Know the county or parish in which you live. Counties and parishes are used in Watches and Warnings to identify the location of tornadoes. Determine places to seek shelter, such as a basement or storm cellar.
- If an underground shelter is not available, identify an interior room or hallway on the lowest floor.
- Know the locations of designated shelters in places where you, your family and your fellow workers work or live such as public buildings, nursing homes and shopping centers. Practice going to your shelter with your fellow workers or family.
- Ask local officials whether a registered engineer or architect has inspected public and private schools for shelter space.
- Ask your local emergency manager or American Red Cross chapter if there are any public safe rooms or shelters nearby.
- Assemble a disaster supplies kit. Keep a stock of food and extra drinking water.
- Make a record of your personal property. Take photographs or videotapes of the exterior and interior of your home, including personal belongings. Store these documents in a safe place, such as a safe deposit box.
- Tornadoes strike with some warning, but not usually enough for a full evacuation. Do your best to get to safety.
• Tornadoes are typically accompanied by hail. Hail travels very fast, and a moderately sized hailstone can put out your eye or break your finger. Large hailstones have killed livestock and other large animals.
• If you must go outside, wear your hard hat. It can protect your head from most hailstones. Downed hail presents a slipping hazard.

Safe Room and Shelter

If you are concerned about wind hazards where you live, especially if you live in high-risk areas, you should consider building a shelter.

• Extreme windstorms in many parts of the country pose a serious threat to buildings and their occupants.
• Your residence may be built to code, but that does not mean that it can withstand winds from extreme events like tornadoes.
• The purpose of a wind shelter or safe room is to provide a space where you and your household can seek refuge that provides a high level of protection. You can build a shelter in your basement, beneath a concrete slab-on-grade foundation or garage floor, or in an interior room on the first floor.
• Shelters built below ground level provide the greatest protection, but a shelter built in a first-floor interior room can also provide the necessary protection.
• Belowground shelters must be designed to avoid accumulating water during the heavy rains that often accompany severe windstorms.
• To protect its occupants, an in-house shelter must be built to withstand high winds and flying debris, even if the rest of the residence is severely damaged or destroyed.
• The shelter must be adequately anchored to resist overturning and uplift.
• The walls, ceiling, and door of the shelter must withstand wind pressure and resist penetration by windborne objects and falling debris.
• The connections between all parts of the shelter must be strong enough to resist the wind.
• If sections of either interior or exterior residence walls are used as walls of the shelter, they must be separated from the structure of the residence, so that damage to the residence will not cause damage to the shelter.

TORNADO ADVISORIES AND RESPONSES

When a tornado weather advisory is issued, appropriate steps must be taken to make sure workers are safe should a tornado strike.

Tornado Watch

When the National Weather service issues a tornado watch, it means tornadoes are possible. Remain alert for approaching storms.

Communicate with your fellow workers. All information should be related to one another.

• Listen to NOAA Weather Radio, commercial radio, or television newscasts for the latest information.
• Be alert for approaching storms. When you see any revolving funnel shaped clouds, report them immediately by telephone to your local police department or sheriff's office.
Danger signs of a possible tornado include:
- Dark, often greenish sky
- Large hail
- A large, dark, low-lying cloud (particularly if rotating)
- Loud roar, similar to a freight train

Some tornadoes are clearly visible, while rain or nearby low-hanging clouds obscure others.
- Occasionally, tornadoes develop so rapidly that little, if any, advance warning is possible
- Before a tornado hits, the wind may die down and the air may become very still
- A cloud of debris can mark the location of a tornado even if a funnel is not visible
- Tornadoes generally occur near the trailing edge of a thunderstorm. It is not uncommon to see clear, sunlit skies behind them
- Avoid places with wide-span roofs such as auditoriums, cafeterias, large hallways, supermarkets, or shopping malls
- Be prepared to take shelter immediately. Assemble supplies to take to the shelter such as a flashlight, battery powered radio, water, and first aid kit. Do not forget about pets and what they will need
- Determine where you would take shelter in case a Tornado Warning was issued. Storm cellars or basements provide the best protection. If underground shelter is not available seek shelter in an interior room or hallway on the lowest floor

Tornado Warning

When the National weather service issues a Tornado Warning, A tornado has been sighted or has been indicated by weather radar. Take shelter immediately.

When a tornado has been sighted, go to your shelter immediately.
- In a small building, move to a pre-designated shelter, such as a basement, storm cellar, or safe room
- If there is no basement, go to an interior room on the lower level (closets, interior hallways). Put as many walls as possible between you and the outside. Get under a sturdy table and use arms to protect head and neck. Stay there until the danger has passed
- Stay away from windows, doors, and outside walls. Go to the center of the room. Stay away from corners. Corners attract debris
- In a school, nursing home, hospital, factory, or shopping center, go to predetermined shelter areas
- Interior hallways on the lowest floor are usually safest. Stay away from windows and open spaces
- In a high-rise building, go to a small, interior room or hallway on the lowest floor possible
- Locations of exits, assembly points and equipment (first aid kits) should be clearly identified and mapped. Exit routes should be clearly marked and well lit, wide enough to accommodate the number of evacuating personnel, unobstructed, and clear of debris at all times
- Get out of vehicles, trailers and mobile homes immediately and go to the lowest floor of a sturdy nearby building or a storm shelter. Mobile homes, even if tied down, offer little protection from tornadoes
• If caught outside with no shelter, lie flat in a nearby ditch or depression, and cover your head with your hands. Be aware of the potential for flooding. Do not get under an overpass or bridge. You are safer in a low, flat location.

• Never try to out drive a tornado in a car or truck. Tornadoes can change direction quickly and can lift up a car or truck and toss it through the air. Get out of the car immediately and take shelter in a nearby building or safe shelter. If there is no time to get indoors, get out of the car and lie in a ditch or low-lying area away from the vehicle. Remember, stay alert to the potential for flooding.

• Tornadoes are erratic and move swiftly. Watch out for flying debris. Flying debris from tornadoes causes most fatalities and injuries.

**After Tornado**

• Monitor weather reports for further developments.
• Wait until dangerous weather advisories end to travel.
• Shut off gas at the main switch. Keep your nose open to the smell of natural gas, and listen for a hissing noise. Use flashlights rather than candles if possible. Gas line breaks can be very dangerous.
• Watch out for downed wires and potentially hazardous debris.
• Photograph damage for insurance claims and repair damage that would allow further wear, leave other damage for investigation by insurance adjusters.
• Stay off the telephone except for emergencies.
• Provide first aid as needed if you are sufficiently trained. Summon emergency help as appropriate.

**LIGHTNING HAZARDS**

The most immediately dangerous hazard faced by workers during a lightning storm is the passing of the electrical current from a lightning bolt through the worker’s body. Burns and cardiopulmonary arrest (heart and lungs stopping) as a result of a lightning strike can be deadly.

**Direct Strike**

When a cloud–to-ground strike hits a worker directly (or an item they are holding), it often results in cardiac arrest and unconsciousness or death. A direct strike typically happens when the victim is on open ground. The current moving over the skin can cause burns, but the flow of the current through the body causes the most damage, disrupting cardiovascular and nervous system function.

**Sideflash**

When lightning strikes a taller object near the victim, the taller object will conduct most of the current, but some of the energy is discharged through the worker as well. Sideflashes are most likely to occur when a person takes shelter from precipitation under a tree.
Step Voltage

When lightning strikes a tall object, the flow of electrical energy is dispersed out from the site of the strike. If a worker is near enough to the location of the strike, the ground current flows between the points of contact the person’s body makes with the ground. The wider the distance between these points, the more damage a lightning strike will do to the victim. Most injuries and deaths from lightning occur because of ground current.

Conducted Current

Metal provides a path for the electrical current in a lightning strike to easily flow. Conduction injuries cause most indoor lightning injuries. During an electrical storm, workers must avoid touching metal items or objects connected to metal items to prevent injury from conducted current. Cables, cords, plumbing and fences all conduct the electricity from lightning and should be avoided during an electrical storm.

Streamer

Streamers from the ground rise through objects and the atmosphere to meet leaders and equalize the charge between the ground and clouds. Even when these streamers fail to connect with the leader, the current can cause significant harm.

Secondary Effects

In addition to lightning striking individuals, electrical storms cause damage that otherwise pose hazards to workers.

Fires

Fires can result from lightning strikes in one of two ways. The heat from a lightning bolt can ignite combustible matter at the site of the lightning strike. Further, electrical fires can ignite along circuits and flammable or combustible materials in containers can ignite causing explosive blazes. Response to fires caused by a lightning strike depends on the location and general nature of the fire. Consult the fire prevention plan and the emergency action plan for more information on appropriate emergency response to such a fire.

Fallen Branches

When a tree is struck by lightning, damaged branches can collapse and crush anything below. Fallen tree branches can also block roadways and break electric wires.

30-30 for Lightning Safety

- **30 seconds**: Measure the seconds between seeing lightning and hearing thunder. 30 seconds or less means to seek shelter immediately.
- **30 Minutes**: Wait an entire half-hour after the last visible lightning strike or audible thunderclap before leaving the shelter. Most lightning deaths occur after the storm has seemingly passed.
Fallen Power Lines

Report fallen power lines immediately to the local utility Company or emergency responders. Workers should never attempt to touch or move fallen electric wires unless it is an explicit part of their job and appropriate steps have been taken to ensure the line is not energized. If an electric wire falls on a vehicle, it is best to drive the vehicle away, or wait until the line is moved if driving away is not possible.

Equipment Damage

Lightning can cause power surges that can damage equipment or cause harm to employees. The best way to prevent potentially dangerous surges is to prevent them with proper circuit design and protecting equipment. Equipment must be grounded and bonded appropriately and any facility where workers will be present must be wired according to applicable standards and regulations.

CONTROLS

Storm Preparedness

An important step in avoiding harm from lightning strikes is to be prepared for an electrical storm before one approaches the worksite.

Weather Monitoring

It is the responsibility of the safety coordinator of this Company to ensure monitoring of the weather in preparation for any expected outdoor work activity. Employees will receive a weather report as part of a daily worksite safety analysis before any work outdoors. This report will include a reminder of expected response to lightning whenever there is a thunderstorm watch issued by the local weather service, or there is a possibility that employees will encounter an electrical storm during the workday.

All weather service warnings and watches, and the recommendations of the weather service will be conveyed to workers as soon as practicable and followed.

Shelter Provision

It is the policy of this Company to provide access to adequate shelter for workers whenever possible in the event of potentially harmful weather. A safe building must have a roof, walls and floor.

If employees must work at a remote site where a quick-moving storm may prevent workers from reaching ideal shelter, there must be sufficient room in a fully enclosed vehicle for all workers at the site. It is important that workers note the distance between the worksite and shelter so that there is a clear understanding of how long it will take to reach the shelter versus the speed of a storm’s approach.

Detecting and Predicting Electrical Storms

Knowing where a storm is and its approximate rate of approach, helps determine when outdoor work needs to cease so workers can seek shelter.
Storm Detector

This Company may use a storm detector at worksites, especially remote ones, to detect an incoming storm. These devices detect severe weather activity many miles away, approximate its distance fairly accurately and precisely, and warn the user of its approach.

Flash to Bang Method

A method to approximate the distance to a lightning strike that requires no equipment involves counting the seconds between the strike and the sound of the thunder that accompanies it. After witnessing a lightning strike, count the seconds until the thunder reaches the worksite.

It takes sound about 5 seconds to travel a mile.

Subsequent counts can help workers and/or supervisors have a better understanding of the storm’s speed of approach.

Clouds

Dark threatening clouds — especially where meteorological prediction models point to a likely electrical storm — indicate an approaching hazard. Ominous clouds are a good indicator that workers need to wrap up the job they are doing and begin moving toward shelter as soon as safely possible.

RESPONDING TO LIGHTNING

It is always best to err on the side of caution in matters of safety. It is advisable to begin moving to shelter upon auditory detection of thunder. If you can hear an electrical storm, you are close enough to be struck by its lightning. Avoid all bodies of water when an electrical storm approaches.

Suspending Activity

All outdoor work must cease when an electrical storm moves within six miles of the worksite. If a storm detector is in use, this limit can be expanded significantly. Work must also be suspended when the weather service issues a storm warning for the work location. Upon notification of work cessation for severe weather, employees will seek shelter as soon as safely possible.

Taking Shelter

Buildings

Enclosed buildings are the safest place to be during an electrical storm. Employees must take shelter in a building whenever one can be reached safely. It is safest to unplug or turn off electrical appliances and avoid corded equipment and plumbing fixtures. Any object in contact with pipes (plumbing or gas) and cables (especially electrical, but also communications) can conduct electricity and poses a hazard during an electrical storm. Stay away from windows and doors as much as possible until the danger of a lightning strike passes.
Cars

If employees cannot reach a safe building during an electrical storm, the next best solution is to take shelter in an enclosed car. A convertible car or open cab of heavy equipment does not provide protection from lightning. Employees must ensure all the windows are rolled up and avoid touching the doors or metal in the interior until the storm has passed.

Shelterless Response

If it is impossible for an employee to reach the shelter of an enclosed building or vehicle, he or she should take the following precautions to ensure safety:

- Stay off and away from tall things, especially solitary tall things surrounded by flat terrain; avoid being the highest point in an open field
- Get off and away from vehicles or machinery that are not enclosed
- Avoid standing in groups
- Avoid conductors like metal fences, rails, poles, etc.
- Put down any item that may conduct electricity
- Move to low ground like a ditch or a gully if one is near (but not one with water)
- Get to land if on water and avoid streams or lakes
- Avoid any flammable, explosive or combustible materials

If you feel tingles or your hair stand on end, or otherwise fear you are in immediate danger of being struck by lightning, take the following steps to reduce harm from a potential strike:

- If possible, find some kind of insulating material upon which you can crouch (e.g. a coil of rope, plank of wood, sleeping bag, woolen shirt)
- Remove metal objects or objects that contain metal that may touch your skin (including a baseball cap)
- Squat down as low as possible on the balls of your feet
- Place your hands over your ears or on the back of your neck, with your head between your knees
- Make yourself as small and low as possible and do your best to keep your heels off the ground and together

DO NOT LIE DOWN FLAT ON THE GROUND.

Responding to a Coworker Being Struck by Lightning

In addition to the measure of current moving through the victim, the speed of medical response after being struck determines the likelihood of the victim surviving a strike. Call for emergency responders immediately.

A lightning victim does not carry an electrical charge and can be safely touched. First aid should be rendered as quickly as possible. Common injuries that result from a lightning strike include burns, wounds and fractures.

Check breathing and pulse if the victim has lost consciousness, begin CPR according to your level of training. Check for broken bones and cover burns with a dry sterile dressing, there may be two areas burned by where the lightning entered and exited the body.
Even if a lightning strike victim seems unhurt, they should receive medical attention promptly. When there are multiple victims, treat those who are unconscious first.

Do not render first aid beyond your level of training.

**Resuming Activity**

Work activities may not resume until the designated supervisor determines it is safe from severe weather.

All workers must wait 30 minutes from hearing the last thunderclap or wait for the end of a weather-service issued warning before leaving shelter from an electrical storm to return to work.
SCOPE

This chapter provides the safe practices and requirements for performing welding, cutting and brazing, also known as hotwork. Our safe practices will comply with OSHA regulations 1910.254 and/or 1926.350, whichever is applicable. This chapter does not include information about the installation and/or maintenance of gas distribution piping and manifold systems.

POLICY

We are committed to preserving the safety of employees and maintaining a place of employment free from recognized hazards. Accordingly, only properly trained employees, authorized to perform such operations may perform welding, cutting, brazing, grinding and other hotwork. If it is impossible to eliminate fire hazards from such work, appropriate control steps will be taken to ensure the safety of workers, including engineering and administrative controls and personal protective equipment.

This welding, cutting and brazing program is designed to protect life and property from fire, atmospheric contaminants and other associated hazards during these operations, and will be enforced rigorously.

EMPLOYER RESPONSIBILITIES

It is our responsibility to:

- Ensure the safe use of cutting and welding equipment on site, including the use of required PPE
- Establish areas for cutting and welding and establish procedures based on the fire potentials of facilities
- Designate a person to authorize cutting and welding operations if they are done outside of designated areas
- Ensure that cutters, welders and their supervisors are trained to operate their equipment according to safe processes; rules and instructions covering the operation and maintenance of oxygen or fuel-gas supply equipment, including generators, and oxygen or fuel-gas distribution piping systems, must also be readily available
- Inform contractors of fire hazards

SUPERVISOR RESPONSIBILITIES

Supervisors of employees who must perform welding are expected to:

- Be responsible for the safe handling and use of equipment to cut or weld
- Determine fire hazards and combustibles that are or may arise at the work location
- Prevent ignition of combustibles by the following:
  - Move work away from combustibles or install guards to prevent fire hazards
  - Ensuring cutting or welding work is done at a time when nearby operations will not expose combustibles to ignition from such work
  - Secure authorization from management before any cutting or welding is begun
Ensure the cutter or welder does not go ahead without approval of safe conditions;
Determine that fire protection and extinguishing equipment are located at the site
Ensure the availability of a fire watch as required

EMPLOYEE RESPONSIBILITIES

Employees who, as part of their work responsibilities engage in welding, brazing, cutting, grinding or any other activity that can produce spark, heat or atmospheric toxicants are expected to:

- Perform only job activities for which they are trained and competent
- Perform hotwork in designated, appropriately ventilated areas unless authorized otherwise
- Refrain from welding or other hotwork without appropriate authorization
- Refrain from tampering with safety devices
- Follow all other safe work practices as outlined in this policy

HAZARDS

The hazards associated with welding cutting and brazing include:

- Fire
- Burns
- Vision Hazards
- Respiratory hazards
- Falls (if working at heights)

PERSONAL PROTECTIVE EQUIPMENT

Employers must provide all of the following to protect employees from injuries likely to be caused by the assigned task of welding, cutting and hotwork (more specific information is provided later in this document):

- Face and eye protection, such as safety glasses or face shields
- Foot protection
- Additional necessary clothing or equipment, such as gloves, aprons, hearing protection devices, respirators, lifelines, safety belts, lanyards, and curtains
- Ventilation, where necessary to protect an employee against toxic materials
- Except for long-sleeve shirts required to protect the employee from ultraviolet rays to the arms, and ankle length trousers, clothing and equipment will be provided without expense to employees

Effective safeguards will protect workers on platforms, scaffolds or other spaces that present a falling hazard. Welding cable and equipment will remain clear of passageways, ladders and stairways to ensure safe travel.

After welding operations are completed, the welder will mark the hot metal or provide some other means of warning other workers.
Eye Protection

Welders must use helmets or hand shields during all arc welding or arc cutting operations, excluding submerged arc welding. The Company also will provide helpers or attendants with proper eye protection.

Goggles or other suitable eye protection must be worn during all gas welding or oxygen cutting operations. Employees may use spectacles without side shields, with suitable filter lenses during gas welding operations on light work, for torch brazing or for inspection.

All operators and attendants of resistance welding or resistance brazing equipment must use transparent face shields or goggles, depending on the particular job, to protect their faces or eyes, as required. The Company will provide eye protection in the form of suitable goggles where needed for brazing operations other than arc welding and brazing, or resistance welding or brazing.

Welders must use helmets or hand shields during all arc welding or arc cutting operations, excluding submerged arc welding. The Company also will provide helpers or attendants with proper eye protection.

Goggles or other suitable eye protection must be worn during all gas welding or oxygen cutting operations. Employees may use spectacles without side shields, with suitable filter lenses during gas welding operations on light work, for torch brazing or for inspection.

All operators and attendants of resistance welding or resistance brazing equipment must use transparent face shields or goggles, depending on the particular job, to protect their faces or eyes, as required.

The Company will provide eye protection in the form of suitable goggles where needed for brazing operations other than arc welding and brazing, or resistance welding or brazing.

The specifications for such protectors are as follows:

- Helmets and hand shields must be made of material that insulates for heat and electricity.
- Helmets, shields, and goggles must be not readily flammable and must be capable of withstanding sterilization
- Helmets and hand shields must be arranged to protect the face, neck, and ears from direct radiant energy from the arc
- Helmets must be provided with filter plates and cover plates designed for easy removal
- All parts must be constructed of a material that will not readily corrode or discolor the skin
- Goggles must be ventilated to prevent fogging of the lenses as much as practicable
- All glass for lenses must be tempered, substantially free from air bubbles, waves and other flaws. Except when a lens is ground to provide proper optical correction for defective vision, the front and rear surfaces of lenses and windows must be smooth and parallel
- Lenses must bear some permanent distinctive marking by which to identify the source and shade
- Filter lenses must meet the test for transmission of radiant energy prescribed by any of the following consensus standards:
  - ANSI Z87.1, "American National Standard Practice for Occupational and Educational Eye and Face Protection"
  - ANSI Z87.1, "American National Standard Practice for Occupational and Educational Eye and Face Protection"
  - ANSI Z87.1, "American National Standard Practice for Occupational and Educational Eye and Face Protection"
- Where work permits, enclose the welder in an individual booth painted with a finish of low reflectivity such as zinc oxide and lampblack or enclose with noncombustible screens similarly painted. Booths and screens must permit circulation of air at floor level
- Protect workers or other persons adjacent to the welding areas from the rays by noncombustible or flameproof screens or shields or must be required to wear appropriate goggles

### Protective Clothing

Protect employees exposed to the hazards created by welding, cutting or brazing operations with personal protective equipment as required to ensure safety and meet regulatory requirements. Appropriate protective clothing required for any welding operation will vary with the size, nature and location of the work.

### SAFE PRACTICES

All employees engaged in welding, cutting and brazing are expected to follow these safe practices.

#### Fire Prevention and Protection

Cutting or welding may only occur in fire-safe areas.

If the object to be welded or cut cannot be moved, movable fire hazards need to be moved at least 35 feet away. If it is impossible to move them, safeguards to confine heat, sparks and slag must protect the immovable fire hazards.

Where combustible materials are on the floor, employees must sweep the floor clean for a radius of 35 feet. Combustible floors must be kept wet (protect welder from shock if arc welding), covered with damp sand, or protected by fire-resistant shields.
Floor openings or cracks in the floor that cannot be closed, as well as holes in walls, open doorways and open or broken windows must be guarded to prevent sparks from reaching readily combustible material. Employees must shutdown ducts that could carry sparks to combustibles, or emplace appropriate safeguards before hotwork.

Fire extinguishing equipment appropriate to the present hazard will be ready for instant use during hotwork.

An inspector will inspect the worksite and designate precautions before granting authorization to proceed with cutting or welding in the form of a written permit.

**Fire Watch**

Firewatchers must be present for welding or cutting in locations where an unplanned flame might develop or when any of the following is true:

- Appreciable combustible material is within 35 feet to the point of operation
- Sparks may easily ignite appreciable combustibles more than 35 feet away
- Wall or floor openings within a 35-foot radius expose combustible material in adjacent areas (including concealed spaces in walls or floors)
- Combustible materials are adjacent to the opposite side of metal partitions, walls, ceilings, or roofs and are likely to be ignited by conduction or radiation

Welding and cutting by gas utility firms on live mains is exempt from this rule when the main if is filled under positive pressure with natural or manufactured gas and air movers are used to ventilate areas where fumes might accumulate.

Firewatchers must have fire-extinguishing equipment readily available and training in its use. They must be familiar with facilities for sounding an alarm in the event of a fire and will watch for fires in all exposed areas. Firewatchers must try to extinguish flames only when within the capacity of the equipment available. Otherwise, they must sound the alarm.

The fire watch will continue for at least a half hour after completion of welding or cutting operations to detect and extinguish possible smoldering fires.

**Prohibited Areas**

Cutting or welding is prohibited in the following situations:

- In areas not authorized by management
- In sprinklered buildings where the sprinkler’s ability to stop fire have been impaired
- In explosive atmospheres, including those that may develop inside uncleaned or improperly prepared spaces that contained explosive materials, or where there is an accumulation of combustible dusts
- In an area nearer than 35 feet to the storage of large quantities of exposed, readily ignitable materials such as bulk sulfur, baled paper, or cotton
• In a metal partition, wall, ceiling or roof that has a combustible covering or walls of sandwich-type construction
• In pipes or other metal near enough to combustible walls, partitions, ceilings, or roofs to ignite them by conduction

Containers

Welding or cutting must not be performed on drums, barrels, tanks, or other containers until they have been cleaned of all flammable combustible or toxic materials or fumes.

All pipelines or other connections to drums, barrels or tanks must be disconnected or blanked.

Hollow spaces or cavities must be vented and either filled with water or purged with an inert gas before preheating, cutting, or welding.

An opening must be maintained during welding and cutting to vent gases or vapors.

Confined Spaces

Ventilation is required to work in any confined space.

Leave gas cylinders and welding machines outside of confined spaces. Before starting operations, block the wheels of heavy portable equipment to prevent movement.

A welder will only enter a confined space with Company-provided means to be removed in case of emergency. When using safety belts and lifelines for this purpose, they need to be attached to the welder's body so that his body cannot be jammed in a small exit opening.

As with any work done in a hazardous confined space, the worker will have an attendant stationed outside with a preplanned rescue procedure. The attendant must be able to observe and/or communicate with the welder at all times and put rescue plans promptly into effect.

See the “Confined Spaces” chapter for specific information on working in those areas.

Health Protection and Ventilation

The factors that govern the amount of contamination to which welders may be exposed are the dimensions of the workspace, the number of welders working, and the evolution of hazardous fumes, gases or dust.

When the welding area is screened on all sides, the screens need to be arranged to allow sufficient ventilation — mounted about 2 feet from the floor, unless the work being done is near enough to the ground to require them to be lower to prevent harm to nearby workers.

Ventilating systems must ensure toxic fumes, gases, or dusts remain under permissible levels for all workers.

First-aid equipment remains available according to the emergency action plan. Report all injuries immediately. Trained personnel will provide first aid until professional medical attention is available.
Precautionary Labels

Fluxes, coatings, coverings and filler metals used in welding and cutting may employ potentially hazardous materials, including, but not limited to the following:

- Fluorine compounds
- Lead
- Beryllium
- Mercury
- Zinc
- Cleaning compounds
- Cadmium
- Chlorinated hydrocarbons

Appropriate ventilation or respirator equipment must control hazards presented by these chemicals and oxygen cutting stainless steel. Find more detail on controlling hazards these chemicals present in CFR 1910.252.

Welding material suppliers are responsible for determining hazards associated with a given material used for welding or cutting. Materials used in hotwork must be labeled with safety warnings according to the hazards the materials present and all workers must understand what the warnings mean.

Ventilation for General Welding and Cutting

Mechanical ventilation for welding or cutting on metals other than those listed above and any of the following is true:

- The space is less than 10,000 cubic feet per welder
- The room has a ceiling height of less than 16 feet
- The space is confined
- The welding space has structural barriers that significantly obstruct cross ventilation

Natural ventilation is sufficient for welding or cutting operations where these restrictions are not present.

Ventilation will be at least 2,000 cubic feet per minute per welder, except where workers have local exhaust hoods and booths or have airline respirators approved for such purposes.

Mechanical local exhaust ventilation may be by means of either of the following:

- Freely movable hoods near the work provided with a rate of airflow in the direction of the hood of 100 linear feet per minute in the zone of welding when the hood is at its most remote distance from the point of welding. The rates of ventilation required to accomplish this velocity using a 3-inch wide flanged suction opening are shown in table 0-2
- A fixed enclosure with a top and at least two sides that surround the welding or cutting operations with a rate of airflow sufficient to maintain a velocity away from the welder of at least 100 linear feet per minute

<table>
<thead>
<tr>
<th>Welding Zone</th>
<th>Minimum airflow cubic feet/minute</th>
<th>Duct Diameter, inches</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 to 6 inches from arc or torch</td>
<td>150</td>
<td>3</td>
</tr>
<tr>
<td>6 to 8 inches from arc or torch</td>
<td>275</td>
<td>3 ½</td>
</tr>
<tr>
<td>8 to 10 inches from arc or torch</td>
<td>425</td>
<td>4 ½</td>
</tr>
<tr>
<td>10 to 12 inches from arc or torch</td>
<td>600</td>
<td>5 ½</td>
</tr>
</tbody>
</table>
**Confined Spaces Ventilation**

Adequate ventilation for all welding and cutting operations in confined spaces must prevent the accumulation of toxic materials or oxygen deficiency. This applies not only to the welder but also to helpers and other personnel in the immediate vicinity. All air replacing used for ventilation must be clean and respirable.

If such ventilation can’t be provided, the Company will provide airline respirators or hose masks approved by the National Institute for Occupational Safety and Health (NIOSH) for this purpose.

Areas immediately hazardous to life require a full-facepiece, pressure-demand, self-contained breathing apparatus or a combination full-facepiece, pressure-demand supplied-air respirator with an auxiliary, self-contained air supply approved by NIOSH.

Where welding operations occur in confined spaces requiring hose masks, hose masks with blowers, or self-contained breathing equipment, a worker stationed on the outside of such confined spaces will ensure the safety of those working within.

Never use oxygen for ventilation.

See the Confined Spaces chapter for specific information on working in those areas.

**Industrial Applications**

Observe OSHA requirements where field shop operations are involved for fabrication of fittings, river crossings, road crossings and pumping and compressor stations.

Special protection against electric shock for arc welding will be provided in wet conditions, or under conditions of high humidity.

In pressure testing of pipelines, protect workers and the public against injury by blowing out closures or other pressure restraining devices. Ensure protection against expulsion of loose dirt trapped in the pipe.

Employees will follow the appropriate standard for the following welding applications:

- Conduct the welded construction of transmission pipelines in accordance with the Standard for Welding Pipe Lines and Related Facilities, API Std. 1104
- The connection, by welding, of branches to pipelines carrying flammable substances must be performed in accordance with Welding or Hot Tapping on Equipment Containing Flammables, API Std. PSD No. 2201
- The use of X-rays and radioactive isotopes for the inspection of welded pipeline joints must be carried out in conformance with the American National Standard Safety Standard for Non-Medical X-ray and Sealed Gamma-Ray Sources, ANSI Z54.1

**OXYGEN-FUEL GAS WELDING AND CUTTING**

Mixtures of fuel gases and air or oxygen may be explosive and require appropriate guards.

Mixing air or oxygen with flammable gases will occur only at the burner or in a standard torch. Unapproved attachments or devices to mix air and fuel gasses are forbidden.
Acetylene may not be generated, piped (except in approved cylinder manifolds), or used at a pressure in excess of 15 psi. Liquid acetylene is also forbidden.

Only approved apparatus such as torches, regulators or pressure-reducing valves, acetylene generators, and manifolds must be used.

Anyone in charge of the oxygen or fuel-gas supply equipment, and oxygen or fuel-gas distribution piping systems must be instructed and judged competent by their employers before being left in charge.

Rules and instructions covering the operation and maintenance of oxygen or fuel-gas supply equipment including generators, and oxygen or fuel-gas distribution piping systems must be readily available.

CYLINDERS AND CONTAINERS

Marking

All portable cylinders used for the storage and shipment of compressed gases must be constructed and maintained according to the regulations of the U.S. Department of Transportation, 49 CFR Parts 171-179.

Compressed gas cylinders must be legibly marked, with either the chemical or the trade name of contents. The cylinder marking must not be readily removable. Whenever practical, the marking will be located on the shoulder of the cylinder. Unlabeled cylinders will not be used. Cylinders must be marked as empty at the time of depletion.

Compressed gas cylinders connections must will ANSI B57.1 requirements.

All cylinders with a water weight capacity of over 30 pounds must be equipped with means of connecting a valve protection cap or with a collar or recess to protect the valve.

Storage

Keep cylinders away from radiators and other sources of heat and at least 20 feet from combustible materials. Do not store cylinders in areas where the temperature is excess of 125° F.

Cylinders stored inside of buildings must be in a well-protected, well-ventilated and dry location. Keep cylinders out of unventilated areas such as lockers, cupboards, basements or pits unless approved ventilation is provided to keep the area purged of any accumulation of gases.

Keep cylinders in designated spaces away from elevators, stairs or gangways. The storage spaces must be located where cylinders will not be knocked over or damaged by passing or falling objects.

Storage must be set up to ensure first-in, first-out usage.

A cylinder storage area must be posted with the names of the individual gases stocked, and the different gases must be grouped by type. Groupings must separate the flammable gases from the oxidizing gases.

Store cylinders in a secure area, with a warning posted against tampering by unauthorized individuals.
Empty cylinders must have their valves closed. Valve protection caps, where a cylinder accepts a cap, must always be in place, hand-tight, except when cylinders are in use or connected for use.

**Fuel-Gas Cylinder Storage**

Cylinders, except those in actual use or attached ready for use, stored inside a building, must be limited to a total gas capacity of 2,000 cubic feet or 300 pounds of liquefied petroleum gas.

When storing cylinders in excess of 2,000 cubic feet total gas capacity of cylinders or 300 pounds of liquefied petroleum gas inside of a building, a separate room or compartment must be used with the following specifications:

- Noncombustible construction having a fire resistance rating of at least one hour
- Walls or partitions continuous from floor to ceiling and securely anchored
- At least one wall must be an exterior wall

Special buildings, rooms or compartments used to store cylinders, must not have any open flames and must be well ventilated. They may also be used for storage of calcium carbide in quantities not to exceed 600 pounds, when contained in metal containers with the following specifications:

- Of sufficient strength to prevent rupture
- With a screw top or equivalent
- Water- and air-tight
- No solder used in a manner that the package would fail in a fire. Acetylene cylinders must be stored valve end up

**Oxygen Storage**

Oxygen cylinders must not be stored near highly combustible material, especially oil and grease; or near reserve stocks of carbide and acetylene or other fuel-gas cylinders, or near any other substance likely to cause or accelerate fire; or in an acetylene generator compartment.

Oxygen cylinders stored in outside generator houses must be separated from the generator or carbide storage rooms by a noncombustible partition having a fire-resistance rating of at least 1 hour. This partition must be without openings and must be gastight.

Oxygen cylinders in storage must be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet or by a noncombustible barrier at least 5 feet high having a fire-resistance rating of at least one-half hour.

If a liquid oxygen system is used to supply gaseous oxygen for welding or cutting and the system stores more than 13,000 cubic feet of oxygen connected in service or ready for service, or more than 25,000 cubic feet of oxygen, including unconnected reserves on hand at the site, it must comply with the provisions of NFPA No. 566.

**Handling Procedures**

- A chain, bracket, or other restraining device must be used at all times to prevent cylinders from falling
• Cylinders, cylinder valves, couplings, regulators, hose and apparatus must be kept free from oily or greasy substances. Oxygen cylinders or apparatus must not be handled with oily hands or gloves. A jet of oxygen must never be permitted to strike an oily surface, greasy clothes, or enter a fuel oil or other storage tank.
• When transporting cylinders by a crane or derrick, a cradle, boat, or suitable platform must be used. Slings or electric magnets must not be used for this purpose. Valve-protection caps, where cylinder is designed to accept a cap, must always be in place.
• Cylinders must not be dropped, struck, or permitted to strike each other violently.
• Valve-protection caps must not be used for lifting cylinders from one vertical position to another. Bars or another force must not be used under valves or valve-protection caps to pry cylinders loose when frozen to the ground or otherwise fixed. A frozen or ice-clogged valve must be thawed by either warm air or use of warm water, and dried, before using. Boiling water or a flame must not be used. Valve-protection caps are designed to protect cylinder valves from damage.
• Unless cylinders are secured on a special truck, regulators must be removed and valve-protection caps, when provided for, must be put in place before cylinders are moved.
• Cylinders not having fixed hand wheels must have keys, handles, or nonadjustable wrenches on valve stems while these cylinders are in service. In multiple cylinder installations, only one key or handle is required for each manifold.
• Cylinder valves must be closed before moving cylinders.
• Cylinder valves must be closed when work is finished.
• Valves of empty cylinders must be closed.
• Cylinders must be kept far enough away from the actual welding or cutting operation so that sparks, hot slag, or flame will not reach them, or fire-resistant shields must be provided.
• Cylinders must not be placed where they might become part of an electric circuit.
• Contacts with third rails, trolley wires, etc., must be avoided. Cylinders must be kept away from radiators, piping systems, layout tables, etc., that may be used for grounding electric circuits such as for arc welding machines. Any practice such as the tapping of an electrode against a cylinder to strike an arc must be prohibited.
• Cylinders must never be used as rollers or supports, whether full or empty.
• The numbers and markings stamped into cylinders must not be tampered with.
• No person, other than the gas supplier, must attempt to mix gases in a cylinder. No one, except the owner of the cylinder or person authorized by him, must refill a cylinder.
• No one must tamper with safety devices in cylinders or valves.
• Cylinders must not be dropped or otherwise roughly handled.
• Unless connected to a manifold, oxygen from a cylinder must not be used without first attaching an oxygen regulator to the cylinder valve. Before connecting the regulator to the cylinder valve, the valve must be opened slightly for an instant and then closed. Always stand to one side of the outlet when opening the cylinder valve.
• A hammer or wrench must not be used to open cylinder valves. If valves cannot be opened by hand, notify the supplier.
Do not tamper with cylinder valves and do not attempt to repair them. If trouble is experienced, send the supplier a report promptly indicating the character of the trouble and the cylinder’s serial number. Follow the supplier’s instructions

- A cylinder’s regulator, gauge, or hose must never be interchanged between fuel gas, oxidizing gas, or inert gas
- Complete removal of the stem from a diaphragm-type cylinder valve must be avoided
- Fuel-gas cylinders must be placed with valve end up whenever they are in use. Liquefied gases must be stored and shipped with the valve end up
- Cylinders must be handled carefully. Rough handling, knocks, or falls are liable to damage the cylinder, valve, or safety devices and cause leakage
- Before connecting a regulator to a cylinder valve, the valve must be opened slightly and closed immediately. The valve must be opened while standing to one side of the outlet, never in front of it. Never crack a fuel-gas cylinder valve near other welding work or near sparks, flame, or other possible sources of ignition
- Before a regulator is removed from a cylinder valve, the cylinder valve must be closed and the gas released from the regulator
- Nothing must be placed on top of a cylinder when in use which may damage the safety device or interfere with the quick closing of the valve
- If cylinders are found to have leaky valves or fittings that cannot be stopped by closing of the valve, the cylinders must be taken outdoors away from sources of ignition and slowly emptied
- Place a warning tag on cylinders having leaking fuse plugs or other leaking safety devices not to approach them with a lighted cigarette or other source of ignition. Notify the supplier promptly and follow his instructions as to their return
- Safety devices must not be tampered with
- Fuel-gas must never be used from cylinders through torches or other devices equipped with shutoff valves without reducing the pressure through a suitable regulator attached to the cylinder valve or manifold
- The cylinder valve must always be opened slowly
- An acetylene cylinder valve must not be opened more than one and one-half turns of the spindle, and preferably no more than three-fourths of a turn
- Where a special wrench is required, it must be left in position on the stem of the valve while the cylinder is in use so that the fuel-gas flow can be quickly turned off in case of emergency. In the case of manifolded or coupled cylinders, at least one such wrench must always be available for immediate use

**ARC WELDING AND CUTTING**

Workers designated to operate arc-welding equipment must have been properly instructed and qualified to operate such equipment.

**Application of Arc Welding Equipment**

Arc welding equipment will comply with the National Electrical Manufacturers Association (NEMA) EW-1 requirements, or the ANSI C33.2 and Underwriters’ Laboratories.
Environmental conditions

Standard machines for arc welding service must carry their rated load with rated temperature rises where the temperature of the cooling air does not exceed 104° F and where the altitude does not exceed 3,300 feet. Arc welding machines must be suitable for operation in atmospheres containing gases, dust and light rays produced by the welding arc.

Unusual service conditions may exist, and in such circumstances, machines must be especially designed to meet the requirements of the service. Chief among these conditions are:

- Exposure to unusually corrosive fumes
- Exposure to excessive oil vapor
- Exposure to abnormal vibration or shock
- Exposure to weather
- Exposure to steam or excessive humidity
- Exposure to flammable gases
- Exposure to excessive dust
- Exposure to unusual seacoast or shipboard conditions

Voltage

When an arc-welding machine is operated without being connected to a load, the open circuit voltage must not exceed the values shown in the table below when rated voltage is applied to the primary winding or when a generator type arc-welding machine is operating at maximum rated no-load speed.

<table>
<thead>
<tr>
<th>Welding Current</th>
<th>Max. Open Circuit (no-load) Voltage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Manual and Semiautomatic Machines</td>
</tr>
<tr>
<td>AC</td>
<td>80 rms</td>
</tr>
<tr>
<td>DC &gt; 10% ripple voltage</td>
<td>80 rms</td>
</tr>
<tr>
<td>DC &gt; 10% ripple voltage</td>
<td>100 average</td>
</tr>
</tbody>
</table>

When special welding and cutting processes require values of open circuit voltages higher than the ones shown above, adequate insulation or other means must be provided to prevent the operator from making accidental contact with the high voltage.

For AC welding under wet conditions or warm surroundings where perspiration is a factor, the use of reliable automatic controls for reducing no load voltage is recommended to reduce the shock hazard.

Design

A controller that is part of an electric motor driven welder must have the capacity for carrying rated motor current and be capable of making and interrupting stalled rotor current of the motor. It may serve as the running overcurrent device if provided with the number of overcurrent units as approved.

On all types of arc welding machines, control apparatus must be enclosed except for the operating wheels, levers or handles.
Input power terminals, tap change devices and live metal parts connected to input circuits must be completely enclosed and accessible only by using tools.

Terminals for welding leads must be protected from accidental electrical contact by personnel or by metal objects i.e., vehicles, crane hooks, etc. Protection may be obtained by use of: Dead-front receptacles for plug connections; recessed openings with non-removable hinged covers; heavy insulating sleeving or taping or other equivalent electrical and mechanical protection. If a welding lead terminal that is intended to be used exclusively for connection to the work is connected to the grounded enclosure, a conductor at least two AWG sizes smaller than the grounding conductor must be used and the terminal must be marked to indicate that it is grounded.

No connections for portable control devices such as push buttons to be carried by the operator must be connected to an AC. circuit of higher than 120 volts. A grounding conductor in the control cable must ground exposed metal parts of portable control devices operating on circuits above 50 volts. Autotransformers or AC reactors must not be used to draw welding current directly from any AC power source having a voltage exceeding 80 volts.

Installation of Arc Welding Equipment

Installation including power supply must be in accordance with the requirements of OSHA electrical regulations. In addition, a welding cable must be protected against damage, entanglement or contact with power supply or high-tension wires.

Grounding

The frame or case of the welding machine (except engine-driven machines) must be grounded according to the methods prescribed in OSHA electrical regulations.

- Conduits containing electrical conductors must not be used for completing a work-lead circuit
- Pipelines must not be used as a permanent part of a work-lead circuit, but may be used during construction, extension or repair providing current is not carried through threaded joints, flanged bolted joints, or caulked joints, and that special precautions are used to avoid sparking at connection of the work-lead cable
- Chains, wire ropes, cranes, hoists and elevators must not be used to carry welding current
- Where a structure, conveyor or fixture is regularly employed as a welding current return circuit, joints must be bonded or provided with adequate current collecting devices
- All ground connections must be checked to determine that they are mechanically strong and electrically adequate for the required current

Supply Connections and Conductors

A disconnecting switch or controller must be provided at or near each welding machine that is not equipped with such a switch or controller mounted as an integral part of the machine. The switch must be in accordance with OSHA electrical regulations. Overcurrent protection must be provided as specified in OSHA electrical regulations. A disconnect switch with overload protection or equivalent disconnect and protection means, permitted by OSHA electrical regulations, must be provided for each outlet intended for connection to a portable welding machine.
For individual welding machines, the rated current-carrying capacity of the supply conductors must be not less than the rated primary current of the welding machines.

For groups of welding machines, the rated current-carrying capacity of conductors may be less than the sum of the rated primary currents of the welding machines supplied. The conductor rating must be determined in each case according to the machine loading based on the use of each welding machine and the allowance permissible in the event that not all the welding machines supplied by the conductors will be in use at the same time.

In operations involving several welders on one structure, DC welding process requirements may require the use of both polarities; or supply circuit limitations for AC welding may require distribution of machines among the phases of the supply circuit. In such cases, no load voltages between electrode holders will be 2 times normal in DC or 1, 1.41, 1.73, or 2 times normal on AC machines. Similar voltage differences will exist if both AC and DC welding are done on the same structure.

- All DC machines must be connected with the same polarity
- All AC machines must be connected to the same phase of the supply circuit and with the same instantaneous polarity

**Operation**

Workers assigned to operate or maintain arc-welding equipment must be acquainted with the requirements for safe arc welding and cutting.

Before starting operations all connections to the machine must be checked to make certain they are properly made. The work lead must be firmly attached to the work; magnetic work clamps must be freed from adherent metal particles of spatter on contact surfaces. Coiled welding cable must be spread out before use to avoid serious overheating and damage to insulation.

Grounding of the welding machine frame must be checked. Special attention must be given to safety ground connections of portable machines.

There must be no leaks of cooling water, shielding gas or engine fuel. A welder must not let live electrodes or holders touch his or her bare skin or damp clothing. When arc welding is performed in wet conditions or under a condition of high humidity, the welder must be protected against electric shock.

It must be determined that proper switching equipment for shutting down the machine is provided. Printed rules and instructions covering operation of equipment supplied by the manufacturers must be strictly followed.

Electrode holders not in use must be placed so they cannot make electrical contact with persons, conducting objects, fuel, or compressed gas tanks. Electrode holders must not be cooled by immersion in water. Cables with splices within 10 feet of the holder must not be used. The welders must not coil or loop welding electrode cable around parts of his body.

A welding machine must be disconnected when moved and turned off when not in use.
Maintenance

The operator will report any equipment defect or safety hazard to his supervisor and the use of the equipment must be discontinued until its safety has been assured. Repairs must be made only by qualified personnel.

Machines that have become wet must be thoroughly dried and tested before being used.

Spliced welding cable must not be used within 10 feet of an arc-welding machine.

Cables with damaged insulation or exposed bare conductors must be replaced. Joining lengths of work and electrode cables must be performed by using a connecting means that is specifically intended for the purpose. The connecting means must have insulation adequate for the service conditions.

RESISTANCE WELDING

All equipment must be installed by a qualified electrician in conformance with regulatory requirements. There must be a safety-type disconnecting switch or a circuit breaker or circuit interrupter to open each power circuit to the machine, conveniently located at or near the machine, so that the power can be shut off when the machine or its controls are to be serviced.

Ignition tubes used in resistance welding equipment must be equipped with a thermal protection switch.

Workers designated to operate resistance-welding equipment must have been properly instructed and judged competent to operate such equipment.

Controls of all automatic or air and hydraulic clamps must be arranged or guarded to prevent the operator from accidentally activating them.

Spot and Seam Welding Machines

An external weld initiating control circuit for a non-portable spot or seam welding machine must operate at not more than 120 volts for stationary equipment and not more than 36 volts for portable equipment.

Stored energy or capacitor discharge type of resistance welding equipment and control panels involving high voltage (over 550 volts) must be suitably insulated and protected by complete enclosures, all doors of which must be provided with suitable interlocks and contacts wired into the control circuit (similar to elevator interlocks). Such interlocks or contacts must be designed to interrupt power and short circuit all capacitors when the door or panel is open. A manually operated switch or suitable positive device must be installed, in addition to the mechanical interlocks or contacts, as an added safety measure assuring absolute discharge of all capacitors.

All doors and access panels of all resistance welding machines and control panels must be kept locked and interlocked to prevent access by unauthorized persons to live portions of the equipment. A door or access panel will be considered locked if a key or wrench is required to open it.
All press welding machine operations, where there is a possibility of the operator's fingers being under the point of operation, must be effectively guarded by the use of a device such as an electronic eye safety circuit, two hand controls. Adequate guards must protect all chains, gears, operating bus linkage and belts. One or more safety emergency stop devices must be provided on all multi-spot welding machines with a minimum of one stop device at each operator position.

The hazard of flying sparks must be eliminated, wherever practical, by installing a shield guard of safety glass or suitable fire-resistant plastic at the point of operation. Additional shields or curtains must be installed as needed to protect passing persons from flying sparks.

All foot switches must be guarded to prevent accidental operation of the machine.

Two or more safety emergency stop buttons must be provided on all special multi-spot welding machines, including 2-post and 4-post weld presses.

On large machines, four safety pins with plugs and receptacles (one in each corner) must be provided so that when safety pins are removed and inserted in the ram or platen, the press becomes inoperative.

Where technically practical, the secondary of all welding transformers used in multi-spot, projection and seam welding machines must be grounded. This may be done by permanently grounding one side of the welding secondary current circuit. Where not technically practical, a center tapped grounding reactor connected across the secondary or the use of a safety disconnect switch in conjunction with the welding control are acceptable alternates. Safety disconnect must be arranged to open both sides of the line when welding current is not present.

**Portable Welding Machines**

All portable welding guns must have suitable counterbalanced devices for supporting the guns, including cables, unless the design of the gun or fixture makes counterbalancing impractical or unnecessary.

All suspended portable welding gun equipment, except the gun assembly, must be equipped with a safety chain or cable capable of supporting the total shock load in event of failure of any component of the supporting system.

When a trolley is used to support a portable welding machine with a clevis for attachment to a safety chain, the clevis must be made of wrought or forged steel and capable of supporting the shock load if the trolley fails.

All initiating switches, including retraction and dual schedule switches, located on the portable welding gun must be equipped with suitable guards capable of preventing accidental initiation through contact with fixtures, operator's clothing, etc. Initiating switch voltage must not exceed 24 volts.

The movable holder, where it enters the gun frame, must have sufficient clearance to prevent the shearing of fingers carelessly placed on the operating movable holder.

The secondary and case of all portable welding transformers must be grounded. Secondary grounding may be by center tapped secondary or by a center tapped grounding reactor connected across the secondary.
Flash Welding Equipment

Flash welding machines must be equipped with a hood to control flying flash. In cases of high production, where materials may contain a film of oil and where toxic elements and metal fumes are given off, ventilation must be provided.

For the protection of the operators of nearby equipment, fire-resistant curtains or suitable shields must be set up around the machine and in such a manner that the operators’ movements are not hampered.

Maintenance

Periodic inspection must be made by qualified maintenance personnel, and a certification record maintained. The certification record must include the date of inspection, the signature of the person who performed the inspection and the serial number, or other identifier, for the equipment inspected. The operator must be instructed to report any equipment defects to his supervisor and the use of the equipment must be discontinued until safety repairs have been completed.

TRAINING

Hotwork training for employees, appropriate to their duties, and the related hazards will be provided at no cost to the employee and will be conducted during working hours.

Training material will be appropriate in content and vocabulary to the educational level, literacy and language of employees.

Training Components

Employees who work with or around welding, brazing, cutting or similar operations will be trained in the following minimum elements:

- Compressed gas hazards and cylinder safety and storage
- Fire hazards in the workplace
- The roles and responsibilities for a fire watch while welding
- Location and use of fire extinguishers
- Housekeeping efforts around welding
- Personal protective equipment selection, fitting and use;
- Welding in confined spaces
- Basic rules for any welding technique used at work
- Protective devices like valves, backflow preventers, etc.
- Hazards associated with chemicals used in welding
- Hazards associated with light and non-visible spectrum radiation in welding

Training Records

Training records will include the following information:

- The dates of the training sessions
- The contents or a summary of the training sessions
• The names and qualifications of persons conducting the training
• The names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment.

FORMS AND ATTACHMENTS

On the following pages, please find the following documents:

• Welding, Cutting and Brazing Checklist
• Ventilation Requirements for Welding and Cutting
• Sample Hotwork Permit
• Welding, Cutting and Brazing Training Record Sheet

These forms may be reproduced freely for the purposes of implementing and maintaining a safety and health program.
### Welding, Cutting and Brazing Checklist for General Industry (Page 1 of 5)

(A negative answer to any question indicates an area of safety or health concern.)

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Date / Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supervisor</td>
<td>Inspector</td>
</tr>
<tr>
<td>Physical Address of Worksite</td>
<td></td>
</tr>
</tbody>
</table>

#### Installation and Operation of Oxygen-Fuel Gas Systems for Welding and Cutting

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Date Corrected</th>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Is acetylene generated, piped or used at a pressure of 30 p.s.i. or less?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td>Have personnel in charge of the oxygen or fuel gas supply equipment been instructed and judged competent before being left in charge?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Is the gas content of compressed gas cylinders marked with either the chemical or the name of the gas?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Are cylinders stored away from radiators and other sources of heat?</td>
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<tr>
<td></td>
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<td></td>
<td>Are cylinders stored inside kept in a well-ventilated, dry location at least 20 feet from highly combustible material?</td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
<td>Are cylinders stored in assigned places away from elevators, stairs, or gangways and where they will not be knocked over or damaged?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are the valves of empty cylinders kept closed?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are valve protection caps in place and hand-tight except when in use or connected for use?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td>Are fuel gas cylinders except those in use or attached for use, which are stored inside a building, limited to a total gas capacity of 2,000 cubic feet or 300 pounds of liquefied petroleum gas?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Are acetylene cylinders stored valve end up?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>If oxygen cylinders are stored in outside generator houses, are they separated from the generator or carbide storage rooms by a gastight, noncombustible partition having a fire-resistance rating of at least one hour?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Are stored oxygen cylinders separated from fuel gas cylinders or combustible material by a minimum of 20 feet, or by a noncombustible barrier at least five feet high with a fire-resistance rating of at least one-half hour?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are cylinders, cylinder valves, couplings, regulators, hose and apparatus kept free from oily or greasy substances?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Do you ensure that cylinders are not dropped, struck or permitted to strike each other violently?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Do you ensure that valve-protection caps are not used for lifting cylinders from one vertical position to another?</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Do you ensure that cylinders that do not have fixed hand wheels, have keys, handles or nonadjustable wrenches on the valve stems while the cylinders are in service?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are cylinder valves closed before moving a cylinder, and when work is finished?</td>
</tr>
</tbody>
</table>
### Welding, Cutting and Brazing Checklist for General Industry (Page 2 of 5)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Date Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are cylinders kept away from sparks, hot slag, or flames produced by welding or cutting operations, or are fire-resistant shields provided?</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Are cylinders placed where they will not become part of an electric circuit?</td>
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<tr>
<td>Do you insure that cylinders are not used as rollers or supports, and that only proper tools are used to open cylinder valves?</td>
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<tr>
<td>Are fuel gas cylinders placed valve end up while in use?</td>
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</tr>
<tr>
<td>Are cylinders with leaky valves or fittings taken outdoors and slowly emptied?</td>
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<tr>
<td>Are warning signs posted which prohibit open flame or other sources of ignition near cylinders with leaking fuse plugs or other leaking safety devices, and are the cylinders tagged?</td>
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</tr>
</tbody>
</table>

#### Manifold Systems

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Date Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you ensure that oxygen manifolds are not located in an acetylene generator room?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Do you ensure that portable outlet headers are used indoors only for temporary service where conditions preclude a direct supply from outlets located on the service piping system?</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Is each outlet on the service piping which supplies a portable outlet header equipped with a readily accessible shutoff valve?</td>
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<td></td>
<td></td>
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</tr>
<tr>
<td>Are master shutoff valves for both oxygen and fuel gas provided at the entry end of the portable outlet header?</td>
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<td></td>
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</tr>
<tr>
<td>Are portable outlet headers provided with frames to support the equipment securely in the correct operating position?</td>
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</tr>
<tr>
<td>When acetylene cylinders are coupled in a manifold, are flash arresters installed between each cylinder and the coupler block?</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>In service piping systems, are distribution lines installed and maintained in a safe operating condition?</td>
<td></td>
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</tr>
<tr>
<td>Are emergency gas cocks or valves provided for all buildings?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Is underground pipe and tubing and outdoor ferrous pipe and tubing protected against corrosion?</td>
<td></td>
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</tbody>
</table>

#### General Requirements

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Date Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is flashback protection provided by an approved device that will prevent flame from passing into the fuel gas systems?</td>
<td></td>
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</tr>
<tr>
<td>Are hoses showing defects repaired or replaced?</td>
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<tr>
<td>Are pressure-reducing regulators used only for the gas and pressures for which they are intended?</td>
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<tr>
<td>Is the repair of regulators performed by properly instructed, skilled mechanics?</td>
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<tr>
<td>Are gauges on oxygen regulators marked “USE NO OIL”?</td>
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</tr>
<tr>
<td>Are union nuts and connections on regulators inspected before use to detect faulty seats?</td>
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</tbody>
</table>
## WELDING, CUTTING AND BRAZING CHECKLIST FOR GENERAL INDUSTRY (PAGE 3 OF 5)

### Acetylene Generators (if applicable)

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Date Corrected</th>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
<td>Is ample space provided around the generator for operation and maintenance?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Are generators placed where water will not freeze, and is the use of sodium chloride to prevent freezing prohibited?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Are portable generators located at a safe distance from the welding position?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are the walls, floors and roofs of outside generator houses constructed of noncombustible materials?</td>
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<tr>
<td></td>
<td></td>
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<td></td>
<td>Are exit doors readily accessible in case of emergency?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Are generators installed inside buildings enclosed in a separate room?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are the walls, partitions, floors, and ceilings of inside generator rooms of noncombustible construction with a fire-resistance rating of at least one hour?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are generator rooms or buildings well ventilated with vents located at floor and ceiling levels?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Do generator rooms or buildings have natural light during daylight hours or artificial light restricted to electric lamps installed in a fixed position?</td>
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<tr>
<td></td>
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<td></td>
<td>Are operating instructions posted in a conspicuous place near the generator or available for ready reference?</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td>Is the generator room electrically wired in accordance with 1910.307 (hazardous locations)?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Do you ensure that the water-carbide residue mixture drained from the generator is not discharged into sewer pipes or stored in areas near open flames?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Do you ensure that calcium carbide is kept in metal packages strong enough to prevent rupture?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are the packages marked “Calcium Carbide - Dangerous If Not Kept Dry”?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Do you ensure that the calcium carbide stored indoors does not exceed 600 pounds and that the storage area is dry, waterproof and well-ventilated?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are carbide containers that are stored outside periodically examined for conditions that could affect water or air tightness?</td>
</tr>
</tbody>
</table>

### Application, Installation and Operation of Arc welding and Cutting Equipment

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Date Corrected</th>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Have employees who are designated to operate arc-welding equipment been properly instructed and qualified?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Are open circuit (no load) voltages of arc welding and cutting machines as low as possible, consistent with satisfactory welding?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>When open circuit voltages must be higher, are means provided to prevent the operator from making accidental contact with the higher voltages?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Is control apparatus enclosed on all types of arc welding machines?</td>
</tr>
</tbody>
</table>
### Welding, Cutting and Brazing Checklist for General Industry (Page 4 of 5)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Date Corrected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are terminals for welding leads protected from accidental electrical contact by personnel or metal objects?</td>
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<tr>
<td>Do you ensure that no connections for portable control devices, such as push buttons carried by the operator, are connected to an AC. circuit of higher than 120 volts?</td>
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<tr>
<td>Is the frame or case of the welding machine effectively grounded and the grounding checked?</td>
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<tr>
<td>Is a separate disconnecting switch or controller provided at or near each welding machine?</td>
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<tr>
<td>Are electrode holders placed so that they cannot make electrical contact with persons, conducting objects, fuel, or compressed gas tanks?</td>
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<tr>
<td>Has the operator been instructed to report any equipment defect or safety hazard to his supervisor, and is use of the equipment discontinued until repaired by qualified personnel?</td>
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<tr>
<td>Are work and electrode lead cables frequently inspected for wear and damage, and are cables with damaged insulation or exposed bare conductors replaced?</td>
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**Installation and Operation of Resistance Welding Equipment**

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<tr>
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<tr>
<td>Have personnel who are designated to operate resistance-welding equipment been properly instructed and judged competent to operate such equipment?</td>
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<tr>
<td>Are all doors and access panels of all resistance-welding machines and control panels kept locked and interlocked?</td>
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<tr>
<td>Has a shield guard of safety glass or suitable fire-resistant plastic been installed at the point of operation?</td>
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<tr>
<td>Are foot switches guarded to prevent accidental operation of the machine?</td>
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<tr>
<td>Are two or more safety emergency stop buttons provided on all special, multisport welding machines, including 2-post and 4-post weld presses?</td>
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<tr>
<td>Are flash welding machines equipped with hoods to control flying flash?</td>
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<tr>
<td>Are periodic inspections of the machines made by qualified maintenance personnel, and are records of the inspections maintained?</td>
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</table>

**Fire Prevention and Protection**

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<tr>
<td>Is suitable fire extinguishing equipment maintained in a state of readiness for instant use?</td>
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<tr>
<td>Are fire watches on duty whenever welding or cutting is performed in locations where a major fire might develop?</td>
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<tr>
<td>Before cutting or welding is permitted, is the area inspected by the individual responsible for authorized cutting and welding operations?</td>
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<tr>
<td>Where practicable, are all combustibles relocated at least 35 feet from the work site?</td>
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<tr>
<td>Does management recognize its responsibility for the safe usage of cutting and welding equipment on its property?</td>
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</tr>
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</table>
**WELDING, CUTTING AND BRAZING CHECKLIST FOR GENERAL INDUSTRY (PAGE 5 OF 5)**

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<tr>
<td>Do supervisors recognize their responsibilities in the safe management of welding and cutting operations?</td>
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<tr>
<td>Are welders or helpers who are working on platforms, scaffolds, or runways protected against falling by railings, safety belts or lifelines?</td>
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<tr>
<td>Is welding cable and other equipment kept clear of passageways, ladders and stairways?</td>
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<tr>
<td>Are helmets, hand shields and goggles worn during all arc welding or cutting operations?</td>
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<tr>
<td>Has a hazard assessment been performed to determine if hazards are present or likely to be present?</td>
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</tr>
<tr>
<td>Are employees who are exposed to the hazards created by welding, cutting, or brazing operations protected by personal protective equipment as?</td>
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<tr>
<td>When welding or cutting is being performed in any confined space, are gas cylinders and welding machines left outside?</td>
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<tr>
<td>Before operations are started, is heavy, portable, wheel-mounted equipment securely blocked to prevent accidental movement?</td>
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<tr>
<td><strong>Health Protection and Ventilation</strong></td>
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<tr>
<td>Where a welder must enter a confined space through a manhole or other small opening, have means been provided for his quick removal in case of emergency?</td>
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<tr>
<td>Are ventilation or respiratory protective devices provided where necessary and do they meet OSHA requirements?</td>
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<tr>
<td>Are employees trained to render first aid, and is first aid equipment available at all times?</td>
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VENTILATION REQUIREMENTS FOR WELDING AND CUTTING

<table>
<thead>
<tr>
<th>Metal Compound</th>
<th>Requirements Confined Space</th>
<th>Requirements Indoors</th>
<th>Requirements Outdoors</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fluorine Compound</td>
<td>Air replacement or airline respirator or self-contained breathing apparatus needed</td>
<td>Air sample tests to determine if exhaust hood, booth, and airline respirator are required</td>
<td>Same as indoors</td>
</tr>
<tr>
<td>Lead Zinc (Galvanized Metals)</td>
<td>Air replacement or airline respirator or self-contained breathing apparatus</td>
<td>Exhaust hood or booth</td>
<td>Combination particulate and vapor and gas removing type respirator if tests indicate need</td>
</tr>
<tr>
<td>Beryllium</td>
<td>Exhaust hood or booth and airline respirator if air sample tests indicate need</td>
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- Airline or self-contained breathing apparatus are required in confined areas that are immediately hazardous to life.
- Local exhaust hoods or booths must provide airflow of 100 linear feet per minute.
- Mechanical ventilation at 2,000 cubic feet of air per minute per welder is required when:
  - Welding or cutting on metals other than described above
  - When there is less than 10,000 cubic feet of space per welder
  - Where the ceiling height is less than 16 feet
  - In confined spaces or where structural barriers such as partitions or balconies significantly obstruct cross ventilation

Note: Mechanical ventilation is necessary when an exhaust hood or fixed booth provide for a rate of airflow sufficient to maintain a velocity away from the welder or not less than 100 linear feet per minute.
HOTWORK PERMIT

This permit is required for operations that involve open flames or that produce sparks or heat outside of designated areas, including, but not limited to brazing, cutting, welding and grinding.

Date

Task

Location

Person doing Hotwork

Precautions have been taken to prevent fire and to control hazards present in the above location for the job described, and hotwork may commence.

Authorizing Individual (sign please)

Person Doing Hotwork (sign please)

Fire Watch (sign please)

Start Date: Start Time:

Finish Date: Finish Time:

Fire Watch Signoff

Work was fire safe through the entire watch period. The area was monitored for _______ minutes (at least 30) to ensure fire safety.

Fire Watch (sign please)
**DISCLAIMER**

OSHA’s “Safety and Health Regulations” are continuously being reinterpreted. Therefore, Safety Services Company is unable to completely guarantee the exactness of the information conveyed in this publication. Safety Services Company assumes no responsibility and shall be held harmless for any inaccuracies or omissions contained within this pocket manual and shall not be held liable to any extent or form for any injury or loss resulting from the manner in which this information is interpreted and/or applied.

Careful effort has been dedicated in order to provide a simplified, understandable explanation of OSHA regulations based on currently available information. This “Injury & Illness Prevention Program” is distributed with the agreement that Safety Services Company is not employed in providing legal or other specialized business services. Should expert assistance be required, retain the services of a competent professional.
EMPLOYEE SIGNOFF

This is to certify that I have received a copy of the Company Injury & Illness Prevention Manual.
I have read these instructions, understand them, and will comply with them while working for the Company.
I understand that failure to abide by these rules may result in disciplinary action and possible termination of my employment with US Trades, LLC
I also understand that I am to report any injury to my foreman or superintendent immediately and report all safety hazards.
I further understand that I have the following “Safety Rights”:

- I am not required to work in any area I feel is not safe.
- I am entitled to information on any hazardous material or chemical I am exposed to while working.
- I will not be discriminated against for reporting safety concerns.

__________________________________________  ____________________________  ____________
Employee Name                                  Signature                                  Date

__________________________________________  ____________________________  ____________
Supervisor Name                                 Signature                                  Date

cc: Employee File