Eastern Elevator

Safety and Health Manual

January 2017

SAFETY AND HEALTH MANUAL

Index by Section Number

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Index by Section Name

SAFETY AND HEALTH POLICY

Eastern Elevator believes that worker health and safety is the number one goal of every job.

All efforts will be made by management and ownership to reduce the risk of health and safety issues whenever possible. This is accomplished using engineering controls, administrative controls and when necessary, Personal Protective Equipment. While all hazards cannot be completely eliminated in every job, it is our goal to reduce risks to As Low As Reasonably Practicable (ALARP).

We believe that the only way to perform a task is the right way. Shortcuts and other deviations from standard operating procedures are not tolerated.

Proper job planning is the most effective way to prevent the temptation of using shortcuts.

All workers have Stop Work Authority if they feel a job, work environment or situation is unsafe. When this happens, they are to notify management immediately so proper actions can be taken. No worker shall ever face disciplinary action or other negative actions for using Stop Work Authority.

If a job cannot be done safely, it will not be done until a safe way can be found.

Sally Westover
Chief Operating Officer

Stan Westover
Field Superintendent / Safety Director

SECTION 1: GENERAL HEALTH AND SAFETY POLICIES

PURPOSE

The purpose of this program is to ensure that a safe and healthful workplace is provided for employees and to comply with general safety and health standards.

SCOPE AND OBJECTIVES

This program applies to all employees, temporary labor and subcontractors hired to perform work on behalf of Eastern Elevator (Eastern).

The objectives of this program are to:

- Ensure programs are in place to prevent injury or illness from occurring.
- Meet OSHA requirements regarding health and safety as they apply to Eastern operations.
- Effectively communicate to employees the basic provisions of the company Safety Program.
- Communicate this Program to contractors and vendors to ensure the safety of company employees and visitors.

RESPONSIBILITIES

Senior Management

- Responsible for the overall administration of the Health and Safety Program.
- Ensures that time and resources are made available to effectively administer the program.

Safety Director

- Responsible for obtaining information from contractors and vendors regarding their health and safety requirements, and for providing that information to other employees and contractors working on the project.
- Employee safety and health orientation and training.
- Distribution of Personal Protective Equipment.
- Ensuring that non-routine work activities are properly evaluated and planned.
- Upkeep of first aid supplies.
- Supervision of accident investigation.
- Oversight of the facility emergency evacuation plans and drills.
- Record keeping.
- Annual review and updating of this program.

Field Superintendents and Shop Supervisors

- Conduct on the job training for new hires following the completion of their formal New Hire Orientation
- Lead by example by following all company safety rules and policies.
- Regularly inspect work areas to ensure safety procedures and the use of PPE is in accordance with Eastern safety policies.

Employees

- Responsible for complying with all procedures and requirements described in this program even while working in remote locations.

GENERAL SAFETY REQUIREMENTS AND PROCEDURES

It is the goal of Eastern to provide to each employee a place of employment that is free from recognized hazards. To this end, Eastern has instituted this and other health and safety programs to ensure that employees are properly protected from recognized hazards and trained in the safe work practices associated with each aspect of their work.

For the protection of all Eastern employees, and other involved personnel, no person shall:

- Remove, displace, damage, destroy or carry off any safety device, safeguard, notice or warning.
- Interfere in any way with the use of any safety device, safeguard, notice, warning or process.
- Neglect to use the safeguards provided for his or her protection.
- Fail to report to his or her supervisor any unsafe equipment, method or other hazard.
- Wear clothing not suitable for the job. Loose or ragged clothing shall not be worn while working around moving machinery. Clothing shall be sufficient and proper to minimize scratches, abrasions, slivers, sunburn, burns or similar hazards.

NEW EMPLOYEE ORIENTATION

New Employee Orientation is provided to each employee by the Eastern Safety Director, or his designee, before the employee starts work. The purpose of the New Employee Orientation is to educate new hires on the requirements of this program and the basic safe work practices necessary to properly conduct their job.

The New Employee Orientation training includes a review of all safety requirements as they apply to Eastern activities. In addition to this training, the employee's direct supervisor will provide an on-the-job review of the practices necessary to perform his or her job assignments in a safe manner.

INJURY AND ILLNESS RECORDKEEPING

Workplace injury and illness information is maintained on the OSHA 300 Log. Logs are maintained in the Eastern corporate office by the Human Resource Manager. Should a situation arise where a project were to last longer than one year, a separate log would be maintained for each site.

All workplace injuries and illnesses that meet OSHA Recordability requirements will be listed on the log within seven days of their occurrence.

Detailed information about the injury and treatment such as the First Report of Injury (FROI) and incident investigation forms are maintained and kept locked in the Office Managers office.

On an annual basis, the OSHA 300A Summary is to be signed by a member of Senior Management and posted in the shop to communicate workplace injury and illness information to employees about the previous year. The summary shall be posted from February 1st through April 30th.

Per OSHA Requirements, any incident that results in a fatality is to be reported to OSHA within 8 hours. Any incident that results in an employee being admitted to the hospital, an amputation or loss of an eye is to be reported to OSHA within 24 hours (800-321-OSHA).

OSHA Logs are to be maintained for a minimum of five years not including the current year.

HOUSEKEEPING

All areas shall be kept clean to the extent that the nature of the work allows. Lunchrooms, washrooms and restrooms shall be kept in a clean and sanitary condition. Common garbage or other waste shall be disposed of at frequent intervals.

WORK IN HOT / COLD TEMPERATURES

During the course of the year, employees will be exposed to both hot and cold temperatures. Although Eastern provides employees with a variety of clothing to be worn, employees may find it necessary to bring additional items to work. Ultimately, it is the responsibility of the employee to wear appropriate clothing at all times.

During summer months, employees routinely work in the heat. Eastern recognizes that the heat combined with work uniforms can become a hazard. Eastern promotes frequent breaks during times of excessive heat.

Information on the signs and symptoms of temperature related illnesses are to be covered during initial employee orientations. Furthermore, during times of hot or cold weather, employees are to list this as a part of their daily JSA to raise awareness.

In the event an employee were to be afflicted with a heat or cold illness, Eastern requires First Aid / CPR training for at least one member of each work crew when medical services are not readily available.

WORKING ALONE – FIELD ASSIGNMENTS

Employees routinely work or travel alone to field assignments. When working alone, employees are to "Reduce Risk" whenever possible by exhibiting responsibility and ownership of their safety, the safety of the community and the environment.

When driving, employees should pre-plan trips and properly secure any equipment needed to the vehicle.

Items should not be stored in the driving compartment or in locations behind the driver where a quick stop could allow the materials to become projectiles endangering the driver.

When stopping, employees should always leave enough space between them and the car in front of them to escape if necessary.
Drive on main roads when traveling after hours even if this adds some travel time to your trip.

On jobsites, employees may receive a site safety orientation from the building Owner upon arrival and must follow all on-site safety training instructions. Employees should always develop a mental safety plan as well.

Careful observation of emergency exits / assembly areas, fire extinguisher locations, environmental hazards, physical hazards, traffic, etc. can reduce the likelihood of injury in an emergency.

Work in unpopulated areas should be carefully evaluated. Employees working after hours should stay in well-lit areas whenever possible. Portable head lights or flashlights should be used in unlit areas. Employees should prepare by ensuring necessary emergency communications are in place, PPE is adequate, and any other site specific precautions are taken.

When working after established working hours, on callbacks, and at the end of each working day, Employee must text the On-Call Dispatcher with a message "on my way home" and text again upon arrival at home with the message "home safely".

When working on callbacks, the On-Call Dispatcher will contact the Employee if no message is received within 3-hours of dispatching from the Employee with a message "on my way home". On-Call Dispatcher will continue to monitor employee status every 3-hours until the text message "home safely" is received.

Always alert employees at the site of your presence and where you will be working.

Report any suspicious behaviors to site personnel and your supervisor.

PROGRAM EVALUATION

The Eastern Management Team shall monitor the effectiveness of this program and all topic specific programs by conducting an annual audit of the program and its elements.

NEW HIRE TRAINING CHECKLIST

Employee Name: _____
(Print name)

Office Orientation:

1. **COMPANY SAFETY RULES**
   A. Review Disciplinary procedures and company expectations.
   B. Review company work attire requirements.
   C. Stop Work

2. **FIRE EXTINGUISHER USAGE**
   A. Fire extinguisher usage is never required. Use of a portable fire extinguisher is always considered to be the act of a Good Samaritan. Employee safety is always the priority.
   B. In case of fire, notify management immediately for assistance.
   C. If you know what is burning, have an escape path and feel comfortable using an extinguisher, you are permitted to locate closest fire extinguisher and use it. No employee is permitted to use more than a single extinguisher to fight a fire.
   D. Stand 8 – 10 feet away from the fire and Pull Pin, Aim, Squeeze, and Sweep (PASS) starting at the base of the fire.

3. **EMERGENCY PROCEDURES/EVACUATION**
   A. As job locations change on a regular basis, you will be instructed by your supervisor as to the way you will be notified prior to the commencement of work at each site.
   B. After evacuation, Superintendents will gather their workers and report any missing employees to the designated emergency response personnel.
   C. Evacuation Floor Plans are posted in all permanent facilities.
   D. Employees are notified of an emergency by word of mouth while working in the office / shop.

4. **ACCIDENTS/FIRST AID**
   A. All injuries / incidents must be reported immediately to Management. Employees must contact their immediate supervisor regardless of time of day or severity of incident.
   B. If first aid is needed, an authorized First Aid trained employee will assist. All workers are trained on First Aid / CPR.
   C. If an employee needs immediate medical attention by a physician, the Supervisor will make the necessary arrangements to coordinate transportation.
   D. For your safety, only employees who have completed Bloodborne Pathogen training may handle bodily fluids.
   E. Employees who have had an occupational exposure to Bloodborne Pathogens are offered Hepatitis B vaccinations.

5. **LOCK OUT/TAG OUT**
   A. **Authorized** employee level requires classroom training and a “hands on” review.

B. **Affected** employee level includes all other employees – requires basic awareness of the program. It is important that affected employees stay clear of locked out equipment and wait for the Authorized employee to notify them when proper machine start up is complete.

6. **MACHINE GUARDING**
   A. Guarding on machinery is not to be removed, altered, opened or circumvented.

7. **ELECTRICAL PANELS AND BOXES**
   A. Only Authorized Persons are allowed to Open Electrical Boxes.
   B. All power tools and equipment must be protected by GFCIs when in wet or damp locations.

8. **HAZARD COMMUNICATION**
   A. MSDS / SDS Sheets are available for all chemicals and materials. MSDS / SDS books are to be kept in each vehicle or job trailer.
   B. SDS binders are also located in the shop. See your immediate supervisor for assistance as needed.
   C. A copy of our Hazard Communication policy is available for review by asking your supervisor.

9. **CONFINED SPACE**
   A. Any space large enough to enter, having limited entry and exit and not designed for continuous occupancy is considered a confined space. This designation is made regardless of the presence of hazards.
   B. Entry is considered breaking the plane of the space.
   C. Employees are prohibited from entering confined space without management authorization.
   D. Only Authorized and trained employees may enter confined spaces.
   E. Confined spaces must be evaluated for contaminants prior to entry. Employees may never enter a space if contaminant levels are above company specified limits.

10. **FORKLIFT / AERIAL LIFT**
    A. Only licensed employees may operate. If you are not licensed and it is necessary for your department to have additional personnel trained, see your supervisor to inquire about training.
    B. A forklift / aerial lift inspection form must be completed prior to the first use of the day and prior to use after an employee of a different company operates the equipment.

11. **PERSONAL PROTECTIVE EQUIPMENT**
    A. Hearing Protection is voluntary unless instructed otherwise by your immediate supervisor.
    B. Eye Protection is required on all sites.
    C. Steel toe boots are required on all sites.
    D. Safety Vests may be required for certain customers / jobs.
    E. Hard Hats are required on all sites unless instructed otherwise.
    F. Any additional PPE required will be discussed prior to the commencement of work.

G. Replacement PPE is available in job trucks / trailers. Employees must turn in damaged PPE to receive new equipment. Damage that has occurred through misuse, abuse or was done intentionally may be charged to the employee.

12. **ERGONOMICS**
    A. When lifting, remember to bend your knees and lift with your legs and not with your back.
    B. Remember that stretching out before you start your shift can help with eliminating work place strains and sprains.
    C. Always listen to your body and ensure that you are not straining your body too much. Ask your Supervisor if you feel you are overdoing it and he/she may have ideas to help reduce certain movements that may be causing strain.

13. **DRIVER SAFETY**
    A. Driving with distractions such as texting, reading, talking on cell phones (outside of hands free), eating, etc. is prohibited.
    B. Seat belts are required at all times in the front and back seats.
    C. Motor Vehicle Records will be reviewed annually. Excessive violations may affect your ability to drive on company business.

14. **ACCESS TO MEDICAL RECORDS**
    A. All employees have the right and opportunity to examine and copy their medical records. Contact your area Supervisor if you are interested in requesting a copy.

15. **HAND AND POWER TOOLS**
    A. Always use the appropriate tool for the job. Wrenches are not hammers; screwdrivers are not chisels, etc.
    B. Always inspect tools and cords prior to use.
    C. Never carry tools by their power cord.
    D. Always unplug tools at the outlet; never pull them by the cord to unplug them.

16. **HOUSEKEEPING**
    A. Housekeeping is part of every job. Routine cleaning should be conducted as work is completed.
    B. Always conduct a review of the work area after a job is finished to ensure no debris remains.
    C. Notify your supervisor if you feel your work area is becoming too cluttered to work safely so time can be made to clean up.

17. **FALL PROTECTION**
    A. Employees working at heights in excess of 6 feet shall be protected by fall protection. This may include a personal fall arrest system, railing, rope grab, netting or other approved device.
    B. Employees must ensure free fall distances never exceed 6 feet. Anchorage points should be above the head whenever possible.
    C. Harnesses and lanyards must be inspected prior to each use. Any damaged equipment must be tagged and removed from service immediately.
    D. No employee is permitted to use a harness and lanyard as fall protection until they have received

I HAVE RECEIVED COMPANY SPECIFIC SAFETY TRAINING ON THE TOPCIS LISTED ABOVE FROM COMPANY MANAGEMENT. I HAVE BEEN PROVIDED AN OPPORTUNITY TO DISCUSS ANY CONCERNS AND HAVE RECEIVED CLARIFICATION ON ALL MY QUESTIONS THAT AROSE DURING MY TRAINING. I AGREE TO ABIDE BY THESE GUIDELINES.

_____ _____

Employee Signature Date

_____ _____

Trainer/Supervisor Signature Date

SECTION 2: HAZARD COMMUNICATION

PURPOSE

The purpose of this program is to inform all employees of the hazards of chemicals in the workplace in accordance with OSHA's Hazard Communication Standard.

Under this program, each employee will be informed of the Hazard Communication Program; its location and components, the hazardous properties of the chemicals with which they work or which they may encounter during their work; operations where hazardous chemicals are used, safe handling procedures, measures to be taken to protect themselves while working with these chemicals, and hazards associated with non-routine tasks.

RESPONSIBILITIES

The Safety Director is the designated program coordinator and has overall responsibility for its implementation. He will ensure that the program is updated as necessary and is available for employees to review in each workplace.

Field Superintendents and Supervisors oversee the program at local levels. This includes ensuring SDS books and chemical inventories are up to date, providing training to new employees and giving information on this program to subcontractors.

Mechanics must maintain a supply of warning labels and an SDS book in their vehicle. Periodic site inspections by the Safety Director or Field Superintendent shall be conducted to verify containers are properly labeled and employees are working in accordance with this program.

All employees shall properly label all secondary containers and replace existing labels if they become illegible. Employees shall also:

- Ensure that all chemicals purchased are accompanied with an SDS.
- Obtain an SDS for any chemical purchased that is not currently used by Eastern.
- Notify management if you encounter any chemical you feel may have been brought from home or purchased outside of normal Purchasing Procedures.

CHEMICAL INVENTORY

An updated chemical inventory will be kept in the Corporate Office and will include all chemicals found in the workplace. The inventory will be reviewed annually during the Hazard Communication Program Review to ensure its accuracy.

LABELING REQUIREMENTS

Eastern employees do not routinely transfer chemicals from their original containers during the course of work. Chemicals on site are to remain in their original packaging complete with the manufacturers original labeling whenever possible.

For occasions when chemicals must be transferred, Eastern has adopted a standardized visual labeling system to identify the inherent properties of a chemical and the protective equipment that may be needed. This visual labeling system is known as the Hazardous Material Identification System or HMIS. When questions about a chemical are not answered by labels, the employee should always refer to the SDS for that chemical. Information on how to read and understand HMIS labels is given in the Appendix.

TRAINING

All employees will receive training on the Eastern Hazard Communication Program upon hire, annually and after a change in operations or job duty. The training program will give instructions in the following areas:

- The requirements and location of the Hazard Communication Program; and
- How to read SDSs and chemical labels; and
- The location of the SDS Master List; and
- Proper labeling procedures; and
- Methods and observations that the employee may use to detect the presence or accidental release or spill of chemical products in the work area; and, measures that employees can take to protect themselves from these hazards (e.g., work practices, personal protective equipment, and emergency procedures).

SAFETY DATA SHEETS (SDS)

Employees have access to all SDSs. A master copy will be maintained in the office of the Safety Director and is available for review by all employees. The SDS book includes a Table of Contents identifying the location of each chemical. Chemicals identities in the Table of Contents are listed by the Product Identifier on the material label.

While conducting field work, SDSs can be found in the company truck unless other arrangements have been agreed upon during the pre-job planning meeting.

NON-ROUTINE TASKS

Prior to starting work on such projects, each affected employee will be given information by the Project Superintendent or his designee about the hazardous chemicals he or she may encounter during such activity.

During the planning phase, they will:

1. Evaluate the possibility of exposure to a hazardous substance,
2. Consult the appropriate SDS,
3. Provide any information and added training needed in case of possible exposure to an unfamiliar hazardous substance or situation.

UNLABELED PIPES

Prior to starting work in areas where chemicals are transferred through unlabeled pipes, the employee shall contact the project owner for information regarding the chemical in the pipes, potential hazards and safety precautions required.

CONTRACTOR TRAINING

All contractors are to be trained on Hazard Communication in accordance with Eastern Contractor Safety Program prior to the commencement of any work on the premises.

Copies of SDSs for any hazardous chemicals brought on site will be provided to the site contact to ensure all third parties on site have access to them.

PERSONAL PROTECTIVE EQUIPMENT

Hazard Communication training teaches all employees an awareness of when to wear protective equipment. Employees are also taught to read the labels that indicate when protective equipment is necessary.

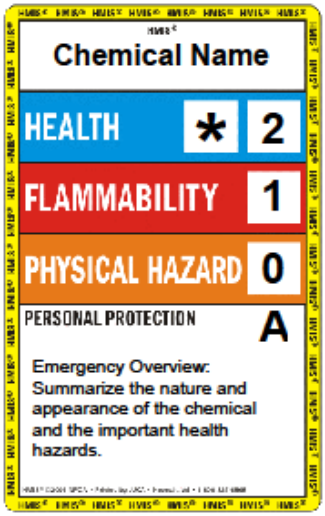
Protective equipment is available through your immediate supervisor upon request. If an employee cannot locate the necessary equipment, he/she should ask their supervisor for assistance.

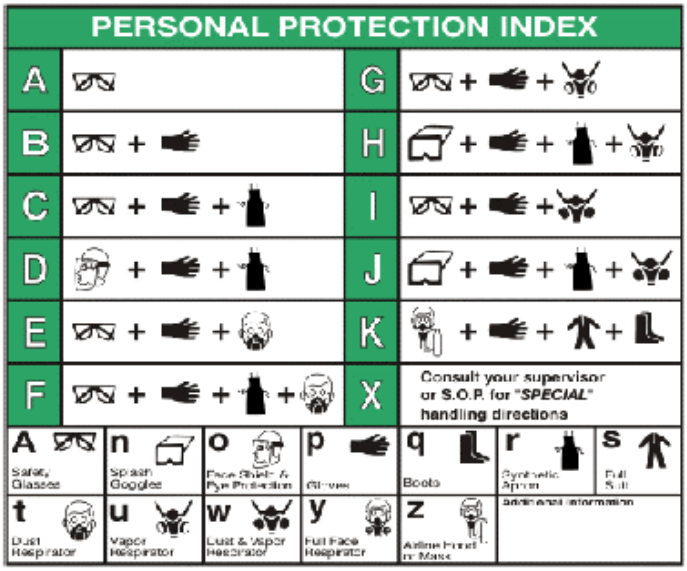
Employees should always wear the protective equipment when necessary. Eastern will conduct periodic checks to ensure that protective equipment is being worn and used properly.

APPENDIX - LABELING SYSTEM

HMIS Hazardous Materials Identification System

HMIS Label Example





HMIS HEALTH HAZARD RATING CHART	
* CHRONIC HAZARD	Chronic (long-term) health effects may result repeated overexposure.
0=MINIMAL HAZARD	No significant risk to health.
1=SLIGHT HAZARD	Irritation or minor reversible injury possible.
2=MODERATE HAZARD	Temporary or minor injury may occur.
3=SERIOUS HAZARD	Major injury likely unless prompt action is taken and medical treatment is given.
4=SEVERE HAZARD	Life-threatening, major or permanent damage may result from single or repeated overexposures.

File Name: HMIS Hazardous Materials Identification System

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HMIS Hazardous Materials Identification System

HMIS FLAMMABILITY HAZARD RATING CHART	
0=MINIMAL HAZARD	Materials that will not burn.
1=SLIGHT HAZARD	Materials that must be preheated before ignition will occur. Includes liquids, solids and semi solids having a flash point above 200° F. (Class IIIB)
2=MODERATE HAZARD	Materials which must be moderately heated or exposed to high ambient temperatures before ignition will occur. Includes liquids having a flash point at or above 100° F but below 200° F. (Classes II & IIIA)
3=SERIOUS HAZARD	Materials capable of ignition under almost all normal temperature conditions. Includes flammable liquidswith flash points below 73° F and boiling points above 100° F.as well as liquids with flash points between 73° F and 100° F. (Classes IB & IC)
4=SEVERE HAZARD	Flammable gases, or very volatile flammable liquids with flash points below 73° F, and boiling points below 100° F. Materials may ignite spontaneously with air. (Class IA)

HMIS PHYSICAL HAZARD RATING CHART	
0=MINIMAL HAZARD	Materials that are normally stable, under fire conditions and will not react to water, polymerize, decompose, condense or self react.
1=SLIGHT HAZARD	Materials that are normally stable but can become unstable at high temperature and pressures. Materials may react non-violently with water or undergo hazardous polymerization in the absence of inhibitors.
2=MODERATE HAZARD	Materials that are unstable and may undergo violent chemical change at normal temperature and pressure with low risk for explosion. Materials may react violently with water or form peroxides upon exposure to air.
3=SERIOUS HAZARD	Materials that may form explosive mixtures with water are capable of detonation or explosive reaction in the presence of a strong initiating source or undergo chemical change at normal temperature and pressure with moderate risk of explosion.
4=SEVERE HAZARD	Materials that are readily, capable of water reaction, detonation or explosive decomposition at normal temperatures and pressures.

File Name: HMIS Hazardous Materials Identification System

SECTION 3: PERSONAL PROTECTIVE EQUIPMENT

PURPOSE

The Personal Protective Equipment (PPE) Program has been developed to reduce the risk of workplace hazards that cannot be fully controlled through the use of engineering or administrative solutions. Eastern recognizes PPE is a last resort in controlling hazards.

PPE will be provided, used, and maintained when it has been determined that its use is required and that such use will lessen the likelihood of occupational injury and/or illness.

SCOPE

This program applies to all employees, temporary labor and subcontractors hired to perform work on behalf of Eastern. The program addresses eye, face, head, foot and hand protection. This policy does not differentiate between equipment owned by the employee or provided by Eastern.

RESPONSIBILITIES

The Safety Director shall ensure that workplace hazard assessments are conducted to determine situations that necessitate the use of PPE. He shall allow time for employees to receive training on the proper use and care of PPE.

The Human Resources Department shall review and update the program annually. They shall maintain employee training records.

Field Superintendents and Supervisors are to replace or repair damaged equipment immediately upon notification and enforce the use of proper PPE.

Lead Mechanics are to seek assistance from Superintendents and competent persons to evaluate workplace hazards when needed and to notify coworkers when changes to the operation occur that will affect the types of PPE needed to protect against hazards.

Employees shall wear PPE where required. They are responsible for attending required training sessions and to care for, clean, and maintain PPE, as required. When PPE needs repair or replacement, employees are to notify their Lead Mechanic.

TRAINING

All employees covered by the Eastern PPE program are to be trained upon hire, when changes occur to the operation and annually.

The content of employee training is to include the following:

- When and what PPE is necessary; and
- How to properly adjust and wear PPE; and
- The limitations of PPE; and
- The proper care, maintenance, and useful life of PPE.

When there is reason to believe that an employee does not understand the requirements of the PPE program or how to use the PPE properly, then that employee shall be retrained. Retraining will also occur if changes are made to the Program.

Training records are to be maintained to verify that each employee has received and understood the required training. Training records shall contain the name of the trained employee, the instructor, date of the training and the subject of the training.

PERSONAL PROTECTIVE EQUIPMENT ASSESSMENT

The Safety Director will certify that a hazard assessment of each work area was conducted to identify sources of hazards. Each assessment will be documented, identifying the work area evaluated, the person conducting the evaluation, the findings of potential hazards, and date of the evaluation. The most recent hazard assessment can be found at the end of this policy.

VOLUNTARY USE OF PERSONAL PROTECTIVE EQUIPMENT

All protective equipment necessary to safely perform work is provided to employees by Eastern. In the event an employee chooses to wear additional PPE voluntarily, it must be approved by the Safety Director in writing to ensure no additional hazards are created by its use. Employees may not bring any PPE from home to the work site without written approval from the Safety Director.

In the event an employee chooses to use a dust mask respirator for certain tasks, Eastern will review the request on a case by case basis. Should the request be approved, dust masks will be provided by Eastern at no cost to the employee and documented training on their use and limitations will be provided prior to the commencement of work.

- Employees choosing to wear dust masks are provided with a copy of Appendix D of the OSHA Respiratory Standard on Voluntary Use of Respirators. Employees must read the material and sign-off upon its receipt.

INSPECTION

PPE is to be inspected per the manufacturer's instructions by employees prior to each use to ensure it is not damaged or worn. Visual inspections should include the following:

- Seams
- Protective coatings
- Checks for tears, holes, cracks, discoloration, stiffness or chemical degradation, and malfunctioning closures.

PPE found to be damaged, defective or inadequate in any way is to be immediately taken out of service.

STORAGE AND MAINTENANCE

Clothing and other PPE are to be stored and maintained in accordance with the manufacturer's instructions. PPE must be maintained in a clean and sanitary condition.

Cleaning is of particular importance for eye and face protection where dirty or fogged lenses could impair vision and create additional hazards.

USE

PPE is not universal; therefore, employees will be provided with various sizes and styles to try to ensure proper fit. Available PPE will be discussed and shown during training.

CERTIFICATE OF HAZARD ASSESSMENT STATEMENT

I certify a worksite hazard assessment was performed on _____ (date) by _____(name/title).

Signature:

Job Function: General Office Work

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE (Refer to PPE Matrix)
General Office Work	Low	Sprains & Strains	• Ergonomic Training - Proper lifting methods • Use proper step ladder • Eastern Elevator Ladder Safety Procedure • Summon help on heavy items • Use cart/dolly & break loads into lighter parts • Properly place extension cords • Do not over stack boxes • Awareness and anticipate blind corners	
General Office Work	Low	Electrical Hazards	• Check cords and plugs for fraying • Keep cords to sides of walking area • Electrical Awareness Procedure	
General Office Work	Low	Slips, Trips & Falls	• Do not block aisles or doors • Properly place extension cords • Use warning signs or cones for wet floors • Do not over stack boxes • Awareness and anticipate blind corners	• Use of ice cleats or other snow and ice anti-slip during winter when working outside
General Office Work	Low	Soft Tissue Damage	• Proper lifting methods • Eastern Elevator Manual Lifting Procedure • Summon help on items over 40 lbs. • Use cart/dolly & break loads into lighter parts	
General Office Work	Low	Eye Fatigue	• Frequent breaks • Anti-glare screens & proper lighting • Properly positioned work station equipment	
General Office Work	Low	Chemical Exposure Bloodborne Pathogens	• Any chemicals other than household use must have SDS • Eastern Elevator HAZCOM Procedure • Eastern Elevator Bloodborne Pathogens procedure	• PPE identified in the Bloodborne Pathogens procedure

Job Function: Construction/Modification of Hydraulic or Traction Elevators

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE
Prepare for work (Selecting & Loading Equipment into Vehicles)	Low	• Injury (head, eye, noise, hand, foot, burn)	• Ensure following are in vehicle: Hard hat, safety glasses, work gloves, fall protection and other as required. • Report travel (journey management) route and consider road factors • Ensure all loads secured • Safe lifting practices while loading (buddy lifting or mechanical equipment for heavy objects) • Manual Lifting Procedure • Eastern Elevator PPE procedure	• As Required based on hazard • Use of ice cleats or other snow and ice anti-slip during winter when working outside
Perform vehicle inspection & drive to location	Med	• Injury while driving	• Perform 360 inspection of vehicle • Check all liquid levels • Follow all rules of the road (speed, warnings, etc.) • Use seatbelts, lights on where required. • Driver has current license • Eastern Elevator Driving Safety Procedure	• As Required based on hazard
Initiate Permit	Low	• Unauthorized entry into process areas. • Lack of communicatio n	• Check in with customer or designated permit issuing office. • Staff must know primary and secondary safe areas in case of incident or alarm	• As Required based on hazard
Offload at Site	Low	• Injury (back, hand, head, foot, eye) • Slips, trips, falls	• Safe lifting practices while loading (buddy lifting or mechanical equipment for heavy objects) • Stretching Exercises • Eastern Elevator PPE procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard
Pit Entry	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye) • Confined Space related hazards	• Eastern Elevator PPE procedure • Eastern Elevator Fall Protection procedure • Eastern Elevator Confined Spaces procedure • Barricades to protect employees and public • LOTO (if req'd)	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Hang Hoist	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye)	• Eastern Elevator PPE procedure • Easter Elevator Fall Protection procedure • Eastern Elevator Ladder Safety procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Build Scaffolding/False Car	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye)	• Eastern Elevator PPE procedure • Easter Elevator Fall Protection procedure • Eastern Elevator Scaffolding procedure+ Daily Inspection • False Car Safety Test and Form • Competent Person Supervision	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE
Install Rails	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye)	• Eastern Elevator PPE procedure • Easter Elevator Fall Protection procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Install Jack(s)	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye)	• Eastern Elevator PPE procedure • Easter Elevator Fall Protection procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Install Machine Room Equipment	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye)	• Eastern Elevator PPE procedure • Easter Elevator Fall Protection procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Install Hydraulic Oil Line	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye) • Hydraulic Fluid Leak/Spill	• Eastern Elevator PPE procedure • Eastern Elevator Ladder procedure • Easter Elevator Fall Protection procedure • Eastern Elevator Spill Prevention Program • Use of absorbent floor covering	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Install Car Sling/Platform	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye)	• Eastern Elevator PPE procedure • Easter Elevator Fall Protection procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Install Hydraulic Oil Line	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye) • Hydraulic Fluid Leak/Spill	• Eastern Elevator PPE procedure • Eastern Elevator Ladder procedure • Easter Elevator Fall Protection procedure • Eastern Elevator Spill Prevention Program • Use of absorbent floor covering	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Install Entrances	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye)	• Barricades to protect employees and public • Eastern Elevator PPE procedure • Easter Elevator Fall Protection procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE
Wiring	Med	• Falls from higher elevation • Injury (back, hand, head, foot, eye) • Hydraulic Fluid Leak/Spill	• Eastern Elevator PPE procedure • Eastern Elevator Fall Protection procedure • Eastern Elevator Spill Prevention Program • Eastern Elevator Lock Out Tag Out procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required) • Arc Flash PPE
Install Cab	Low	• Injury (back, hand, head, foot, eye)	• Eastern Elevator PPE procedure • Safe lifting practices while loading (buddy lifting or mechanical equipment for heavy objects)	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Adjust	Low	• Injury (back, hand, head, foot, eye) • Shock Hazard	• Eastern Elevator PPE procedure • Eastern Elevator Lock Out Tag Out procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required) • Arc Flash PPE
Ascending Descending stairs, ladders, scaffolding	Med	• Slips, Trips and Falls • Falls from higher elevation	• Maintain contact with handrail if available • Three-point contact with ladders. Do not carry anything on a ladder. • Inspect all scaffolding for tag and other competent user knowledge points.	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Walking / Working Surfaces	Med	• Slips, Trips and Falls	• Watch for objects or conditions that could cause footing problems. • Watch for uneven work surfaces, deep mud, wet floors, etc. • All pipes move – be aware of signs of slugging and use chocks where required.	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE
General Safety Precautions	Med	• Pinch Points, Struck by, Struck Against, Cuts, eye injury, Slips and Trips, Falls, Hot Surfaces, Sharp Edges • Toxic Atmospheres	• Ladders / Scaffolding: leave hands free and maintain 3-point contact. Stay within guardrails on scaffolding. Use self-retracting lifeline with harness if lifeline installed. Do not have belt buckle past the rails of ladders. Use step ladders in good condition vs. climbing on piping. Ensure scaffolding is tagged for use. • Use proper body position, lifting techniques. Avoid lifting and twisting. • Keep vigilance for objects that can be struck against (sharp edges, pipes, etc.) • Pay attention to caution / warning signs • Facility Emergency Action Plan • Eastern Elevator pit and car top entry procedure	• Safety toed footwear • Hard Hat • Safety Glasses • Gloves Appropriate for Hazard • Hearing Protection (if required)
Craning Operations	Low	• Communication, passersby, falling objects, load ratings, swing radius, power lines, unstable outrigger foundations, wind, side loads, sling capacities,	• Confirm hand signals or 2 way communications with operator • Keep onlookers away • Do not stand under overhead load • Confirm crane is capable of handling load at swing radius used • Use Caution Tape to show swing radius • No closer than 10’ from overhead lines • Confirm integrity of outrigger foundations • Confirm wind speed is acceptable with operator • Do not side load boom • Confirm sling ratings are acceptable factoring angles, etc.	• Hard hats • Gloves • Safety toed footwear • Safety Glasses
Hand and Power Tools	Med	Injury (hand, eye, face)	• Eastern Elevator Hand and or Power Tools procedure • Inspect before use • No loose clothing, long hair or jewelry • Keep floor surface clean • Keep guards in place • Disconnect when changing accessories or cleaning • Remove from Use and Tag damaged tools Immediately • GFCI or double insulated equipment	• Safety Glasses or Goggles • Face Shield • Gloves

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE
Arc Welding/Cutting	Low	• Fire Hazards • Metal Splatter • Electric Shock • Explosion Hazards • Released Gases • Radiant Energy	• Eastern Elevator Welding Cutting Hot Work procedure • Remove all combustible materials at least 35' away • Have fire extinguisher handy for instant use • Eye protection • Protective equipment • Protect nearby workers from arc welding rays (screens) • Run exhaust fan • Keep tanks closed and capped when not in use and in designated storage space • Keep tanks away from heat sources • Keep cylinders, valves, couplings, regulators, etc. free of oil or grease • 30-minute fire watch	• OSHA Approved welding garments • Proper rated welding hood lens • Welding gloves • If necessary, properly rated respiratory protection PPE
Lifting/Carrying materials	Low	• Back, hand, foot injuries	• Eastern Elevator Manual Lifting procedure • Safe lifting practices while loading (buddy lifting or mechanical equipment for heavy objects) • Avoid lifting above shoulder level • Avoid twisting at the waist • Stretching Exercises prior	• Steel toe boots • Kevlar Gloves
Finish Work Return to Base Put Equipment Back into Storage	Med	• Damage to vehicle • Injury while driving Injury (head, eye, noise, hand, foot, burn)	• Close Permit or notify customer work is finished • Perform 360 inspection of vehicle before leaving • Check fuel levels • Follow all rules of the road (speed, warnings, etc.) • Use seatbelts, lights on where required.	• As Required

Job Function: Driving

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE (Refer to PPE Matrix)
General Operating	Med	Injuries to driver and passengers of any vehicle	• Check fuel level before leaving • Brake & radio check (if equipped) • Perform 360 walk around before driving • Safety Glasses if on gravel road and lights on • Use passenger to assist in backing up • Currently licensed to operate type of vehicle • Journey Management – Fatigue – Reporting / Driving Breaks • Eastern Elevator Driving procedure	• Safety glasses if on gravel road
Visibility	Med	Struck by vehicles	• When on side of road where vest to increase visibility	• High Visibility Vest

Environmental Concerns	Low	Harm to the environment	• NO maintenance or repairs on vehicle beyond adding fluids • Use fuelling station spill liner • Report all fluid leaks that touch ground	

Job Function: Manufacturing Area

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE (Refer to PPE Matrix)
Moving Raw Materials	Low	Injury (back, head, eye, noise, hand, foot, burn)	• Safe lifting practices while loading/unloading (buddy lifting or mechanical equipment for heavy objects) • Stretching Exercises • Eastern Elevator PPE procedure • Eastern Elevator Manual Lifting procedure	• As required based on hazard
Hand and Power Tools	Med	Injury (hand, eye, face)	• Eastern Elevator Hand and or Power Tools procedure • Inspect before use • No loose clothing, long hair or jewelry • Keep floor surface clean • Keep guards in place • Disconnect when changing accessories or cleaning • Remove from Use and Tag damaged tools Immediately • GFCI or double insulated equipment	• Safety Glasses or Goggles • Face Shield • Gloves
Gluing Laminate	Med	Inhalation, Absorption, Eye	• Eastern Elevator HAZCOM procedure & SDSs • Adequate Ventilation • Check Condition of Eye Wash Station • Run Exhaust Fan • Have fire extinguisher handy for instant use • Eastern Elevator Fire Extinguishers procedure • Eastern Elevator Respiratory Protection procedure	• Safety Goggles • Synthetic Apron • NIOSH Respirator • Nitrile Gloves • Long Sleeve Shirt
Painting	Med	Inhalation, Absorption, Eye	• Eastern Elevator HAZCOM procedure & SDSs • Eastern Elevator Respiratory Protection procedure • Adequate Ventilation • Check Condition of Eye Wash Station • Run Exhaust Fan	• Safety Goggles • NIOSH Respirator • Nitrile Gloves • Long Sleeve Shirt

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE (Refer to PPE Matrix)
Ladders	Low	Falls	• Eastern Elevator Ladder Safety procedure • Eastern Elevator Fall Protection procedure • Keep Ladders in Safe Condition – Inspect Before Use • Keep Ladders Free From Slipping Hazards • Don't Load Above Rated Capacity • Use on Stable, Level Surface • Check Top of Ladder for Objects Before Moving • Do Not Use Top Step or Top of Ladder as a Step • Do Not Climb on Crossbracing on Rear of Ladder • Remove from Use and Tag Defective Ladder Immediately • Face the Ladder When Climbing • Do Not Carry Objects When Climbing • Keep Area at Bottom of Ladder Clear • Fall Protection Above 6'	• As Required based on hazard
Arc Welding/Cutting	Low	• Fire Hazards • Metal Splatter • Electric Shock • Explosion Hazards • Released Gases • Radiant Energy	• Eastern Elevator Welding Cutting Hot Work procedure • Remove all combustible materials at least 35' away • Have fire extinguisher handy for instant use • Eye protection • Protective equipment • Protect nearby workers from arc welding rays (screens) • Run exhaust fan • Keep tanks closed and capped when not in use and in designated storage space • Keep tanks away from heat sources • Keep cylinders, valves, couplings, regulators, etc. free of oil or grease • 30-minute fire watch	• OSHA Approved welding garments • Proper rated welding hood lens • Welding gloves • If necessary, properly rated respiratory protection PPE

Job Function: Warehouse and Waste Oil Management

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE (Refer to PPE Matrix)
Lifting/Carrying materials	Low	• Back, hand, foot injuries	• Eastern Elevator Manual Lifting procedure • Safe lifting practices while loading (buddy lifting or mechanical equipment for heavy objects) • Avoid lifting above shoulder level • Avoid twisting at the waist • Stretching Exercises prior	• Steel toe boots • Kevlar Gloves
Rack Storage	Low	• Rack collapse • Falling objects	• Place load to avoid sliding or collapse • Properly rated storage racks	• Hard Hat
Forklift	Low	• Pedestrians • Ramps • Dock plates • Overhead Clearance	• Eastern Elevator Forklift procedure • Training and proof of training required • Daily forklift checklist	• Hard Hat • Safety glasses • Seat Belt
Waste oil handling	Low	• Back injuries, oil splash, slips and falls, eye injury	• Dump slowly to avoid oil spills • Use proper lifting techniques • Pour oil into smaller container if lifting above shoulders • Follow EPA guidelines	• Eye (googles) and face protection • Hand protection

Job Function: Elevator Maintenance Operations

TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE (Refer to PPE Matrix)
Prepare for work (Selecting & Loading Equipment into Vehicles)	Med	• Injury (head, eye, noise, hand, foot)	• Ensure following are in vehicle: Hard hat, safety glasses, work gloves, fall protection and other as required. • Report travel (journey management) route and consider road factors • Ensure all loads secured • Eastern Elevator Manual Lifting Procedure • Eastern Elevator PPE procedure	• As Required based on hazard • Use of ice cleats or other snow and ice anti-slip during winter when working outside
Perform vehicle inspection & drive to location	Med	• Injury while driving	• Perform 360 inspection of vehicle • Check all liquid levels • Follow all rules of the road (speed, warnings, etc.) • Use seatbelts, lights on where required. • Driver has current license • Eastern Elevator Driving Safety Procedure	• As Required based on hazard
Contact customer	Low	• Check in with customer or designated permit issuing office. • Staff must know primary and secondary safe areas in case of incident or alarm	• Check in with customer or designated permit issuing office. • Staff must know primary and secondary safe areas in case of incident or alarm	• As Required based on hazard

Entering equipment room	Low	• Slips, falls, electrical hazards, rotating equipment hazards	• No loose clothing, rags or tools in pockets, pay attention to floor surface for oily conditions. Potential fire or smoke; feel door for heat - open door slowly to check for smoke.	• As Required based on hazard
Cleaning operations	Med	• Slips, falls, dusty conditions, electrical hazards, dust, eye injury	• Deenergize electrical equipment & LOTO • Be alert for oily/slippery surfaces. • Keep soles of shoes clean and free of oils, greases • Follow Eastern Elevator pit entry procedure • Observe Confined Space requirements • Protect lobby floors from dirt/grease/oil	• Respiratory protection • Hand protection • Safety glasses
Carrying pit oil bucket to equipment room	Low	• Slips, falls, back injuries	• Be alert for oily/slippery surfaces. • Keep soles of shoes clean and free of oils, greases • Protect lobby floors from dirt/grease/oil • Use proper lifting/carrying techniques when carrying pit oil buckets	• As Required based on hazard
Emptying oil bucket into reservoir	Low	• Fluid splash, spills, back injuries, eye injury	• Dump slowly to avoid oil spills • Use proper lifting techniques • Pour oil into smaller container if lifting above shoulders	• Eye and face protection • Hand protection
Electrical maintenance operations	HIGH	• Serious injury, death	• Eastern Elevator LOTO procedure • Ensure only trained and qualified employees work with high voltage	• Arc flash gear, multi-meter
Electrical component replacement	HIGH	• Serious injury, death	• Eastern Elevator LOTO procedure • Deenergize electrical equipment & LOTO • Eastern Elevator car top/pit entry procedure	• Arc flash gear, multi-meter
Electrical trouble shooting	HIGH	• Serious injury, death	• Deenergize electrical equipment & LOTO whenever possible • When necessary to trouble shoot energized equipment, use arc flash gear	• Arc flash gear, multi-meter
Mechanical trouble shooting	HIGH	Serious injury, death, eye injury	• Deenergize equipment & LOTO • Caught in hazards • Struck by hazards • Rotating equipment hazards • No loose clothing, rags or tools in pockets, pay attention to floor surface for oily conditions	• As Required based on hazard • Eye injury
Contact customer before leaving	Low	• Check in with customer or designated permit issuing office.	• Check in with customer or designated permit issuing office. • Customer needs to know if you are still on site in case of emergency	• As Required based on hazard

SECTION 4: EMERGENCY ACTION PLAN

PURPOSE

This Emergency Action Plan establishes methods and procedures to be used in emergency situations at Eastern. This Plan is also intended to minimize the possibility of fire or other emergencies that could threaten human health or the environment.

SCOPE

Conditions which seriously threaten the safety of personnel may require evacuation of the facility or a shelter in place situation to occur. These situations include, but are not limited to the following:

- Fire / Explosion
- Gas leak
- Hazardous material leak or spill
- Natural disaster
- Terrorism

RESPONSIBILITY

The Safety Director is responsible for the general administration of the Emergency Action Plan (EAP). On jobsites, the most senior employee oversees the EAP.

The Safety Director shall ensure employees receive annual training on this policy including site specific requirements. Upon arrival to a new area, all employees must be instructed on the location of this and other safety programs.

Field Superintendents or their designee are responsible for communicating site specific procedures, answering employee questions or concerns and conducting employee headcounts during emergencies. The senior employee is to notify the Safety Director in the event of any site emergency once the headcount has been conducted.

Employees are responsible for understanding the plan. In the event an employee is unsure of their role, they must request additional information. This may include information on items such as muster areas, alarm sounds and evacuation routes. Employees must always obey the warning alarms and exit the work area or shelter in place as quickly as possible.

CHAIN OF AUTHORITY

Eastern conducts work in many locations and environments. All field operations conducted by Eastern fall under the requirements of the site owner unless otherwise specified. In these situations, the procedures are communicated to all affected employees prior to the commencement of work at the pre-job planning meeting, JSA or site safety orientation meeting.

Should an emergency occur at the Eastern office or yard, the highest ranking employee on site is responsible for notifying the appropriate authorities.

EVACUATION PROCEDURES

Fire or Other Imminent Danger

Any employee discovering a situation that presents a threat or potential threat to the safety of personnel within the facility (i.e. fire, explosion, etc.) shall notify co-workers through the PA System.

Upon hearing instructions, all employees must immediately proceed to the nearest exit. Once outside the facility, personnel will go directly to their designated meeting area. No employees of Eastern have any responsibility to shut down equipment or utilities. The designated meeting area for employees at the Eastern office is:

Employee Parking Lot

For shelter in place emergencies, all employees are to report to:

The Kitchen

Once personnel have assembled at their designated meeting areas, it is the responsibility of the person in charge to determine if all employees are accounted for and have evacuated safely. A final head count will be given to the responding local authorities.

All personnel shall remain at the designated meeting areas and await further instructions prior to returning to work. Employees shall always notify their supervisor prior to leaving the site in case an emergency situation occurs. This requirement ensures that emergency response personnel are not placed in danger while searching for an employee who is not on the premises. No individual shall leave the property during the course of an evacuation unless given permission by the person in charge.

Employees at Eastern have not been trained in firefighting techniques beyond basic fire extinguisher use and principles. Although fire extinguishers are located throughout the office, shop and field locations, employees should evacuate unless:

- The employee chooses to act as a Good Samaritan and extinguish the fire under his / her own free will, and
- The employee knows the material that is burning and its hazards, and
- The employee can keep their back facing an unblocked / unobstructed exit to safety while fighting the fire.

Employees will be instructed on this procedure upon hire and again annually. Under no circumstance is an employee permitted to continue fighting a fire that is not extinguished by a single fire extinguisher unless it is blocking their path to an exit.

While working in the field, all employees are to evacuate to the assigned muster point upon hearing the evacuation alarm. Alarm sounds and meanings will be communicated during the site-specific orientation.

TRAINING

The employer will review the plan with each employee covered by the plan at the following times:

- Initially when the plan is developed; and
- When a new employee is hired; and
- Whenever the employee's responsibilities or designated actions under the plan change; and
- Whenever the emergency action plan is changed or modified.

The employer will provide training on all site-specific emergency procedures prior to the commencement of work.

EMERGENCY NUMBER LISTING

A list of emergency numbers for Police, Fire Department and Ambulance Services shall be posted in the office and all outbuildings.

SECTION 5: FALL PROTECTION

PURPOSE

The purpose of this program is to protect employees from the hazard of falls in the workplace in accordance with OSHA Standards. As falls are a leading cause of workplace injuries in the construction industry, Eastern considers the education of employees and the enforcement of fall protection policies to be of utmost importance.

Under this program, each employee will be informed of the hazards associated with working at heights and the protective systems or equipment that are necessary to ensure work is conducted safely.

SCOPE

This policy applies to all employees, temporary labor and subcontractors hired to perform work on behalf of Eastern.

RESPONSIBILITY

The Safety Director is responsible for the oversight and support of the Fall Protection Program. This includes ensuring there is an adequate supply of fall protection equipment, proper training and a plan for prompt rescue of employees involved in a fall. He shall also evaluate and update the plan on at least an annual basis.

In the event an incident occurs; the Safety Director shall conduct a thorough investigation in accordance with the Eastern Incident Investigation Program

He shall ensure that training is conducted in accordance with all program requirements.

Field Superintendents and Supervisors must ensure that all employees work in accordance with the Eastern Fall Protection Program. They shall contact the Safety Director if an issue arises concerning missing, damaged or inadequate equipment to perform work.

Employees must always utilize the proper fall protection devices or equipment in accordance with this program. They shall notify their immediate supervisor if they are unsure about the type of fall protection equipment needed to safely perform work.

The lead mechanics is to notify the Safety Director when fall protection equipment or devices are missing, damaged or inadequate.

HAZARD IDENTIFICATION

Eastern considers work above four (4) feet in height to be a fall hazard. Work at heights less than four feet high but are conducted over hazardous equipment will be evaluated by the Safety Director prior to the commencement of work to ensure safe procedures are in enacted. Fall protection while on scaffolds is covered under the Eastern Scaffold Safety Program.

When feasible, the company always prefers to engineer hazards out of the operation. Fall protection devices are considered a last resort. In the event a fall protection device is necessary, Eastern will provide the proper equipment to employees.

Personal Fall Arrest Systems (PFAS) are to be chosen based upon a review of environmental conditions in accordance with manufacturer's specifications.

RULES AND GUIDELINES

Employees working at heights in excess of four feet are required to maintain 100% tie off. This is to be accomplished by use of guardrails or Personal Fall Arrest Systems (PFAS). PFAS with double lanyards are to be used when an employee must unhook their lanyard while moving throughout the work area.

Snap hooks must be double locking. Lanyards are not to be connected to each other by means of the snap hook.

All equipment must be visually inspected before each use. Equipment must not be altered in any way. Repairs must be performed only by the manufacturer or authorized agent.

Fall arrest systems are designed for personal fall protection. Never use fall protection equipment for purposes other than those for which it was designed. Fall protection equipment should never be used for tag lines, hoisting, securing, or towing.

Anchorage points for lanyards must be capable of withstanding 5,000 pounds unless designed by a Registered Professional Engineer. Employees must never tie off to a railing, pipes, cable trays, etc., unless it is rated to meet this requirement and approved as an anchorage point by a Competent Person. Anchorage points must be at least 18.5 feet above ground level when using shock absorbing lanyards.

TRAINING

Training shall be provided and documented for each employee who might be exposed to fall hazards. Training shall include the following:

- Proper donning and sizing of body harnesses
- The correct procedures for erecting, dismantling and maintaining fall protection systems
- Limitations of the equipment
- Proper anchoring and tie-off techniques
- Estimating free fall and deceleration distances
- Proper use, storage and inspection of the equipment
- Proper use of accessories such as double lanyards and cross-arm straps
- Hazards or working at heights
- The contents and location of the Eastern written program

Retraining / Refresher training is to be conducted on an annual basis and under the following circumstances:

- A change in the types of fall protection are introduced to the company

- An employee exhibits a lack of understanding of the company fall protection requirements

INSPECTIONS

The Field Superintendent or his designee will inspect work areas prior to the commencement of work to evaluate the need for fall protection systems. After analyzing the area, employees shall be instructed on the specific fall protection systems to be used.

Personal fall arrest systems shall be inspected prior to each use for wear, damage, deterioration and defective components shall be removed from service. Monthly inspections shall be conducted by a competent person, recorded and turned in to the Safety Director.

FALL PROTECTION SYSTEMS

Eastern may utilize various types of fall protection systems depending upon the work to be performed and the configuration of the job site. The qualified person in charge shall determine which system to use prior to the start of work.

Primary Fall Protection Systems

Standard Railing Systems: A standard railing systems consist of a top rail approximately forty-two inches (42") above the walking/working surface, a mid rail at approximately twenty-one inches (21") high and a four inch (4") tall toe board mounted at the walking/working surface. The system must be capable of supporting 200 pounds of force outward with minimum deflection. These systems are used to guard open sides of floors, platforms and walkways in elevated areas.

Elevated Platforms: These systems are equipped with standard guard rail systems on all open sides and with closure apparatus for ladder openings or other points of access when required. Examples would include scissors lifts, scaffolds and boom lifts.

While working on elevated platforms, the equipment must be placed on a level surface to prevent a tipping hazard. In the event a platform does not meet this requirement, the employee must notify the Safety Director before beginning work so the system can be evaluated.

Covers: In the event a work area is found to have holes in floors, platforms and walkways, covers capable of supporting the maximum potential load they may be subjected to will be placed over the hole. The cover must completely cover the opening/hole and be secured against accidental displacement. These covers must be marked HOLE COVER - DO NOT REMOVE".

Secondary Fall Protection Systems

PFAS: These systems must be worn in the absence of primary systems detailed above and as a backup to primary fall protection devices when instructed by the Safety Director. Only PFAS that meet OSHA and ANSI standard may be used. All fall protection devices must be used according to manufacturer instruction. When lanyards cannot be attached at a safe height to prevent an employee from falling to a lower level or from contacting

equipment below, a self-retracting lanyard may be necessary. Shock absorbing lanyards are only permitted when the anchorage point is at least 18 feet above the ground or equipment. Lanyards shall be attached to the D-ring located in the middle back of the safety harness.

Horizontal Lifelines: This type of system may be used to allow an employee to work along an area where horizontal mobility is required. In the event an employee would need to remove their lanyard from the lifeline to pass an obstruction, the 100% tie off rule applies and a double lanyard must be used.

Positioning Devices: D-rings located at the waist may only be used for positioning and with rail type ladder climbing devices. Positioning devices are never allowed to be used as a PFAS. When using a positioning device, free-fall distance may never exceed two (2) feet.

Self-Retracting Lanyards:

The evaluation conducted prior to the commencement of work by the Safety Director or his designee will determine the types of fall protection required to safely perform work.

SECTION 6: LADDER AND WALKWAY SAFETY

PURPOSE

Falls in the construction industry are one of the leading sources of serious injuries. The purpose of the Eastern ladder safety program is to ensure employees are informed of the hazards and proper uses of ladders on the jobsite.

Under this program, each employee will receive initial and periodic training by a competent person on general and site specific ladder safety practices. The Safety Director is the designated program coordinator and has overall responsibility for the program. He will ensure that the program is updated, as necessary, and is available for employees to review.

SCOPE

This program applies to all Eastern employees. Subcontractors that do not supply a company specific program that is approved by Eastern prior to the commencement of work shall also adhere to this program.

RESPONSIBILITY

The Safety Director is responsible for the oversight and support of the Ladder Safety Program. He shall provide subcontractors with information about Ladder Safety Program as necessary and ensure that Ladder Safety training is conducted in accordance with all program requirements.

Field Superintendents and the lead mechanic ensure that all employees perform work in accordance with the Eastern Ladder Safety Program. They must also ensure that adequate equipment is available to employees on the job site.

Employees must adhere to the requirements of the Ladder Safety Program. They are to notify their immediate supervisor if they encounter a situation in which proper equipment is not available or ladders are found to be damaged.

TYPES OF LADDERS

All ladders are not created equal. A number of different types are available for a variety of purposes. At Eastern, all ladders used must be a minimum of Heavy Duty. Depending upon the task, size of employee, weight of equipment being worn or used, heavier duty ladders shall be used.

Ladder types include:

Type III - Light duty	lightweight, holds a maximum of 200 pounds.
Type II - Medium duty	holds a maximum of 225 pounds.
Type I - Heavy duty	holds a maximum of 250 pounds.
Type IA - Extra heavy duty	holds up to 300 pounds.
Type IAA -Professional duty	holds up to 375 pounds.

To ensure that adequate ladders are available on the job site, Superintendents or their designee will review operations prior to commencing work. Should it be determined that additional or heavier duty ladders are needed, work will not be conducted on ladders until suitable equipment is available.

In addition to weight capacity, the material the ladder is made of must be taken into consideration. It is recommended that metal ladders are not used around energized electrical circuits or equipment or in places where they may come in contact with such circuits. If the ladder is fiberglass, avoid extreme heat; if it is wood, never paint it -- this could hide serious defects.

CARE OF LADDERS

Ladders shall be maintained in good condition always, the joint between the steps and side rails shall be tight, all hardware and fittings securely attached, and the movable parts shall operate freely without binding or undue play.

Metal bearings of locks, wheels, pulleys, etc., shall be frequently lubricated.

Frayed or badly worn rope shall be replaced.

Safety feet and other auxiliary equipment shall be kept in good condition to ensure proper performance.

Before each use, employees shall inspect the ladder and those which have developed defects shall be removed from service for repair or destruction and tagged or marked as "Dangerous, Do Not Use."

Rungs should be kept free of grease and oil.

Ladder components shall be smooth to prevent injury to an employee from punctures or lacerations, and to prevent snagging of clothing.

Wood ladders shall not be coated with any opaque covering, except for identification or warning labels which may be placed on one face only of a side rail.

USE OF LADDERS

Portable rung and cleat ladders shall be used at a pitch of 4:1, where the base is placed one foot away from the structure for every four feet of height. The top of the ladder shall always extend at least 3 feet above the surface of the supporting structure.

The ladder shall be so placed and secured to prevent slipping or tipping. Ladders are to be used as intended and never to be used in a horizontal position as platforms, runways, or scaffolds unless rated as such and approved for use in that manner by the original equipment manufacturer.

Portable ladders shall be so placed that the side rails have a secure footing.

Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced when the ladder is in position for use.

Ladders shall not be placed in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded.

Ladders shall not be placed on boxes, barrels, or other unstable bases to obtain additional height.

Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment shall not be used.

A metal spreader or locking device shall be provided on each stepladder to hold the front and back sections in an open position when the ladder is being used. Portable A-frame ladders are never to be used while in the closed position.

Short ladders shall not be spliced together to provide long sections.

Tops of the ordinary types of stepladders shall not be used as steps.

On two-section extension ladders the minimum overlap for the two sections in use shall be as follows:

Size of ladder (feet)	Overlap (feet)
Up to and including 36	3
Over 36 up to and including 48	4
Over 48 up to and including 60	5

When ascending or descending, the climber must face the ladder.

Portable ladders shall have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized parts.

Except when portable ladders are used to gain access to fixed ladders (such as those on utility towers, billboards, and other structures where the bottom of the fixed ladder is elevated to limit access), when two or more separate ladders are used to reach an elevated work area, the ladders shall be offset with a platform or landing between the ladders.

Employees shall not carry any object or load while ascending or descending a ladder that could cause the employee to lose balance and fall.

STAIRS AND WALKWAYS

When carrying tools or material, always keep one hand free to use the handrails as you go up and down stairways.

All steps, walkways, and stairs must be kept free of obstructions and slippery material such as oil and grease. Tools, equipment, and material must not be left on walkways. When walkways and steps are provided, they must be used. Do not take shortcuts.

Standard handrails must be provided on stairs once the elevation change exceeds 30” or four steps. The use of colors to mark elevations changes is encouraged.

Secure hoses and electrical cords to the floor or ground whenever they are laid across walkways. Never run a hose or other lines up the stairs. Run the lines between the mid rail and toe-board of the guardrails mounted on the floors.

During winter, be careful of icy walkways. Keep hands free and out of the pockets.

TRAINING

Employees shall be trained on ladder safety and use at the time of initial hire, annually and as needed as determined by a competent person. Training may be provided internally or using external contractors.

The program shall enable each employee to recognize hazards related to ladders and stairways, and shall train each employee in the procedures to be followed to minimize these hazards.

The Project Safety Director shall ensure that each employee has been trained by a competent person in the following areas, as applicable:

- The nature of fall hazards in the work area;
- The correct procedures for erecting, maintaining, and disassembling the fall protection systems to be used;
- The proper construction, use, placement, and care in handling of all stairways and ladders;
- The maximum intended load-carrying capacities of ladders; and
- The standards contained in 1926.1053 Subpart X.

SECTION 7: BLOODBORNE PATHOGENS

PURPOSE

Eastern Exposure Control Plan has been developed to comply with OSHA's Blood Borne Pathogens Standard, 29 CFR 1910.1030.

SCOPE

This plan applies to all employees at Eastern who may have exposure to blood or other potentially infectious materials (OPIM).

EXPOSURE DETERMINATION

At Eastern, employees who are trained to provide First Aid / CPR may find it necessary to provide basic first aid treatment for injured employees. Employees may also be involved in the cleaning or disinfecting of equipment after an exposure incident. As such, the potential for employee exposure is considered to be incidental as these are collateral duties to their routine work assignments.

COMPLIANCE METHODS

The Safety Director is the designated program coordinator.

Universal precautions will be observed at Eastern to prevent contact with blood or other potentially infectious materials. All blood or OPIM will be considered infectious regardless of the perceived status of the source individual.

Employees are required to wash their hands with soap and water immediately after an exposure incident. Hand-washing facilities equipped with anti-microbial soap are available to employees in each of the facilities restrooms.

Eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lenses are prohibited in work areas where there is a reasonable likelihood of occupational exposure.

CONTAMINATED EQUIPMENT

Equipment that has become contaminated with blood or other potentially infectious materials shall be examined prior to servicing and shall be decontaminated as necessary unless the decontamination of the equipment is not feasible. A readily observable label shall be attached to the equipment stating which portions remain contaminated. This information shall be conveyed to all affected employees, the servicing representative, and/or the manufacturer, as appropriate, and prior to handling, servicing, or shipping so that appropriate precautions will be taken.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All PPE required to protect employees from exposure to blood or OPIM will be provided by Eastern at no cost to employees. All employees are to be trained on the PPE contained in the blood borne pathogens kits and their locations.

All clothing and equipment that become contaminated are to be removed prior to leaving the work area. Any PPE that is penetrated by blood or OPIM shall be removed immediately and replaced with new PPE.

When PPE is removed, it shall be placed in an appropriately designated area or container for storage, washing, decontamination or disposal.

Gloves shall be worn where it is reasonably anticipated that employees will have hand contact with blood, OPIM, non-intact skin, mucous membranes, and when handling or touching contaminated items or surfaces.

Disposable (single use) gloves shall not be washed or decontaminated for re-use. They shall be replaced as soon as practical when they become contaminated or as soon as feasible if they are torn, punctured, or when their ability to function as a barrier is compromised.

Masks in combination with eye protection devices, such as goggles or glasses with solid side shields, or chin length face shields, shall be worn whenever splashes, spray, splatter, or droplets of blood or other potentially infectious materials may be generated and eye, nose or mouth contamination can reasonably be anticipated.

HOUSEKEEPING

All equipment and working surfaces that have been contaminated shall be cleaned and decontaminated as soon as possible. Decontamination can be performed with any EPA registered germicide in compliance with the manufacturer's directions.

WASTE DISPOSAL

Regulated waste and material that cannot be decontaminated must be disposed of in a container that is closable, constructed to prevent leakage during storage or transport, and color-coded.

Warning labels shall be affixed to containers of regulated waste. These labels shall include the title "Biohazard", shall be fluorescent orange or orange-red with the lettering in contrasting colors, and shall be affixed by a method that prevents their loss or unintentional removal. Red bags or red containers may be substituted for labels.

Reusable containers shall not be opened, emptied, or cleaned manually or in any other manner that would expose employees to risk.

HEPATITIS B VACCINATION & POST-EXPOSURE EVALUATION & FOLLOW-UP

Following an exposure incident, all involved employees are offered Hepatitis B Vaccinations. Hepatitis B vaccinations, post-exposure evaluations and follow-up will be at no cost to the employee, at a reasonable time and place and under the supervision of a licensed healthcare provider.

Employees who decline to accept the hepatitis B vaccination must sign the Declination Statement found at the end of this policy.

If the employee initially declines the hepatitis B vaccination, but at a later date, while still covered under the standard, decides to accept the vaccination, the vaccination shall be made available at that time.

When an exposure incident occurs, the employee is required to immediately notify their immediate supervisor. All employees who incur an exposure incident will be offered a post-exposure confidential medical evaluation and follow-up.

Information regarding the source individual's infectious status shall be made available to the healthcare provider and exposed employee, *if known.* By law, the source individual is *not* required to submit to testing or to disclose information regarding their infectious status.

INFORMATION PROVIDED TO THE HEALTHCARE PROFESSIONAL

The healthcare professional responsible for the employee's Hepatitis B vaccination shall be provided a copy of 29 CFR 1910.1030, OSHA's Blood Borne Pathogens standard (Appendix).

The healthcare professional evaluating an employee after an exposure incident shall be provided the following information:

- A copy of 29 CFR 1910.1030, OSHA's Bloodborne Pathogens standard;
- A description of the exposed employee's duties as they relate to the exposure incident;
- Documentation of the route(s) of exposure and circumstances under which the expose occurred;
- Results of the source individual's blood testing, *if available*; and
- All medical records relevant to the appropriate treatment of the employee, including vaccination status.

HEALTHCARE PROFESSIONAL'S WRITTEN OPINION

Eastern shall provide the employee with a copy of the evaluating healthcare professional's written opinion within 15 days of the completion of the evaluation.

The healthcare professional's written opinion for hepatitis B vaccination shall be limited to whether the hepatitis B vaccine is indicated for an employee, and if the employee has received such vaccination. The healthcare professional's written opinion for post-exposure evaluation and follow-up shall be limited to the following:

- That the employee has been informed of the results of the evaluation; and
- That the employee has been told about any medical conditions resulting from the exposure to blood or other potentially infectious materials which require further evaluation or treatment.

All other findings or diagnoses shall remain *confidential* and shall not be included in the written report.

TRAINING

Training for all employees covered by this policy, will be provided at the time of initial assignment and again annually. Training records shall be maintained for at least three (3) years. Additional training shall be provided when changes in procedure affect the employee's occupational exposure. The additional training may be limited to addressing the new exposures created.

The training program shall contain at a minimum the following elements:

- The location of the Eastern Blood Borne Pathogens Program; and
- How to obtain a copy of the Blood Borne Pathogens Program and the OSHA Standard (1910.1030); and
- A general explanation of the epidemiology and symptoms of Blood Borne diseases; and
- An explanation of the modes of transmission of Blood Borne pathogens; and
- An explanation of the control methods that will be used at the facility to control exposure to blood or other potentially infectious materials; and
- Information on the types, proper use, location, removal, handling, decontamination and disposal of personal protective equipment; and
- An explanation of the basis for selection of personal protective equipment; and
- Information on the Hepatitis B vaccine, including information on efficacy, safety, method of administration, the benefits of being vaccinated; and
- An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available; and
- Information on the post-exposure evaluation and follow-up; and
- Explanation of signs and labels used at the facility; and
- An opportunity for interactive questions and answers with the person conducting the training.

RECORDKEEPING: MEDICAL RECORDS

A complete and accurate record of training, medical treatment and vaccination history will be maintained for each employee covered by this program for the duration of the employee's employment plus a period of thirty (30) years. All records are to be maintained in the Human Resources office.

AVAILABILITY OF RECORDS

Employee training records shall be provided upon request for examination and copying to employees and/or representatives of the employee.

Employee medical records shall be provided upon request for examination and copying to the subject employee and to anyone having written consent of the subject employee.

HEPATITIS B VACCINE DECLINATION (MANDATORY)

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself.

However, I decline Hepatitis B vaccination at this time. I understand that declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Name: _____

Signature: _____

Date: _____

SECTION 8: MOTOR VEHICLE SAFETY POLICY

POLICY

As employees operate company owned, leased, rental or personal vehicles as part of their jobs they are expected to operate vehicles safely to prevent accidents that may result in injuries and property loss. It is the policy of Eastern to provide and maintain a safe working environment to protect our employees and the citizens of the communities where we conduct business from injury and property loss.

Elements of this program include:

- Assigning responsibilities at all levels of employment.
- Vehicle use and insurance requirements.
- Employee driver's license checks and identification of high-risk drivers.
- Accident reporting and investigation.

SCOPE

This policy applies to employees who operate vehicles on company business and will be reviewed by managers and supervisors to ensure full implementation and compliance.

ORGANIZATION AND RESPONSIBILITIES

The Safety Director will implement the Motor Vehicle Safety Program. He shall establish measurement objectives to ensure compliance with the program and provide assistance and the resources necessary to implement and maintain the program.

Employees are required to report all motor vehicle accidents, regardless of severity, immediately to company management. The Safety Director will investigate all accidents involving a motor vehicle while on company business.

Drivers shall always operate a motor vehicle in a safe manner. They are to maintain a valid driver's license and minimum insurance requirements on personal vehicles used in company business. Assigned company vehicles must be maintained according to the manufacturers recommended standards.

VEHICLE USE

Company Owned Vehicles

Employees who are at least 21 years of age and authorized by their supervisors will be permitted to operate a passenger car, van or truck to conduct company business. Only the driver and other Eastern employees on the clock will be allowed to be in the vehicle unless approved by the General Manager. Vehicles are not allowed to be driven for personal use.

Personal Vehicles Used for Company Business

Employees who drive their personal vehicles on company business are subject to the requirements of this program including:

1. Maintaining auto liability insurance with minimum limits of $100,000/$300,000 for bodily injury and $50,000 for property damage with combined single limit of $300,000.

2. Maintain current state vehicle inspections when required.

3. Maintain their personal vehicle in a safe operating condition when driven on company business.

DRIVER SELECTION

Employees who wish to conduct work for Eastern that requires the use of a company owned vehicle must submit to an evaluation of the following items:

Motor Vehicle Record (MVR) – a three year history must be provided prior to beginning work and annually thereafter. This report must meet the requirements of the Eastern MVR Criteria below.

Minor Violations: no more than two (2) moving violations or one (1) at-fault accident in the previous 36 months.

Major Violations: no occurrences during the previous 36 months:

- DUI / DWI, or
- Driving in Possession of Drugs or Alcohol, or
- Refusal to submit to a blood, urine or breath test, or
- Reckless Driving, or
- Any Vehicular Felony, or
- Driving with a Suspended or Revoked License, or
- Careless Driving, or
- Driving in Excess of 30 Miles over the Posted Speed Limit.

Driver's License – the employee must be able to provide a valid driver's license.

Insurance – employees driving personal vehicles must provide proof of insurance that meets the requirements of this policy.

ACCIDENT REPORTING PROCEDURE

Employees will take the following actions when there are injuries to persons and/or damage to other vehicles or property:

1. If possible, move the vehicle to a safe location out of the way of traffic. Call for medical attention if anyone is hurt.

2. Since the driver is the first person at the accident scene, he/she will initiate the information-gathering process as quickly and thoroughly as is feasible. Secure the names and addresses of drivers and occupants of any vehicles involved their operator's license numbers, insurance company names and policy numbers, as well as the names and addresses of injured persons and witnesses. Record this information on the Accident Report form. **Do not discuss fault with, or sign anything for anyone except an authorized representative of Eastern or a police officer.**

3. Take photos of the scene. Photos should show damage to equipment and the area but not be of any persons involved with the accident.

4. Contact your immediate supervisor.

SECTION 9: HEARING CONSERVATION

PURPOSE

Exposure to high sound levels in the work environment may cause temporary or permanent hearing loss, with the extent of damage depending primarily on the intensity of the sound and the duration of the exposure.

Although there are no operations that currently exceed 85 dBA over an 8-hour TWA, isolated activities do occur which could exceed 90 dBA in short durations. The position of Eastern is to take all reasonable steps to minimize employee exposure to noise however isolated. This will include proper engineering and administrative controls where feasible and the establishment of components of a hearing conservation program.

This program contains steps that will be immediately implemented and compliant with OSHA Hearing Conservation Standard (29 CFR 1910.95) in the event operations change which would increase employee exposure to noise.

SCOPE

The program applies to all employees, temporary labor and subcontractors hired to perform work on behalf of Eastern.

RESPONSIBILITIES

The Safety Director is responsible for the oversight and support of the company Hearing Conservation Policy.

Field Superintendents, Supervisors and Lead Mechanics are to lead by example by following the requirements of the program.

Employees shall notify management of any concerns regarding potential noise exposures.

MONITORING

Operations conducted by Eastern do not currently exceed the 85dBA Action Level established by OSHA. Noise monitoring will be conducted if there is a change in production, process, equipment, or when there is reason to believe employee noise exposure levels may have changed. Hearing protection will be required during the period between notification of the noise exposure and the monitoring to ensure employees are protected.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Personal protective equipment will be provided for employee usage on a voluntary basis at no cost to the employee. Should hearing protection become mandatory, Eastern will evaluate the types available to ensure adequate protection is provided. Employees will be provided with multiple types of hearing protection to ensure fit and comfort.

Employees may not bring any hearing protection devices to the workplaces that have not been provided by Eastern unless it has previously been in approved in writing. At no time are employees allowed to wear hearing protection with built in radios used for playing music.

TRAINING

Training will be done on an annual basis and when changes occur to the work process that would affect the type of hearing protection necessary. The training program will cover the following elements:

- The effects of noise on hearing and current noise exposure levels
- The purposes of hearing protectors, the advantages, disadvantages, and attenuation of various types, and the instructions on the selection, fitting, use, and proper care of hearing protectors; and
- The purpose of audiometric testing and an explanation of the test procedures.

ACCESS TO INFORMATION AND TRAINING

Eastern shall make available to affected employees or their representatives copies of 29 CFR §1910.95, Occupational Noise Exposure. (A copy of the standard can be found in Appendix of this policy)

AUDIOMETRIC TESTING

Should noise monitoring results indicate an exposure above the OSHA Action Limit (85 dBA over 8 hr TWA), Eastern will immediately implement an audiometric testing program for employees. The testing program will include the following components:

Baseline Testing – All new hires and current employees who work in an area found to be above the Action Limit shall receive a baseline hearing test. New hires will receive this evaluation during their first six months of employment.

Annual Audiograms – Employees entered into the Hearing Conservation Program shall be evaluated on an annual basis. Hearing exams shall be conducted at a time when employees have been removed from workplace noise for a period of at least 14 hours. Any employee who exhibits a Standard Threshold Shift in the hearing shall be notified in writing within 21 days.

In the event an STS is found during an annual audiogram, a follow up exam shall be scheduled for the employee to verify the initial test. PPE shall be re-evaluated to ensure proper fit and adequacy for the work being performed. An appointment with a licensed healthcare provider may be scheduled to properly fit PPE for employees with a confirmed STS.

RECORDKEEPING

If applicable, noise exposure measurement records will be retained on file in the Eastern Human Resources office.

Audiometric test records (if necessary) will be maintained for the duration of the affected employee's employment. These records shall include:

- Name and job classification of the employee;
- Date of the audiogram;
- The examiner's name;
- Date of the last acoustic or exhaustive calibration of the audiometer; and
- Employee's most recent noise exposure assessment.

Eastern will maintain accurate records of the measurements of the background sound pressure levels in audiometric test rooms.

All records specified above shall be provided upon request to employees, former employees, and representatives.

If Eastern ceases to do business, they will transfer to the successor employer all records required to be maintained, and the successor employer shall retain the records for the duration of the employee's employment.

SECTION 10: LOCKOUT / TAGOUT

PURPOSE

The purpose of this procedure is to specify the actions that will be taken to prevent employee injuries due to the unexpected start-up of machinery and equipment during servicing and/or maintenance, in accordance with guidelines set forth by the Occupational Safety & Health Administration (OSHA).

SCOPE

This procedure applies to the control of hazardous energy (lockout/tagout) during the servicing and/or maintenance of machines and equipment. All authorized and affected employees, as defined below, are covered by the scope of this procedure.

DEFINITIONS

Authorized Employee – A person who uses locks and/or tags to control the release of hazardous energy when performing servicing or maintenance on machinery or equipment. See “List of Authorized Employees” in Appendix.

Affected Employee – An employee whose job requires him / her to operate, use or work in an area where a machinery or equipment is serviced or maintained under lockout/tagout.

Lockout Device – A device that uses a positive means, such as a lock, to hold an energy isolating device in a safe position and prevent the energizing of a machine or equipment.

Lockout – The placement of a lockout device on an energy isolating device ensuring that the equipment being controlled can't be operated until the lockout device is removed.

RESPONSIBILITIES

Safety Director shall ensure that effective written procedures are in place for machinery or equipment. He shall conduct training for all Authorized employees to ensure they understand the lockout procedures and will conduct training for all Affected Employees to ensure they understand and recognize equipment that is locked out and the potential hazards in the area.

Field Superintendents, Supervisors and Lead Mechanics will enforce the use of proper lockout procedures.

Authorized Employees are responsible for following the necessary Lockout/Tagout Procedures when servicing or maintaining equipment.

Affected Employees / Other Employees shall observe all warning tags and will not attempt to operate any machinery or equipment that is under the control of a lockout / tagout.

PROCEDURE

The following procedure applies to equipment with a single power source and does not have the capacity to store energy. Examples of stored energy include pressurized lines, springs, capacitors, thermal energy, potential energy (gravity) and tension. Equipment not meeting these criteria or that have the possibility of re-accumulating energy are De-Energized using the applicable Machine Specific Procedures found in the Appendices.

De-Energization

1. Notify any Affected Employees that the equipment is to be locked out for service.
2. Shut down the equipment using the normal stopping methods (e.g. depress stop button, etc.).
    a. In the event that protective covers must be removed to make adjustments on energized equipment, appropriate guards must be constructed and attached in such a manner as to prevent employee contact with live circuitry capable of causing human injury. Such guards must be of durable construction, adequate to prevent injurious contact, and remain in place at all times that the equipment is energized.
3. Each person working on the circuit or piece of equipment shall place a personal padlock and warning tag on the energy isolation device (e.g., disconnect switch).
4. Each person working on the circuit or piece of equipment shall attempt to energize or start the piece of equipment prior to starting work. Each on/off switch capable of energizing the equipment must be "tried."
    a. If the try step reveals that the equipment is capable of being energized, the proper disconnects must be located and locked out and the try step repeated.
5. As each person completes his or her task, they shall remove their personal padlock and tag from the energy-isolating device.
6. In the event that personnel cannot repair the unit they are working on, and it is unlikely that they will be the personnel returning to complete the repair, personal padlocks and tags will be removed and a company padlock and tag will be installed. The person whose company padlock is installed will notify the office the condition the equipment has been left in.
7. The personnel arriving to complete the repair, upon viewing the company padlock and tag, will contact the office and the owner of the company padlock and tag to ascertain the condition of the equipment. Only then may the company padlock and tag be removed and personal padlocks be installed. The company padlock and tag will then be returned to the office to be returned to the person whose name is on the tag.
8. Construction jobs that have not been state inspected and turned over to the customer will be left with the disconnect switch "off" and a company lock and tag with the mechanic's name will be installed.

Re-Energization

1. Once servicing is complete, remove all tools, spare parts, etc. from the equipment.
2. All protective covers or panels shall be securely re-attached prior to energizing the equipment after work is completed.
3. Make sure all employees are clear of the equipment.
4. Notify all affected employees that the lockout is about to be removed and the equipment is about to be re-energized.
5. All authorized employees remove their own lock(s). No one may remove another employee's lock with the following exception. If the authorized employee who installed the lock is not available when the work is completed, the Safety Director may remove this lock only after all of the following conditions have been met:
   - it is verified that the employee is not on site
   - all reasonable efforts are made to contact the employee and notify him/her that the lock is being removed
   - the employee is made aware of the removal of the lock before he/she resumes work on site
6. The authorized employee(s) re-energize the machine at the main power source(s).

SHIFT OR PERSONNEL CHANGES

Whenever one authorized employee takes over for another authorized employee during a lockout situation (i.e. shift change), the person who is taking over the job shall apply his/her lock(s) before the employee who is leaving the job removes his/her lock(s).

Exchanging keys and using the same locks is not an acceptable means to comply with this section.

GROUP LOCKOUT / TAGOUT

In the event multiple employees are simultaneously working on a single piece of equipment or system, each shall have their own uniquely identifiable lock placed on the energy isolating device. Multiple locks shall be accommodated using a multi lock hasp. During these situations, the authorized employee who de-energized the equipment shall have primary responsibility for the group and his / her lock is to be removed last.

LOCKOUT / TAGOUT EQUIPMENT

Authorized Employees are assigned individually identifiable locks. Every person qualified to work on electrical equipment will carry one personal padlock and two company padlocks. No two personal padlocks are keyed the same.

These locks are for use only by the person to whom it has been assigned and only for lockout purposes. It is each Authorized Employee's responsibility to store and use these locks properly. Additional locks can be obtained from the Lockout Stations or Mechanics in the field.

CONTRACTORS

When an outside contractor needs to perform service or maintenance on equipment that needs to be locked out, the Safety Director or his designee authorizing the contract work must first review this Lockout/Tagout procedure, with the contractor.

They are then responsible for making sure that the contractor complies with the minimal requirements of this procedure.

ANNUAL AUDIT

The Lockout/Tagout Procedure and any Machine Specific Procedures shall be reviewed annually to ensure that the requirements of the OSHA standard are being met. This review is to be documented and kept on file with this program.

Authorized Employee(s) are to be evaluated annually on each of the Lockout / Tagout procedures they are authorized to conduct. The evaluation is to be conducted by another Authorized employee who is familiar with the specific procedure being completed using the Periodic Lockout Audit Form.

TRAINING

Upon initial job assignment, Authorized Employees shall receive training on the proper use of energy control procedures. All training shall be documented, signed, certified and maintained by the Human Resources Manager. Affected / Other Employees shall be instructed in the purpose of this procedure and the means to recognize lockout situations.

Affected Employees shall be instructed in the purpose of this procedure and the means to recognize lockout situations.

Training is conducted:

- At the time of initial job assignment
- When changes in job assignments present new hazards
- When there are changes in the energy control procedures
- When the Annual Audit reveals inadequacies in employees' use or knowledge of the energy control procedures

LIST OF AUTHORIZEDLOCKOUT / TAGOUT EMPLOYEES

SEE APPENDIX B

LOCKOUT / TAGOUT PERIODIC OBSERVATION FORM

On _____, _____ was evaluated performing the Eastern Elevator Lockout / Tagout procedure while working on _____.

During the evaluation, _____, exhibited competence in understanding the procedure and the hazards associated with the equipment.

_____ _____

Observer Authorized Employee

EQUIPMENT SPECIFIC LOCKOUT/TAGOUT PROCEDURE

Equipment Name:		**Location:**	
Date Issued:		**Date Revised:**	
Affected Employees:			

LOCKOUT / TAGOUT STEPS

1. Notify Affected employees that a Lockout / Tagout is in process

2. If the machine is running, shutdown using the normal operating controls:

Type	Location

3. Isolate the Machine from its Energy Sources in the following sequence:

Type	Magnitude	Location	Disconnect Method	Method of Securing
Electrical	volts			
Hydraulic				
Pneumatic	psi			
Thermal	deg			
Gravity				
Mechanical				
Chemical				
Other				

4. Apply Locks and Tags to each Energy Source

5. Release stored energy and block moving or raised parts in the following sequence:

Type	Method to Control or Release

6. With energy isolated, verify that the machine is disconnected from its power source(s):

(Caution! After verification, return the operating controls to the neutral of OFF position.)

You may now proceed with your work

RESTORING MACHINE TO SERVICE

1. Clear all tools and parts from inside and around the machine

2. Replace any guards that may have been removed

3. Make sure all employees are at a safe distance from the machine

4. Make sure normal operating controls are still in the “neutral” or “off” position

5. Remove all Energy Isolation Devices from the machine and restore all power to the machine

6. Notify Affected Employees that the Lockout / Tagout is complete and the machine is ready for use

SECTION 11: FIRE PREVENTION

PURPOSE

The purpose of this policy is to outline prevention and protective measures which should be taken to ensure protection of personnel, property, and the environment from a fire incident.

The Safety Director is the designated program coordinator and has overall responsibility for the program. He will ensure that the program is updated, as necessary, and is available for employees to review.

SCOPE

This policy applies to all employees, temporary labor or subcontractors performing work on behalf of Eastern.

RESPONSIBILITIES

Safety Director is responsible for the oversight and support of the Eastern Fire Prevention Program. He shall ensure employees have been provided with adequate time for training on the safe use of fire extinguishers. He shall also ensure that adequate extinguishers are available on jobsites and that monthly visual inspections are conducted.

An outside vendor shall be contracted to conduct required annual inspections on firefighting equipment.

Field Superintendents / Lead Mechanics shall ensure that all firefighting equipment is accessible and in proper working condition. They will conduct inspections on fire extinguishers monthly. The inspection must be documented on the back of the extinguisher tag or on an inspection log.

Employees are only to use chemicals in containers that are properly labeled. They shall notify their supervisor immediately if any sign of fire is detected.

FIRE PREVENTION

Trash should be removed daily from the work area. Drums should be utilized to reduce extra material handling.

Empty Compressed Gas Cylinders should be stored separate from full cylinders. Oxygen storage shall be stored separate from fuel gas cylinders by at least 20 feet or by a 5-foot-high barrier with at least a ½ hour fire rating. Oil and grease is to be kept away from oxygen valves. Cylinders are to be turned off when not in use and kept safe from excessive heat.

Areas must be checked for combustible materials prior to performing hot work. Combustible materials that cannot be moved must be covered with fire retardant materials. Temporary heating devices must have automatic fuel shut-off valves must be present. Oil heating units must be cooled prior to refilling. Adequate clearance must be maintained around combustible materials.

Smoking is prohibited in the vicinity of flammable or combustible liquids.

FLAMMABLE AND COMBUSTIBLE LIQUID STORAGE

Only approved containers and portable tanks shall be used for storage and handling.

All liquids with a flash point below 140 degrees F are referred to as "flammable liquids." Handle small quantities (five-gallon maximum) in "safety cans."

Flammable or Combustible Liquids shall not be stored in areas used for exits, stairways, or normally used for the safe passage of personnel.

INDOOR STORAGE OF FLAMMABLE AND COMBUSTIBLE LIQUIDS

No more than twenty-five (25) gallons of flammable or combustible liquids are to be stored inside a building unless stored in an approved storage cabinet and labeled "flammable - keep fire away."

No more than sixty (60) gallons of flammable or one hundred and twenty (120) gallons of combustible liquids may be stored inside of a single storage cabinet inside a building. No more than three (3) storage cabinets are allowed in a single building when containing the maximum amount allowed.

HANDLING FLAMMABLE AND COMBUSTIBLE LIQUIDS

Dispensing of flammable or combustible liquids from one container to another shall be separated from other operations by a distance of not less than twenty five (25) feet.

Dispensing of flammable or combustible liquids from one container to another shall be separated from other operations by a distance of not less than twenty five (25) feet.

Containers shall be bonded when transferring flammable liquids from one container to another.

Approved self-closing valves shall be used for dispensing of flammable or combustible liquids.

Flammable or combustible liquids shall be drawn or transferred by either gravity or pump only. Never transfer by means of air pressure on the container or portable tank.

Flammable liquids shall be kept in closed containers when not actually in use.

Precautions shall be taken to eliminate leakage or spillage of flammable and combustible liquids where necessary such as the use of funnels.

Leakage or spillage from flammable and combustible liquids must be promptly cleaned up and properly disposed of.

TRAINING

All employees receive fire extinguisher training at their time of hire and again annually. Training includes basic fire extinguisher use and principles, fire classifications, extinguishing methods and the limitations of extinguishers. Whenever personnel are assigned as fire watch they shall receive additional training. Fire watches are to be at the site prior to beginning hot work and thirty minutes after hot work is complete. Fire watches are to have no other duties during the time they are acting as a fire watch.

All personnel which may be required to use fire extinguishers shall be trained in the proper type, use, care, and technique for fighting incipient stage fires.

Hot work is to be scheduled as early in the day whenever possible.

FIRE EXTINGUISHERS - MOUNTING AND ACCESS

Extinguishers are not to be left on the floor, or a scaffold, or on the ground. They are to be mounted on a wall, handrail, barricade, etc.

Extinguishers should be located where they can be easily seen. In cases where this is not practical, signs or red paint marking, need to be added to identify the location of the extinguisher.

Keep trash and stored material away from extinguishers to prevent blockage of the access to the extinguisher.

FIRE EXTINGUISHERS - INSPECTION AND TESTING

Eastern will ensure that all emergency and fire suppression equipment is maintained in good working condition in accordance with local, state, and federal regulations. The following audits/inspections will be performed:

- All Portable extinguishers will be inspected monthly by the Field Superintendent or his designee. Inspections are to be recorded on the individual tags or inspection log.

- Annual maintenance checks on all fire extinguishing equipment will be conducted through a third-party inspection company. A record of this testing will be kept on file and maintained for a period of (1) year.

- Hydrostatic Tests are to be conducted in accordance with manufacturer's and NFPA recommendations by an outside contractor.

SECTION 12: CONFINED SPACE

PURPOSE

The intent of this program is to comply with the requirements of the OSHA Confined Space standard, 29 CFR 1926 SubPart AA. Under this program, all confined spaces are to be identified and evaluated for hazards and relevant information prior to the commencement of work.

Information obtained from the Hazard Assessments is to be communicated to all employees and subcontractors involved with the Confined Space entry including entrants, attendants, site supervisors and rescuers.

SCOPE

This policy applies to all employees, temporary labor or contractors performing work on behalf of Eastern.

HAZARD ASSESSMENT

A Hazard Assessment of all confined spaces will be conducted at each job site and documented. This document is to be used to evaluate all confined spaces and their potential hazards.

The Safety Director or another Competent Person will conduct these surveys to determine the types of confined spaces so proper procedures can be developed to control hazards. Eastern will not conduct entries into confined spaces concurrently with other companies. Employees are prohibited from acting as an Entrant, Attendant, Entry Supervisor or Rescuer for any other company.

Whenever possible, spaces will be reclassified or entered using alternate procedures to reduce the risk during entry. Eastern will not conduct any work in spaces identified as Immediately Dangerous to Life or Health (IDLH).

Confined Space Hazard Assessments shall be kept on file with the Safety Director and will be:

- Reviewed as part of the annual assessment.
- Updated whenever entry into the confined space has identified a hazard not previously documented.
- Created whenever new confined spaces are identified where work is to be performed.

When workplace changes occur that could affect a confined space, the space must be reevaluated. Under certain circumstances, a non-permit space could become permit-required. Factors that may alter a confined space include:

- A change in the configuration of a space that could alter the entrance or interior structure.
- A change in equipment being used in the space that may increase or decrease the volume of air within the space.

- A change in the work to be conducted or a change in the process being used to conduct work that causes it to be permit-required.

TRAINING

All employees shall receive training on confined space awareness prior to their initial assignment. Training shall include the following:

- Definition of confined space and examples of typical confined spaces
- Identifying permit required confined space
- Hazards of confined space work

Employees authorized to conduct permit required confined space operations shall receive additional training that covers the roles of entrants and attendants. Employees deemed competent persons shall also receive instruction on the roles of entry supervisors.

All other employees shall be instructed that entry into a permit required spaces is prohibited.

Rescue training on non-entry retrieval shall be conducted on a case by case basis prior to the entry. Training shall include the equipment to be used and the space to be entered (or similar space).

Refresher training shall be conducted on an annual basis for all employees. Additional retraining shall be conducted if a new type of entry is to be conducted, following an incident or when an employee is observed operating in violation of the confined space program.

All training records shall be certified and include each employee's name and dates of training and the name of the instructor. Records of completed training shall be kept electronically or in each employees file.

PRE-ENTRY PROCEDURES

Prior to entry of any confined space, each authorized employee will be given information by the Field Superintendent, in which there will be a review of:

- The hazardous chemicals used or encountered while performing work within the confined space.
- Lock Out / Tag Out requirements of the confined space.
- Any hazardous atmospheres identified through air testing of the confined space.
- Procedures developed to reduce the hazards posed by the confined space. Procedures developed to reduce the hazards posed by the confined space such as pedestrians, vehicles or other work being completed in the area such as:
    - Barricades around the opening
    - Traffic control / flaggers around the zone
    - Scheduling the work during off-peak hours to avoid other contractors conducting activities nearby

PERMITTING

A Confined Space Entry Permit shall be used at all times when real or potential Physical Hazards or Atmospheric Hazards are found to be present (see definitions). Permits shall also be used for Non-Permit Confined Spaces when required by site hosts. A copy of the permit is found at the end of this policy.

Permits are to be completed by the Entry Supervisor and must contain the following information at a minimum:

- The permit space to be entered;
- The purpose of the entry;
- The date and the authorized duration of the entry permit;
- The names of authorized entrants;
- The names of authorized attendants;
- The name of the entry supervisor;
- The hazards of the permit space to be entered;
- The measures used to isolate the permit space and to eliminate or control permit space hazards before entry;
- The acceptable entry conditions;
- The results of initial and periodic tests of the atmosphere;
- The rescue and emergency services that can be summoned and the means for summoning those services;
- The communication procedures used by authorized entrants and attendants to maintain contact during the entry;
- Testing equipment, PPE and communications equipment necessary for safe entry;
- Any other information necessary to ensure employee safety

Permits are to be suspended under the following conditions:

- Conditions change that create unexpected hazards

Permits are to be terminated if during the suspension, the conditions cannot be returned to the original permitted conditions through the use of control measures or if:

- The work has been completed, or
- The duration has expired, or
- The scope of work changes.

DUTIES

Entrants

Eastern considers any employee who breaks the plane of a confined space during work to be an entrant. Prior to the commencement of work, entrants must be trained on the following:

- The hazards of the space.
- Equipment necessary to remove or control the hazards such as PPE, lockout / tagout, fans, etc.

- The method of communication to be used between the entrant and the attendant.

Entrants shall notify the attendant whenever conditions change, work outside of the permit specifications is required or they recognize a warning sign or symptom of exposure.

Entrants must exit the space immediately when ordered to do so by the attendant, when an alarm system is activated or they recognize a warning sign or symptom of exposure.

ATTENDANTS

An attendant shall be posted at the entrance to each confined space while an entrant is inside. Attendants are prohibited from monitoring more than one space at any given time. Prior to the commencement of work, attendants must be trained on the following:

- The hazards of the space and signs and symptoms of exposure including potential behavioral changes of the entrant.
- The method of communication to be used between the entrant and the attendant.

Attendants must maintain an accurate headcount of all entrants and maintain regular communication.

Attendants may not leave the space they are monitoring unless they are relieved by another authorized attendant who is listed on the permit.

While monitoring an entry, attendants are prohibited from performing any other duties outside of the scope of their responsibilities. Work to be performed by an attendant could include tasks such as air monitoring of the space, sounding an alarm, summoning rescuers, ordering an evacuation of the space or preventing unauthorized entry into the space. When air monitoring is necessary, attendants shall monitor the space continuously and document the results every half hour for the duration of the entry. This procedure shall be followed regardless of whether clean air is being supplied from outside of the space.

Attendants may conduct non-entry rescues if necessary. Under no circumstances may an attendant perform a rescue that requires entry unless all of the following conditions are met:

- They are a trained rescuer
- They have been relieved by another trained attendant listed on the permit
- The proper equipment necessary to protect them from hazards within the space is available

ENTRY SUPERVISOR

A competent person shall be assigned as the entry supervisor for any confined space entered by Eastern employees. They must be knowledgeable of the hazards faced during an entry and develop an effective plan to ensure worker safety.

They are also responsible for identifying the past and present uses of the space, conducting initial air monitoring, identifying physical hazards and completing the entry permit. Air monitoring equipment shall be field calibrated (bump tested) in accordance

with manufacturer instructions. Entry Supervisors shall offer entrants the opportunity to be present during testing of the equipment. Additional testing is to be conducted at the request of any affected employee.

Eastern employees are prohibited from entering spaces that contain atmospheric hazards or uncontrolled physical hazards. In the event a situation arose that required an exception to this policy. The Entry Supervisor is responsible for ensuring properly trained rescue personnel are available on site during the entry.

RESCUERS

Eastern does not have trained rescue personnel. In the event on site rescue is required on site, a third party would be contracted for rescue operations.

RESCUE

In the event an on-site rescue team is necessary; the Safety Director is responsible to contract with an outside rescue service. This service must be given the location, configuration and an opportunity to conduct practice rescues.

CONTRACTORS

In the event a contractor is hired to perform confined space work on behalf of Eastern, the sub-contractor engaged in the work shall be covered by this policy.

After each confined space entry made by a contractor, a post review shall be performed and documented to determine if new or previously unidentified hazards are within the confined space.

The Safety Director shall certify that post entry reviews have been accomplished. The certification shall contain each contractor's name and dates of the entry. Documentation shall be filed and maintained for 12 months from the date on which the entry occurred.

ACCESS

Employees shall be provided access to this Plan by requesting it verbally or in writing to the Safety Director or his designee. If requested, the employee shall be provided a copy of this document by the end of the next business day.

DEFINITIONS

Confined Space-

1. Is large enough or so configured that an employee can bodily enter and perform work.

2. Has limited or restricted means for entry or exit (i.e. tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry).

3. Is not designed for continuous employee occupancy.

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

1. Contains or has a potential to contain a hazardous atmosphere.

2. Contains a material that has the potential for engulfing an entrant.

3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly covering walls or by a floor which slopes downward and tapers to a smaller cross-section.

4. Contains any other recognized serious safety or health hazard.

Each Permit-Required Confined Space will be marked "Confined Space - Entry Permit Required".

Hazardous Atmosphere- is an atmosphere that may expose employees to the risk of death, incapacitation, and impairment of ability of self-rescue, injury or acute illness from one or more of the following causes:

- Flammable gas or vapor or mist in excess of 10% of the Lower Flammable Limit (LFL);
- Airborne combustible dust at a concentration that meets or exceeds LFL;
- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
- Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published and could result in employee exposure in excess of its does or permissible exposure limit;
- Any other atmospheric condition that is immediately dangerous to life or health.

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

Authorized Entrant- means an employee who is authorized by the employer to enter a permit space.

Confined Space Assessment Form

Location of Space:	Type of Space:
Dimensions:	
Date of Assessment:	

A. Confined Space Determination

1. Area was NOT designed for continuous human occupancy. ☐ YES ☐ NO
2. Area can be bodily entered and assigned work performed. ☐ YES ☐ NO
3. Area has limited and or/restricted means of access and egress. ☐ YES ☐ NO

If you answered yes to ALL of the above, then the space has met the criteria for a confined space. Please move on to the next section.

B. Permit-Required Confined Space Determination

1. Does the space have or have the potential for a hazardous atmosphere?
☐ YES ☐ NO

If a hazardous atmosphere was detected, please mark the hazard{s) below:

☐ Oxygen Deficiency ☐ Oxygen Enrichment ☐ Explosive Gas/Vapor ☐ Explosive Dust
☐ Hydrogen Sulfide ☐ Carbon Monoxide ☐ Chlorine ☐ Other: _____

2. Does the space have the potential to engulf the entrant?
☐ YES ☐ NO

Please mark below if the hazard poses a potential for engulfment:

☐ Water ☐ Sand ☐ Soil ☐ Gravel/Loose Rock ☐ Sewage ☐ Oil

☐ Other: _____

3. Does the space have the potential to entrap the entrant? ☐ YES ☐ NO

4. Is there a potential for any other serious safety and health hazard? ☐ YES ☐ NO

If yes, please mark below:
☐ Electrical ☐ Moving Parts ☐ Slips and Trips ☐ Falling (deeper than 5 ft.) ☐ Heat ☐ Cold ☐ Skin or Eye Irritants ☐ Noise ☐ Chemicals ☐ Other: _____

5. How is the space entered?

☐ Fixed Ladder (circle one: good condition or needs repair) ☐ Stairs ☐ Portable Ladder
☐ Lowering Winch ☐ Hatch

6. Will ventilation be required for the space?

☐ YES ☐ NO

If YES: (check all that apply) ☐ Natural ☐ Forced Positive ☐ Forced Negative

7. Will the entrant need to detach from the lifeline requiring rescue to be on site?

☐ YES ☐ NO

C. Alternate Entry Procedure Determination

1. If parts 2-4 of Section B were marked YES, then alternate entry procedures are NOT allowed for the space.
2. Is the only hazard an actual or potential hazardous atmosphere?

   ____YES ____NO

   If yes, will ventilation alone maintain safe conditions?

   ____YES ____NO

If yes has been marked for both questions in part 2, the space may use alternate entry procedures. If at any time the space changes and other hazards are present, it is automatically a permit-required space again.

FINAL DETERMINATION: (Check All that Apply)

☐ Non-Permit Confined Space ☐ Permit-Required Confined Space

☐ Alternate Entry Procedures Allowed

Assessment Completed by: _____

Confined Space Entry Permit

Entry Date: _____ **Start Time:** _____ **Completion Time:** _____

Description of Work to Be Performed: _____

_____

Location of Confined Space: _____

Type of Confined Space: _____

Entrant(s) (print name): _____

Supervisor in Charge Of Entry (print name)**:** _____

Safety Watch(es) (print name)**:** _____

Pre-Entry Authorization

(check those items below which are applicable to your confined space entry permit)

☐ Oxygen-Deficient Atmosphere	☐ Engulfment	☐ Energized Electrical Equipment
☐ Oxygen-Enriched Atmosphere	☐ Toxic Atmosphere	☐ Entrapment
☐ Welding/Cutting (Hot Work)	☐ Flammable Atmosphere	☐ Hazardous Chemical

PPE & Safety Equipment Required for Entry

☐ Self-Contained Breathing Apparatus	☐ Harness	☐ Hard Hat
☐ Air-Line Respirator (SABA)	☐ Rescue Tripod with lifeline	☐ Safety glasses / Goggles / Shields
☐ Flame Resistant Clothing	☐ Rescue Tripod with mechanical winch	☐ Hearing Protection
☐ Ventilation	☐ Chemical Suits	☐ Steel Toed Boots
☐ Two Way Communications	☐ Gloves	☐ _____

Comments (communication method, emergency contact): _____

_____

_____

_____

Air Monitoring Results Prior To Entry

Monitor Type: _____

Oxygen _____ % LEL _____ % CO _____ % H_2S _____ %

Bump Test Performed? ☐ YES ☐ NO Initials _____

Monitoring Performed By (sign): _____ Date: _____ Time _____

Continuous Air Monitoring Results (Documented at least every 30 minutes)

Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		
Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		
Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		
Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		
Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		
Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		
Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		
Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		
Time	_____	Oxygen	_____ %	LEL	_____ %	CO	_____ %	H_2S	_____ %		

Continuous Monitoring Performed By (sign): _____

Name of Authorized Entrant	Time In	Time Out
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		

All workers listed on permit must sign below prior to the commencement of work:

Entrant(s):
_____

Attendant(s):
_____

Supervisor:
_____

Permit Cancelled by: _____ Time: _____

On-Site Rescue Plan

Confined Space Name / Location:	Date:

Attendant:

Rescuer(s): 1. _____ 2. _____

3. _____ 4. _____

Method of Communication: Attendant to Rescue Personnel - ☐ Verbal ☐ Radio ☐ Horn ☐ Phone
Attendant to Workers - ☐ Verbal ☐ Rope Signal ☐ Audible Signal ☐ Hand Signal ☐ Turn off equipment

Rescue Method: ☐ Tripod ☐ Hoist ☐ Rope ☐ Entry Retrieval

Rescue Equipment Requirements:

☐ Tripod	☐ Pulleys	☐ SRL	☐ Escape Air Pack
☐ Hoist	☐Safety Lines	☐ Wrist / Ankle Harness	☐ Fire Extinguisher
☐ Hitch Mount	☐ Body Harness	☐ SCBA	

Rescue Equipment Inspected by:

Medical Equipment Requirements:
☐ First Aid Kits ☐ Backboard ☐ Other: (List)

Description of Space and Attendant Location:

Diagram of Space (Use Back of Page if Necessary):

Completed by: _____ ☐ Entry Supervisor ☐ Attendant ☐ Other _____

SECTION 13: SCAFFOLDING SAFETY PROGRAM

PURPOSE

The purpose of this program is to provide education and instructions to employees involved with erecting, dismantling and working on scaffolds.

SCOPE

This program applies to all employees, temporary labor and subcontractors working on behalf of Eastern.

RESPONSIBILTY

The Safety Director is responsible for the oversight and support of the Scaffold Safety Program. He shall update and maintain the program on at least an annual basis and provide contractors with information about the program.

He shall instruct Field Superintendents and Lead Mechanics on the precautions they need to take to protect their employees who may be working in the area and verify that training is conducted in accordance with all program requirements.

On each project he shall designate a competent person to oversee the use, erection and dismantling of scaffolds.

The OSHA Standards require that the competent person must be capable of identifying existing and predictable hazards in the surroundings, or working conditions which are unsanitary, hazardous, or dangerous to employees, and have authorization to take prompt corrective measures to eliminate them and, if necessary, to stop the work. The competent person on each project shall:

- Understand the requirements of the OSHA Scaffold Standards and the Eastern Scaffold Safety Program.
- Conduct inspections of all scaffolds prior to use, at the beginning of each work day and as needed or requested by employees and tag any defective or damaged equipment out of service.
- Evaluate the site prior to the erection or dismantling of scaffolds to ensure proper equipment is used and safety procedures are adequate for the exposures.
- Take prompt corrective action to eliminate any identified hazards.

Field Superintendents shall ensure that all employees work in accordance with the Eastern Scaffold Safety Program. They are to contact the Safety Director or competent person if an issue arises concerning damaged or inadequate scaffolding necessary to perform work safely.

Employees are required to utilize the proper fall protection devices. They shall notify the competent person or their Lead Mechanic if they are unsure about the type of fall protection equipment needed to safely perform work. If they feel fall protection equipment or devices are missing, damaged or inadequate, they shall stop work until the situation is corrected.

SCAFFOLD REQUIREMENTS

Guardrails and Toe boards

Eastern employees will utilize scaffolding materials designed by the original manufacturer whenever possible. In the event guardrails must be constructed on the job site, the competent person will determine the appropriate material to be utilized. Materials that may be used include 2" X 4" lumber, 1/2 inch wire rope and angle iron.

Top rails shall be approximately 42 inches above the working surface. Mid rails shall be approximately 21 inches above the working surface.

Wire rope top rails and mid rails shall be stretched tight with no more than a 2 inch deflection.

Toe boards shall extend a minimum of 4 inches above the working surface.

When the placement of the scaffold work platform prevents the installation of guardrails, other fall protection equipment shall be used.

Guardrails and toe boards shall be installed on all open sides and ends of scaffolds.

Working Surfaces

Working surfaces shall be constructed of scaffold plank, aluminum deck boards or other materials evaluated by the competent person and compliant with Subpart L.

Working surfaces shall be secured by nails, double wrap of #9 wire or cleats.

Scaffold planks shall extend a minimum of 6 inches and a maximum of 12 inches over the end supports. Scaffold planks in excess of 10 feet in length may extend up to 18 inches over the end supports.

If required, an access/egress ladder shall be provided and extend 3 feet above the work surface.

Scaffold planks shall not span more than 8 feet between supports/vertical legs.

Scaffold planks and plywood shall be free of splits and burns.

Scaffold Footing and Anchorage

The footing or anchorage shall be capable of carrying the maximum intended load without settling or displacement.

The uprights/vertical legs shall be plumb and securely braced to prevent swaying and displacement.

Tubular Welded Frame:

Scaffold shall be cross-braced to assure scaffold is plumb, square, and rigid.

Stacking pins shall only be secured with the manufacturer's pins or recommended bolts. Cross braces shall be secured, as designed by the manufacturer.

Stationary scaffolds must be secured horizontally, every 26 feet of height and 30 feet horizontally, to prevent tipping.

The height of rolling scaffolds, measured from the ground to the top rail, shall be no more than four times the minimum base dimension (length times the width).

All wheels/casters shall be the same size, equipped with a positive locking device, and in good working condition.

Wheels shall be locked while personnel are working from the scaffold. Personnel shall not be permitted on mobile scaffold while the scaffold is being moved.

Ladders:

Ladders shall extend 36 inches above the landing.

Extension and job-built ladders shall be secured to prevent movement or falling. All ladders shall be set on a firm base to prevent shifting and tipping. Ladders with broken or missing rungs or steps, broken or split side rails, or faulty or defective construction, shall not be used.

Personnel shall have both hands free of tools, materials, or equipment, while climbing and descending ladders. Personnel shall face the ladder when climbing and descending.

TRAINING REQUIREMENTS

Employees shall receive scaffold training prior to their initial assignment and again annually. Content of the program may include classroom instruction, safety tool box meetings, and other forms of group or singular instruction. Topics covered shall include this program, fall protection requirements, access and OSHA requirements at a minimum.

Employees conducting scaffold erection or dismantling shall receive more formal instruction that includes hands-on training and a formal evaluation.

The Safety Director is responsible for ensuring that mechanics are qualified or competent in the following areas:

- Fall hazards and falling object hazards.
- Electrical hazards (protection from electrical hazards for erecting, maintaining, and dismantling).
- Fall protection and protection systems.
- Proper and safe handling of materials.
- Trained in the maximum intended loads and load-carrying capacities.
- Any other pertinent requirements.

SECTION 14: ELECTRICAL SAFETY - (NON-QUALIFIED)

PURPOSE

The possibility of electrical accidents in the field is a very serious risk. Unlike most workplace accidents that can be healed with rest, medication or therapy, electrical accidents tend to be life altering incidents.

GENERAL REQUIREMENTS

Employees of Eastern are prohibited from conducting work on or near exposed live electrical equipment, parts and systems if it is feasible to de-energize the system. Controls such as lockout / tagout and covers over panels are to be used at all times.

Employees shall always treat all powered systems as if they are live unless they can personally verify it is de-energized. Employees deemed qualified or qualified contractors shall follow approach distances as outlined in Table S5 while working near energized systems.

Employees must maintain at least a 10 foot clearance from power lines while conducting work. Vehicles should be positioned at least 10 feet from power lines while work is being performed. Vehicles closer than 10 feet must be grounded.

Non-qualified employees shall not conduct electrical work in confined spaces. Should non-electrical work need to be performed in an enclosed or confined space in the presence of electrical hazards, protective shields, barriers or insulating materials must be used to protect the employee.

EXTENSION CORDS

Although most company equipment is limited to battery operated hand tools, cord and plug equipment may be used on the job site. While using this equipment, extension cords are often necessary to reach the work location. The following requirements apply to all extension cords used to conduct Eastern work:

- Use only three-wire, grounded, commercial or industrial rated extension cords.
- Cords must have suitable strain relief provisions at both the plug and the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment should be plugged directly into an outlet whenever possible.

- All extension cords shall be plugged into one of the following:
  - A GFCI outlet;
  - A GFCI built into the cord;
  - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be tagged or have the end cut, removed from service and repaired or replaced.
- Cords may not be run under floors, behind walls, above ceilings or any other concealed spaces.
- Cords run through doorways must be protected by use of blocks to prevent closing of the door.
- Cords are not to be stapled, nailed or otherwise secured to structures.
- Temporary cords are not to be used as a means of permanent wiring. Use in excess of 90 days is to be considered permanent. In the event permanent wiring solutions are needed, a qualified electrician will be contracted.

INSPECTIONS

Electrical equipment, tools, and appliances must be inspected prior to each use.

The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment. GFCI's, must be tested to ensure proper working condition.

Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

REPAIRS

Only qualified electricians shall be allowed to make repairs to electrical equipment and wiring systems.

Employees shall not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.

Employees shall not wear conductive apparel such as rings, watches, jewelry, etc. while working near open energized equipment.

DOUBLE INSULATED TOOLS

Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection. Double insulated tools must not be altered in any way, which would negate the factory rating.

LADDERS

Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.

Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.

When using ladders they shall be free from any moisture, oils, and greases.

ENCLOSURES, BREAKER PANELS, AND DISTRIBUTION ROOMS

Breaker panels are to be de-energized prior to commencing work through Lockout / Tagout.

TRAINING

All employees shall be trained in safety related work practices that pertain to their respective job assignments including:

- The care and maintenance of tools, and
- Use of extension cords, and
- Maintaining adequate clearance distances when working near power lines or powered equipment / systems (Table S-5), and

Safe work practices to be employed to prevent electric shock or other injuries resulting for either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

SECTION 15: SIGNS AND BARRICADES

Signs, barricades and flagging shall be used to protect employees from hazards such as wall and floor openings, roof edges and any other situation where employees could be exposed to serious harm or danger.

Barricades and flagging shall not be crossed without first identifying the hazard and asking questions before crossing if the hazard does not seem obvious. Signs such as Danger and Caution shall be used to identify a hazard. Signs, barricades and flagging removed to complete a specific task, such as bringing in material, shall be replaced when task is completed.

The following are types of flagging which are to be used:

- 3 inch “DO NOT ENTER” banner tape. This is a red tape with black letters. This is used to control access to areas where a hazardous condition exists and it is determined necessary to keep all unauthorized personnel out of the affected area. No one other than the personnel that have established the area, may enter or remove the tape.

  “DANGER” signs are to be used with this tape to identify the hazard. Unauthorized persons crossing or removing this barrier will be subject to termination or other disciplinary action.

- 3 inch “CAUTION” tape is a yellow banner with black letters. This is used to identify a potentially hazardous condition. CAUTION signs are used with this tape to identify the potential hazard.

  Personnel may cross this barrier so long as they take the precautions necessary to ensure their safety. Unauthorized persons removing this barrier will be subject to disciplinary action.

NOTE: BARRICADES MAY BE NEEDED IN CONJUNCTION WITH ANY OF THE FLAGGING AND SIGNING NOTED ABOVE.

Barricade tapes and warning signs are a temporary method of protecting and warning personnel of hazardous conditions, but are not a substitute for physical barrier guarding (i.e. 2”x4” lumber, wire rope, etc.) where a hazardous condition presents a potential for serious injury or death.

Do not leave openings, floors, walkways, or catwalks without proper guarding installed. It is the responsibility of the Mechanic performing the work to ensure the protection and safety of all personnel affected by the operation.

Barricades will be treated according to the flagging attached to the barricade.

SECTION 16: HOT WORK

PURPOSE

The purpose of this program is to ensure a safe work environment during welding, cutting, and other hot work operations on Eastern property as well as in the field.

SCOPE

This program applies to all employees directly involved or assisting in the welding, cutting and hot work operations on Eastern property. When work is performed on a non-owned or operated site, the operator's program shall take precedence unless their program is less stringent.

RESPONSIBILITIES

The Safety Director is responsible for overseeing the company Hot Work Program.

All hot work conducted in the field must be approved. Under the direction of management, safe areas will be established and monitoring conducted if necessary. Work conducted outside of a safe hot work area must be approved through the use of a hot work permit. This permit shall identify the work, safety precautions and proper PPE to be used during the course of work.

Employees are expected to follow all hot work procedures. This includes the proper use of the appropriate PPE, inspecting equipment prior to use and reporting unsafe equipment immediately. Anytime work must be deviated from that listed on the permit, the employee must notify management.

PROCEDURES

General

Eastern does not train new welders. Only workers who have successfully completed welding training from a third party school or program shall be authorized to conduct hot work.

Defective equipment must be removed from service until it is repaired. Employees are prohibited from using damaged or defective equipment.

A hot work permit must be completed before performing hot work outside of a safe hot work area. Precautions that are to be taken shall be documented in the form of a written permit. Before cutting or welding is permitted the area shall be inspected.

Where practicable, all combustibles shall be relocated at least 35 feet from the work site. Where relocation is impractical, combustibles shall be protected with flameproof covers, shielded with metal, guards, curtains or wet down to help prevent ignition of material.

Where cutting or welding is done near walls, partitions, ceilings, or openings in the floor (grating, etc.), fire-resistant shields or guards shall be provided to prevent ignition.

If welding is to be done on a partition or solid decking/flooring, precautions shall be taken to prevent ignition of combustibles on the other side, due to conduction or radiation of heat. Where combustibles cannot be relocated on the opposite side of the work, a fire watch person shall be provided on the opposite side of the work.

Cutting or welding on pipes or other metal in contact with combustible walls, partitions, floors, ceilings, or roofs shall not be undertaken if the work is close enough to cause ignition by combustion.

Cutting or welding shall not be permitted in the following situations:

- In areas not authorized by management.
- In the presence of flammable / combustible gases.
- In areas near the storage of large quantities of exposed, readily ignitable materials.

Whenever welding or cutting is performed in locations where other than a minor fire might develop; or any of the conditions mentioned above cannot be met, a fire watch shall be provided.

If welding and cutting cannot be performed safely, the work shall not be performed until effective controls are made available.

Fire Watch

When hazards cannot be controlled through traditional methods, or is conducted outside of a safe hot work area, a fire watch must be posted. A fire watch must be trained on their duties and comply with all of the following:

- The fire watch may not conduct any other activity or task while working as a fire watch.
- The fire watch shall remain after the completion of the hot work for a period of at least ½ hour.
- Must have training in the use of fire extinguishers and have an appropriate extinguisher readily available.

Fire Prevention Measures

A designated Safe Hot Work Area shall be established to meet the following requirements:

- Floors swept and cleaned of combustibles within 35 feet of work area.
- Flammable and combustible liquids and material will be kept 35 feet from work area.
- Adequate ventilation providing 20 air changes per hour.
- At least one 10 pound dry chemical fire extinguisher shall be within access of 35 feet of the work area.

Requirements for welding conducted outside the designated welding area:

- Portable welding curtains or shields must be used if other workers are in the area.
- A hot-work permit must be completed prior to initiating welding operations.

- Adequate ventilation must be maintained throughout the course of work to prevent exposure to hazardous fumes.
- Plastic materials must be covered with welding tarps during welding procedures.
- Fire Watch must be provided for all hot-work operations.

After welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.

CONFINED SPACE

Ventilation is a prerequisite to work in confined spaces. When welding or cutting is being performed in any confined spaces, the gas cylinders and welding machines shall be left on the outside.

When a welder must enter a confined space through a small opening, means shall be provided for quickly removing him in case of an emergency.

- When lifelines are used for this purpose, they shall be so attached to the welder's body that it cannot be jammed in a small exit opening.
- An attendant with a preplanned rescue procedure shall be stationed outside to observe the welder at all times and be capable of putting rescue operations into effect.

When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes shall be removed from the holders and the holders carefully located so that accidental contact cannot occur and the machine shall be disconnected from the power source.

To eliminate the possibility of gas escaping through leaks, torch valves shall be closed and fuel-gas and oxygen supply to the torch must be shut off at some point outside of the confined area when the torch is not to be used for a substantial period of time. If practical, the torch and hose shall also be removed from the confined space.

All welding and cutting operations carried on in confined spaces shall be adequately ventilated to prevent the accumulation of toxic materials or possible oxygen deficiency. This applies not only to the welder, but also to helpers and other personnel in the immediate vicinity. All air withdrawn will be replaced with air that is clean. In circumstances for which it is impossible to provide such ventilation, employees are not permitted to work. Eastern employees are prohibited from working in all areas considered Immediately Dangerous to Life and Health.

Refer to Eastern' Confined Space Program if further guidance is required before commencing any welding, cutting, and/or brazing operations in an area meeting the requirements of a confined space.

Fumes, Gases and Dust

Fumes produced by some welding processes can be toxic and may require extraction. An assessment of the work to be performed must be completed before each job is undertaken. Fumes generally contain particles from the material being welded. Welding fumes can have acute and / or chronic effects on the respiratory system.

Any welding, cutting or burning of lead base metals, zinc, cadmium, mercury, fluorides, beryllium or exotic metals or paints not listed here that could produce dangerous fumes shall have proper ventilation. This includes inert-gas metal-arc welding or oxygen cutting of stainless steel.

Personal Protection

Employees conducting welding operations must wear appropriate PPE such as:

- Helmets
- Hand protection
- Welding goggles / shields
- Body protection
- Eye protection should be ventilated to prevent fogging as much as practicable. All glass for lenses shall be tempered, substantially free from scratches, air bubbles, waves and other flaws. Lenses shall bear some permanent distinctive marking which may readily identify the source and shade.

DEFINITIONS

Welding / Hot Work Procedures - any activity which results in sparks, fire, molten slag, or hot material which has the potential to cause fires or explosions

Examples of Hot Work - Cutting, Brazing, Soldering, Thawing Pipes, Grinding, using an electric tool in a hazardous area and Welding.

Special Hazard Occupancies - any area containing Flammable Liquids, Gases, Plastics, Dust Accumulation, Rubber and Paper Products.

Safe Hot Work Area – an area that has been designated by management where hot work can be conducted without the use of a permit or a fire watch. Safe Hot Work Areas are kept free of combustibles and other potential hazards.

Hazards - includes, but not limited to the following; fires and explosions, skin burns, welding "blindness", and respiratory hazards from fumes and smoke.

Confined Space – any space meeting all three of the following criteria:

- Large enough to enter
- Is not designed for continuous worker occupancy
- Has limited entry and exit – usually requiring some sort of body contortion to enter such as tanks, pits, vessels, excavations, bins and hoppers

SECTION 17: HAND AND POWER TOOLS

PURPOSE

Many injuries are attributed to improper or unsafe use of tools or the use of tools which are in poor condition. The purpose of this program is to provide direction and to establish the Eastern general requirements to be implemented when using tools, hand or power.

SCOPE

This program applies to all employees, temporary labor and contractors performing work on behalf of Eastern.

RESPONSIBILITIES

All Eastern Management has a responsibility to assist with the oversight of this program. During each site visit, a review of the items listed in this program must be conducted.

The Safety Director will have the primary responsibility for implementing and communicating this program to employees and contractors performing work on behalf of Eastern.

Employees shall adhere to the requirements of this program and notify their Supervisor of inadequate, defective or improper equipment.

GENERAL REQUIREMENTS

All hand and power tools must be maintained in safe working condition. Employees are to inspect tool prior to use. Damaged or defective tools are to be tagged and removed from service immediately. Always use tool for their intended purpose and use the right tool for the job. Job made tools are not to be used.

Never remove or interfere with the operation of any tool guard or safety features. Proper PPE must be worn when working with hand and power tools. At a minimum, eye protection must be worn at all times when power tools or hand tools used for striking are in use. Additional PPE such as gloves, protective footwear, respirators, chaps, head protection, hearing protection or full body protection may be required based upon the task being completed.

Keep tools clean and check their condition prior to using. Do not use striking tools if heads become mushroomed or burred. If handles of tools are splintered, broken, or loose, have them replaced.

Do not carry tools in pockets. Do not use excessive pressure or force on any hand tool or use cheaters to apply more force. Tools should not be dropped or thrown from place to place or from employee to employee. Tools that must be raised or lowered from one elevation to another shall be placed in a tool bucket or firmly attached to hand-line (rope).

Tools must always be returned to their proper storage place and not left where they create a hazard.

HAND TOOLS

Wooden handles of tools, such as hammers, picks, etc. shall not be taped or covered in such a way as to hide damage or defects. Cracked or damaged wooden handles of tools, such as hammers, shall be replaced immediately upon discovery of the damage.

Keep your hand tools in peak condition, sharp, clean, oiled, and not abused. Do not use tools for pry bars. Do not use two wrenches to increase leverage capacity.

SCREWDRIVERS

Use the right size and type screwdriver for the job. Do not hold screwdriver tips in the palm of the hand. Do not use a screwdriver as a pry bar.

HAMMERS

Hammers shall have a clear path for back swing and the target area shall be free from obstructions. Hammers with mushroomed heads shall never be used.

Never use your hands to hold any object to be struck with a hammer by another employee. Hold the object with pliers or another tong-type device. Wooden handles shall be kept free of splinters or cracks and shall be kept tight in the tool.

PRY BARS

Be sure bite of bar is secure under load by first applying a slight pressure. Check your own balance before exerting full force. A cheater bar shall not be used on pry bars.

WRENCHES

Wrenches should be pushed away from the body, if possible, to reduce the chance of the wrench slipping and striking the user in the face or body. Adjustable (crescent) and combination wrenches should be snug on bolts and nuts to avoid slipping. Never use a cheater on a wrench or "double wrench" a nut. Wrenches shall not be used when jaws are sprung to the point that slippage occurs.

POWER TOOLS

Protective guards on power tools shall not be removed. Do not use tools without guards in place. Employees shall avoid loose fitting clothing when operating power tools.

Tools shall not be dropped or allowed to strike another object in such a fashion that damage may occur.

The power source on tools shall be physically disconnected prior to attempting any repairs or attachment changes. Always double check to make sure no one has plugged the cord back in.

Electrical tools shall be of the double insulated or be of the three wires grounded type.

All electrical tools and power cords must be used with a Ground Fault Interrupter to protect against faulty ground. Electrical tools shall not be hoisted or carried by their power cords. Employees shall not operate electrical tools while standing in water or wet locations.

Extension cords shall be of the three wires grounded type and be continuous without splice or repair. Extension cords shall not be placed through doorways unless stops or guards are put in place to prevent pinching of the cord by the door. Extension cords shall not be suspended by wire or nails.

PNEUMATIC TOOLS

When gas or diesel compressors furnish the air source, keep them outside or vent them to the outside to prevent carbon monoxide poisoning.

Air hoses and connections shall be checked prior to each use for defects. Air hoses should be protected from sharp objects. Disconnect source and "bleed" hose before breaking connection on any air tool. Never crimp hoses to stop air.

Do not let your hoses create tripping hazards. Keep out of traffic areas such as walkways and stairs. Always wear eye, face, and ear protection when using air tools.

Air used for cleaning machines shall be regulated to 30 psi or less. Compressed air is never to be used to clean clothing or parts of the body.

Air tools shall not be hoisted or carried by their air hoses.

PEDESTAL, BENCH, AND PORTABLE GRINDERS

Wheel rating must exceed the maximum potential RPM of the grinder on which it is mounted.

All abrasive wheels shall be mounted between flanges which are at least 1/3 the diameter of the wheel. Guards shall be installed and maintained. Guards, work rests, eye shields, and other permanent protection devices shall not be removed from any grinding or buffing wheels. Tool rests and tongue guards shall be regularly adjusted. Tool rests shall be a maximum of 1/8” from the wheel and tongue guards a maximum of 1/4”.

On all portable tools, the control switch shall be instant-pressure controlled without a locking pin. Wheels should be stored in a dry place with constant temperature above freezing and protected from physical damage, which could cause cracking.

The proper eye/face, hand, and ear protection shall be used.

Grinding shall not be performed on the side of the wheel. All wheels are to be ring tested prior to mounting. No work is to be performed until wheels reach full speed.

SECTION 18: INCIDENT INVESTIGATION

As the majority of Eastern business is conducted by employees in the field, Field Superintendents and Lead Mechanics have a prominent role in the Incident Investigation process. They shall immediately investigate all incidents by interviewing the affected employee(s) and witnesses to the incident, inspecting the scene and conditions surrounding the incident, and referring to applicable standards and additional expertise if necessary to identify a root cause. All employees on site must complete a witness statement to identify their location whether they observed the incident or not. Findings, corrective actions, assigned persons responsible for corrective actions and follow up dates are to be documented on the Incident Investigation Report.

In the event an incident occurs at a client site, the incident is to be reported to the site contact within 12 hours or prior to the end of the shift, whichever is sooner, as they may wish to take part in the investigation. This policy applies to incidents involving employees and subcontractors. Any incident involving a fatality (within 8 hours), hospitalization or amputation (within 24 hours) is to be reported to OSHA.

Employees and subcontractors are prohibited from altering the site prior to the investigation being conducted. To preserve evidence, witnesses may need to barricade or rope off the area to prevent unauthorized access and tampering. Basic information should be obtained while waiting for the investigator such as weather conditions, the location of employees, noise, the presence of other contractors and lighting at the time of the incident.

If there is an urgent concern, serious injury potential, or imminent hazard, employees may act to correct the situation without waiting for management to conduct their investigation.

All incidents are to be investigated to the extent the issue warrants. Minor first aid and near misses may not require the same response as a serious injury. It shall be the responsibility of the employee in charge of the investigation to determine the level of detail necessary. During the investigation, all equipment necessary to thoroughly evaluate and document the incident must be available. Required equipment available for investigations shall include at a minimum a camera, flashlight, tape measure and investigation / witness statement forms for documenting work conditions. Additional equipment may be necessary depending on the severity or complexity of the incident.

All evidence including materials, photographs, tools, statements and monitoring results shall be taken directly to the Eastern offices and kept in the Human Resources office.

Accident reports and their subsequent findings are to be reviewed on a quarterly basis to identify potential trends or potential lessons from losses. Lessons from loss shall be included in the site specific orientation when similar jobs are conducted.

TRAINING

The Field Superintendent or Safety Director is typically the first management representative on site; therefore, each shall receive documented training on Incident Investigation. New Field Superintendents shall receive training prior to being assigned projects. Training topics shall include the following:

- Required equipment for conducting an investigation
- Interviewing techniques such as proper tone of voice, body language and use of open ended questions.
- Root cause analysis.
- Documentation of site conditions, tools, equipment, witnesses and chain of custody for evidence.
- Site specific procedures required by clients.

INCIDENT INVESTIGATION REPORT

Call-in Confirmation # _____ OSHA LOG # _____

Instructions:

Any employee can complete sections 1, 5, & 6 for a Safety Suggestion and return this form to their immediate supervisor or Department Manager to forward to the Safety Department.

For Safety Incidents, the immediate supervisor of the person involved in the incident must complete this form as soon as possible and submit to the Safety Department.

☐ INJURY / ILLNESS	☐ NEAR MISS	☐ PROPERTY DAMAGE	☐ SAFETY SUGGESTION

1. DATE OF OCCURRENCE	TIME:	LOCATION:	SUPERVISOR:	SUBMITTED BY:

2. EMPLOYEE AFFECTED :

LAST NAME, FIRST INITIAL	SOCIAL SECURITY #	DEPT. & SHIFT	HIRE DATE

3. TREATMENT OF INJURY (Check one or more, if applicable)

☐ NO TREATMENT ☐ FIRST AID ☐ Hospital ☐ OTHER

4. TYPE OF INJURY & BODY PART AFFECTED:

5. DESCRIPTION:

DESCRIBE ACTIVITY IN PROGRESS, HOW INCIDENT / ACCIDENT OCCURRED, AND EXTENT OF THE DAMAGE / INJURY. LIST THE SEQUENCE OF EVENTS IN CHRONOLOGICAL ORDER IF POSSIBLE.

6. CONTRIBUTING FACTORS:

CLEARLY STATE WHAT UNSAFE BEHAVIOR, PROCESS, OR EQUIPMENT CAUSED THE INCIDENT. DO NOT SPECULATE. IF YOU ARE AWARE OF PREVIOUS ATTEMPTS TO CORRECT THIS PROBLEM PLEASE INDICATE.

EQUIPMENT:

EMPLOYEE BEHAVIORS:

ENVIRONMENTAL:

OTHER:

7. ROOT CAUSE(S)

8. CORRECTIVE ACTIONS

PREVENTION ACTIVITY	ASSIGNED TO	PLANNED COMPLETION DATE	COMPLETION DATE

EMPLOYEE NAME (PRINT) _____ EMPLOYEE SIGNATURE _____ DATE _____

SUPERVISOR NAME (PRINT) _____ SUPERVISOR SIGNATURE _____ DATE _____

REPORT COMPLETED BY _____ DATE _____

SAFETY COMMITTEE REPRESENTATIVE PRESENT _____

WITNESS STATEMENT FORM

Instructions:

Complete the form below to the best of your recollection. Write factual information, not opinions in the description box. Do not include information learned from others or descriptions of issues you did not personally witness in this section.

If you did not see the incident but believe you have information that could be of value due to experience, issues that occurred previously during similar operations or concerns you have heard voiced previously, please complete Box 3.

1. DATE OF OCCURRENCE	TIME:	LOCATION:	SUPERVISOR:	Witness:

2. **DESCRIPTION:** DESCRIBE ACTIVITY IN PROGRESS, HOW INCIDENT / ACCIDENT OCCURRED, AND EXTENT OF THE DAMAGE / INJURY. LIST THE SEQUENCE OF EVENTS IN CHRONOLOGICAL ORDER IF POSSIBLE.

3. PROVIDE INFORMATION IN THE BOX BELOW IF YOU BELIEVE YOU HAVE SECOND HAND KNOWLEDGE OR INFORMATION FROM PREVIOUS EXPERIENCE THAT WILL AID IN THE COMPLETION OF THE INVESTIGATION.

4. IF YOU DID NOT SEE THE INCIDENT AND HAVE NO RELEVANT INFORMATION, PLEASE NOTE YOUR LOCATION AT THE TIME OF THE INCIDENT IN THE SPACE BELOW.

SECTION 19: FIRST AID

PURPOSE

The purpose of this program is to ensure that employees are provided with appropriate first aid should they become injured or ill while working at Eastern facilities or at Customer sites. This program applies to all employees and temporary workers conducting business on behalf of Eastern. When working for customers that have a site specific plan, the strictest plan shall be followed.

MEDICAL EMERGENCY and FIRST AID

At least one employee of Eastern on each work crew will be trained in first-aid by the American Red Cross or equivalent agency and carry a valid training certification card when medical facilities are not readily available. The responsibility of the trained employee is to provide basic First Aid to injured workers in the field or company facilities when necessary.

If an employee is injured or becomes ill, the person should immediately contact their lead mechanic. They or a trained First Aider will take the following steps when applicable:

1. Obtain critical details that need communicated to emergency response personnel.
2. Send someone for help if you cannot leave the person.
3. Provide care up to the level of their training.
4. Accompany (or follow) the injured worker to the medical facility.

Employees who do not require emergency medical attention shall be taken to the medical facility. No employee shall be permitted to drive themselves to a medical facility following an accident or the onset of a work-related illness.

For serious injuries or when a person trained in first aid is not available, call 911. If working in an area not covered by 911, a list of emergency numbers or a jobsite specific emergency procedure will be developed and posted in a conspicuous place prior to commencing work. If 911 has been called, an employee shall be posted to watch for their arrival and direct them to the scene of the injury.

First aid supplies will be available and readily accessible at the office and in company vehicles. First Aid kits are required to be compliant with ANSI Z308 standards. Additional items may be stocked based on an evaluation of the work and location prior to the start of the job. Kits are to be inspected on a monthly basis. Any items found to be missing are to be replaced immediately.

Prior to work at any client site, the Field Superintendent or his designee shall instruct employees on the location of First Aid kits, eyewash stations / showers and the identity of First Aid responders. When the possibility of work with corrosive materials exists, equipment necessary for quick drenching or flushing of the eyes shall be made available.

If employees are working on an unmanned site, a plan will be developed for obtaining medical assistance including details about the closest hospital, methods of communication and transport.

SECTION 20: RESPIRATORY PROTECTION

PURPOSE

The purpose of the respiratory protection program is to establish and set guidelines for the selection of respiratory equipment, situations for its use, and training in the use of the respirators.

SCOPE

It is the policy of Eastern to maintain and implement a Respiratory Protection Program that will ensure employee respiratory protection for routine and non-routine activities. When feasible, engineering controls or work practices are used to control exposure to airborne contaminants. Effective engineering controls include enclosure or confinement of the operation, general and local ventilation, and substitution of less toxic materials. When not feasible, or while instituting controls, appropriate respiratory protection should be used as described in this program.

Medical evaluation prior to fit-testing must be confidential, during normal working hours, convenient, understandable, and provide the employee a chance to discuss the results with the PLHCP (Primary Licensed Healthcare Provider).

Eastern is required to establish and retain written information regarding medical evaluations, fit testing, and the respirator program. Records of medical evaluations required by this section must be retained and made available in accordance with 29 CFR 1910.1020.

All records are kept by the Human Resources department in the main office.

RESPONSIBILITIES

The Eastern Safety Director and Field Superintendents are responsible for:

- Evaluating the respiratory hazards at their facility / site and the protective equipment required.
- Ensuring engineering controls are used where feasible. Such controls may include:
  - Change of the work process
  - Substitution of less hazardous substances for harmful materials
  - Isolation or enclosure of the work process or affected employees
  - Local exhaust or general dilution ventilation
- Ensuring employees expected to wear respiratory protection have received the proper training, medical evaluations and fit testing to safety use this equipment.
- Enforcing the use of proper respiratory protection and leading by example.

Employees are responsible for compliance with this program. This includes wearing and maintaining their equipment in the manner they were instructed and reporting any deficiencies or concerns immediately.

Employees are also responsible for alerting their immediate supervisor about any portion of the program that is not fully understood.

The Safety Director is the designated program administrator.

OXYGEN DEFICIENCY

Normal breathing air contains approximately 21% oxygen by volume at sea level. If the oxygen concentration in air drops below 19.5%, breathing the air is considered immediately dangerous to life or health (IDLH). To determine the oxygen concentration of the work atmosphere, a qualified person shall test the space to be entered with a properly calibrated direct-reading oxygen indicator or other suitable device. This program specifies that all work locations must contain at least 20% oxygen.

Eastern employees or contract employees shall not enter IDLH atmospheres.

RESPIRATOR SELECTION

Exposure Considerations

Respirators shall be provided to workers at no cost when necessary. They shall be selected on the basis of the hazards to which the worker is exposed. The following factors shall be considered in the selection of respirators:

- Location of the work and its proximity to a safe area in the event of an emergency.
- Length of time the worker will be wearing respiratory protection and any environmental conditions that could affect the worker.
- Limitations of the respirators available.
- Regulatory Guidelines – All respirators must be approved by NIOSH for the hazards to which the worker is exposed.

Respirators for Oxygen-Deficient Atmospheres

For all oxygen-deficient atmospheres, only self-contained positive pressure air breathing apparatus with full facepiece or positive pressure air-line breathing equipment combined with auxiliary self-contained air supply for emergency egress is acceptable to Eastern.

Respirators for Atmospheres with Gas and Vapor Contaminants

Pressure demand or positive pressure respirators may be used in gas and vapor atmospheres that contain adequate oxygen and are not immediately dangerous to life or health. Chemical cartridge or canister type full or half mask respirators may be worn when the filtering media is designed for the specific exposure conditions.

Respirators for Atmospheres with Particulate Contaminants (Dusts, Fogs, Smoke, Spray)

Particulate-filters with quarter mask, half mask, or full facepiece shall be used provided the unit meets the respiratory protection factor criteria of NIOSH for the specific conditions encountered. Selection of the appropriate respirator is based on the type, toxicity, and particle size of the particulate matter.

UNUSUAL JOBS OR EMERGENCY SITUATIONS

Many chemicals, under normal operating conditions will not cause overexposure to personnel; however, during emergencies such as during a fire or spill, exposure can exceed permissible exposure limits. In these situations, personnel should take necessary steps to ventilate the work area, or evacuate the work area if the level of contamination is suspected to exceed the permissible exposure limit.

FIT TESTING PROCEDURES

Employees or contractors using a tight-fitting facepiece respirator must pass a qualitative fit test (QLFT) or a quantitative fit test (QNFT). The employee or contractor must be fit tested with the same make, model, style, and size of respirator that will be used by the employee.

Fit Testing Schedule

- Before an employee or contract employee may use any negative or positive pressure tight-fitting respirator, the employee must be fit tested.
- Fit testing shall be conducted whenever a different respirator facepiece (size, style, model, or make) is used, and then annually.
- Changes in the employee's physical condition that could affect respirator fit shall require re-fit testing. Some examples include obvious changes in body weight, facial scarring, and dental changes.
- The contractor will be responsible for fit testing their employees who will be required to wear a respirator.

Fit Testing Considerations

- Respirators may need to be modified before fit testing. Remove any modifications to the respirator so it is restored to NOISH-approved configuration before using the facepiece in the workplace.
- The test shall not be conducted if there is any hair growth between the skin and the facepiece sealing surface, such as stubble beard growth, beard, mustache or sideburns which cross the respirator sealing surface. Any type of apparel, which interferes with a satisfactory fit, shall be altered or removed.

Qualitative Fit Testing (QLFT)

- Qualitative fit tests shall be used to fit test only negative pressure air-purifying respirators that are used for a fit factor of 100 or less.
- Qualitative fit tests shall be conducted using the employee's actual respirator. Convert the facepiece into a negative pressure respirator if it is not already a negative pressure respirator. Use appropriate filters for negative pressure respirators or an identical surrogate for the atmosphere supplying or PAPR facepiece and convert to a negative pressure respirator.

Quantitative Fit Testing (QNFT)

- Quantitative fit tests are passed only when a tight-fitting facepiece fit factor of 100 or more has been achieved for half-facepieces and 500 or more has been achieved for full facepieces.
- Quantitative fit testing shall require sampling inside the facepiece, midway between the nose and the mouth of the employee. Modification of the employee's respirator with a temporary sampling adapter or surrogate respirator modification to accept a permanent sampling probe is required.

RESPIRATOR USE PROCEDURES

Procedures include proper use for routine and reasonably foreseeable emergency situations. Workers must comply with all of the following requirements while using respirators:

- No leakage between the face piece and face.
- Respirators may not be removed while in a hazardous environment.
- Respirators must be maintained and evaluated for effectiveness during the work shift.
- Unauthorized employees are prohibited from entering and IDLH atmosphere.

Facepiece Seal Protection

Conditions that will prevent employees wearing tight-fitting facepiece respirators include:

- When facial hair comes between the sealing surfaces of the face piece.
- When facial hair interferes with valve function.
- When any condition interferes with the face-to-facepiece seal or valve function.
- When corrective glasses or goggles or other personal protective equipment is worn in a manner that interferes with the seal of the facepiece to the face.
- When the respirator fails a pre-use seal check.

The user seal check is not a substitute for qualitative or quantitative fit testing.

Facepiece Positive and/or Negative Pressure Checks

Positive Pressure Check

Close off the exhalation valve and exhale gently into the facepiece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the facepiece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve, and then carefully replacing it after the test.

Negative Pressure Check

Close off the inlet opening of the cartridges by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the facepiece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. In this case, perform the test by covering

the inlet opening of the cartridge with a material so that no air may pass the inlet opening. If the facepiece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

Manufacturer's Recommended User Seal Check Procedures

The respirator manufacturer's recommended procedures for performing a user seal check may be used instead of the positive and/or negative pressure check procedures, provided that the employer demonstrates that the manufacturer's procedures are equally effective.

Ensure Continuing Respirator Effectiveness

The Lead Mechanic shall survey the work area conditions and degree of employee exposure or stress. When there is a change in work area conditions, or the degree of employee exposure or stress that may affect respirator effectiveness, respirator use and filtering media shall be reevaluated.

Respirator Maintenance

Cleaning and Disinfecting

- Eastern shall provide employees with respirators that are clean, sanitary, and in good working order.
- Employees and contractors shall maintain respirators in a clean and sanitary condition. Employees must leave the work area to wash or change cartridges and if any signs of breakthrough are detected.
- Respirators issued to more than one employee shall be cleaned and disinfected following use by the employee who used the respirator. The respirator shall be cleaned and disinfected before the respirator is provided for the next employee.
- Respirators issued for exclusive use shall be cleaned and disinfected after each use, or more often, to maintain the respirator in sanitary condition.

- Respirators used in fit testing and training shall be cleaned and disinfected after each use.
- Test the respirator to ensure that all components work properly after the respirator is cleaned and reassembled.

Storage

Respirators shall be protected from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture and damaging chemicals while in storage. They shall be packed in a way that prevents deformation of the facepiece and exhalation valve.

Inspection

Respirators shall be inspected by the employee before each use and during cleaning. Respirator inspections shall include the following:

1. Check for function, tightness of connections, and the condition of the various parts including, but not limited to, the facepiece, head straps, valves, connecting tube, cartridges, and filters.

2. Check plastic and rubber parts for pliability and signs of deterioration.

Repairs

Respirators that fail inspection or are otherwise defective shall be removed from service and replaced. Authorized employees may make repairs on respirators as long as they are in accordance with any manufacturer specification.

Breathing Air Quality and Use

Procedures are included to ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators.

Air Quality

- Employees will not use self-contained breathing apparatus for routine work. In the event the Field Superintendent deems SCBA is necessary for non-routine work, a procedure for respirator use consistent with the OSHA regulations shall be developed before the work begins.
- Compressed or liquid oxygen shall not be used for respiration.
- Compressed breathing air shall meet at least the following requirements for Grade D breathing air and must not have a noticeable odor.

Filters and Cartridges

Filters and cartridges used in the workplace shall be labeled and color-coded with the NIOSH approved label. Ensure the label is not removed and that it remains legible.

Training

Employees who are required to use respirators shall be provided with comprehensive training on hazards, proper use & care, evaluation of hazards and maintenance. Records of training shall be maintained by the Human Resources Manager. Training records shall include the name of the attendee, date of training and the name of the instructor providing training.

Following training, employees shall be able to demonstrate knowledge on the following:

- Why the respirator is necessary;
- How improper fit, usage, or maintenance can reduce the protective effect of the respirator;
- The limitations and capabilities of the respirator;
- How to inspect, put on and remove, use, and check the seals of the respirator;
- Procedures for respirator maintenance and storage;
- Recognition of medical signs and symptoms that may limit or prevent respirator effective use;
- General requirements of the Respiratory Protection standard, 29 CFR 1910.134.

Retraining shall be administered annually or earlier when the following conditions occur:

- Changes in the workplace or the type of respirator render the previous training obsolete;
- Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the knowledge;
- Any other situation arises in which retraining appears necessary to ensure safe respirator use.

Medical evaluations, respirators, and training are required to be provided free to the employee.

Information for Employees Using Respirators When Not Required Under the Standard

If a respirator is provided a respirator for voluntary use, or if the respirator is employee provided, certain precautions are required to be sure that the respirator itself does not present a hazard. All employees who choose to voluntarily wear a respirator as issued a copy of Appendix D of the OSHA Respiratory Stand. Employees shall be counseled on the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
2. Choose respirators certified for use to protect against the contaminant of concern.
3. NIOSH, the National Institute for Occupational Safety and Health certifies respirators. A NIOSH label or statement of certification should appear on the respirator or respirator packaging. The label or statement of certification will tell you the applications for which the respirator is designed and the extent of protection it will provide.
4. Do not wear the respirator into atmospheres containing contaminants for which the respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect against gases, vapors, or very small solid particles of fumes or smoke.
5. Keep track of the respirator so that one employee's respirator is not mistakenly used by someone else.

SECTION 21: STOP WORK

Eastern employees have the authority and obligation to Stop Work any time unsafe conditions are identified in the workplace. Stop Work Authority can be exercised on co-workers, vendors, clients, customers, subcontractors or other companies in the vicinity. Employees are required to document the situation any time Stop Work Authority is used.

RESPONSIBILITIES

Management is responsible for creating an atmosphere where employees feel comfortable using Stop Work Authority. This is accomplished through employee training, open communication and follow up / investigation each time Stop Work is used. Management shall ensure all Stop Work incidents are documented. At least one member of management shall review each Stop Work report.

Management must follow up on all Stop Work events to verify issues have been corrected effectively. Timely follow up is imperative and shall be conducted immediately after notification.

Employees shall adhere to the requirements of this policy and Stop Work when risks are not properly understood or controlled

TRAINING

A review of Stop Work Authority is to be conducted during new hire orientation and then again annually. Employee training is to include the following:

- Purpose of Stop Work
- Examples of reasons to Stop Work
- How to document Stop Work situations
- Steps involved with work stoppages
    - Stop, Notify, Correct & Resume

Employees may only return to work once all concerns have been addressed and hazards abated or other means of protection have been implemented

Employees shall be made aware that use of Stop Work Authority will not result in any disciplinary action toward the employee using his / her authority. This includes times when no unsafe action was found as long the employee acted in Good Faith.

SECTION 22: EARLY RETURN TO WORK (ERTW)

Eastern is committed to providing a safe work environment for all employees. Early Return To Work - Modified Duty procedures have been implemented which will allow employees who become injured or ill while on the job to return to work as soon as reasonably possible. It is recognized that returning to the work environment as soon as possible has a positive impact upon the healing process and is in the best interests of the employee and employer alike. Adopting a comprehensive ERTW-Modified Duty program will effectively manage workers' compensation costs throughout the company and safeguard its most valuable resources: the skills, knowledge, and experience of our employees.

Employees must report all work-place injuries and work-related illnesses immediately; or as soon as it is suspected that an illness is work related. Employees are required to advise their treating physician or other medical care provider that Eastern provides Early Return to Work and/or Modified Duty opportunities.

Although there may be some variability, on a position by position basis in how Modified Job opportunities are developed, the end result shall be consistent in that every effort shall be made to provide these opportunities to employees.

SECTION 23: JOB SAFETY ANALYSIS (JSA)

PURPOSE

This program has been developed to ensure that hazards in the workplace are accounted for in each and every step of the process. Our goal is to identify real and potential hazards that may be found in routine activities, simultaneous operations, adverse weather and other work conditions through group discussion prior to the commencement of work.

By adhering to this program, each and every employee will be actively involved in the process and will thoroughly understand the hazards associated with the task.

RESPONSIBILITY

The Safety Director is the designated program coordinator and has overall responsibility for this program. He will ensure that the program is updated as necessary and is compliant with customer specifications.

Field Superintendents and Lead Mechanics oversee the program at local levels. Responsibilities include completing JSAs prior to each shift or change in activity. JSAs are to be reviewed as a group and each individual must sign the form. Employees must have all other contractors sign the Eastern JSA if they are performing work with or near Eastern activities or equipment.

JOB SAFETY ANALYSIS

Each Eastern employee that is working on location will be actively involved in the JSA before work is started. The JSA must break down the job and identify items that could pose harm to personnel, the environment and equipment. Measures must be taken by employees to reduce identified hazards to As Low As Reasonably Practicable (ALARP). Measures may include things such as PPE, tools, equipment, training, changes in process, etc.

JSAs are meant to be overviews of tasks, not detailed procedures. For detailed processes, formal SOPs have been created that can be referenced when:

- There are questions about the hazards to include on a JSA
- Training new hires to complete JSAs
- A task has not been conducted recently and hazards may be missed

Procedure manuals may also be used to conduct pre-job safety meetings. Mechanics may also use a procedure as a regularly scheduled safety talk

Certain common tasks may have pre-written JSAs that can be used instead of writing out a new JSA each time. Pre-written JSAs are written under the assumption that conditions are optimal. Any additional hazards not listed must still be added by the worker and reviewed with all workers. Examples of additional hazards could include:

- New / inexperienced employees on crew or workers new to their position
- Shift changes such as going from day work to night work
- Weather issues – extreme cold, heat, freezing rain, etc.

- Deviating from normal operating procedures
- Working with unfamiliar contractors

Completed JSAs must be kept in an area accessible to all employees.

New JSA Steps

Some tasks may be uncommon and some companies may not allow pre-written JSAs. In these situations, a handwritten JSA must be completed by an employee. Employees should follow the steps below when writing a new JSA:

- Outline the sequence of events
- Identify hazards associated with those events
- Document steps to be taken to mitigate the identified hazards.
- Identify the person responsible to ensure mitigation steps are taken

If conditions change or workers must deviate from the original plan, the job shall be suspended until the JSA is revised or a new JSA is completed.

TRAINING

New hires shall be trained on this program during their initial safety training. Practical hands-on training shall be conducted by their mentor.

During employees' first days on site, they shall be required to complete handwritten JSAs as practical training and review them verbally with co-workers. These JSAs will be compared against the formal JSA prepared by an experienced worker or the pre-written JSA if available.

SECTION 24: POWERED INDUSTRIAL TRUCKS

PURPOSE

Eastern employees utilize a variety of Powered Industrial Trucks in our daily operations. This may include Aerial Work Platforms and Forklifts. Due to the potential hazards involved with this equipment, this program outlines the requirements in place to ensure employee safety.

SCOPE

All employees are required to be trained and certified prior to operating each specific type of equipment. Eastern certifies all employees authorized to operate equipment internally. Under this program, each employee will be informed of the hazards associated with working at heights and the protective systems or equipment that are necessary to ensure work is conducted safely.

When work is performed on a non-owned or operated site, the site owners program shall take precedence, however, this document covers Eastern employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

RESPONSIBILITY

The Safety Director is responsible for the oversight and support of the Powered Industrial Equipment program. Each year he is to review the program and update it if necessary.

He shall ensure training is conducted in accordance with all program requirements. This training must be conducted before an employee is allowed to operate equipment.

Field Superintendents and Supervisors are to enforce the provisions of this program with their workers. They must ensure that the equipment is routinely inspected to evaluate potential hazards. During operations, they shall periodically observe employees to verify they are in compliance with this program.

In the event employees express concerns or inform them of defective equipment, they shall tag the equipment out of service until the issue is resolved or the equipment is repaired.

Employees must always utilize the proper devices or equipment in accordance with this program. In the event an employees is unsure about the type of equipment needed to safely perform work or issues are identified during an inspection, they must notify their Supervisor immediately. Issues warranting notification include missing, damaged or inadequate equipment.

AERIAL LIFTS / AERIAL WORK PLATFORM

An aerial lift device is defined as any device, vehicle mounted or manually propelled, telescoping or articulating, or both, which is used to position personnel above six feet in height.

All aerial lifts will be operated by trained personnel and will be designed and constructed in conformance with applicable requirements of the American National Standards. Aerial lifts may be "field modified" for uses other than those intended by the manufacturer provided the modification has been certified in writing by the manufacturer.

Lift controls shall be tested each day prior to use to determine that such controls are in safe working conditions. Tests shall be made at the beginning of each shift when equipment is used around the clock. Only authorized persons shall operate an aerial lift.

Employees shall be trained in the safe operation of the specific device they will operate. At no time are employees permitted to exceed the boom and basket load limits specified by the manufacturer. Employees shall always stand firmly on the floor of the basket, and shall not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position. An approved fall restraint system shall be worn when working from an aerial lift. Fall restraint systems are to be attached to the lifts boom or basket. Employees are prohibited from tying off to adjacent structures.

Aerial lifts shall have a working back-up alarm audible above the surrounding noise level or the vehicle is backed up only when an observer (spotter) signals that it is safe to do so.

The minimum clearance between electrical lines and any part of the equipment shall be 10 feet for lines rated 50 kV or below.

POWERED INDUSTRIAL TRUCKS (FORK LIFTS)

A Powered Industrial Truck (Fork Lift) is any mechanical device used for the movement of supplies, material or finished a product that is powered by an electric motor or an internal combustion engine. All employees are required to be trained and certified prior to operating each specific type of forklift equipment. Employees must be at least 18 years of age to operate fork lifts.

All forklifts are to be inspected before each shift and all repairs are made before the forklift is operated.

All approved forklifts shall have a manufactures identification plate attached showing all specifications of the forklift and that the forklift is accepted by a nationally recognized testing laboratory. Modifications and additions, that affect capacity and safe operation, shall not be performed without manufacturer's prior written approval. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed reflect the modification or addition.

If the forklift is equipped with front-end attachments other than factory installed attachments, the operator shall ensure that the forklift is marked to identify the attachments and show the approximate weight of the forklift and attachment combination at maximum elevation with load laterally centered. The operator shall see that all nameplates and markings are in place and are maintained in a legible condition.

All forklifts shall be equipped with seat belt, a horn, backup alarm, headlights and taillights. Forklifts shall be fitted with an overhead rollover cage, as per manufacturer's specifications.

TRAINING

Training shall consist of a combination of formal instruction (lecture, discussion, video or written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee) and evaluation of the operator's performance in the workplace.

All operator training and evaluation shall be conducted by authorized persons who have the knowledge, documented training, and experience to train powered industrial truck operators and evaluate their competence. Each operator is required to be re-evaluated every three years at a minimum. Training shall include the following topics:

1. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate,
2. Differences between the truck and the automobile,
3. Truck controls and instrumentation: where they are located, what they do, and how they work,
4. Engine or motor operation,
5. Steering and maneuvering,
6. Visibility (including restrictions due to loading),
7. Fork and attachment adaptation, operation, and use limitations,
8. Vehicle capacity,
9. Vehicle stability,
10. Any vehicle inspection and maintenance that the operator will be required to perform,
11. Refueling and/or charging and recharging of batteries,
12. Operating limitations,
13. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate,
14. Surface conditions where the vehicle will be operated,
15. Composition of loads to be carried and load stability,
16. Load manipulation, stacking, and unstacking,
17. Pedestrian traffic in areas where the vehicle will be operated,
18. Narrow aisles and other restricted places where the vehicle will be operated,
19. Hazardous (classified) locations where the vehicle will be operated,
20. Ramps and other sloped surfaces that could affect the vehicle's stability,
21. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust,
22. Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation, and
23. The requirements of CFR 1910.178 (Powered Industrial Trucks).

Mandatory refresher training shall be provided when unsafe operations are observed, after an incident, if operating a different vehicle type, changes in conditions or any time Eastern feels an operator requires refresher training. The trainer shall certify in writing that each operator has been trained and evaluated as required. The certification shall include the name of the operator, the date of the training, the date of the evaluation and the identity of the person(s) performing the training and/or evaluation.

OPERATIONS

While operating fork lifts, all operators shall wear a seat belt when operating a forklift.

Forklifts shall not be driven up to anyone standing in front of a bench or other fixed object. No person shall be allowed to stand or pass under the elevated portion of any forklift, whether loaded or empty.

Unauthorized personnel shall not be permitted to operate forklifts and no riders or passengers are permitted.

It is prohibited for arms or legs to be placed between the uprights of the mast or outside the running lines of the forklift.

A forklift is unattended when the operator is 25 ft. or more away from the vehicle, which remains in view, or whenever the operator leaves the forklift and it is not in view. When a forklift is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, and brakes set. Wheels shall be blocked if the forklift is parked on an incline.

Operators shall check to ensure brakes are set and wheel blocks are in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading.

There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.

An overhead guard (cages) shall be used as protection against falling objects. Eye protection shall be worn if equipment does not have an enclosed cab.

TRAVELING

Operators shall slow down and sound the horn at cross isles and other locations where vision is obstructed.

If the load being carried obstructs forward view, the operator shall be required to travel with the load trailing or use a spotter.

Operators are required to look in the direction of, and keep a clear view of the path of travel. Grades shall be ascended or descended slowly. On all grades the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.

Under all travel conditions the forklift shall be operated at a speed that will permit it to be brought to a stop in a safe manner. The operator shall slow down for wet and slippery floors.

Stunt driving and horseplay are prohibited.

While negotiating turns, speed shall be reduced to a safe level. Except when maneuvering at a very low speed, the hand steering wheel shall be turned at a moderate, even rate.