

SAFETY & HEALTH POLICY



Calumet Civil Contractors, Inc.

01/01/2021

SAFETY & HEALTH PROGRAM

Calumet Civil Contractors, Inc.

Management Commitment

Safety Policy

Calumet Civil Contractors, Inc. places a high value on the safety of its employees. Calumet Civil Contractors, Inc. is committed to providing a safe workplace for all employees and has developed this program for injury prevention to involve management, supervisors, and employees in identifying and eliminating hazards that may develop during our work process.

It is the basic safety policy of this company that no task is so important that an employee must violate a safety rule or take a risk of injury or illness in order to get the job done.

Employees are required to comply with all company safety rules and are encouraged to actively participate in identifying ways to make our company a safer place to work.

Supervisors are responsible for the safety of their employees and as a part of their daily duties must check the workplace for unsafe conditions, watch employees for unsafe actions and take prompt action to eliminate any hazards.

Management will do its part by devoting the resources necessary to form a safety committee composed of management and elected employees. We will develop a system for identifying and correcting hazards. We will plan for foreseeable emergencies. We will provide initial and ongoing training for employees and supervisors. And, we will establish a disciplinary policy to insure that company safety policies are followed.

Safety is a team effort – Let us all work together to keep this a safe and healthy workplace.

Signature of Top Management Official

Title President

Date

1/1/21

TABLE OF CONTENTS:

1. **Manager Responsibilities**
2. **Supervisor Responsibilities**
3. **Employee Responsibilities**
 - 3.1 **PPE Requirements** – 29 CFR 1926.28, 1926.95 Subpart E, 1910.132 Subpart I
4. **Employee Participation**
 - 4.1 **Employee Safety Meetings**
 - 4.2 **Safety Team**
5. **Hazard Recognition**
6. **Incident Investigation**
 - 6.1 **Injury Report**
 - 6.2 **General Liability**
7. **Safety Inspection Procedures** – 29 CFR 1926.21
8. **Hazard Prevention & Control**
 - 8.1 **Elimination Workplace Hazards**
 - 8.2 **Basic Safety Rules**
 - 8.3 **First Aid**- 29 CFR 1926.50
 - 8.4 **Job Related Safety Rules**
 - 8.5 **Bloodborne Pathogens** – 29 CFR 1910.1030(c)(2)(ii)
 - 8.6 **Hearing Conservation** – 29 CFR 1910 Subpart G and 1926.101
 - 8.7 **Lockout / Tagout** – 29 CFR 1910.147
 - 8.8 **Confined Space** – 29 CFR 1910.146 and 1926.21(b)(6)
 - 8.9 **Respiratory Protection** – 29 CFR 1910.134 and 1926.103 Subpart E
 - 8.10 **Fire Prevention** – 29 CFRv 1926.150 and 1926.151 Subpart F
 - 8.11 **Excavation and trenching** – 29 CFR 1926.650 Subpart P
 - 8.12 **Fall Protection** – 29 CFR 1926.500 Subpart M
 - 8.13 **Electrical Safety** – 29 CFR 1926.400 and 1926.416
 - 8.14 **Cranes** – 29 CFR 1926.1400 Subpart CC
 - 8.15 **Ladders & Stepladders** – 29 CFR 1926.1050 Subpart X
 - 8.16 **Housekeeping** – 29 CFR 1926.25
 - 8.17 **Hazardous Materials** – 29 CFR 1926.59 and 1910.1200
 - 8.18 **Power Saws** - 29 CFR 1926.302
 - 8.19 **Chain Saws** - 29 CFR 1926.302
 - 8.20 **Abrasive Cut-off Saws & Chop Saws** - 29 CFR 1926.302
 - 8.21 **Grinders & Grinding Wheels** – 29 CFR 1926.303
 - 8.22 **Portable Grinders** - 29 CFR 1926.303
 - 8.23 **Pneumatic & Hydraulic Tools** – 29 CFR 1926.302
 - 8.24 **Electrical Powered Tools** - 29 CFR 1926.300 Subpart I
 - 8.25 **Hand Tool Safety** – 29 CFR 1926.300 Subpart I
 - 8.26 **Forklift Safety** – 29 CFR 1910.178 Subpart N
 - 8.27 **Aerial Lift Safety** – 29 CFR 1926.453
 - 8.28 **Scaffolding** – 29 CFR 1926.450 Subpart L
 - 8.29 **Compressed Gas Cylinders –Storage & Handling** -
 - 8.30 **Welding / Cutting / Brazing** – 29 CFR 1926.350Subpart J
 - 8.31 **Asbestos** – 29 CFR 1926.1101 Subpart Z
 - 8.32 **Lead** – 29 CFR 1926.62 Subpart D and 29 CFR 1910.1025
 - 8.33 **Sign, Signals and Barricades** – 29 CFR 1926.200 Subpart G
 - 8.34 **Heat-Related Illness**
 - 8.35 **Cold Weather Illnesses**
9. **Progressive Discipline Policy**
10. **Emergency Action Plan** – 29 CFR 1926.35
11. **Safety Training and Education** – 29 CFR 1926.21

Additional Information, Forms & Checklists

- A. Employee Training Matrix
- B. Injury Report Form
- C. General Liability Report Form
- D. Damage Information Reporting Tool (DIRT)
- E. Safety Checklist (SCL)
- F. Construction Job Hazards Analysis
- G. Personal Protective Equipment Hazard Assessment
- H. Pre-task Plan Checklist
- I. Work Zone Review Check Sheet
- J. Pedestrian Checklist
- K. Forklift Daily Shift Checklist
- L. Pre-Start Up Project Safety Checklist
- M. Start-Up Work Zone Evaluation Checklist
- N. Daily production Checklist
- O. Shut Down Safety Checklist
- P. Completed Project Maintenance Checklist
- Q. Excavation Checklist
- R. Excavation Daily Trench Log
- S. Confined Space Permit Program
- T. Confined Space Permit Form
- U. Crane Signal Signs
- V. Excavator Signal Signs

Additional Policies

- W. Substance Abuse and Drug Free Workforce Policy
- X. Hazardous Communication Policy
- Y. Progressive Discipline Policy

Safety and Health Responsibilities

1.0) Manager Responsibilities

1. Insure that a companywide attitude is promoted that anyone has the ability to stop unsafe acts or conditions that may result in an injury or damage to property.
2. Insure that sufficient employee time, supervisor support, and funds are budgeted for safety equipment, training and to carry out the safety program.
3. Evaluate supervisors each year to make sure they are carrying out their responsibilities as described in this program.
4. Insure that incidents are fully investigated and corrective action taken to prevent the hazardous conditions or behaviors from happening again.
5. Insure that a record of injuries and illnesses is maintained and posted as described in this program.
6. Set a good example by following established safety rules and attending required training.
7. Report unsafe practices or conditions to the supervisor of the area where the hazard was observed.

2.0) Supervisor Responsibilities:

1. Insure that each employee you supervise has received an initial orientation *before* beginning work. Including the daily task assignments for each employee.
2. Insure that each employee you supervise is competent or receives training on safe operation of equipment or tasks *before* starting work on that equipment or project.
3. Insure that each employee receives required personal protective equipment (PPE) *before* starting work on a project requiring PPE.
4. Do safety-checks of the work area as needed, daily at a minimum. Promptly correct any hazards you find.
5. Observe the employees you supervise working. Promptly correct any unsafe behavior. Provide training and take corrective action as necessary. Document employee evaluations.
6. Set a good example for employees by following safety rules and attending required training.
7. Investigate all incidents in your area and report your findings to management as required.
8. Talk to management about changes to work practices or equipment that will improve employee safety.
9. Complete tool box talks, excavation checklists, trenching logs, and any other safety tools or check lists required by the company.

3.0) Employee Responsibilities

1. Follow safety rules described in this program, IOSHA safety standards and training you receive.
2. Report unsafe conditions or actions to your supervisor or safety representative promptly.
3. **Report all injuries to your supervisor promptly regardless of how serious.**
4. Report all near-miss incidents to your supervisor promptly.
5. Always use personal protective equipment (PPE) in good working condition where it is required.
6. Do not remove or defeat any safety device or safeguard provided for employee protection.
7. Encourage co-workers by your words and example to use safe work practices on the job.
8. Make suggestions to your supervisor, safety committee representative or management about changes you believe will improve employee safety.

3.1 Personal Protective Equipment (PPE)

1. Safety glasses, goggles, or a full face shield shall be worn at all times.
2. Hard hats are required at all times, unless approved by management or the safety director.
3. Hard soled shoes are required on all projects. Athletic footwear will not be allowed
4. Appropriate hand protection shall be used, depending on the task.
5. Hearing protection should be worn at all times

4.0) Employee Participation

Employee Safety Meetings

All employees are required to attend all safety meetings (Tool Box Talks) held at the jobsite. These meetings are to help identify safety problems, develop solutions, review incidents reports, provide training and evaluate the effectiveness of our safety program. Sign in sheets will be made and will be kept on file at the office. Daily meetings or "start of the shift meetings" and "end of shift" will be encouraged to go over the tasks for the day and potential safety hazards associated with that work.

5.0) Hazard Recognition

Record Keeping and Review

Employees are required to report any injury or work related illness to their direct supervisor, immediately. Minor injuries such as cuts and scrapes can be entered on the daily report for the project. The employee must use an "Employee's Injury/Illness Report Form" to report more serious injuries.

The Supervisor will:

- Investigate a serious injury or illness using procedures in the "Incident Investigation" section below.
- Complete an "Incident Investigation Report" form.
- Give the "Employee's Report" and the "Incident Investigation Report" to the office, to the attention of the Human Resource Manager and/or Safety Director.

The Human Resource Manager and/or Safety Director will:

- Determine from the Employee's Report, Incident Investigation Report, and any claim form associated with the incident, whether it must be recorded on the OSHA 300 Injury and Illness Log and Summary according to the instructions for that form.
- Enter a recordable incident within seven days after the company becomes aware of it.
- If the injury is not recorded on the OSHA log, add it to a separate incident report log, which is used to record non-OSHA recordable injuries and near misses.

The Safety Director will post a signed copy of the OSHA log summary for the previous year on the safety bulletin board each February 1 until April 30. The log will be kept on file for at least 5 years. Any employee can view an OSHA log upon request at any time during the year.

Workman's Comp Process:

- Any work related incident or injury must be reported to a Superintendent or Project Manager the day of the occurrence and as soon as practical.
- Reporting should be done even if the injury is considered minor at the time. The employee "Injury/Illness Report Form" shall be completed for each incident occurrence and turned into the Worker's Compensation Representative – Pat Bigham. The submission of the Injury/Illness Report Form should be as soon as possible and no later than 24 hours after the incident occurrence. A copy of the daily report should accompany the Injury/Illness Report for added information of the project activities.
- If medical attention is required, the supervisor should direct the associate to the closest clinic for evaluation and care. A drug screen will be done at the time of treatment. Nonpayment may result

if an employee seeks care at an unauthorized clinic, with a medical health care professional, or at a medical facility. This condition may be waived under emergency situations.

- First Aid supplies should be accessible at all jobsites and facilities for any minor injuries.
- All documentation and billing should be forwarded to the Worker's Compensation Representative at Calumet's main office facility.
- All follow-up appointments are mandatory for attendance. If an associate is unable to keep an appointment, the medical clinic or health care professional should be called to reschedule.
- The Worker's Compensation Representative should be kept informed of any associate's progress, especially any lay-offs, terminations, or suspensions who is receiving medical care under workman's compensation.
- If an associate has been placed on restrictions, due to work related injury, those restrictions should be accommodated whenever possible. The associate shall not be allowed to perform work outside his/her restrictions.
- The Worker's Compensation Representative will be notified when associate restrictions cannot be accommodated at the jobsite; other possible positions will be evaluated within the Calumet workplace for placement. It may become necessary for an associate to be off work until the restrictions have been lifted.
- An associate shall not be allowed to return to full duty without a written release from Calumet's company medical health care provider, who has been taken off work or placed on restrictions.

NOTE: *An employee placed on restrictions may not work more than an 8 hour work day, 40 hours a week, 5 day work week.*

Early Return to Work:

Purpose and Intent

- ❖ In order to minimize serious disability due to on the job injuries and to reduce worker's compensation costs, Calumet Civil Contractors, Inc. has developed procedures to deal with injuries / illnesses in which the worker can be offered light duty or modified work, temporarily.
- ❖ Light duty jobs will be identified after obtaining and examining the injured worker's physical limitation of restrictions. "Light duty" might be the worker's regular job, modified by removing heavier tasks and reassigning these to other workers, different regular job currently existing at the workplace, or a job that is specifically designed around the worker's restrictions.
- ❖ A light duty job offer will be made only when the work is available and of benefit to the company. The light duty job, if offered, will end with the date the worker received a regular release, and may be ended at any time if there is no longer a need for the light duty work. Each case will be assessed individually based on need. Light duty and modified work may not be implemented in every injury or illness. Wage rate will not necessarily be the same as that of the regular job.
- ❖ On-the-job injuries and occupational diseases will be handled by a team consisting of the injured worker, his or her supervisor, the safety director, the company owners, the insurance company and the injured worker's physician. The team approach is the most effective method for achieving a return to productive work at the earliest opportunity. The responsibilities of the injured worker, the supervisor, and the safety director are outlined in the following pages.

Employee's Responsibility:

- ❖ Report all injuries to your supervisor immediately. If medical treatment is necessary, you should go the nearest immediate care facility or if necessary emergency facility.
- ❖ Take the Physical Status Update form with you to the first and all subsequent medical visits.
 - Tell the doctor the company may be able to place you in a temporary modified job if you cannot return to regular work.

- Return form completed by the doctor to your supervisor or to the office the same day, or the next scheduled business day.
- ❖ You and your supervisor must complete forms as soon after the injury as possible.
- ❖ If you are not released for regular work, but are released for light duty, discuss the possibilities with your supervisor and/or safety director.
- ❖ If an appropriate light duty job is developed, whether it is a modified version of your regular job or another light duty job, you must report to work at the time designated by the company.
- ❖ If you are taken off work completely, or if light duty is unavailable, you must report your medical condition and your progress to the safety director at least once a week. Report in person if possible. Also, furnish the office with your mailing address and telephone number.
- ❖ If you return to a light duty job, you must make sure that you do not go beyond either the duties of the job or your physician's restrictions.
 - If your restrictions change at any time, you must notify your supervisor at once and give your supervisor a copy of the new medical release at which time the light /modified duties may be changed to be consistent with your current restrictions.
- ❖ If you see a doctor or emergency facility after hours or on a weekend for a work related injury, you must notify your supervisor of this fact and the nature of the injury and any restrictions on the next scheduled business day.
- ❖ Employee must understand that a refusal of light duty offer may impact the workers worker compensation benefits.

Superintendent / Foreman Responsibility:

- ◆ Assure the employee understands and follows his/her responsibilities as listed above.
- ◆ Work with the safety director and employee to determine what light duty jobs are available that meet the restrictions specified by the treating physician.
- ◆ Verify that the employee does not go beyond either duties of the job or the physician's restrictions.

Safety Director's Responsibility:

- ◆ Assist the superintendent/foreman in determining available light duty work that will meet the restrictions set by the treating physician.

6.0) Incident Investigation

Incident Investigation Procedure

- **DO NOT DISTURB the scene except to aid in rescue or make the scene safe.**

Whenever there is an incident that results in serious injuries (or death) that have immediate symptoms, a preliminary investigation will be conducted by the immediate supervisor of the injured person(s), a person designated by management, and any other persons whose expertise would help the investigation.

The investigation team will take written statements from witnesses, photograph the incident scene and equipment involved. The team will also document as soon as possible after the incident, the condition of equipment and any anything else in the work area that may be relevant. The team will make a written "Incident Investigation Report" of its findings. The report will include a sequence of events leading up to the incident, conclusions about the incident and any recommendations to prevent a similar incident in the future. The report will be reviewed by the management as soon as possible.

When a supervisor becomes aware of an employee injury where the injury was not serious enough to warrant a team investigation as described above, the supervisor will write an "Incident Investigation Report" to accompany the

"Employee's Injury/Illness Report Form" and forward them to the Human Resource manager and/or Safety Director. Project Manager's will be held accountable for the failure of their subordinates to properly report incidents.

Whenever there is an incident that did not but could have resulted in serious injury to an employee (a *near-miss*), the incident will be investigated by the supervisor or a team depending on the seriousness of the injury that would have occurred. The "Incident Investigation Report" form will be used to investigate the near-miss. The form will be clearly marked to indicate that it was a near miss and that no actual injury occurred. The report will be forwarded to the Safety Director to record on the incident log.

General Liability Report must be completed and submitted for any utility line cut, theft, vandalism, property damage or motor vehicle incidents. Those incidents that may potentially pose a liability risk, but are minor in nature, should be reported for "record purposes only". Tort claims have a 2 year window before any notice of intent to file a claim must be submitted in court.

Section "A" of the form must be completed for all incidents.

- Utility Line Cut – Section A, B, and D
 - Property Damage – Section A, C and D
 - Auto / Equipment Loss – Section A, E, F and G
-
- Once the report is completed and signed, it must be routed to the Calumet Office within 24 hours of the incident occurrence and submitted to the Safety Director. Include any daily report(s), detailed narratives, estimates and photo documentation.
 - It is the responsibility of the jobsite supervisor/superintendent to take photo documentation of any incidents, vandalism, theft, injuries or marked utility locates that may occur legal liabilities, along with all traffic setups and traffic setup changes (phase changes).
 - Calumet will be responsible for providing the vehicle for photo documentation, which may include disposable cameras, picture phones with memory cards, video camera, etc.
 - Photo documentation should also take place on any work related situation that may possibly impact, including documentation of any potential claim for extra work, change order, delay, etc., including subcontractor's work that may impact performance.
 - Photo documentation should be taken from various points of view (angles) including all sides or views of the incident. Remember that you cannot take too many photos.
 - All photo documentation must include the job name, job number, date of incident, location of the incident (specific to job), along with the individual submitting the documentation.
 - Upon submitting the photo documentation, individuals will be issued new vehicle(s) for photo documentation, if necessary.
 - All documentation should be developed on CD's, memory cards or hard-drives for storage and ease of transmission.
 - Upon submission, Section "H" will be filled in with the incident file number, the location code and the date the report was received, by the Safety Director / Human Resource Manager.
 - The Safety Director / Human Resource manager will then provide copies of all pertinent information to the company's insurance agency representative.
 - The Safety Director / Human Resource manager will establish a file, where the pertinent information of the incident will be kept for a period of two years or until closure of any legal matters.

7.0) Safety Inspection Procedures

Calumet Civil Contractors, Inc. is committed to aggressively identifying hazardous conditions and practices which are likely to result in injury or illness to employees. We will take prompt action to eliminate any hazards we find. In addition to reviewing injury records and investigating incidents for their causes, management and the safety director will regularly check the workplace for hazards as described below:

Periodic Change Survey -- We will assign a supervisor or form a team to look at any changes we make to identify safety issues. Changes include new equipment, changes to production processes or a change to the building structure. A team is made up of maintenance, production, and management representatives. It examines the changed conditions and makes recommendations to eliminate or control any hazards that were or may be created as a result of the change.

Monthly Safety Inspection -- We will periodically or randomly schedule a safety audit inspection of areas (jobsites) for hazards using the standard safety inspection checklist and company team (project managers, superintendents, employees, safety director, etc.). We will talk to co-workers about their safety concerns and any observed unsafe actions. Team members will report any hazards or concerns to the whole company for consideration. The results of the area inspection and any action taken will be posted in the affected area.

Job Hazard Analysis -- As a part of our on-going safety program, we will use a "Job Hazard Analysis" form to look at each type of job task our employees do. This analysis will be done by the supervisor of that job task and/or a member of management and/or the safety director. We will change how the job is done as needed to eliminate or control any hazards. We will also check to see if the employee needs to use personal protective equipment (PPE) while doing the job. Employees will be trained in the revised operation and to use any required PPE. The results will be reported to the supervisor and management. Each job task will be analyzed at least once every two years, whenever there is a change in how the task is done or if there is a serious injury while doing the task.

◆ See Form *Construction Job Hazards Analysis*

8.0) Hazard Prevention and Control

8.1 Eliminating Workplace Hazards

Calumet Civil Contractors, Inc. is committed to eliminating or controlling workplace hazards that could cause injury or illness to our employees. We will meet the requirements of state safety standards where there are specific rules about a hazard or potential hazard in our workplace. Whenever possible we will design our facilities and equipment to eliminate employee exposure to hazards. Where these engineering controls are not possible, we will write work rules that effectively prevent employee exposure to the hazard. When the above methods of control are not possible or are not fully effective we will require employees to use personal protective equipment (PPE) such as safety glasses, hearing protection, foot protection etc.

8.2 Basic Safety Rules

The following basic safety rules have been established to help make our company a safe and efficient place to work. These rules are in addition to safety rules that must be followed when doing particular jobs or operating certain equipment. Those rules are listed elsewhere in this program. Failure to comply with these rules will result in disciplinary action.

- Never do anything that is unsafe in order to get the job done. If a job is unsafe, report it to your supervisor or safety representative. We will find a safer way to do that job.
- Do not remove or disable any safety device! Keep guards in place at all times on operating machinery.
- Never operate a piece of equipment unless you have been trained and are authorized.
- Use your personal protective equipment whenever it is required.
- Obey all safety warning signs.
- Loose clothing, jewelry and hair longer than shoulder length shall not be worn around moving machinery.
- Working under the influence of alcohol or illegal drugs or using them at work is prohibited.
- Do not bring firearms or explosives onto company property.
- Smoking is only permitted in designated areas on the jobsite and not in any building.
- Horseplay, running and fighting are prohibited
- Clean up spills immediately. Replace all tools and supplies after use. Do not allow scraps to accumulate where they will become a hazard. Good housekeeping helps prevent injuries.

8.3 First Aid

In the event an employee is injured on the job, first aid kits are available for them to treat their own injuries. In the event of a serious injury, 911 or medical response will be summoned. No employee is required to treat another's wounds. However, in the event "Good Samaritan" assistance is rendered, barrier protection is available in the first aid kits.

- First Aid Kits are available in all Supervisor's Trucks
- All employees should be trained in First Aid and CPR on a bi-annual basis

8.4 Job Related Safety Rules

We have established safety rules and personal protective equipment (PPE) requirements based upon a hazard assessment for our company listed below:

- Eye and Face Protection – eye protection must comply with the latest revision of ANSI Z87.1. Safety glasses must have a "Z87.1" marking on the frame and be equipped with side shields. If they are prescription glasses, the initials of the lens manufacturer must be stamped into the corner of the lens to show that they are safety glass lenses.
- Safety Vest – Class III with retro-reflective stripes shall be worn at all times. A shirt or jacket may be used, providing it has the proper striping.
- Hard Hats – Shall be worn at all times.
- Proper Clothing-
 - Normal Work Attire: Sleeved shirts and long pants are required at all times. Sleeveless shirts, tank top-type shirts, or shirtless attire are not allowed. Where hazards exist due to moving parts on machinery or equipment, clothing shall be maintained to avoid entanglement.
 - Special Work Clothing: Appropriate work clothing shall be worn where exposure to fire, extreme heat or cold, corrosive chemicals, body impacts, cuts from handled materials or other specialized hazards are possible.
- Hand Protection – work gloves must be worn where appropriate for the performance of the work. When handling sharp or rough stock, welding, or performing other jobs, which could cause hand injuries. Synthetic gloves must be worn when handling chemicals. Leather gloves must be used when working around asphalt equipment and materials.
- Foot Protection shall comply with the latest revision of ANSI Z41. Athletic shoes and open-toed footwear are prohibited.
- Respirators – only employees trained and authorized to use respirators are allowed to do so.
- Hearing Protection – is required in areas where noise exposure is more than 90dBA (85dBA if you already have experienced a hearing loss).

8.5 Bloodborne Pathogens

PPE Required: *Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

1. Blood and other bodily fluids can carry pathogens, which are capable of causing diseases in others. This includes HIV, which leads to AIDS, and hepatitis.
2. Because we cannot tell by looking at a person if they are infected with a pathogenic disease, we must take precautions following an illness or injury when bodily fluids are released.
3. In the event of a person losing bodily fluids, stay away from the area and warn others to also do so. You can still stay close to the ill/injured person to support him/her, just be sure to stay out of contact any bodily fluids.
4. In the event that you find spilled bodily fluids, a syringe, or other medically contaminated materials, do not attempt clean up by yourself. Call the Safety Director / Human Resource Manager immediately for instructions.

8.6 Hearing Conservation

Employees may be exposed to excessive noise levels during the operation of some field equipment. Ear protection approved by the Occupational Safety and Health Administration (OSHA) for sound levels exceeding 85 dba must be worn when excessive noise is evident. Hearing protection also should be available during all field activities.

8.7 Lockout/Tagout

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

Prior to working on any machinery when guards are removed, every energy source (electrical, hydraulic, chemical, mechanical, etc.) must be deactivated, stored energy dissipated, and the control locked in the off (safe) position.

Never remove or tamper with a lockout performed by another employee or contractor. A lockout could consist of a lock applied to a control such as a switch, breaker, or valve. A tag containing words such as "DANGER - DO NOT OPERATE" may also be used for lockout. If you see the lock, the tag, or both applied to an energy control device it means, "Keep your hands off."

1. Do not perform any maintenance, inspection, cleaning, adjusting or servicing of any equipment without following the company's lockout/tagout program.
2. If required to work on powered equipment (hydraulic, electrical, air, etc.), you must have your personal padlock assigned to you and personal key on your person at all times.
3. Disconnect and padlock all machine power disconnects in the off position before removing guards for the purpose of working "ON" or "IN" the machinery or approaching its unguarded parts. (NOTE: When more than one employee is working on a single piece of equipment, each employee must use his own padlock along with lock-out tongs to lock out the equipment. When the work is completed, he must remove only his lock.
4. Do not commence equipment repair or maintenance work until you have verified that the tagged/locked out switch or control cannot be overridden or bypassed.
5. Replace all guards before removing personal padlocks from the control.
6. Do not use or remove another employee's protective lock. Do not remove a lock from equipment unless you placed it there.
7. Before machinery is put back into use after LOCKOUT/TAGOUT, give a verbal announcement or sound a warning to fellow employees.

8.8 Confined Space

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

Only trained and authorized employees are permitted to enter confined spaces. If you believe that your job requires confined space entry, contact your supervisor prior to undertaking the work. Confined spaces are areas not meant for human occupancy, have limited means of entry/exit, and have electrical, chemical, thermal, atmospheric, or entrapment hazards.

➤ **See Additional Information for Permit Confined Space Requirements**

8.9 Respiratory Protection

1. Do not perform operations requiring respirators, unless you have been approved for use of respirators, fitted and trained the company's respiratory protection program.
2. Inspect respirators for cracked or worn parts before and after each use and after cleaning.

3. Do not work in an area that requires the use of respiratory equipment, if you fail to obtain a tight seal between the respirator and your face.
4. Do not wear a respirator if facial hair prevents a tight seal between the respirator and your face.
5. Clean and sanitize respiratory equipment according to manufactures recommendations after each use.
6. Store respiratory equipment in a clean and sanitary location.

8.10 Fire Prevention

1. Smoking is only allowed in designated exterior smoking areas.
2. No candles or open flames are allowed within the office facility.
3. Contractors performing hot work must contact **the Shop Manager or Job Supervisor** for approval.
4. Only space heaters provided by the company are approved for use within the main office facility. Employees using space heaters are responsible to turn the heater off when leaving their desk for extended periods of time (lunch, end of the workday, etc.).
5. No flammable chemicals are allowed inside the office building at any time. If you feel that there is a work-related need to use a flammable chemical, contact the supervisor for guidance on Hazard Communication and fire safety.

8.11 Excavation and Trenching

***PPE Required:** Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

The primary objective of this trenching and excavating plan is to prevent injury or death to company personnel when excavations and trenches are opened on our job sites.

The purpose of this program is to define procedures for the protection of company personnel anytime they are required to work in a trench or excavation. On our varied projects, the opportunity for employee exposure to the hazards associated with trenching and excavation are numerous, therefore no work will commence until all aspects of this program are addressed.

The Project Superintendent will be responsible for ensuring the presence of a "competent person" when employees are working in any excavation.

- ❖ Project Superintendent's responsibilities as a "competent person" must satisfy the definition of "competent person" as stated in 29 CFR 1926.32 (f).
- ❖ The Project Superintendent or "competent person" will also be responsible for the following:
 - Performing daily inspections of excavations and recording the results of these inspections on the attached inspections form.
 - Maintaining a log of daily inspections and their results on attached form.
 - Testing for and controlling hazardous atmospheres.
 - Conferring with registered professional engineer for the design of shoring systems or shielding systems.
 - The availability of rescue equipment and services to include medical response.
 - Removing employees from the excavation or trench when conditions deteriorate, threatening employee safety.
 - Determining the scope of all work performed in the trench or excavation.
 - Locating all underground utility installations and walking the area to be excavated daily.
 - Ensuring that only those employees who have received appropriate training enter the trench or excavation.
 - Supervise the installation of shoring /shielding systems.

- Maintaining emergency rescue equipment on site.
- Correcting unsafe conditions within the excavation or trench.
- Removing or supporting underground utility installations that would threaten the safety of employees.

Surface Encumbrances

- All surface encumbrances such as rail road tracks, footings, etc will be removed or supported, as necessary to safeguard employees
- Equipment, workers, etc. are not to disturb the actual top of slope.
- A minimum 10 foot setback for workers is advised
- Equipment and materials will be evaluated individually

Underground Installations

- The estimated location of all underground installations such as telephone, gas, electric, sewer, and water lines are to be determined before opening any excavation.
- When excavation operations approach the estimated location of underground installations, the exact location of these installations shall be determined by "potholing" and hand digging. The client or their representative may need to assist in the location process.
- While the excavation is open, underground installations will be removed or supported as necessary to safeguard employees. This may require the assistance of the utility company.

Access and Egress

- Ladders, stairways, ramps or other safe means of egress shall be located in trenches and excavations greater than four (4) feet in depth, so as to require no more than twenty-five (25) feet of lateral travel for an employee.

Exposure to Falling Loads

- No employee will be permitted under loads handled by lifting or excavation equipment.
- No employee will enter the bucket or scoop of any excavation equipment for the purposes of being lifted or lowered, steadying equipment, etc.
- Employees will stand away from any vehicle being loaded or unloaded to avoid being struck by any spillage or falling materials.
- Spoil piles will be located at least two (2) feet from the edge of the excavation.
- Large rocks, scrap pipe, etc. will not be placed on the edge of any excavation as to present a hazard to workers in the excavation.
- Pipe staged along a trench will be placed at least two (2) feet from the edge of the trench to prevent it from being dislodged and rolling into the trench.

Warning Systems for Mobile Equipment

- ◆ When mobile equipment is operated adjacent to an excavation or when equipment must approach an excavation, if the operator does not have a clear view of the edge of the excavation, a ground guide will be used to guide the operator in conjunction with the appropriate back up alarms on bi-directional equipment.
- ◆ Such protections shall consist of scaling to remove loose material, installation of protective barricades at intervals as necessary on the face to stop and contain falling material, or other means that provide equivalent protection
- ◆ Employees shall be protected from excavated or other materials or equipment that could pose a hazard by falling or rolling into excavations
- ◆ Protection shall be provided by placing and keeping such materials or equipment at least two (2) feet from the edge of excavations, or by the use of retaining devices that are sufficient to prevent material or equipment from falling or rolling into excavations, or by a combination of both if necessary.

Inspections

- ❖ Daily inspections of excavations, adjacent areas, and protective systems will be made by the Project Superintendent or other "competent person".
- ❖ The inspections will focus on situations that could result in possible cave-ins, indications of failure of protective systems, hazardous atmospheres or other hazardous conditions.
- ❖ When the "competent person" finds a hazardous condition to exist, employees will be removed or prevented from entering the excavation/trench until action has been taken, including flagging off the area with danger tape to ensure their safety.
- ❖ A log of these inspections will be kept to include:
 - ✓ The name of the excavation inspected.
 - ✓ The date and time of the inspection.
 - ✓ Results of the inspection (hazards found, etc.).
 - ✓ Name of "competent person" making the inspection.
- ❖ **See Form Excavation Checklist and Excavation Daily Trench Log for completing this task.**
- ❖ **See Excavator Signals for additional information.**

Fall Protection

- Walkways shall be provided where employees or equipment are required or permitted to cross over excavations.
- Guardrails which comply with 1926.502(b) shall be provided where walkways are six (6) feet or more above lower levels.
- Each employee at the edge of an excavation six (6) feet or more in depth shall be protected from falling by guardrail systems, fences or barricades when the excavations are not readily seen because of plant growth or other visual barrier.
- Each employee at the edge of a well, pit, shaft and similar excavation six (6) feet or more in depth shall be protected from falling by guardrail systems, fences, barricades or covers.
 - ◆ **See Form Construction Job Hazards Analysis**

8.12 Fall Protection

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

Fall Protection is a broad concept that includes training, procedures, rules, systems and methods, intended to protect workers from fall hazards. Calumet requires fall protection for work activities that expose workers to fall hazards of six (6) feet or more. *All employees must comply with the site fall protection policy. Failure to adhere to the site fall protection policy is grounds for immediate termination.*

Pre-Task Planning

A site specific Fall Protection Plan is required to be submitted and approved prior to performing activities that expose workers to fall hazards. You should try to engineer out the need for a fall arrest system during your pre-task planning. Examples would be pre-fabricating on the ground, using a man-lift, or installing standard guardrails. A company project manager or safety representative will approve Fall Protection Plans.

Fall Protection Plan shall include the following:

- Type of work
- Procedures to be followed
- Assembly, inspection and disassembly
- Rescue Plan

- Training Program and list of trained employees
- Date plan prepared and approved
- Fall protection equipment required.
 - ◆ **See Form Construction Job Hazards Analysis**

Fall Protection Systems

A fall protection system refers to equipment designed to control fall hazards. All fall protection systems either prevent a fall from occurring or safely arrest a fall. Types of fall protection systems include the following:

- ◆ **Guardrail Systems**
 - Top edge height of guardrail systems shall be 42", plus or minus 3". Guardrails shall have a mid-rail and toe board.
 - Guardrail systems shall be capable of withstanding a 200 pound force in any outward or downward direction.
 - Wood top rails and posts shall be at least 2"x4" and posts shall be spaced not more than 8' on center.
 - Wire rope used for a top rail must be at least 1/4" diameter and be flagged at not more than 6' intervals with high-visibility material.
 - When guardrail systems are used at hoisting areas, a chain, gate or removable guardrail section shall be placed across the access opening when hoisting operations are not taking place.
- ◆ **Warning Lines**
 - Warning lines may be used for deep excavation areas, but should not replace a plan for fall protection.
 - Warning lines may be used to mitigate the fall hazards by eliminating exposure.
 - When a safe work distance is designated, which may also include some sort of warning line or other barricade, it must be one that eliminates the potential for the worker to stumble and fall over an unprotected edge but at a minimum ten (10) feet.
 - There should also be a margin of error included in the distance since there is not a positive means of stopping the worker's forward momentum toward the unprotected edge.
 - Factors that might enter into such evaluation could include weather conditions, lighting, the slope and condition of the walking surface, the kind of work being performed, materials being handled, the height of the worker above the work surface (such as working from a ladder), housekeeping, training, experience, how much time the job takes, or the distance that the worker stays away from any open sides or edges.
 - The guiding principle to follow when evaluating warning or barricade lines is that the distance from the unguarded edge of the work surface must be great enough to remove the worker from exposure to a fall hazard.
 - Factors to evaluate in determining the allowable use and correct location of barrier lines include such things as the kind of fall hazard present, the work being done and the exposure to the hazard, the slope of the work area, the degree of slickness of the walking surface, weather conditions and environmental conditions (ice, rain, wind, lighting, etc.), what equipment is being used, access and egress protection, training, and supervision.
 - It is quite simple, if there is no exposure, then there is no hazard, and thus, no violation.
- ◆ **Personal Fall Arrest Systems**
 - Personal Fall Arrest Systems have four basic components
 - Body Support (Full body harness)
 - The only form of body wear acceptable for fall arrest is the full body harness
 - The Lanyard connecting device (connecting components)

- Lanyards shall be constructed of synthetic material (nylon rope, nylon webbing) and have a locking snap-hook.
- Lanyards will not be "tied-back" unless they are designed for that purpose. Carabiners shall be locking.
- Lanyards, connectors, and carabiners shall have a minimum breaking strength of 5,000 pounds.
- Deceleration devices (rope grabs, shock absorbing lanyards, self-retracting lanyards)
 - You need to verify if the retractable lanyard you are using may be operated flat, some need to be in the overhead position.
- Anchorage points (includes: lifelines; horizontal and vertical)
 - Anchorage points need to be capable of supporting 5,000 pounds for each employee attached to it.
 - If there are no permanent tie-off points, the superintendent shall be consulted to establish ones that meet the needs of the project.
 - Vertical lifelines are designed to be used by only one person with a rope grab for vertical mobility, only for up and down movement.
 - Horizontal lifelines can only be used when designed, installed and used under supervision of a qualified person.
 - ✓ Horizontal lifelines and their anchors are subject to much greater loads than vertical lifelines.
 - ✓ Although two workers can tie-off to the same horizontal lifeline, if one worker falls, the line movement could cause the other worker to fall too, subjecting the line and anchors to even greater forces.
 - ✓ For these reasons, horizontal lifelines must be designed, engineered and installed under the supervision of a qualified person.
 - ✓ Locations of anchor points need to be planned, considering free-fall distances and swing fall risks.

◆ **Covers**

- Floor and roof openings shall be protected by a standard guardrail system or covered. The cover shall be clearly marked "hole" or "cover" and be secured to prevent accidental displacement. Covers shall be capable of supporting at least twice the weight of employees, equipment or material that may be imposed on them at any one time.

Procedures

All components of Personal Fall Arrest System shall be inspected before usage for damage and serviceability. Refer to manufactures instructions for inspection procedures. Lanyards, Harnesses, Lifelines, and Retractable Lanyards shall be checked quarterly by the job foreman or superintendent.

Rescue Plan

Workers who use personal fall arrest systems must be able to rescue themselves if they are suspended after a fall or they must be promptly rescued. Workers may be trained in self-rescue or aided-rescue. Superintendent should consult with local fire department for rescue procedures and access to site. Only rescue trained personnel should assist with rescue

Training Program

Calumet shall provide a training program for each employee who might be exposed to fall hazards. The program shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards. Fall protection training shall be specific to the tasks being completed.

Calumet will assure that each employee has been trained in the following areas:

- ◆ 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, warning line systems, safety monitoring systems, positioning devices, and other protection to be used.
- ◆ The correct procedure for handling and storage of equipment and materials and the erection of overhead protection
- ◆ The role of employees in the fall protection plan

Certification of Training

Training shall be documented on the specific Fall Protection Plan. The written certification record shall contain the name of the employee trained, the date (s) of training, and the signature of the person who conducted the training.

8.13 Electrical Safety

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

1. With the exception of independently fused multi-tap cords for computers, extension cords are not allowed in office areas.
2. Keep electrical cords out of areas where they will be damaged by stepping on or kicking them.
3. Turn electrical appliances off with the switch, not by pulling out the plug.
4. Turn all appliances off before leaving for the day.
5. Never run cords under rugs or other floor coverings.
6. Any electrical problems should be reported immediately.
7. The following areas must remain clear and unobstructed at all times:
 - Exit doors,
 - Aisles,
 - Electrical panels, and
 - Fire extinguishers.

8.14 Cranes

PPE Required: *Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

Fatalities and serious injuries can occur if cranes are not inspected and used properly. Many fatalities can occur when the crane boom, load line or load contacts power lines and shorts electricity to ground. Other incidents happen when workers are struck by the load, are caught inside the swing radius or fail to assemble/ disassemble the crane properly.

- ❖ A preplanning meeting should be conducted to address all of the pertinent elements required by 29 CFR 1926.1400.
- ❖ Prior to the preplanning meeting, the crane contractor must submit the following:
 1. Crane lifting work sheet.
 2. Provide Annual Inspection Certificate satisfying OSHA requirements and submit to Calumet before the crane arrives on site. Cranes used for critical, high risk, or sensitive lifts shall have an annual inspections within the past three (3) months.
 3. Provide operator qualifications and/or license to Calumet. Operators are required to have Certified Crane Operators (CCO) certification or equivalent. Check with local codes for any other specific requirements.
 4. If the crane operator is not a Certified Crane Operator, a letter or other written documentation from the subcontractor or subcontractor's training organization attesting that the "operator has been trained, evaluated and meets the qualification requirements of OSHA 29 CFR 1926.1427.
 5. Submit load chart and load weights verification in writing. Identify maximum radius and capacity.

Requirements:

1. Cranes shall be used on firm, drained and graded surfaces sufficient to support all crane functions and travel.
2. For each crane set-up, the locations of all underground hazards shall be identified and communicated to the subcontractor. These hazards shall be identified to the crane operator/owner, and crew for each crane set-up and location of outrigger pads for underground utilities, voids or soft spots in the area.
3. The subcontractor shall identify the Assembly/Disassembly Director who must be a qualified and competent person or a competent person assisted by a qualified person.
4. All items identified by 29 CFR 1926.1404 shall be reviewed with the assembly/disassembly crew, by the Assembly/Disassembly Director before work begins.
5. Shift, monthly and annual written OSHA inspection reports are to be submitted to the Calumet Superintendent or Safety Director.
6. Danger tape or barricades must be placed to protect pinch points and radius of counter weights.
7. Landing areas must be identified and communicated to all workers who might be affected.
8. Cranes are not permitted to work within twenty (20) feet of any electrical lines 350kv or lower, except where lines have been de-energized or visually grounded at the worksite. Voltages higher than 350kv require greater distances. See OSHA 29 CFR 1926.1410 for additional requirements and information.

9. Safety devices, including but not limited to crane level indicator, boom/jib stops, outrigger stabilization, and horn must be in operation as required by the standard.
10. Safety devices and operational aids shall not be used as a substitute for professional judgement.
11. Lift routes shall avoid lifting over personnel
12. Subcontractor to secure any permits required for their work.
13. Subcontractor shall submit in writing the names of the competent and qualified person for both rigger and signalperson required before arrival of the crane
14. Signalperson and Riggers to be trained and evaluated, by their employer, in accordance to 29 CFR 1926.1430.
15. Review as required: slings, points of attachment, hooks, spreaders, shackles and training.
16. Identify method of communication during picks.
17. Review lay down, staging and shakeout operations.
18. Develop an emergency plan, if necessary.
19. Fall Protection required for employees working above six (6) feet in unprotected areas. Verification of training required.
20. Anti-two block device required.
21. Use of suspended person platform (man basket) requires further pre-planning per 29 CFR 1926.1431.
22. Cracked or broken window glass in cabs of cranes is prohibited.
23. Lift in the following categories are considered "Sensitive Lifts" and require development of a detailed lift plan to be submitted by the subcontractor and reviewed by Calumet.
 - a. Lifts over personnel occupied areas (i.e., buildings, sidewalks, etc.)
 - b. Any lift where the payload weight is over 20 tons or greater.
 - c. Lifts requiring the crane to be set-up over or adjacent to underground building structures, transportation tunnels, retaining walls, (i.e. parking garages, etc.).
 - d. Lifts where any part of the crane or load encroaches onto or over highway, roadway, or railroad rights of way, unless the corridor is shut down to traffic. Traffic control may be required.
 - e. Drifting operations, i.e., crane lifts where the load is drifted sideways by external means.

- Cranes are to be operated only by qualified and trained personnel.
- A designated competent person must inspect the crane and all crane controls before use.
- Be sure the crane is on a firm/stable surface and level.
- During assembly/disassembly do not unlock or remove pins unless sections are blocked and secure (stable).
- Fully extend outriggers and barricade accessible areas inside the crane's swing radius.
- Watch for overhead electric power lines and maintain at least a 10-foot safe working clearance from the lines.
- Inspect all rigging prior to use; do not wrap hoist lines around the load.
- Be sure to use the correct load chart for the crane's current configuration and setup, the load weight and lift path.
- Do not exceed the load chart capacity while making lifts.

- Raise load a few inches, hold, verify capacity/balance, and test brake system before delivering load.
- Do not move loads over workers.
- Be sure to follow signals and manufacturer instructions while operating cranes.
- A pre-planning meeting should be held with the entire crew prior to the lift.
 - ◆ **See Form Construction Job Hazards Analysis**
 - ◆ **See Crane Signals for additional information.**

8.15 Ladders & Stepladders

PPE Required: *Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

1. Read and follow the manufacturer's instructions label affixed to the ladder if you are unsure how to use the ladder.
2. Do not use ladders that have loose rungs, cracked or split side rails, missing rubber foot pads or are otherwise visibly damaged.
3. Keep ladder rungs clean and free of grease. Remove buildup of material such as dirt or mud.
4. Do not place ladders in a passageway or doorway without posting warning signs or cones that detour pedestrian traffic away from the ladder. Lock the doorway that you are blocking with the ladder and post signs that will detour traffic away from your work.
5. Do not place a ladder at a blind corner or doorway without diverting foot traffic by blocking or roping off the area.
6. Allow only one person on the ladder at a time.
7. Face the ladder when climbing up or down it.
8. Maintain a three-point contact by keeping both hands and one foot or both feet and one hand on the ladder at all times when climbing up or down.
9. When performing work from a ladder, face the ladder and do not lean backward or sideways from the ladder. Do not jump from ladders or step stools.
10. Do not stand on tables, chairs, boxes or other improvised climbing devices to reach high places. Use a ladder or stepstool.
11. Do not stand on the top two rungs of any ladder.
12. Do not stand on a ladder that wobbles, or that leans to the left or right of center.
13. When using a straight or extension ladder, extend the top of the ladder at least 3 feet above the edge of the landing.
14. Secure the ladder in place by having another employee hold it if it cannot be tied to the structure.
15. Do not move a rolling ladder while someone is on it.
16. Do not place ladders on barrels, boxes, loose bricks, pails, concrete blocks or other unstable bases.
17. Do not carry items in your hands while climbing up or down a ladder.
 - ◆ **See Form Construction Job Hazards Analysis**

8.16 Housekeeping

1. Do not place materials such as boxes, buckets or trash in walkways and passageways.
2. Pick up all trash in the area of your work area (examples: drink cups, paper and plastic bags, envelopes, food debris, etc.)
3. Do not store or leave items on stairways or in areas not designated for such storage.
4. Do not block or obstruct stairwells, exits or accesses to safety and emergency equipment such as fire extinguishers or fire alarms.
5. Do not block the walking surfaces of elevated working platforms, such as scaffolds, with tools or materials that are not being used.
6. Straighten or remove rugs and mats that do not lie flat on the floor.

7. Remove protruding nails or bend them down into the lumber by using a claw hammer.
8. Remove all caution tape from area when work is completed or tape is no longer needed.
9. Return tools to their storage places after using them.
10. Remove all wood blocking or dunnage left at the work site.
11. Do not use gasoline for cleaning purposes.
12. Use caution signs or cones to barricade areas such as open trenches, changes in elevations of walking surfaces or wet floors.

8.17 Hazardous Communication

The Calumet Hazard Communication program is designed to provide the employee with information about hazards in the work place, chemicals that he/she works around and with, and safety information to protect the employee. The employee is granted this Right-To-Know information by OSHA and Calumet has a moral obligation to provide such information to the employee for their own safety and health.

The responsibility for the Hazard Communication Program rests with the Supervisors to seek compliance with the Hazard Communication Standard. However, all levels of employees, supervisors, and management have a role in such hazard communication. Management must review products and Material Data Safety Sheets of chemicals that are in use or considered for use by the employees. Calumet management must label containers of chemicals and products and keep the MSDS book current. Supervisors shall be observant of the products that are being used and remind employees of the hazards. All employees share the responsibility to look up and use the information that the Hazard Communication Program makes available to them. A Material Safety Data Sheet (MSDS) book is available in all supervisors' trucks.

1. Follow the instructions on the label and in the corresponding Material Safety Data Sheet (MSDS) for each chemical product you will be using in your workplace.
2. Do not use protective clothing or equipment that has split seams, pin holes, cuts, tears or other visible signs of damage.
3. Each time you use your gloves, wash them before removing, using cold tap water and normal hand washing motion. Always wash your hands after removing the gloves also.
4. Do not use chemicals from unlabeled containers or unmarked cylinders.
5. Always use chemical goggles and a face shield before handling chemicals labeled "Corrosive" or "Caustic."
6. Do not store chemical containers labeled "Oxidizer" with containers labeled "Corrosive" or "Caustic."
7. Do not smoke while handling chemicals labeled "Flammable."

◆ **See Additional Information in the Hazardous Communication Policy**

8.18 Power Saws

PPE Required: *Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

1. Wear the prescribed personal protective equipment such as goggles, gloves, dust masks and hearing protection when operating the power saw.
2. Turn the saw power switch "Off" before making measurements, adjustments or repairs.
3. Keep your hands away from the exposed blade.
4. Operate the saw at full cutting speed, with a sharp blade, to prevent kickbacks.
5. If the saw becomes jammed, turn the power switch of the saw to "Off" before pulling out the incomplete cut.
6. Do not alter the anti-kickback device or blade guard.

◆ **See Form Construction Job Hazards Analysis**

8.19 Chain Saw

PPE Required: *Hard Hats, Safety Glasses, Face Shield, Chain Saw Chaps, Ear Plugs, Reflective Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

Operating a chain saw is inherently dangerous. Potential injuries can be minimized by using proper personal protective equipment and safe operating procedures.

Before starting a Chain Saw

- Check controls, chain tension, and all bolts and handles to ensure that they are functioning properly and that they are adjusted according to the manufacturer's instructions.
- Make sure that the chain is always sharp and the lubrication reservoir is full.
- Start the saw on the ground or on another firm support. Drop starting is never allowed.
- Start the saw at least ten (10) feet from the fueling area, with the chain brake engaged.

Fueling a Chain Saw

- Use approved containers for transporting fuel to the saw.
- Dispense fuel at least ten (10) feet away from any sources of ignition when performing construction activities. No smoking during fueling.
- Use a funnel or a flexible hose when pouring fuel into the saw.
- Never attempt to fuel a running or HOT saw.

Chain Saw Safety

- Clear away dirt, debris, small tree limbs and rocks from the saw's chain path. Look for nails, spikes or other metal in the tree before cutting.
- Shut off the saw or engage its chain brake when carrying the saw on rough or uneven terrain.
- Keep your hands on the saw's handles, and maintain secure footing while operating the saw.
- Proper personal protective equipment must be worn when operating the saw, which includes hand, foot, leg, eye, face, hearing and head protection.
- Do not wear loose-fitting clothing.
- Be careful that the trunk or tree limbs will not bind against the saw.
- Watch for branches under tension, they may spring out when cut.
- Gasoline-powered chain saws must be equipped with a protective device that minimizes chain saw kickback.
- Be cautious of saw kickback. To avoid kickback, do not saw with the tip. If equipped, keep tip guard in place.

◆ **See Form Construction Job Hazards Analysis**

8.20 Abrasive Cut-Off Saws and Chop Saws

PPE Required: *Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

1. Do not use the saw if the lower portion of the blade hood is not adjusting itself to the thickness of the material being cut as the blade passes through the material.
2. Allow the saw to return to its stored position before removing the cut material from the table.
3. Lay the material squarely and solidly down before sawing it.
4. Use a clamp to secure cylindrical materials to the saw "table" before cutting.
5. Do not use the abrasive cut off saw for grinding or sharpening any tool or material.

◆ **See Form Construction Job Hazards Analysis**

8.21 Grinders & Grinding Wheels

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

1. Prior to installing a new grinding wheel, inspect the wheel for cracks or other visible damage by conducting a "ring test." Tap the wheel gently with a plastic screwdriver handle to detect cracks that are not visible. If the wheel has a dead sound rather than a ring sound, do not use the wheel.
2. Do not use a grinding wheel that has chips, cracks or grooves.
3. Do not use the grinding wheel if it wobbles. Tag it "Out of Service."
4. Adjust the tongue guard so that it is no more than 1/4 inch from the grinding wheel.
5. Adjust the tool rest so that it is no more than 1/8 inch from the grinding wheel.
6. Do not use a bench grinder if it is not firmly anchored to the work bench or other secure platform.
7. Do not install a grinding wheel whose labeled RPM is lower than the rated speed of the grinder.
8. Stand to one side of the plane of a rotating grinding wheel during the first few seconds of operation.
9. Grind on the side of the wheel only when it is made for side grinding.
10. Turn the grinder "off" when you have finished working with it and remain at the machine until it has completely stopped turning.

◆ See Form Construction Job Hazards Analysis

8.22 Portable Grinders

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

1. Do not use a portable hand held grinder with a wheel diameter larger than 2" unless the grinder has a positive action switch to ensure the switch cannot be locked in the "On" position.
2. Do not use a portable grinder if the grinding wheel guard is missing.
3. Do not clamp a portable grinder in a vice to use it as a bench grinder.

8.23 Pneumatic & Hydraulic Tools

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

1. Do not point a charged compressed air hose at bystanders or use it to clean your clothing.
2. Lock and/or tag tools "Out of Service" to prevent usage of the defective or damaged tool.
3. Do not use tools that have handles with burrs or cracks.
4. Do not use compressors if their belt guards are missing. Replace the belt guards before using the compressor.
5. Turn the power switch of the tool to "Off" and let it come to a complete stop before leaving it unattended.
6. Disconnect the tool from the air line before making any adjustments or repairs to the tool.

8.24 Electrical Powered Tools

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

1. Do not use power equipment or tools on which you have not been trained.
2. Keep power cords away from the path of drills, saws, vacuum cleaners, floor polishers, mowers, knives and grinders.
3. Do not use cords that have splices, exposed wires or cracked or frayed ends.
4. Do not carry plugged in equipment or tools with your finger on the switch.
5. Do not carry equipment or tools by the cord.
6. Disconnect the tool from the outlet by pulling on the plug, not the cord.

7. Turn the tool off before plugging or unplugging it.
8. Do not leave tools that are "On" unattended.
9. Do not handle or operate electrical tools when your hands are wet or when you are standing on wet floors.
10. Do not operate spark inducing tools such as grinders near containers labeled "Flammable."
11. Turn off the electrical tool and unplug it from the outlet before attempting repairs or service work. Tag the tool "Out of Service."
12. Do not use extension cords or other three pronged power cords that have a missing prong.
13. Do not use an adapter such as a cheater plug that eliminates the ground.
14. Do not run extension cords through doorways, through holes in ceilings, walls or floors.
15. Do not drive over, drag, step on or place objects on a cord.
16. Do not use a power hand tool while wearing wet cotton gloves or wet leather gloves.
17. Never operate electrical equipment barefooted. Wear rubber-soled or insulated work boots.
18. Do not operate a power hand tool or portable appliance while holding a part of the metal casing or while holding the extension cord in your hand. Hold all portable power tools by the plastic hand grips or other nonconductive areas designed for gripping purposes.

◆ **See Form Construction Job Hazards Analysis**

8.25 Hand Tool Safety

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

1. Do not continue to work if your safety glasses become fogged. Stop work and clean the glasses.
2. Tag worn, damaged or defective tools "Out of Service" and do not use them.
3. Do not use a tool if the handle surface has splinters, burrs, cracks or splits.
4. Do not use impact tools such as hammers, chisels, punches or steel stakes that have mushroomed heads.
5. When handing a tool to another person, direct sharp points and cutting edges away from yourself and the other person.
6. Do not carry sharp or pointed hand tools such as screwdrivers, scribes, chisels or files in your pocket unless the tool or your pocket is sheathed.
7. Do not perform "make-shift" repairs to tools.
8. Do not throw tools from one location to another or from one employee to another.
9. Transport hand tools only in tool boxes or tool belts. Do not carry tools in your hand or clothing when climbing.

8.26 Forklift Safety

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

1. Only employer authorized personnel may operate forklifts.
2. Do not exceed the forklift lift capacity (refer to the lift capacity plate on the forklift).
3. Follow the manufacturer's guidelines concerning changes in the lift capacity before adding an attachment to a forklift.
4. Lift the load an inch or two to test for stability: If the rear wheels are not in firm contact with the floor, take a lighter load or use a forklift with a higher lift capacity.
5. Do not raise or lower a load while you are in route. Wait until you are in the loading area and have stopped before raising or lowering the load.
6. After picking up a load, adjust the forks so that the load is tilted slightly backward for added stability.
7. Drive with the load at a ground clearance height of 4-6 inches at the tips and 2 inches at the heels in order to clear most uneven surfaces and debris.
8. Drive at a walking pace and apply brakes slowly to stop when driving on slippery surfaces such as icy or wet floors.
9. Approach railroad tracks at a 45 degree angle.
10. Do not drive over objects in your pathway.
11. Do not drive into an area with a ceiling height that is lower than the height of the mast or overhead guard.

12. Steer wide when making turns.
13. Do not drive up to anyone standing or working in front of a fixed object such as a wall.
14. Do not drive along the edge of an unguarded elevated surface such as a loading dock or staging platform.
15. Obey all traffic rules and signs.
16. Sound the horn when approaching blind corners, doorways or aisles to alert other operators and pedestrians.
17. Do not exceed a working speed of five miles per hour and slow down in congested areas.
18. Stay a minimum distance of three fork truck lengths from other operating mobile equipment.
19. Drive in reverse and use a signal person when your vision is blocked by the load.
20. Look in the direction that you are driving; proceed when you have a clear path.
21. Do not use bare forks as a man-lift platform.
22. Do not load pallets of wood that are not banded on to the forklift.
23. Do not drive the forklift while people are on an attached aerial lift platform.
24. Drive loaded forklifts forward up ramps and in reverse when driving down a ramp.
25. Drive unloaded forklifts in reverse when going up a ramp & forward when going down a ramp.
26. Raise the forks an additional two inches to avoid hitting or scraping the ramp surface as you approach the ramp.
27. Do not attempt to turn around on a ramp.
28. Do not use "Reverse" to brake.
29. Lower the forks completely, turn off the engine and set the parking brake before leaving your forklift.

◆ **See Forklift Daily Shift Checklist**

8.27 **Aerial Lift / Manlift Safety**

PPE Required: Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.

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 and vertical towers.

Before Operating an Aerial Lift

- Check operating and emergency controls, safety devices (such as outriggers and guardrails), personal fall protection gear, wheels, tires and other items specified by the manufacturer.
- Look for possible leaks (air, hydraulic fluid and fuel-system) and loose or missing parts.
- Check where the lift will be used. Is it on a level surface that won't shift?
- Check the slope of the ground or floor. Do not work on steep slopes that exceed slope limits listed by the manufacturer.
- Look for hazards such as holes, drop-offs, bumps, debris, overhead power lines and other obstructions.
- Set outriggers, brakes, and wheel chocks, even if you're working on a level slope.
- Manufacturer's manuals should be provided for operations and maintenance mechanics.
- Operators and mechanics should be trained by a qualified person experienced with the aerial lift model.

Using an Aerial Lift

- Close lift platform chains or doors.
- Stand on the floor of the bucket or lift platform.
- Do not climb on or lean over guardrails.
- Do not exceed manufacturer's load-capacity limits, including the weight of such things as bucket liners and tools.
- If working near traffic, set up work-zone warnings like cones and signs.

To Prevent Electrocutions:

- Non-electrical employees must stay at least 10 feet away from overhead power lines.
- Electrical employees must de-energize/insulate power lines or use proper personal protective equipment and tools.
- Insulated buckets protect from electrocution due to electric current passing through you and the boom to ground. The buckets do not protect if there's another path to ground such as if you touch another wire.

To Prevent Falls:

To help keep employees inside guardrails or in buckets, a full-body harness or a positioning device on bucket trucks or boom-supported lifts will be used. A positioning device (belt) with a short lanyard can be used, if there is an anchorage inside the bucket.

To Prevent Tipovers

- Check the manufacturer's instructions.
- Do not drive with the lift platform elevated unless the manufacturer says that is acceptable.
- Do not exceed vertical or horizontal reach limits or the specified load-capacity of the lift.
- On an elevated scissor lift, avoid too much pushing or pulling.

Training

OSHA says a qualified person must train all users. The training must include:

- Any electrical, fall and falling-object hazards.
- Procedures for dealing with hazards.
- How to operate the lift correctly including maximum intended load and load capacity. The user must show he or she knows how to use the lift.
- Manufacturer's requirements.
- If the hazards change, the type of aerial lift changes, or an employee is not operating a lift properly, employees must be retrained.

Maintenance and Inspections

De-energize and lockout/tagout aerial lifts before any maintenance or repairs. Each aerial lift must be inspected as the manufacturer requires, generally every three months or after 150 hours of use, whichever comes first. The owner of a lift must do a detailed annual inspection, as required by the manufacturer.

When Operating a Leased Lift

- Be sure the lift is properly inspected and serviced before rental.
- Obtain the operator and maintenance manuals and maintenance history.
- Operator controls should be easy to reach and properly marked.
- Aerial lift shall not be modified without written permission of the manufacturer.
- Aerial lifts shall be used only under conditions approved by the manufacturer.
- Proper personal fall protection shall be provided and used.

◆ **See Form Construction Job Hazards Analysis**

8.28 Scaffolding

PPE Required: *Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

The objective of this program is to supplement the safety policy by providing specific standards regarding Scaffold Safety, and to ensure that each employee is adequately trained and fully aware of safety procedures associated with Scaffold Safety.

The Safety Director will conduct routine safety inspections of jobsites to ensure compliance with this program. The Safety Director has the authority to enforce the Scaffold Safety program in accordance to any and all Calumet safety rules and applicable OSHA regulations.

Scaffold Requirements

1. Calumet ensures safe means of access for each employee erecting or dismantling scaffold.
2. The job site supervisor is designated the competent person for scaffold erecting and dismantling.
3. Scaffolds and scaffold components shall not be loaded in excess of their maximum intended loads or rated capacities, whichever is less.
4. The job site supervisor (competent person) shall inspect scaffold and scaffold components for visible defects before each work shift, and after any occurrence which could affect a scaffold's structural integrity.
5. Any part of a scaffold damaged or weakened shall be immediately repaired or replaced, braced, or removed from service until repaired.
6. Scaffolds shall not be erected, used, dismantled, altered, or moved so they or any conductive material handled on them might come closer to exposed and energized power lines than as follows:

Insulated Lines		
Voltage	Minimum Distance	Alternatives
Less than 300 volts	3 feet (0.9m)	2 times the length of the line insulator, but never less than 10 feet (3.1m).
300 volts to 50 kv	10 feet (3.1m)	
More than 50 kv . . .	10 feet (3.1m) plus 0.4 inches (1.0 cm) for each 1 kv over 50 kv	
Uninsulated Lines		
Voltage	Minimum Distance	Alternatives
Less than 50 kv . . .	10 feet (3.1m)	2 times the length of the line insulator, but never less than 10 feet (3.1m)
More than 50 kv . . .	10 feet (3.1m) plus 0.4 inches (1.0 cm) for each kv over 50 kv	

Exception to this is as follows: Scaffolds and materials may be closer to power lines than specified above where such clearance is necessary for performance of work, and only after the utility company, or electrical system operator, has been notified of the need to work closer and the utility company, or electrical system operator, has de-energized the lines, relocated the lines, or installed protective coverings to prevent accidental contact with the lines.

7. Only under the supervision of the job site supervisor (competent person) shall scaffold be erected, moved, dismantled, or altered. Only properly trained and experienced Calumet employees shall be selected for such work by the competent person.
8. All scaffolds shall be assembled and utilized in accordance with manufacturer's recommendations and in compliance with OSHA requirements. This would include utilization of fall protection, via guardrail systems whenever the platform height is 10' or more, fully decking the working surface of the scaffold, installation of adequate mud sills and use of base plates, leveling the scaffold to plumb, providing proper access, and forbidding climbing of the scaffold structure (unless designated by the manufacturer for such use and properly erected).
9. Calumet employees shall be prohibited from working on scaffolds covered with snow, ice, or other slippery material except as necessary for removal of such materials.

10. Tag lines shall be used to control swinging loads being hoisted onto or near scaffold or equivalent measures to control the loads shall be used to prevent the loads from contacting scaffold.
11. Calumet employees shall not work on or from scaffold during storms or high winds unless the job supervisor (competent person) has determined that it is safe for employees to be on the scaffold and those employees are protected by a personal fall arrest system or wind screens. Note: Wind screens shall not be used unless the scaffold is secured against the anticipated wind forces imposed.
12. Debris shall not be allowed to accumulate on platforms.
13. Makeshift devices shall not be used on top of scaffolds to increase employee working height.
14. Employees shall not use ladders on scaffolds to increase the working level height of employees unless the following criteria are satisfied by Calumet:
 - a. When the ladder is placed against a structure that is not a part of the scaffold, the scaffold shall be secured against the sideways thrust exerted by the ladder;
 - b. The platform units shall be secured to the scaffold to prevent their movement;
 - c. The ladder legs shall be on the same platform or other means shall be provided to stabilize the ladder against unequal platform deflection, and
 - d. The ladder legs shall be secured to prevent them from slipping or being pushed off the platform.

Training

Calumet shall have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training shall include the following areas:

1. Identifying and understanding electrical hazards, fall hazards and falling object hazards in the work area.
2. Utilizing 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.
3. Proper scaffold access.
4. Proper use of scaffold, and proper handling of materials on scaffold.
5. Understanding and identifying the maximum intended load and the load-carrying capacities of the scaffolds used.
6. Calumet employees who are involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold shall be trained by the Safety Director or Jobsite Supervisor (competent person) to recognize any hazards associated with scaffold.
7. Training topics shall include the following:
 - a. The nature of scaffold hazards.
 - b. Correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining scaffold.
 - c. The maximum intended load-carrying capacity and intended use of the scaffold;
8. When Calumet has reason to believe that an employee lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, the employee shall be retrained. Retraining is required in the following situations:
 - a. When changes at the worksite present a hazard that the employee has not been previously trained.

- b. When changes in the types of scaffolds, fall protection, falling object protection, or other equipment present a hazard that the employee has not been previously trained.
 - c. When inadequacies are identified in the employee's work involving scaffolds, which show the employee lacks retention of proficiency.
9. Calumet employees shall receive training on scaffold safety on an as needed basis.
 10. Employees shall demonstrate knowledge and understanding of scaffold safety under the guidance of the Job Supervisor (competent person).
 11. Upon completion of scaffold safety training, Calumet shall certify in writing that each employee has received and understands requirements of scaffold safety. Certification shall include the employee's name, date of training, and subject of certification.

Conclusion

All employees of Calumet are required to comply with the rules set forth in this written program. This program is intended to provide the maximum protection for employees of Calumet.

◆ **See Form Construction Job Hazards Analysis**

8.29 Compressed Gas Cylinders – Storage & Handling

PPE Required: *Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

1. Do not handle oxygen cylinders if your gloves are greasy or oily.
2. Store all cylinders in the upright position.
3. Place valve protection caps on gas cylinders that are in storage or not in use.
4. Do not lift cylinders by the valve protection cap.
5. Do not store compressed gas cylinders in areas where they can come in contact with chemicals labeled "Corrosive."
6. Do not place cylinders against electrical panels or live electrical cords where the cylinder can become part of the circuit.
7. Do not store oxygen cylinders near fuel gas cylinders such as propane or acetylene, or near combustible material such as oil or grease.
8. If a cylinder is leaking around a valve or a fuse plug, move it to an outside area away from where work is performed and tag it to indicate the defect.

8.30 Welding/Cutting/Brazing

PPE Required: *Hard Hats, Safety Glasses, Ear Plugs, Reflective Vest/Shirt/Jacket, Gloves and Proper Clothing for the task. A PPE Hazard Assessment should be completed to determine if additional measures are needed.*

1. Obey all signs posted in the welding area.
2. Do not leave oily rags, paper such as blueprints or other combustible materials in the welding, cutting or brazing area.
3. Do not perform "hot work," such as welding, metal grinding or other spark producing operations, within 50 feet of containers labeled "Flammable" or "Combustible."
4. Use the red hose for gas fuel and the green hose for oxygen.
5. Do not use worn, burned or cracked hoses.
6. Do not use oil, grease or other lubricants on the regulator.
7. "Blow Out" hoses before attaching the torch.
8. Ignite torches with friction lighters only. Do not use a cigarette lighter.
9. Do not change electrodes with bare hands; use dry rubber gloves.
10. Bleed oxygen and fuel lines at the end of the work-shift.
11. Do not wear contact lenses when welding.

12. When welding, wear a welding helmet with filter plates and lenses, welding gloves, a long sleeve shirt, long pants, and an apron.
13. Wear clothing made of cotton, wool, or non-synthetic fibers. Wear long sleeve shirts, long pants, boots, and gloves.
14. Use the welding screen to shield other employees from flying slag and intense light.
15. Before welding place the floor fan behind you to keep welding fumes away from your face.
16. Do not use a torch on any container that is labeled "Flammable" or "Combustible."

◆ **See Form Construction Job Hazards Analysis**

8.31 **Asbestos Awareness**

The purpose of the policy is to provide information to employees of Calumet Civil Contractors, Inc. regarding the management of asbestos-containing materials (ACM) in various construction projects, in accordance with OSHA 29 CFR 1910.12(b) and 29 CFR 1926.1101. This policy applies to all employees of Calumet who may be occupationally exposed to hazardous materials or conditions in the workplace due to the presence or suspected presence of ACM, as well as those employees responsible for managing abatement projects conducted by certified contractors.

Program Components

1. **Policy Administrator** – The Safety Director will be the policy administrator.
2. **ACM Investigation** – For purposes of compliance, it is to be assumed that buildings, materials or components constructed or installed prior to 1981 contain ACM and their renovation or demolition will be managed as such. In the case of a scheduled renovation or demolition of a structure potentially containing ACM, a Pre-Abatement Survey must be conducted by a Certified Asbestos Inspector, which must:
 - a) Identify in writing all suspect ACM that could be impacted by the planned project, and provide analytical results to confirm the presence or absence of asbestos in the materials sampled in accordance with IDEM regulations.
 - b) Be completed prior to the submission of notification to IDEM by the abatement contractor; and
 - c) Be maintained onsite and made available to IDEM upon request.

In lieu of a survey, the company may presume that all suspect materials are in fact ACM, and have the contractor conducting the renovation or demolition proceed as such without detailed testing of individual materials. In this circumstance, all workers engaged in the identification and abatement of materials from the project prior to the renovation or demolition must be a qualified asbestos contractor.
3. **Exemptions** – Materials exempt from the pre-abatement survey include: wood, fiberglass, glass, plastic, metal, laminates, unmudded gypsum board, and exterior caulking and glazing compounds. In addition, materials that have been previously surveyed and analyzed, or for which other written documentation exists confirming the absence of asbestos, are exempt from future pre-abatement surveys.
4. **ACM Abatement** – IDEM Certified Asbestos Abatement contractors will be expected to conduct the renovation or demolition project in accordance with Indiana Rule 326 IAC 14-10 and Federal Register Title 40 CFR 61, Subpart M. No employee of Calumet is intended to perform abatement procedures that would disrupt or generate visible debris in excess of one 60x60 inch glove-bag, or three linear feet, in course of normal operations and maintenance of a facility. Should suspect ACM in excess of the OSHA Class III limit be encountered, the area will be secured and a certified abatement contractor retained.
5. **Employee Training** – The Safety Director will provide initial and annual awareness level training for employees who may be exposed to ACM in the course of normal operations and maintenance, or who are responsible for managing abatement projects.

Records of training will be kept by the Human Resources for three (3) years. Training shall include (at a minimum) the following components:

- a) Potentially asbestos-containing materials that may be encountered.
- b) The potential health effects of ACM exposure, and requirements for medical monitoring.
- c) How to identify and contain ACM during removal, disturbance, or alteration.
- d) Worksite precautions to be taken, such as postings, engineering controls, personal protective equipment and best work practices.
- e) The general requirements of the OSHA occupational exposure standard (29 CFR 1910.1001) and IDEM waste management regulations.

8.32 Lead Awareness

Exposure to lead can occur when workers inhale or ingest lead dust or fumes during construction activities including but not limited to: demolition, renovation or repair of surfaces or materials containing lead (including painting and decorating). In particular, the use of abrasive blasting, mechanical or manual sanding, manual scraping, manual demolition of structures, heat gun applications, power tool cleaning, welding, cutting and torch burning are covered by this program as well as the OSHA – Lead in Construction Standard 29 CFR 1926.62.

The purpose of this written program is to provide protection to all employees engaged in work that may expose them to lead hazards and to eliminate lead poisoning in construction workers as well as the general public. This will be accomplished by providing formal classroom education/training, site specific instruction by supervisors, establishing and following safe work practices, establishing a medical surveillance program, comprehensive supervisor oversight to ensure components of this program are met. Supervisors and project managers should continuously communicate their expectation of the importance of lead poisoning prevention and monitor work to ensure it is conducted in compliance with this program.

Identification of Lead Hazard:

Prior to any task activities: demolition, renovation, surface preparation; sand blasting, sanding, manual scraping, heat guns, power tool cleaning, welding, cutting, etc.. Paint/window caulk/ glaze or other materials should be:

- 1) Tested for lead content – review report with Safety office
 - a) TDH >0.5% - proceed using lead compliance plan
 - b) TDH <0.5% - proceed with caution – review hazard based on amount of dust potential.
 - c) <0.05% - may use normal construction techniques
- 2) Assumed to contain lead
 - a) Precede using lead compliance plan and safe work practices.

Assign Competent Person:

The competent person is one who is capable of identifying existing and predictable lead hazards in the surroundings or working conditions and who has the authorization to take prompt corrective measures to eliminate them. Competent person is responsible to follow this written program and complete a site specific compliance plan for all work covered under this program. Supervisors are responsible to ensure components of this plan are being met regardless of assignment of competent person trained and experienced employee.

Site Specific Lead Compliance Plan

Supervisors assigning work for projects or tasks that involve the potential for lead exposure shall ensure that our lead compliance plan is used on site, and that employees are following proper work practices and completed plan is filed.

This involves:

- 1) Identification of potential lead hazards.
- 2) Safe work practices (lead warning signs, barrier tape if indoors or where pedestrians could be exposed).
- 3) Control of lead chips/dust (drop cloth, poly tent, source ventilation).
- 4) Use of respiratory protection and personal protective equipment (coveralls).
- 5) Proper hygiene prior to all breaks (hand and face washing) and proper cleaning of work clothing.
- 6) Proper cleanup of lead chips/dust (wet clean/hepa vac)

Medical Monitoring Program

Initial Medical Surveillance – Calumet will arrange for medical services using IU Health Center to provide initial medical surveillance to any worker occupationally exposed to lead at or above the action level of 30 ug/m³ (at no cost to the employee).

Medical Surveillance Program – Calumet shall set up and maintain a medical surveillance program for all employees who are or may be exposed to lead at or above the action level for more than thirty (30) days in a twelve (12) month period. This program shall meet the requirements in 29 CFR 1926.62(j) and (k)

Employees in this program shall participate in biological monitoring.

Medical Removal – provisions will be made to remove employees from lead hazards in the working environment if blood lead levels meet or exceed 50 ug/dl per 29 CFR 1926.62(k)(1)i. Full benefits will be maintained.

Exposure Assessment

Supervisors are responsible for contacting the Safety Director (3 day notice) prior to starting a project that may expose an employee at or above the OSHA PEL of 50 ug/m³. Personal air monitoring may be conducted and laboratory results with hazard assessment will be made available to employee. The Safety Director and Human Resources representative will arrange for necessary medical surveillance.

Lead Hazard Training and Information

All employees engaged in construction activities that may expose them to lead hazards will be trained in accordance with the requirements of the OSHA lead in construction standard 1626.62(l). Contact the Safety Director to schedule formal classroom training. Employees shall receive site specific instruction and review of lead compliance plan shall be conducted by supervisors (contact Safety Director for assistance).

Clean Up

The work area shall be properly cleaned (wet wiped/hepa vacuumed) and visibly inspected for the presence of lead dust/debris by the competent person before the area is opened to the public.

Lead Based Waste Disposal

Lead based waste shall be collected at the job site and containerized/stored in a secure, closed and properly labeled container. A test shall be conducted to determine if the material is considered hazardous waste or construction debris.

8.33 Sign, Signals and Barricades

Calumet is dedicated to the protection of its employees from occupational injuries and illnesses. Calumet is responsible for providing a safe working environment, and the employees have and assume the responsibility of working safely.

The objective of this program is to supplement the safety policy by providing specific standards regarding Signs, Signals, and Barricades program, and to ensure that each employee is adequately trained and fully aware of safety procedures associated with Signs, Signals, and Barricades.

The Safety Director will conduct routine safety inspections of jobsites to ensure compliance with this program. The Safety Director has the authority to enforce the Signs, Signals, and Barricades program in accordance to any and all Calumet safety rules and applicable OSHA regulations.

Employees are required to comply with the guidelines set forth, and to comply with the instruction of the Safety Director. In the event an unsafe condition arises in the absence of the Safety Director, employees shall alert the lead person on the jobsite immediately. Employees shall alert coworkers of any unsafe conditions that arise.

Any Calumet employee who disobeys and/or disregards the guidelines set forth in this program or the company's safety program shall be subject to disciplinary action.

Signs

1. Signs and symbols shall be visible at all times when work is being performed, and shall be removed or covered promptly when the hazards no longer exist.
2. Danger signs are to be used only when an immediate hazard exists.
3. Caution signs are to be used only to warn against potential hazards or to caution against unsafe practices.
4. Exit signs shall comply with American National Safety Institute guidelines.
5. Traffic signs are to be used to in construction areas to identify points of hazard. Traffic signs shall comply with American National Safety Institute guidelines and the Indiana MUTCD.

Accident Prevention Tags

1. Accident prevention tags are to be used as a temporary means of warning employees of an existing hazard, such as defective tools, equipment, etc. They are not to be used as a substitute for accident prevention signs.

Signaling

1. Calumet requires that flagmen are utilized when signs, signals, and barricades do not provide the necessary protection on or adjacent to a highway or street.
2. Signaling directions shall conform to American National Standards Institute guidelines and American Traffic Safety Services Association (ATSSA).
3. Flagmen are required to wear the appropriate garments as directed by Calumet and in compliance with OSHA regulations, ATSSA, and Indiana MUTCD.
4. All flagmen are to be certified under INDOT specifications. Certification must be completed by ATSSA, Union affiliation, or any other approved association or group.

Barricades

1. Barricades must conform to American National Standard Institute guidelines and Indiana MUTCD.
2. Barricades must be used when closing a sidewalk, path or other area where pedestrians must travel.

Training

1. Calumet employees are required to become familiar with and understand the guidelines regarding Signs, Signals, and Barricades. Designated flagmen shall receive annual training and must demonstrate their understanding of these guidelines to the Safety Director.
2. Upon completion of Signs, Signals, and Barricades training, the agency/group providing the training shall certify in writing that each designated flagman has received and understands training requirements. Certification shall include the employee's name, date of training, and subject of certification.

Conclusion

All employees of Calumet are required to comply with the rules set forth in this written program. This program is intended to provide the maximum protection for employees of Calumet.

◆ *See Forms Work Zone Review, Pedestrian, and Start-Up Work Zone Evaluation*

8.34 Heat-Related Illnesses

1. Wear loose, light colored clothing and a hat.
2. Adapt to working in hot conditions gradually, avoid over-exerting yourself during peak temperature periods.
3. Drink water frequently—at least eight ounces every 20 to 30 minutes. Stay away from liquids containing caffeine, as they tend to increase urination, which causes rapid depletion of body liquids.
4. Watch for the following signs and symptoms of heat-related illnesses:
 - a. Heat Cramps – severe muscle spasms in the back, stomach, arms, and legs, which are attributed to the loss of body salt and water during periods of heavy perspiration.
 - b. Heat Exhaustion – heavy sweating, cool or pale skin, nausea, headache, weakness, vomiting, and fast pulse.
 - c. Heat Stroke – high body temperature, minimal sweating, red and dry skin, rapid breathing and pulse, headache, nausea, vomiting, diarrhea, seizures, confusion or unconsciousness.
5. Treat heat illness as soon as possible by doing the following:
 - a. Heat Cramps – move to a cooler area and drink approximately six ounces of water every 15 minutes. Follow-up with a medical examination.
 - b. Heat Exhaustion – move to a cooler area and lie down with your legs slightly elevated. Cool your body by fanning and applying cool, wet towels and drink approximately six ounces of water every 15 minutes. Follow-up with a medical examination.
 - c. Heat Stroke – Call 9-1-1 immediately. Move to a cooler area, remove your outer clothing, immerse yourself in cool water or apply cool, wet towels or cloths to the body. Do NOT drink liquid, and wait for emergency personnel to arrive.

8.35 Cold Weather Illnesses

1. Exposed skin freezes within one minute at -20°F when the wind speed is five miles per hour (mph), and will freeze at 10°F if the wind speed is 20 mph. When skin or clothing are wet, injury or illness can occur in temperatures above 10° F, and even above freezing (32° F). When the body is unable to warm itself, hypothermia and frostbite can set in, resulting in permanent tissue damage and even death.

2. Watch for the following signs of cold-related illnesses:
 - a. Uncontrollable shivering
 - b. Slurred speech
 - c. Clumsy movements
 - d. Fatigue
 - e. Confused behavior
3. Layer clothing to keep warm enough to be safe, but cool enough to avoid perspiring excessively.
 - a. Inner layer – synthetic weave to keep perspiration away from the body.
 - b. Middle layer – wool or synthetic fabric to absorb sweat and retain body heat.
 - c. Outer layer – material designed to break the wind and allow for ventilation.
4. Wear a hat to avoid losing almost 40 percent of your body heat.
5. Place heat packets in gloves, vests, boots and hats to add heat to the body.
6. Watch out for the effects of cold temperatures on common body functions such as:
 - a. Reduced dexterity and hand usage
 - b. Cold tool handles reducing your grip force
 - c. The skin's reduced ability to feel pain in cold temperatures
 - d. Reduced muscle power and time to exhaustion

9) Disciplinary Policy

Employees are expected to use good judgment when doing their work and to follow established safety rules. We have established a disciplinary policy to provide appropriate consequences for failure to follow safety rules. This policy is designed not so much to punish as to bring unacceptable behavior to the employee's attention in a way that the employee will be motivated to make corrections. The following consequences apply to the violation of the same/similar rule or the same/similar unacceptable behavior:

First Instance -- verbal warning, notation in employee file, and instruction on proper actions

Second Instance -- written reprimand, and instruction on proper actions

Third Instance – 1-5 day suspension, written reprimand, and instruction on proper actions

Fourth Instance -- Termination of employment.

An employee may be subject to immediate termination when a safety violation or pattern of behavior places the employee or co-workers at risk of permanent disability or death.

- ◆ **See Progressive Discipline Policy for additional information**

10) Emergency Planning

What will we do in an emergency?

In case of fire

An evacuation map for the Main Office Building is posted in various locations throughout the building at 4898 Fieldstone Drive, Whitestown, Indiana. It shows the location of exits, fire extinguishers, first aid kits, and where to assemble outside. A copy of the map is attached to this program. All employees will receive training on how to use of fire extinguishers as part of their initial orientation.

- **If you discover a fire:** Tell another person immediately. Call or have them call 911 and a supervisor.
- If the fire is small (such as a wastebasket fire) and there is minimal smoke, you may try to put it out with a fire extinguisher.
- If the fire grows or there is thick smoke, do not continue to fight the fire.
- Tell other employees in the area to evacuate.
- Go to the designated assembly point outside the building.

- If you are a supervisor notified of a fire in your area: Tell your employees to evacuate to the designated assembly location. Check that all employees have been evacuated from your area.
- Verify that 911 has been called.
- Determine if the fire has been extinguished. If the fire has grown or there is thick smoke, evacuate any employees trying to fight the fire.
- Tell supervisors in other areas to evacuate the building.
- Go to the designated assembly point and check that all your employees are accounted for. If an employee is missing, *do not* re-enter the building! Notify the responding fire personnel that an employee is missing and may be in the building.

11) Safety and Health Training and Education

Safety Training

Training is an essential part of our plan to provide a safe work place at Calumet Civil Contractors, Inc. To insure that all employees are trained *before* they start a task that requires training, we have a training coordinator whose name is posted on the safety bulletin board. The Safety Director is responsible for all training coordination and any additional training needs should be directed to that person. That person is responsible to verify that each employee has received an initial orientation by his or her supervisor, has received any training needed to do the job safely and that the employee file documents the training. The coordinator will make sure that an outline and materials list is available for each training course we provide:

<u>Course</u>	<u>Who must attend</u>
Basic Orientation	All employees (given by the employee's supervisor)
Safe Lifting	Any employee who lifts more than 20 pounds
Chemical Hazards (General)	All employees
Chemical Hazards (Specific)	An employee who uses or is exposed to a particular chemical
Fire extinguisher safety	All employees
Respirator Training	Employees who use a respirator
Forklift Training	Employees who operate a forklift
Lockout Training (Awareness)	All employees
Lockout Training (Advanced)	Employees who service/repair equipment/machinery
Welding Safety	Employees who operate a welder
PPE Training	Employees who use PPE (e.g, safety glasses, hard hats, safety-toe shoes)
Confined Space (Awareness)	All employees
Confined Space (Advanced)	Employees involved in confined space entry
Hearing Conservation (noise)	Employees exposed to >85 decibels
Electrical Safe Work Practices	Employees who work on energized (live) circuits/equipment
Blood-borne Pathogens	Employees potentially exposed to BBP
Emergency Evacuation/egress	All employees
Ladder Safety	Employees who use ladders
Fall Protection	Employees exposed to falls >4' in general industry, >6' in construction work.

◆ **See Training Matrix for additional information**

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the integrity of the financial system and for the ability to detect and prevent fraud. The text also mentions the need for regular audits and the role of independent auditors in ensuring the reliability of the data.

In addition, the document highlights the significance of transparency and accountability in financial reporting. It states that stakeholders, including investors and the public, have a right to know how their money is being managed. This requires the implementation of robust internal controls and the disclosure of relevant information in a clear and concise manner. The text also touches upon the importance of ethical conduct and the role of professional standards in guiding the behavior of financial professionals.

The document further explores the challenges faced by financial institutions in the digital age. It notes that the rapid advancement of technology has created new opportunities for innovation but also poses significant risks, such as data breaches and cyberattacks. To address these challenges, the text advocates for the adoption of advanced security measures and the development of a strong cybersecurity culture. It also discusses the importance of staying up-to-date with the latest regulatory requirements and industry best practices.

Finally, the document concludes by emphasizing the need for continuous improvement and learning. It suggests that financial institutions should regularly evaluate their performance and seek ways to enhance their operations. This can be achieved through the implementation of a robust risk management framework and the fostering of a culture of innovation and collaboration. The text also mentions the importance of staying informed about the latest developments in the financial industry and the role of industry associations in promoting best practices and standards.