

HSE Manual | Flintco, LLC

UPDATED OCTOBER 2024





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Management Statement and Ethos

Management Statement

The management of Flintco, LLC is committed to the elimination of all jobsite accidents and injuries, property damage, fire damage and occupational illness. These objectives are all of equal importance and must be given equal attention in the implementation of the company safety policy.

The company not only has a legal obligation to provide a safe place to work, but more importantly a moral obligation to all employees of the company, trade partners' employees, visitors, and the public, as well as the protection of all adjacent property from damage. Each employee has the right to refuse to work in an unsafe condition without fear of retaliation. Nothing less will be accepted.

Supervisory employees must accept as part of their job description the responsibility for the prevention of accidents, the safety of workers under their direction, and the enforcement of company safety requirements.

Steve Eikanger President

Still Eller

Flintco, LLC

ETHOS I WILL HONOR AND RESPECT THE FLINTCO HERITAGE.

I WILL NOT LET MY PAST SUCCESSES LEAD ME

TO RELIEVE WILLET MY ENOUGH FOR TOMORROW. COMPLACENCY IS NOT PART OF OUR CULTURE. I AM COMMITTED TO THE SUCCESS OF MY COMPANY. MY TEAMMATES AND MYSELF, I AM HUMBLE. I AM RESULTS DRIVEN AND BELIEVE IF WE ARE NOT WINNING. WE ARE LOSING. I WILL UNDERTAKE ALL OF MY RESPONSIBILITIES WITH THE UTMOST HONESTY AND INTEGRITY. I WILL APPROACH EVERY TASK WITH PASSION, RESPONSIBILITY, CREATIVITY AND INNOVATION. I WILL SUCCEED. I BELIEVE THAT MEDIOCRITY IS UNACCEPTABLE AND MY TRAINING IS NEVER DONE - THERE IS NO FINISH LINE, I ENCOURAGE A FLEXIBLE APPROACH TO ACCOMPLISHING MILESTONES BUT I AM INFLEXIBLE IN MY EXECUTION. SAFETY AND QUALITY ARE PARAMOUNT. **CONTRIBUTE** TO OUR CULTURE AND COMMUNITY. I EXPECT LEADERSHIP AT EVERY LEVEL. I AM IN CONTROL OF MY ENVIRONMENT BECAUSE I OWN MY ACTIONS. I AM ACCOUNTABLE. AM FLINTCO. MUST BE EARNED EVERY DAY.

Crisis Flow Form & Media Statement

JOB NAI	ME:		JO	B NUMBER:
PROJECT Name	CT CRISIS TEAM	Number	1.	. Contact proper emergency agency (Fire / Ambulance / Police)
				. Secure Crisis Area
			3	8. Contact HSE Area Manager
1			4	 Contact Division President / Area Manager / Project Director
			5	5. "Buy time" statement to the Media
+			_	
AREA S	SAFETY MANAGE	Number	1.	. Contact Vice President, Steve Jordan – (918) 710-3327
			2	e. Get to site
Backup	1		3	3. Assign duties
1			4	Contact Division President (Alternate-Area Manager)
			5	5. Contact Employee Family
			6	5. Contact Owner / Owner Rep
			7	. Call OSHA
*				
Name	ON PRESIDENT	Number	1.	. Call Steve Eikanger (Tony DeStefano if can't reach Steve)
Backup			2	2. Contact Flintco General Counsel - Trent Gudgel (918)710-3410
Баскар			3	3. Dispatch spokesperson - Tony DeStefano (678)794- 6616
			4	. Alternate – Craig Saur (314)537-1878
	Steve Eikanger	O: (720) 778-5575		
		C: (303) 591-0843	1.	
	Backup:		2	
	Tony DeStefano	C: (678) 794-6616		3. Issue Company Wide Statement
	Tony DeStefano	0: (512) 822-7445	_1	. Call Craig Saur
		C: (678) 794-6616	1.	
+	Backup:		\longrightarrow $\begin{bmatrix} 2 \\ 3 \end{bmatrix}$	
	Craig Saur	0: (314) 733-2352	4	
		C: (314) 537-1878		DeStefano)

MEDIA STATEMENT

Injury Accident

(Flintco OR Oakridge) primary concern is for the well-being of those involved. Our thoughts and prayers are with individual(s) and their (family OR families.)

At this time, we are gathering information on the incident in full cooperation with the OSHA inspector and assisting them in their investigation. Safety is the top priority at Flintco, and we will share information once the details have been confirmed.

Contact Tony DeStefano, who will gather your questions and respond as information becomes available. You may reach him at (512)822-7445 or on his mobile at (678)794-6616.

Thank you.

Non-Injury Incident

This is a non-injury incident and our safety management team is in the process of investigating. Please contact Tony DeStefano, VP Human Resources, who will gather your questions. You may reach him at (512)822-7445 or his mobile at (679)794-6616. Once we have confirmed the information and details of the incident, we will contact you with a statement.

Thank you.

Emergency Action Plan (EAP)

Purpose

Flintco, LLC and its Subsidiaries are dedicated to the protection of its employees from emergencies such as tornadoes, fires, structural collapse, and chemical releases. When emergencies do occur, our Emergency Action Plan (EAP) is initiated. This EAP is in place to ensure employee safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a work place emergency.

OSHA's Emergency Action Plan requirements, found at **OSHA 29 CFR 1926.35**, require Flintco, LLC to have a written Emergency Action Plan (EAP). This EAP addresses emergencies that our company expects may reasonably occur at any of our construction sites.

The EAP communicates to employees, policies and procedures to follow in emergencies. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.

Administrative Duties

Flintco, LLC Superintendent or HSE Professional (or designee) is the EAP administrator, who has overall responsibility for the plan. This responsibility includes the following:

- Developing and maintaining a written Emergency Action Plan for regular and after hours work conditions
- Notifying the proper rescue and law enforcement authorities, and the building owner/ superintendent in the event of an emergency affecting the facility Taking security measures to protect employees

- Integrating the Emergency Action Plan with any existing general emergency plan covering the building or work area occupied
- Distributing procedures for reporting emergencies, the location of safe exits, and evacuation routes to each employee
- Conducting drills to acquaint employees with emergency procedures and to judge the effectiveness of the plan
- Training of designated employees in emergency response situations such as the use of fire extinguishers and the application of first aid/CPR
- Deciding which emergency response to initiate (evacuate or not)
- Ensuring that equipment is placed and locked in storage rooms or desks for protection
 Maintaining records and property as necessary
- Ensuring that our facility meets all local fire codes, building codes, and regulations.

The Flintco, LLC Superintendent or HSE Professional is responsible for reviewing and updating the plan as necessary. Copies of this plan may be obtained from the Flintco, LLC Site Administration office.

The Flintco, LLC Superintendent or HSE Professional has full authority to decide to implement the EAP if he/she believes an emergency might threaten human health. The following potential emergencies might reasonably be expected at this facility and thus call for the implementation of this EAP:

 Fire, Tornado, Lightning, Collapse, Chemical Release, etc. The following personnel can be contacted regarding further information about the written Emergency Action Plan or an explanation of duties under this plan: The Flintco, LLC Superintendent or HSE Professional.

KEY MANAGEMENT PERSONNEL CELL TELEPHONE NUMBERS INCLUDE:		
Key Management Member Cell Telephone Number		

If, after reading this plan, you find that improvements can be made, please contact the Plan Administrator, The Flintco, LLC Superintendent or HSE Professional. We encourage all suggestions because we are committed to the success of our Emergency Action Plan. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Alarms

Different emergencies call for different alarms to indicate what actions employees should take. Flintco, LLC has established an employee alarm system using air horn blasts. We use a distinctive alarm capable of identification as a signal whether or not to evacuate for each emergency. We realize that where alarm signals have similar sounds and are used for purposes other than to signal evacuation, they can be confused with the fire alarm signal and either be ignored or cause overreaction. Therefore, we use a distinctive signal for each purpose. We will use the tornado alarm to warn employees of tornado warnings only.

- Fire and Evacuation Alarm: Multiple 3-4 second bursts from an air horn
- Lightning Danger Alarm: Multiple 3 short quick bursts from an air horn
- Tornado Alarm: Continuous blast from airhorn

Because we may use the radio communication system as a means to deliver emergency information, all emergency messages have priority over all non-emergency messages.

We have posted the following emergency telephone numbers near telephones, or emergency notice boards, and other conspicuous locations for use when telephones serve as a means of reporting emergencies:

EMERGENCY CONTACTS			
Emergency Responder	Telephone Number		
Ambulance	911 or		
Fire Department	911 or		
Police Department	911 or		
Hospital			
Physician			

Emergency Reporting and Weather Monitoring Procedures

In the Event of an Emergency Requiring Evacuation:

- The alarm will consist of multiple 3-4 second bursts from an air horn.
- Employees will exit to the nearest safe designated evacuation point.

When employees detect an emergency that requires an evacuation, such as a fire or hazardous release, they should immediately leave the area and notify their supervisor. A supervisor, superintendent, safety personnel, or a member of management will notify the Fire Department.

Our backup method for reporting emergencies that require evacuation includes the following:

- Direct Verbal Communication
- Radio Communication

In the Event of a Tornado Watch

- We monitor possible tornadic activity by national weather service alerts
- We monitor possible tornadic storm activity by national weather service radar

Our backup method for monitoring tornadoes includes the following:

- Local weather service alerts
- Local weather radar

Responding to a tornado alarm:

 A tornado alarm will consist of a continuous burst from an air horn. This will continue for several minutes.

In the event of a tornado, it is corporate policy to provide emergency warning. Once employees are made aware of a tornado situation, they are to follow these procedures:

 Employees are to seek shelter in the lowest area in the building in a room with no windows.

- Employees that are in a temporary trailer are instructed to leave the trailer and seek shelter in a low-lying area free from debris.
- If the building has been constructed, employees should seek shelter in the lowest portion of the stairwells.
- This list will continue to be updated as project construction progresses.

Workers will cease work immediately and safely proceed to the designated safe area. Due to everchanging work areas the safe area could be moved accordingly. These safe areas are posted in the Flintco, LLC trailers.

Employees are not to leave the shelter or return to their regular duties until the all clear is given.

The Flintco, LLC Superintendent or HSE Professional or other designee will determine when it is safe for employees to leave their tornado shelter and return to work. At that time, the Plan Administrator will sound an all clear horn and work can be continued.

If anyone is injured or contaminated, the Plan Administrator will activate rescue and first aid actions.

Evacuation Procedures

Some emergencies require evacuation or escape procedures, while some require employees to stay indoors, or in a safe area. Our emergency escape procedures are designed to respond to many potential emergencies, depending on the degree of seriousness. Nothing in these procedures precludes the Plan Administrator's authority in determining whether employees should remain inside or evacuate.

The emergency evacuation procedures and assignments are designed to respond to many potential emergencies that require them, including: fire, explosions, chemical spills, collapse.

Employees need to know what to do if they are alerted to a specific emergency. After an alarm is sounded to evacuate, employees should take the following steps:

- Stop work immediately and proceed to the nearest available and safe exit to leave the facility.
- If a safe exit is unavailable, proceed to a room with an outside window, in the occurrence of fire, close and seal the door.
- Hang something light colored out the window and call or phone for help. DO NOT GO TO THE ROOF.

Once evacuated, employees are to head toward their designated exterior or safe area, where a head count will be performed, and further instructions given.

Procedures to Account for Employees

Trained evacuation personnel assist in safe and orderly evacuation for all types of emergencies that require evacuation. Once evacuation is complete, they conduct head counts. The employees selected are trained in the complete workplace layout and the various alternative escape routes from the workplace. Before leaving, these employees check rooms and other enclosed spaces in the workplace for employees who may be trapped or otherwise unable to evacuate the area. A list of trained personnel appears below:

All Frontline Supervisors and/or Superintendents

This list indicates a sufficient number of employees who have been designated by the company and trained to:

- Direct and assist in safe and orderly emergency evacuation
- Provide guidance and instruction for all types of emergency situations
- Be aware of employees with special needs who may require extra assistance Use the buddy system
- Avoid hazardous areas during an emergency evacuation.

The list of trained personnel includes at least one person from every area for every shift. This means that every trained evacuation person is responsible for seeing to approximately 15-20 evacuated employees. The trained personnel also serve as a resource of information about emergency procedures and conduct head counts once evacuation is complete.

Frontline supervisors must be aware of the locations of those employees working on a particular day when an emergency occurs, as well as suppliers, customers, and other non-employees on the premises, when an emergency occurs, and be aware of who is absent or otherwise away from the premises. Accounting for employees and non-employees will aid local responding fire/rescue departments in determining whether rescue efforts are necessary. Each department reports to their respective representative as follows:

 Report to your direct supervisor and supervisors will report to management.

Once each evacuated group of employees have reached their evacuation destinations, each trained evacuation employee:

- Takes roll of his or her group
- Makes sure all persons are accounted for
- Reports in to a central checkpoint managed by the Flintco, LLC HSE Professional assumes the role of department contact to answer questions

Head count results should be given to the local Fire Chief or firefighter, if requested.

No employees are to return to the buildings until advised by the Flintco, LLC Superintendent or HSE Professional or designee (after determination has been made that such re-entry is safe). If anyone is injured or contaminated, the Plan Administrator will activate rescue and first aid actions. If an emergency incident expands, the EAP Administrator may send employees home by normal means or provide them with transportation to an offsite location.

Non-Evacuation Emergency Procedures

Flintco, LLC has the following nonevacuation procedures:

- Small spills or small fires
- Any emergency where it would not be safe for employees to evacuate, or they need not evacuate. Responding to a tornado alarm

Plan Administrator Duties

During an emergency, the Flintco, LLC Superintendent or HSE Professional or other designated personnel will do the following:

- Assess the situation to determine whether an emergency exists, requiring activation of emergency procedures.
- Supervise all efforts, including evacuating employees.
- Call outside emergency services.
- Take all necessary measures to contain the hazard and prevent its spread to other nearby areas, with the assistance of emergency personnel.
- Direct the shutdown of facility operations when required.
- If the emergency is a biological agent, turn off the ventilation system in the building.
- If the emergency is a hazardous material spill, ensure that the hazardous material and any material with which it came into contact (gravel, soil, etc.), is abated by a trade partner who is licensed in the removal of hazardous material as required by federal, state, and local regulations and environmental agencies.
- Ensure that the emergency crew restores all emergency equipment to full operational status.
- Assisted by other qualified persons, begin to investigate the cause of the emergency and take steps to prevent a recurrence of such or similar incidents.
- Ensure that the cause of the emergency has been investigated and eliminated and that cleanup

- and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees, and that EPA, state, and local authorities have been notified, if required.
- Ensure that for spills or releases involving a hazardous substance at or above its reportable quantity, the following necessary information is recorded and reported: name of chemical(s) involved, whether the substance is listed under OSHA 40 CFR 302—extremely hazardous substances, estimated quantity of the released substance, time of the release and duration, medium into which the substance was released, health risks associated with the release, precautions taken to respond to the release, name and telephone numbers of persons who can be contacted for further information.

Rescue and First Aid

Designated first aid responders should provide first aid assistance within their capabilities to employees requiring it during emergency situations. Appropriate first-aid supplies have also been provided.

Professional emergency services responding in an emergency will help with and direct all rescue and medical duty assignments upon their arrival onsite.

Training

Our Plan Administrator reviews the Emergency Action Plan with each of our employees at the following times:

- Initially when the plan is developed
- Whenever a new employee is hired
- Whenever the employee is assigned initially to a job
- Whenever an employee's responsibilities or designated actions under the plan change
- Whenever new equipment, materials, or processes are introduced into the workplace
- Whenever the layout or design or thefacility changes
- Whenever the plan is changed



The information in this plan is not intended for casual reading but is intended to get the appropriate message across. We present the material for training in the following manner:

Site orientation

Flintco, LLC and its Subsidiaries perform drills for the following emergencies:

• Fires and Tornados. We hold these drills at least twice annually.

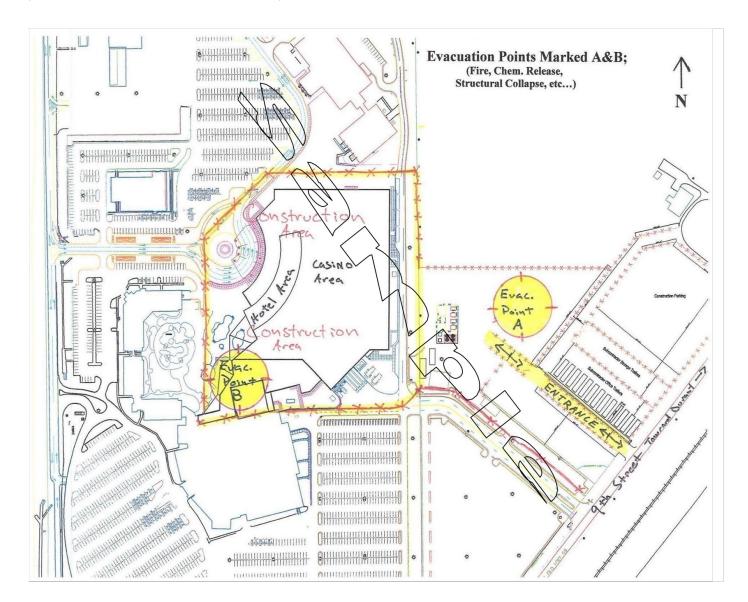
After a drill, the Plan Administrator judges the effectiveness of the plan and reviews any employee input concerning the drill. Employees performing the drill may identify something that did not follow procedure or was ineffective. For example, they

may discover doors that would not open; they may enter storage closets instead of exiting; they may get lost and confused or they may carry a suspicious package through the facility. These are the types of things the Plan Administrator needs to hear about after a drill. That way, they can be addressed before a real emergency.

Appendices

We have attached to this Emergency Action Plan, the following documents for reference to ensure a better understanding of our written program:

- Evacuation Checkpoints
- Emergency Equipment Entrance Points



Employee Hiring

Prior to new employees starting work, the following steps are to be taken. A new employee is a person who has not worked for the company within the last three months.

- Call the area office and schedule an appointment for the prospective employee to go in for a pre- employment drug screen and preemployment functional capacity test.
- 2. Inform prospective employee that after their collection is over to return to you and bring a copy of their signed chain of custody control form. Fax the chain of custody form along with a cover letter stating the prospective employee's name, social security number, and chain of custody number to Employee Services, attention Jill Lingle at (877)504-8349.
- 3. Once Employee Services has notified you with a "negative" result, contact the area office to schedule orientation. No prospective employee is to be put to work until steps 1 through 3 have been completed.
- 4. Each new employee and newly transferred employee will be instructed by the project superintendent in the recognition and avoidance of hazards conditions that is applicable to their work environment.

- 5. New hires should be assigned to a partner who has been with the company and is aware of the company's safety policy.
- 6. Project superintendents will issue to the new employee all personal protective equipment that will be needed by the employee.
- 7. Project superintendent will inspect or have inspected new employee's personal tools to ensure that all tools are in good condition.
- 8. New employees should be monitored to ensure they are performing their tasks in a safe manner.
- 9. Employees hired through a temporary service are to be interviewed by a member of the project team to determine what experience the person has in the construction industry.
- 10. The temporary employee will be made aware of the company's safety requirements, the employee's responsibility, and the hazards present at the project.

Employee Training

- Each employee who will be operating certain equipment must meet the requirements of the company operator's certification program and be conducted by a competent person.
 The training shall include formal instruction, practical training and operator evaluation in the workplace. Training on the equipment's operator manual will be completed on each piece of equipment. Each operator is re-evaluated at least every three (3) years. The equipment that requires certification including, but not limited to:
 - Cranes (Must be certified by an accredited organization after 5/21/07)
 - Bobcats
 - Forklifts
 - Backhoe
 - Concrete Pump Truck Driver
 - Self-propelled Boom Lift
 - Truck Driver
 - Scissor Lift
 - Personnel Hoist
 - Dozer
 - Moto-grader
 - Rigging
 - Signal Person
- 2. All temporary employees that operate company vehicles/equipment must have documented proof of training and or certification (if required by standard) and must be tested for proficiency prior to use by a Flintco, LLC competent person (operations staff or safety staff).
- A Tool Box Safety Training meeting will be held for the purpose of continuing training. Tool box safety training is to be held each and every Monday morning. A topic that reflects site

- specific issues should be chosen. Pre- Work Meetings are to be scheduled on a daily basis. Daily Pre-Work Meetings are to be documented.
- Employees who are engaged in certain tasks and operations are required to receive training, i.e., excavation, fall protection, scaffolding work. Consult the following for requirements: OSHA 29 CFR 1926
- 5. Employees will receive re-training when it is evident that an employee is not performing a task in a safe manner or if the employee is involved in an accident.
- 6. The HSE Department will conduct periodic safety training for supervisors and non-supervisory personnel.
- 7. Each employee who will be operating equipment or tools that require certification as outlined in the **OSHA 29 CFR 1926** must be certified before operation of equipment, i.e. power actuated tool, laser equipment, etc.
- 8. Project Managers, Engineers and Field Office personnel are required to take the OSHA 30 hour course.
- 9. Superintendents, Assistant Superintendents, and Foremen and are required to take the OSHA 30 hour course.
- 10. Field personnel are required to take the OSHA 10 hour course.
- 11. A valid certificate in First Aid/CPR/Blood Borne Pathogens/AED training must be obtained from the American Red Cross, or equivalent training that can be verified by documentary evidence.

Firearm/Weapons Free Work Place

STATEMENT OF FIREARM, WEAPONS-FREE WORKPLACE POLICY

Statement of Policy

It is the policy of the Company to maintain a work environment that is safe for all persons, including the community, and conducive to attaining high work standards. To achieve these objectives, the company is committed to a strong stand against firearms and weapons in the work environment.

It is the Company's policy to maintain a firearms and weapons free workplace and prohibit the possession of firearms and weapons regardless of any license or permit that an individual may have which would otherwise authorize the individual to carry firearms or weapons. The Company will strictly enforce this policy.

Definitions

Firearm - A weapon, a pistol or rifle, whether loaded or unloaded, capable of firing a projectile and using an explosive as a propellant. Exception: powder – actuated tools which are manufactured for the use of fastening building materials are not part of this policy.

Weapons - An instrument of attack or defense.

Office - All permanent facilities, all mobile facilities, all leased facilities, and any facility designated as an office by the Company.

Parking Lot - All lots at permanent facility, lots at project sites, any lot that the Company designates as a parking lot that is not at a permanent facility or project site.

Company Vehicle - All company-owned vehicles, all company-leased vehicles, all company-rental vehicles, and all personal vehicles for which the owner receives a vehicle allowance, all personal vehicles where the owner receives reimbursement for mileage.

Company Events - Company sponsored events, sporting events, award banquets, and picnics.

Search - To examine in order to find something concealed.

Jobsites - Any and all locations where the company conducts business.

Signs

- 1. At each entrance to offices, parking lots, and project sites, a sign shall be posted in a location that is conspicuous to all who could enter an office, parking lot, or project site.
- 2. Signs shall have wording or pictogram that prohibits firearms and weapons.
- 3. The absence of a sign does not excuse compliance with this policy.

Communication of Policy

- 1. Each employee of the Company shall receive a copy of this policy at the time of his/her hire and shall sign a copy of the acknowledgment. Employees who were employed before the effective date of this policy shall also receive a copy of this policy and shall sign a copy of the acknowledgment. A copy of the signed acknowledgment shall be maintained in each employee's personnel file.
- 2. A copy of this policy shall be attached to each trade partner's subcontract and shall become a part of its subcontract. The trade partner shall be responsible for communicating this policy to its employees and any employees and any second-tier trade partners that the trade partner sublets any portion of its contract.

Prohibited Conduct

- The transportation of firearms or weapons in company vehicles is prohibited. This includes but is not limited to, (a) to and from work, (b) when conducting company business, (c) at all times in company-owned or leased vehicles.
- 2. The carrying of permitted and non-permitted firearms while at company offices, parking lots, sponsored events, and job sites. In certain states, including Oklahoma, Georgia, Indiana, Kansas, Louisiana, Mississippi, Tennessee, Texas, and other states, employees are permitted to store firearms in their personal vehicles in company parking lots so long as the firearm is locked and secured inside the personal vehicle.

- Laws change frequently on this subject and the policy is deemed to update automatically with the law of the relevant state.
- 3. The carrying of weapons while at company offices, parking lots, sponsored events, and job sites is strictly forbidden.
- 4. Exception: powder actuated tools which are manufactured for the use of fastening building materials are not part of this policy.

Search

- The Company is frequently engaged in work where the owner reserves the right to search all vehicles prior to entering the work site and all persons and their personal effects.
- 2. The Company reserves the right to conduct reasonable, unannounced searches of company premises and personal searches of employees and others while entering, on, or leaving company premises, including, but not limited to, personal effects, vehicles, lockers, desks, tool boxes, clothing, meal containers, and baggage.
- 3. Individuals refusing to allow an inspection will not be detained or forced to submit to the inspection. Refusal violates company policy and constitutes voluntary termination of the employment relationship. Non-employees who refuse to allow an inspection will not be permitted on company premises.

Discipline

- 1. Violations of any portion of this policy will subject the employee to disciplinary action up to and including termination of employment.
- 2. Violations of by a trade partner's employee any portion of this policy will constitute insubordination and serious misconduct that will mandate the trade partner's employee to immediate removal from the Company's premises and barring future access to any company premises.

ACKNOWLEGMENT OF RECEIPT OF POLICY

I acknowledge that I have received Flintco, LLC Firearms and Weapon Free Workplace Policy and/or that I have thoroughly read the Policy and/or have had it explained to my understanding. I understand that I will abide by all terms of this policy and understand that my failure to comply with this policy will result in disciplinary action up to and including termination of employment.

I understand that compliance with this policy does not guarantee employment for any set or definite term and that my employment remains at-will, which means that either I or the company can terminate the employment relationship at any time, for any reason or no reason, with or without cause.

Date			
Print Name			
Signature			

FX Point Criteria

Objective

Flintco is committed to creating an incident and injury-free environment for all individuals working on our projects. This requires all employees to maintain a constant awareness of their surroundings and a willingness to correct unsafe conditions and behaviors before they result in an incident or injury.

The following criteria is designed to encourage employees to actively participate in creating a culture of safety within Flintco. Point deductions are meant to ensure that all injuries are reported so that we may collectively learn from them and prevent similar incidents.

How the Program Works

Earning Points:

- FX points will be awarded per quarter to each employee for being injury free.
- Additional FX points will be awarded per quarter if the employee's assigned area office the employee
 goes injury free.
- On-the-Spot FX points can be earned for proactive behavior such as identifying un-safe conditions, participating in safety solutions, etc. On-the-Spot FX points will be awarded at the discretion of Flintco management.

Operations & Field Employee		
Employee Recordable Injury Free	50 FX Points per Quarter	
Area Office Recordable Injury Free	30 FX Points per Quarter	
Office & Corporate Employee		
Employee Recordable Injury Free	25 FX Points per Quarter	
Area Office Recordable Injury Free	15 FX Points per Quarter	

Point Deductions:

- FX points will be deducted from the employee's account for failure to report an injury per Flintco policy.
- FX points will be deducted for a Class B safety violation as defined in Chapter 5 of the safety manual.
- FX points will be deducted for a Class C safety violation as defined in Chapter 5 of the safety manual.

Point Deduction Breakdown	
Failure Timely Report per Policy	-40 FX Points
Class B Safety Violation	-40 FX Points
Class C Safety Violation	-20 FX Points
Area Recordable Injury (Field/Operations)	-30 FX Points (one-time loss per quarter)
Area Recordable Injury (Office/Corporate)	-15 FX Points (one-time loss per quarter)

Definitions

To be eligible for safety points, an employee must work a minimum of 312 hours per quarter.

- A field employee is someone who has a title that contains "Project", "Superintendent", "Safety", "Office Engineer," or "Quality Control Coordinator" as well as those on the field payroll system (hourly).
- An office employee is any employee not defined as a field employee. This includes Area Managers and above and any non-project-based employees.
- A corporate employee is someone who is not part of a specific area office. If any corporate employee across all the offices has a recordable accident within the quarter, it will result in a loss of 15 FX points for all corporate employees for that time frame.

Motor Fleet Policy

Our motor fleet safety program is designed to promote safe driving on and off the job. When properly implemented, this program will help reduce the frequency and severity of incidents and violations in our vehicle operations. Our focus is on reducing the financial burden of incidents and the potential of personal injury. It is equally important that we maintain a strong public image of a company that puts safe drivers on the road.

Flintco, LLC/Oakridge considers the use of company provided vehicles and personal vehicles being operated on company business as part of the working environment. Operation of a company vehicle is both a privilege and a responsibility, not a right. Drivers are responsible for operating company vehicles according to federal and state laws and our company policy. Violation of these laws and rules will result in the loss of driving privileges.

Our HSE team members are responsible for investigating, documenting, contacting and maintaining communication with our Risk Management group and insurance carrier(s), and following up on automobile claims handling. This program also fits within our modified duty plans for emphasizing a prompt return to work for workplace injuries sustained from motor vehicle incidents, through a transitional duty assignment.

This program has been designed to address vehicles driven by or for:

- Delivery operations
- Transport operations between facilities,
- Related business purposes when using company vehicles or personal transportation

The driver's assigned manager or area manager and area safety manager will review all incidents.

Employees are required to immediately report all incidents and moving violations that occur during work-related activities, if they are driving a company-owned vehicle or personal vehicle on company business.

We will provide safe and reliable transportation to authorized drivers, and the resources for properly maintaining company vehicles. It is each driver's responsibility to ensure proper vehicle maintenance, exercise defensive driving habits, maintain a good driving record, and adhere to the company safe driving expectations and objectives of this program.

Employees who are authorized to drive personal vehicles on company business are expected to maintain their vehicles in safe operating condition, as well as provide the fleet coordinator with proof of liability insurance with minimum coverage that aligns with corporate risk management philosophy. All occupants of company vehicles and occupants of personally owned vehicles driven on company business must wear seat belts / restraints at all times.

We will adhere to all federal, state and local laws governing vehicle operation.

- Peter Kozicz, CEO
- Steve Eikanger, President
- Steve Jordan, Vice President of HSE

Vehicle Safety Program Elements

The following driver evaluation, selection, training, and reporting tools will be used to administer a successful safety plan:

See: Equipment Maintenance Warehouse (EWM) Company Vehicle Policy for procurement, replacement and mileage reimbursement

Driver Selection

Employees with poor driving records expose our company to potentially significant liability. We will only allow the use of company vehicles, and the operation of non-company owned vehicles on company business by those drivers who are qualified to drive based on the following criteria:

- Drivers must provide proof of a valid driver's license for the vehicle to be operated which may include a Commercial Driver's License
- Drivers must have an acceptable Motor Vehicle Driving Record (MVDR Policy Appendix A)
- Drivers will be subject to an annual MVDR review
- Drivers must be on the company's approved driver list
- Employees will be alcohol/drug tested at hire, randomly, for cause and post incident in accordance with our Company Substance Free Policy.

Employees who are assigned company vehicles or who regularly operate personal vehicles on company business are expected to maintain acceptable driving records, per the company's Motor Vehicle Policy.

Motor Vehicle Record Policy

It is Flintco policy that every employee who operates a vehicle (company owned or personally owned) does so safely and in accordance this policy and all applicable laws in the jurisdiction of operation.

A copy of a driver's Motor Vehicle Driving Record (MVDR) will be obtained upon employment and annually thereafter to ascertain that an applicant or existing driver has a valid license and acceptable driving record.

Appendix A of this section will be used to objectively evaluate applicants and existing employees who drive. Drivers with unacceptable driving records will be subject to having privileges revoked and possible removal from positions requiring driving.

A Motor Vehicle *Driving Record Authorization* and *Release (MVDRAR)* form and a *Company Vehicle Policy Acknowledgement (CVPA)* form must be completed and sent to the Risk Management Department upon employment and annually thereafter. The forms can be located in the Documents center under the Equipment Maintenance Warehouse (EMW) tab.

The following employees are required to submit an annual MVDRAR and CVPA:

- A company owned or leased vehicle
- A personally owned or leased vehicle used to conduct company business
- A rental vehicle used to conduct company business

Company Owned / Leased Vehicles Assigned to an Authorized Driver

It is the responsibility of the employee/driver to comply with these policies at all times when using the vehicle.

- The employee must have a current signed (Company Owned Vehicle Authorization) COVA on file with the Risk Management Department before using the vehicle.
- If the assigned vehicle is used by any company employee other than the person assigned to the vehicle, that person must also read these policies and sign the COVA before using the vehicle.

Company Owned Vehicles Assigned to a Project

It is the responsibility of the project manager to confirm an approved MVDR and COVA is on file with the Risk Management Department for each employee who drives a company vehicle.

Apportioned vehicles are heavy hauling vehicles specially licensed to drive through multiple states. If an apportioned vehicle is assigned to a project, it is the responsibility of the project manager, in conjunction with the Equipment/Warehouse Manager, to comply with all required regulations and paperwork.

Employee Owned /Leased Vehicles Utilized for Company Business

It is the responsibility of the employee/driver to comply with these policies at all times when using the vehicle.

- Employees must sign a Personally Owned Vehicle Acknowledgement (POVA) before using the vehicle for company business
- Employees shall provide proof of insurance on a semi-annual basis with limits that meet or exceed the minimum state requirements or those established by the company, whichever is provides a higher level of coverage. Company requirements are as follows: \$100,000/\$300,000 bodily injury, \$100,000 property damage, \$300,000 combined single limits

Withdrawal of Vehicle Privilege

The assignment of a company owned/leased vehicle is a privilege and this privilege may be withdrawn at any time.

Violation(s) of the following nature may result in revocation of company vehicle driving privileges and/or disciplinary measures up to and including termination. The following list is not inclusive of all violations:

- Unacceptable MVDR. Refer to the MVDR Policy
- Conviction or guilty plea to driving any vehicle under the influence of alcohol or an illegal substance
- Tampering with or disconnecting the odometer or GPS device (if so equipped).
- "Road rage" or aggressive driving.
- Abuse or misuse of the vehicle.
- Failure to comply with the rules and procedures set forth in company policy.
- Failure to comply with local, state, and federal laws.
- Possession of weapons, alcohol, or illegal substances
- Failure to comply with the company Mobile Communication Policy

A combination of and/or multiple violations of the following may result in withdrawal of the privilege to drive a company vehicle. The list is not inclusive of all violations that may result in loss of driving privileges.

- Speeding or other moving violations.
- Red light camera violation.
- Failure to obey traffic signs.
- Preventable or at-fault accident.
- Misuse of company fuel card, or fuel paid for or reimbursed by the company
- Careless and/or inattentive driving

Driver Responsibilities

The majority of vehicle accidents are a result of driver error, whether caused by inattentiveness, distractions, fatigue or lack of appropriate defensive driving. While driving a vehicle for business purposes, it is the employee's responsibility to remain attentive and drive defensively in an effort to continuously evaluate, recognize and avoid accident producing situations and physical conditions.

Driver fatigue has been identified as a leading contributor to roadway crashes. Fatigue affects driving performance by impairing information processing, attention and reaction times. Fatigue may cause a driver to fall asleep. Time of day, duration of wakefulness, inadequate sleep, sleep disorders and prolonged work hours have all been identified as major causes of fatigue.

- Employees are responsible for driving their vehicle in a safe and prudent manner.
- Employees must know and abide by all applicable driving laws while operating a company vehicle or personal vehicle on company business.
- Employees must maintain a valid driver's license issued by the state in which they are living.
- Notification of the Risk Management Department is mandatory if an employee's driver's license is revoked, suspended or restricted. It is the employee's responsibility to promptly report a revoked, suspended or restricted driver's license. Failure to do so may result in disciplinary action up to and including termination of employment.

Safe Driving Performance Expectations

Driving is a critically important part of the job for those employees assigned company vehicles or operating their own vehicle for company purposes. Evaluations of your job performance will include an evaluation of your driving performance.

The use of seatbelts is mandatory by all occupants of a company owned vehicle, personally owned vehicle, or company rental vehicle at all times, without exception. It is the driver's responsibility to ensure that all occupants fasten their seatbelts prior to operating the vehicle. Any malfunctioning seatbelt should be repaired and/or replaced immediately. The company reserves the right to revoke the driving privilege of any driver not complying with this policy.

All safety-related equipment on each vehicle must be functional at all times. This includes air bags, windshield wipers, defrosters, power steering, headlamps and backup lights, directional signals, horn, glass, mirrors and brakes. Each company vehicle should be suitably equipped with items for use in an emergency, whether the emergency is a collision or breakdown.

Each company vehicle shall have the following standard items:

- 1. Current insurance verification
- 2. Fire extinguisher
- 3. First aid kit
- 4. Usable spare tire, jack and lug wrench
- 5. Emergency kit (Yellow bag) containing our incident information forms.
- 6. Operators Manual

Safe driving performance also includes responsible use of mobile communications devices. Please make sure to read and follow the policies outlined in our Mobile Device Use Policy for Drivers (Appendix B).

Vehicle Maintenance

Employees are responsible for (1) ensuring their assigned vehicle is well maintained; (2) taking their assigned vehicle to approved service locations for scheduled maintenance; (3) reporting any damage, faulty equipment or other needed repairs to his/her supervisor; and (4) making sure their assigned vehicle is safe to operate on the road.

Every employee assigned a company owned vehicle or reimbursed for using a personally owned vehicle is expected to maintain his or her vehicle in a safe operating condition.

Maintenance schedules for company owned vehicles are mileage based.

- Employees are required to report mileage to the EWM on a monthly basis.
- It is the employee's responsibility to ensure that his/her assigned company vehicle is properly maintained in conformance with the Enterprise Fleet Management program. See Enterprise Fleet Management SOP
- After repairs and fuel, tires are the costliest operating expense. Proper tire inflation requires only a few minutes of work each week and will minimize expenses by extending tire life and enhance the safe operation of the vehicle.
 - a) Maintain the manufacturer's recommended tire pressure.
 - b) Check the pressure once a week, including the spare.
 - c) Carefully inspect tires for uneven wear, cuts, fabric breaks and abrasions.

Employees are expected to keep their vehicles clean and orderly.

Vehicle Security

Employees are responsible for ensuring all necessary precautions are taken to prevent damage and theft of their assigned company vehicle and/ or its contents at all times. To reduce risk of theft, employees should:

- Shut off the ignition and remove the keys when not operating the vehicle.
- Close all windows before leaving the vehicle unattended.
- Lock all doors before leaving the vehicle unattended.
- Do not leave merchandise or equipment in open view inside a vehicle.
- When possible, select an off-street, lighted area close to a business or hotel entrance where normal police surveillance or security protection exists to park a company vehicle over-night.

Vehicle Inspection Procedure

Employees are responsible for taking their assigned vehicle to approved service locations for scheduled maintenance. Employees are responsible for reporting any damage, faulty equipment or other needed repairs to his/her supervisor. Employees should routinely inspect their assigned company vehicle as follows:

- 1. Look for leaks of coolant, fuel or lubricants under the vehicle.
- 2. Note body condition.
- 3. Check battery water level, oil level, transmission fluid level, windshield washer fluid level, belt and hose condition and adjustment.
- 4. Start engine for warm up. Check for abnormal noise and gauges for normal readings. Try steering wheel for excess play.
- 5. Depress brake pedal for excessive travel, mushy or hard feel.
- 6. Check horn and windshield wipers.
- 7. Turn on all lights including the emergency flasher. Check high and low beam headlights.
- 8. Check tire inflation and tread.
- 9. Check emergency equipment, including fire extinguisher, first aid kit, emergency triangles, spare tire, jack, spare fuses and bulbs.
- 10. Check parking brake.

Trailering

Prior to employment in a position requiring towing a trailer on company business the employee must be trained in trailering. The use of a trailer with a company owned vehicle is prohibited without prior authorization from the EWM Department.

All employees who tow trailers in the course of company business are required to complete an online trailering safety video. (Contact EWM)

- Upon completion of the video training, the employee will be required to pass a short test of the material covered in the training for comprehension.
- Employees who have completed the trailering training will be required to sign a Trailering Safety Acknowledgement Form prior to commencing trailering activities.
- Trailer Authorized Drivers are required to complete pre-activity inspection forms to ensure that vehicle and trailering equipment are adequately sized for the intended loading.

Items to review include but are not limited to: trailer brakes and capacities, hitch systems and capacities, receiver hitch and trailer tongue compatibility, working lights, tire pressure, redundant securement, and trailer loading.

All trailering should be performed in accordance with local, state, and federal laws.

Acceptable Company Vehicles and Optional Equipment

When a vehicle is requested, and approval is granted by the CEO and Regional President, it is company policy to first determine if there is an unassigned vehicle currently available within the company's vehicle fleet. If an appropriate vehicle is available, it will be assigned to the eligible employee. If none is available, one will be obtained pursuant to the Company Equipment Acquisition Request process.

 Bumper/Window Stickers. No bumper or window stickers should be affixed to a company vehicle.

- Non-Standard Equipment. All deviations from the standard vehicle outfitting requires the authorization of the EWM Manager
- Alterations to Company Vehicles. Any alteration to an existing company owned vehicle requires the authorization of the EWM Manager
- Vehicle Turn-in. At vehicle turn-in, or at the time of an employee's departure from the company, a determination will be made by the Equipment/ Warehouse Manager as to whether the project to which the vehicle is assigned is responsible for damage considered beyond normal wear and tear. The assigned driver or project team should clean the vehicle prior return to the warehouse. All keys should be returned to the Equipment/ Warehouse Manager.

Company Vehicle Odometers

Company vehicle odometers shall be governed in accordance with the following Federal odometer laws and regulations.

Change of mileage indicated on the odometer is prohibited. No person shall disconnect, reset or alter the odometer of any motor vehicle with intent to change the number of miles indicated thereon.

Operation of a motor vehicle with knowledge of disconnected or non-functional odometer is prohibited.

No person shall, with intent to defraud, operate a motor vehicle on any street or highway knowing that the odometer of such a vehicle is disconnected or non-functional.

Criminal Penalties. Any person who knowingly and willfully commits any of the prohibited acts listed above is liable to be fined not more than \$50,000 and/or imprisoned not more than one year. Any Company employee who knowingly violates Federal laws specified above will be immediately terminated and the Company may pursue available legal remedies.

What to do in the Event of an Accident

- 1. STOP! When involved in a crash, however slight, do not leave the scene until speaking with the other driver, the police, or both.
- 2. Stay Calm Remain as calm as possible, avoid any inclination to react in anger, particularly when encountering another driver behaving irrationally.
- 3. Check yourself and others for Injuries Call for 911 for emergency medical help if anyone involved in the crash is bleeding, feels lightheaded, or is suffering any physical injury. Always error on the side of caution and call for help. Unless someone at the scene is specifically trained in emergency medical procedures, wait until emergency first responders arrive before attempting to move a person or perform emergency aid.
- 4. Keep Safety First When involved in a minor accident with no serious injuries, move the vehicles and occupants safely to the side of the road, out of the way of traffic. If a vehicle cannot be moved and no injuries have occurred, drivers and passengers should remain in the vehicle with seat belts fastened until help arrives. Turn on hazard lights and if safe to do so, place cones, flares, or warning triangles.
- 5. Contact the Police Calling the police from the crash site is the best action. If you cannot contact the local law enforcement, you should instruct someone else to do so. Police officers can address traffic infractions and take notes for the incident record.
- 6. You Are Not Required To Admit Fault Do not discuss specific details of the accident with anyone except the police. Be polite, but you are not required to, and you should not admit fault to the other driver or the police.
- Contact Your Supervisor Call your supervisor immediately and area safety manager as soon as possible.

- 8. Document the Accident Your vehicle accident kit contains a camera and a tape measure to aid in the documentation. Use your phone or the disposable camera provided in the accident kit to photograph the damage to all vehicles involved. Include photos that reveal the overall context of the crash road conditions, intersection site, traffic signs or lights, etc.
- 9. Exchange Information your vehicle accident kit also contains a card with a contact number on it and information exchange forms. Record in writing all pertinent information concerning the incident, including:
 - The Incident The time and date, a
 description and exact location of the
 accident scene, and any recollection of your
 vehicle's handling or mechanical functioning
 immediately prior to the crash.
 - Involved Parties Names, addresses, telephone numbers, vehicle and driver's license numbers, and their insurance carrier.
 Do not give them our insurance card.
 Give them the information card that has the safety department phone number on it.
 - Witnesses Names, addresses, and contact information.
 - Police Officers Names, badge numbers, where to obtain a copy of the police report, and issuance of any citations.

Reporting the Accident

All accidents, no matter how seemingly inconsequential, must be reported to your Supervisor and Area Safety Manager **immediately** and to the Equipment/Warehouse Manager, and Risk Management as soon as possible **but no later than 8 hours following the incident.**

Accident Report

 A Vehicle Accident Form, Notification of Incident Form, Property Damage Form, and police investigation information (if applicable), must

- be completed and submitted to the Equipment/ Warehouse Manager, Safety Department and Risk Management within 24 hours of the accident.
- If an employee is involved in an accident while on company business with their personally owned vehicle, they will be responsible for completing the Vehicle Accident Form and Notification of Incident Form per the Accident Reporting Process, found in Section 7 of the Company Safety Manual. The employee should notify Risk Management as soon as possible, but at least no later than eight (8) hours following the accident.
- Any employee involved in an accident while on company business will be subject to the company Drug Free Workplace policy.
- Failure to comply may have serious consequences for the employee and may result in disciplinary actions up to and including termination.

Repair Authorization

- Advance approval from the Equipment/ Warehouse Manager must be obtained before you authorize accident repairs and service work in excess of \$50.00.
- Employee must obtain receipts for all work performed on a Company Owned vehicle.
- If employee pays for reimbursable work under \$50.00, the charges should be entered on his/ her expense report for reimbursement.
- Employees may authorize emergency repairs required to make the vehicle operational outside of normal business hours. However, the Equipment/Warehouse Manager must be contacted the next business day indicating the repair and service work performed. Employees should be familiar with the vehicle's warranty coverage to prevent unnecessary payment for covered parts and service.

Preventable Accident Accountability

Any employee responsible for a preventable accident as defined by Appendix C of the Motor Fleet Policy involving a company owned vehicle shall be assessed \$500.00 payable within 10 days of assessment. Failure to make payment when due will result in loss of company owned vehicle driving privileges. Any driver responsible for a preventable accident also may be required to complete a state approved defensive driving course at the driver's expense.

Stolen Vehicle

If a company owned vehicle is stolen, report the theft immediately to the local police, the Equipment/Warehouse Manager, Safety Department and Risk Management.

The employee should keep a copy of the stolen vehicle police report for his/her personal files and submit one copy to the Equipment/Warehouse Manager.

Employees should not make accusations or press charges against anyone being held in connection with a theft of a company owned vehicle without the Legal Department's prior approval.

Stolen Items

Any attempted break-in or theft of items from a company owned vehicle must be reported to the local police. The company requires the following information be provided to the Equipment/ Warehouse Manager.

- The name, badge number and precinct/unit number of the police officer(s) responding to your call.
- A list of the stolen items including the model and serial number.
- The date and location of attempted break-in or theft.

APPENDIX A

Motor Vehicle Driving Record (MVDR) Policy

It is a Flintco, LLC/Oakridge policy that every employee who operates a vehicle on company business does so safely and in accordance with all applicable motor vehicle laws.

An employee's MVDR will be examined prior to the assignment of a company vehicle and at least monthly thereafter. An employee's MVDR is evaluated according to the most recent (rolling) 3-year period. If an employee has any alcohol related infraction on his/her MVDR, then the evaluation period may be extended to a 5-year period.

Risk Management will assess and evaluate every driver's record continuously against the point system below:

Point System	
Speeding Ticket and Minor Violations	4 Points
Distracted Driving	6 Points
Red Light Camera Violations	10 Points
Speeding Ticket of 20 MPH or More Above Posted Limit	10 Points

Minor Violations - 4 points

- Motor vehicle equipment, load or size requirement
- Improper or failure to display license plates (if applicable)
- Failure to sign or display registration
- Failure to have a valid driver's license in possession (if applicable)
- Failure to produce evidence of insurance
- Cited moving violations
- Speeding less than 20 MPH above posted limit.
 Speeding of 20 MPH or more above the posted limit will result in 10 points
- Blocking or retarding traffic
- Crossing yellow line, driving left of center
- Disobeying traffic lights, signs, or signals
- Driving on shoulder
- Driving uninsured vehicle
- Driving with an expired or invalid driver license (has not been suspended or revoked)
- Driving with blocked vision or tinted window
- Driving with expired plates or without plates
- Driving without registration or without proper registration
- Driving wrong way on one-way street
- Failure to display a driver's license
- Failure to have vehicle under control

- Failure to signal
- Failure to stop or yield to pedestrian
- Failure to yield right-of-way
- Faulty equipment, such as defective exhaust, horn, lights, mirror, muffler, signal device, steering device, tail pipe, or windshield wipers
- Following too closely
- Improper backing, such as backing into intersection or highway, backing on expressway, or backing over a crosswalk
- Improper blowing of horn
- Improper turn
- Invalid or unofficial inspection sticker, failure to display inspection sticker
- License plates improperly displayed or not displayed
- Operating overloaded vehicle
- Seat belt or child restraint violations, unless charged with child endangerment
- Spilling load on highway
- Spinning wheels, improper start, zigzagging, or weaving in traffic
- Violation of noise control ordinance (vehicle)
- Violation of driver license restrictions
- Violate Promise to appear (not the same as Failure to Appear)

Major Violations - 20 points

- Driving under the influence of alcohol/drugs
- Two preventable or at-fault accidents causing property damage or personal injury
- Two speeding tickets of 20 MPH or more above posted limit
- Failure to stop/report an accident
- Reckless driving/racing, dragging or speeding contest
- Open container

- Making a false accident report
- Homicide, manslaughter, or assault arising out of the use of a vehicle
- Driving while license is suspended/revoked
- Careless and imprudent driving
- Improper passing, such as passing on the right, passing in a no-passing zone, passing a stopped school bus, or passing a pedestrian in crosswalk
- Attempting to elude a police officer

Major violations will disqualify an employee from company vehicle driving privileges and the employee will be subject to additional disciplinary actions up to and including termination.

Note: Other violations (some examples noted above) will be assessed or weighted at the discretion of Risk Management.

Driving records are judged to be **Clear (O points)**, **Acceptable (1 – 14 points)**, **Borderline (15 – 19 points)**, **or Unacceptable (20 points or more)** over the rolling 3-year evaluation period. Again, a 5-year period may be evaluated if an alcohol offense is noted within the MVDR.

Anyone scoring 6 points within a 12-month period will be required to take a state approved Defense Driving Class at their expense.

Anyone scoring **Borderline** will be required to meet with EWM Director, Regional President, Risk Manager, and Chief Administrative Officer to discuss circumstances of the accidents or violations. A written warning will be issued. A new MVDR must be provided no later than 6 months after the meeting.

Anyone scoring **Unacceptable** will attend a meeting the EWM Director, Regional President, Risk Manager, and Chief Administrative Officer to discuss circumstances of the accidents or violations. The employee will be required to turn in any assigned company vehicle and will be expected to use other means of transportation. Major violations may also be subject to additional disciplinary measures, up to and including termination. Any exceptions are at the discretion of the President which will be documented including the circumstances warranting an exception.

APPENDIX B

Mobile Device Use Policy for Drivers

Policy regarding use of cellular phones, personal digital assistants (PDAs), converged devices, texting devices, computers and other mobile electronic devices.

Our company is committed to providing a safe work environment for all our employees. In addition, we strive to prevent injury to third parties while our employees are performing work-related activities.

Using cellular phones, computers, messaging devices, or any other mobile electronic device while operating a motor vehicle is a critical safety concern for Flintco/Oakridge. As research has shown, such devices significantly distract drivers. Distracted driving increases the likelihood that a crash will occur.

This policy is intended to control the circumstances under which an employee can utilize a cell phone or other remote device while operating a motor vehicle on company business, regardless of whether the vehicle is company-owned or employee-owned.

Flintco / Oakridge requires all drivers on company business and drivers operating a company-owned vehicle for personal use to adhere to the following policy parameters while operating the motor vehicle:

- Employees must comply with federal, state or local laws and regulations that may exist to control usage of mobile devices while operating a motor vehicle.
- If it is necessary to place a cellular phone call at any time while operating a motor vehicle, the

- employee will safely drive his or her vehicle to an off-road location where the vehicle can be stopped without risk to the employee or any third party.
- When pulling over safely is not an option, all mobile phone use must be hands free. Any phone not equipped for hands free operation will not be used while operating a motor vehicle. Focusing on the driving task should be the driver's first priority.
- Drivers will not send, or review received text messages, either on a company-owned or personally-owned device.
- Drivers will not operate any other mobile device, including but not limited to a Tablet, iPad, Personal Digital Assistant (PDA), converged device, pocket PC, binaural headset-based audio device, such as an MP3 player or laptop computer, either in a company owned or personally owned vehicle while on company business.
- Navigation systems will be programmed before the trip is started, not while the motor vehicle is in operation.
- Any employee who fails to adhere to this policy may be subject to disciplinary action, including, for example, written warning and/or subsequent restrictions on using a vehicle for company business. Employee safety is a priority at Flintco / Oakridge, and your adherence to these guidelines will help us maintain the personal safety of our employees as well as that of our fellow drivers on the road.

Driver Receipt I hereby acknowledge receipt of the Mobile Device Use Policy for D directives set forth in this policy and to conduct myself according to	
Signature	Date
Printed Name	

APPENDIX C

Preventable Accidents

One in which the driver failed to exercise every reasonable precaution to prevent the accident. This is irrespective of whether or not there is property damage or personal injury, the extent of the loss of injury, to whom it occurred and the location of the accident. In order for a person to avoid being involved in a preventable accident, each driver should understand and practice the concept of defensive driving. "Defensive driving" is driving so as to prevent accidents in spite of the incorrect actions of others and adverse driving conditions; such as light, weather, road, traffic, vehicle condition and your physical and mental state.

The National Safety Council lists the following as preventable accidents:

- 1. INTERSECTIONS It is the responsibility of all drivers to approach, enter and cross intersections prepared to avoid accidents that might occur through the actions of other drivers. Complex traffic movement, blind intersections, or failure of the "other driver" to conform to law or traffic control devices will not automatically discharge an accident as not "preventable." Intersection accidents are preventable even though the driver has not violated traffic regulations. Failure to take precautionary measures prior to entering the intersection is a factor in determining if an accident is preventable. When a driver crosses an intersection and the obvious actions of the "other driver" indicate possible involvement in an accident either by reason of excessive speed, crossing the lane in turning, or coming from behind a blind spot, involvement in the accident is preventable.
- 2. VEHICLE AHEAD Regardless of the abrupt or unexpected stop of the vehicle ahead, a driver can prevent rear-end collisions by maintaining a safe following distance at all times. This includes being prepared for possible unexpected stops on the highway, either in plain view or hidden by the crest of a hill or the curve of a roadway.

- Overdriving headlights at night is a common cause of rear-end collisions. Night speed should not be greater than that which will permit the vehicle to come to a stop within the forward distance illuminated by the vehicle's headlights.
- 3. VEHICLE BEHIND Investigation often discloses that driver's risk being struck from behind by failing to maintain a margin of safety in their own following distance. Collisions involving the rear of the vehicle, which are preceded by a roll-back, an abrupt stop at a grade crossing, when a traffic signal changes, or when the driver fails to signal a turn at an intersection, should be charged as preventable. Accidents resulting from the failure to signal intentions or to slow down gradually should be considered preventable.
- 4. PASSING Failure to pass safely indicates faulty judgment and the possible failure to consider one or more of the important factors a driver should observe before attempting a maneuver. Unusual actions of the driver being passed or of oncoming traffic might appear to exonerate a driver involved in a passing accident; however, the entire passing maneuver is voluntary and the driver's responsibility.
- 5. BEING PASSED Sideswipes and cut-offs involving a driver being passed is preventable when the driver fails to yield to the passing vehicle by slowing down or moving to the right where possible.
- 6. ONCOMING It is extremely important to check the action of a driver involved in a head-on or sideswipe accident with a vehicle approaching from the opposite direction. Exact location of vehicles prior to and at the point, should be carefully verified. Even though an opposing vehicle enters a driver's traffic lane, it may be possible for the driver to avoid the collision by slowing down, stopping or moving to the right. Failing to signal the opposing driver by flashing the headlights or sounding the horn should also be taken into account.

- 7. FIXED OBJECTS Collisions with fixed objects are preventable. They usually involve failure to check or properly judge clearances. New routes, strange delivery points, resurfaced pavements under viaducts, inclined entrance to docks, marquees projecting over a traveled section of road, and similar situations are not, in themselves, valid reasons for excusing a driver from being involved in an accident. A driver should be constantly on the lookout for such conditions and make the necessary allowances.
- 8. PEDESTRIANS Since a driver of a motor vehicle has the responsibility to yield the right of way to pedestrians, primarily due to their vulnerability to injury when involved in an accident, most pedestrian accidents are preventable. An unusual route of a pedestrian at mid-block or from between parked vehicles does not relieve a driver from taking precautions to prevent such accidents. Whether speed limits are posted, or the area is placarded with warning signs, speed may be too fast for conditions. School zones, shopping areas, residential streets, and other areas with special pedestrian traffic should be traveled at reduced speeds equal to the particular situation. Bicycles, motor scooters, and similar equipment are often ridden by young and inexperienced operators. The driver who fails to reduce speed and increase side space cushions when approaching this type of equipment has failed to take the necessary precautions to prevent an accident. When unusual conditions call for voluntary reduction of speed, merely keeping within posted speed limits is not taking the proper precaution.
- 9. PRIVATE PROPERTY When a driver is expected to make deliveries at unusual locations, constructions site, etc., or on driveways not built to support the weight of the vehicle being driven, it is the driver's responsibility to discuss the operation with the proper authorities and to obtain permission prior to entering the area.
- 10. PASSENGER ACCIDENTS Passenger accidents in any type of vehicle are preventable when

- they are caused by faulty operation of the vehicle. Even though the incident did not involve a collision of the vehicle, it must be considered preventable when a driver stops, turns, or accelerates abruptly. Emergency action by a driver to avoid a collision that results in passenger injury should be checked to determine if proper driving prior to the emergency would have eliminated the need for the evasive maneuver.
- 11. NON-COLLISION Many accidents, such as overturning, jack-knifing, or running off the road may result from emergency action by the driver to avoid being involved in a collision.

 Examination of events prior to the incident may reveal speed too fast for conditions, or other factors. The driver's actions prior to involvement should be examined for possible errors or lack of defensive driving practice.
- 12. MISCELLANEOUS Projecting loads, loose objects falling from the vehicle, loose tarpaulins or chains, doors swinging open, etc., resulting in damage to the vehicle, cargo, or other property or injury to persons, are preventable when the driver's action or failure to secure them are evidenced. Cargo damage, resulting from unsafe vehicle operation, is preventable by drivers.
- 13. PARKING Unconventional parking locations, including double parking, failure to put out warning devices, etc., generally constitute evidence for judging an accident preventable. Roll-away accidents from a parked position normally should be classified as preventable. This includes unauthorized entry into an unlocked, unattended vehicle, or failure to properly block wheels or to turn wheel toward the curb to prevent vehicle movement.
- 14. BACKING Practically all backing accidents are preventable. A driver is not relieved or responsibility to back safely when a guide is involved in the maneuver. A guide cannot control the movement of the vehicle; therefore, a driver must verify all clearances.

Policy Responsibility

HSE DIRECTOR

- Provide vision and means to accomplish a sound and effective safety program.
- Consult and support policy disciplinary action for employees who willfully disregard the policy.
- Conduct periodic safety observations and file reports.
- Incident analysis and lessons learned.
- Establish procedure for treatment of injuries.
- Establish HSE procedures and provide training for personnel.
- Provide all federal, state, and local safety code requirements.
- Establish and maintain incident reporting programs and recordkeeping.
- Keep current with all regulations and develop new policy as needed.
- Hold quarterly round table meetings with each area office supervisory personnel.
- Once a year the HSE Director and one member of management from each area office shall review the effectiveness of the safety program. This will be done to determine areas of the program that are deemed ineffective or need to be addressed. A decision will be made as to addition to or removal from the existing program.

ESTIMATING

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy.
- With regard to safety, be responsible for including the proper amount of materials,

- safety equipment, and money to properly protect personnel and property.
- Utilize Pre-Bid Safety/ Health/Security Planning for evaluating and controlling costs:
 - Exposure of people
 - Adjacent property
 - Trench safety
 - Fall protection
 - Asbestos
 - Personal Protection Equipment
 - Housekeeping
 - Fire protection
 - Street traffic
 - Pedestrian traffic
 - Lead
 - Scope of proposed operation

AREA MANAGER

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy.
- Create uncompromising expectations for the attainment of safety performance excellence
- Integrating attainable leading and lagging performance indicators into business plan
- Establish and reward safety milestone accomplishment
- Develop annual Safety Management Action Plan
- Begin all meetings with safety performance status and areas of concern
- Regularly integrating safety messages into correspondence

- Reaffirm the Flintco 4 LIFE philosophy often
- Provide adequate staffing of the safety function
- Authority to stop work

PROJECT DIRECTOR

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy.
- Create uncompromising expectations for the attainment of safety performance excellence
- Communicate safety expectations to Project Managers and Superintendents
- Provide the necessary support and resources to Project Managers and Superintendents
- Develop action plans to accomplish the goals, address problem areas and problem employees
- Closely measure and monitor supervisory safety performance
- Create uncompromising expectations for the attainment of safety performance excellence
- Begin all meetings with safety performance status and areas of concern
- Monitor Project Manager and Superintendent for one documented safety checklist per day per project/s of supervision
- Evaluate that adequate equipment, tools, and personnel are present to perform the work required.
- Review all accidents within 24 hours that occur on the project in area office jurisdiction with the superintendent whose project the accident occurred on.
- Evaluate operation where the hazards for personal injury are the most likely to occur, such as excavation, elevated work, large scale scaffolding, and operation requiring the use of cranes.
- Strictly enforce pre-employment drug screening and employee orientation.
- Conduct pre-job counseling for all new or

- promoted foremen in their safety responsibility and accountability.
- Review all new projects for safety sensitive issues.

PROJECT MANAGER

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy.
- Communicate safety expectations
- Provide the necessary support and resources
- Develop action plans to accomplish the goals, address problem areas and problem employees
- Begin all meetings with safety performance status and areas of concern
- Closely measure and monitor supervisory safety performance
- Model desired behaviors
- Assure working safely is a condition of employment
- Impress upon supervisory personnel who report to you their personal responsibility and accountability of everyone to maintain a safe workplace
- Lead incident analysis alongside Project Superintendent
- Participate in all accident analysis, lessons learned, JHA, and pre-task briefings
- Shared responsibility with project
 Superintendent for one documented safety
 checklist per day per project/s of supervision
- Check jobsite safety record on a regular basis, noting accident trends.
- At all project meetings, ensure that trade partner's supervisory personnel are aware of Flintco LLC/Oakridge HSE Policy.
- Verify that the project superintendent is maintaining all logs correctly and up to date.
- See that pre-construction conferences are held

- with each trade partner prior to trade partner starting their work.
- Ensure that all safety submittals are on file and current for each trade partner prior to work activities

SUPERINTENDENT

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy.
- Be completely responsible and accountable for on-site safety and record keeping for the project.
- Model desired behaviors
- Begin all meetings with safety performance status and areas of concern
- Assure working safely is a condition of employment
- Conduct JHA and Pre-task safety reviews/ briefings
- Make Pre-task planning the most important thing you do
- Educate employees on policies, procedures and accountability for non-compliance
- Frequently observe and discuss individual safety performance
- Shared responsibility with Project Manager for one documented safety checklist per day per project/s of supervision.
- Purchase and make available all necessary personnel protective equipment, job safety materials, and first aid equipment.
- Oversee the compliance of all safety policies and regulations by the companies' employees, trade partners and their employees.
- Instruct the foremen that safe practices are to be followed and safe conditions are to be maintained throughout the duration of the project.
- Participate in all incident analysis and fill out

- appropriate forms. Superintendent's signature is required on all incident reports.
- Inform the foremen that they are not to require or permit workers under their supervision to work in an unsafe condition, but rather instruct their workers in proper and safe procedures.
- Review all incidents with foremen and see that lessons learned action is taken immediately.
- Establish first aid, fire protection, sanitation, and water facilities.
- Responsible for job layout and inspection of all operations.
- Ensure that a competent person is present where required, such as, excavation, scaffold erection and dismantling.
- Have available copies of company safety manual, material safety data sheet book, all federal, and other applicable regulations at the jobsite office. If a superintendent is transferred prior to the end of the project the outgoing superintendent shall take their manuals with them to their new project. The contents of their material safety data sheet book will be transferred to the incoming superintendent's material safety data sheet book.
- Keep all safety posters and forms posted in the jobsite bulletin board current.
- Be familiar with the laws pertaining to safety and their basic requirements.
- Authority to stop work

PROJECT SAFETY

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy
- Assist Project Manager and Project
 Superintendent in performing their activities
 - Consult with and support
 - Regulatory compliance
 - Regulatory training

- Industrial hygiene
- Conduct frequent Flintco 4 LIFE walks for assurance, acknowledgement and contribution
- Participate in all incident analysis, lessons learned, JHA, and pre-task briefings
- Foster a learning environment
- Coach, mentor and educate project management on safety responsibilities
- Make a documented Flintco 4 LIFE walk daily of project or each daily visit if multiple site responsibility.
- Implement safety program as written
- Trend safety and incident data
- Authority to stop work

PROJECT ENGINEER

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy
- Observe policies and procedures
- Model desired behavior
- Begin all meetings with safety performance status and areas of concern
- Participate in all Incident analysis, lessons learned, JHA, and pre-task briefings
- Recognize good performers and correct poor performers
- Provide employees with the necessary safety resources
- Participate in daily documented safety inspection per project as directed by supervision
- Authority to stop work

ASSISTANT SUPERINTENDENT / FIELD ENGINEER / FOREMAN

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy
- Begin all meetings with safety performance status and areas of concern
- See that the entire safety program is carried out at the work level.
- Participate in all incident analysis, lessons learned, JHA, and pre-task briefings
- Make sure only safe conditions exist in their work area.
- Make sure that necessary protective equipment is on hand and being used.
- Coach, mentor and educate employees in safety procedures and job safety requirements.
- Conduct craft safety training meetings on a weekly basis and discuss safety in personal contact with employees.
- Participate in daily documented safety checklist per project as directed by supervision.
- Recognize good performers correct poor performers
- See that all injuries are cared for properly and reported to the project superintendent promptly.
- Be familiar with safety regulations pertaining to safety and their basic requirements.
- Authority to stop work

EMPLOYEE

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy
- Abide by company safety rules and regulations on the job.
- Observe others around you for dangerous working habits or conditions and report such activities to your foreman.
- Make good safety practices a habit.
- Attend all safety training meetings.
- Never hide unsafe conditions.
- Immediately report any accident or near miss to your foreman.
- All levels of Flintco LLC/Oakridge employees as well as employees of all Trade Partners have the authority to correct a hazardous condition that they observe. If the employee does not know the correct procedure to make the correction, then the employee should contact their supervisor for assistance in making such correction.

TRADE PARTNER

- Enforce this policy and implement disciplinary action for employees who willfully disregard the policy
- Fill out and turn in daily, a pre-task plan for all work activities
- Conduct JHA and pre-task safety reviews/ briefings daily
- Assure that all employees attend a safety training meeting each week.
- Supply and maintain a first aid kit on the jobsite and provide any and all necessary non-emergency transportation for injured employees.
- Immediately notify the general trade partner of any incident involving trade partner, employee, vendor, or visitor to the jobsite.
- Provide a copy of the state's First Report of Injury, Trade Partner Accident Form, Injured Employee and Witness Statement to the project superintendent within 24 hours of the accident
- Supply and ensure the use of personnel protective equipment for their employees in accordance with OSHA standards.
- Maintain work area in a neat and orderly manner and remove debris and rubbish on a continuous basis
- Comply with all OSHA standards.
- Provide safety submittals prior to work activities.
- Instruct their employees in the safety procedures and accident prevention.
- Authority to stop work

Pre-bid Safety / Health / Security Planning

Due to the significant costs related to the loss potentials of certain construction activities, it is essential that early identification, evaluation, and planning be utilized to effectively and consistently control such costs. This is to be used as a means of evaluating and controlling these costs.

Scope of Proposed Operations

- Safety professional salary (percentage included depending on contract requirements)
- Review plan and specifications; type of work; insurance coverage provided
- Applicable safety standard (OSHA, state, local, contractual, other)
- Soil conditions (soil) borings, studies, analysis, and considered controls
- Project starting date and duration
- Subcontract work, certificates of insurance?
- Pre-job Planning and Safety Meeting

Exposure to People - Present and Future

- Walkway(s) needs and conditions (installation and maintenance program for pedestrians)
- Directions to public (Flagman, warning signs, lighting, fencing, barricading, etc.)
- Proximity of operations to children and general public (schools, playgrounds, parks, churches, residential areas, hospitals, commercial or business area, etc.)
- Maintenance of protection during non-working hours and in adverse weather
- Consider "attractive nuisances" caused by excavations, water holes, pipes, ladders, scaffolds, heavy equipment

Adjacent Property

- Proximity, type and values of adjacent property exposures. Potential for business interruption exposures?
- Underpinning, sheeting, freezing, tiebacks, slurry walls, and other excavation procedures. By whom?
- Vibrations (from pile driving, blasting, concrete breaking, and frost ball operations, compactors, and instrumentation for monitoring vibrations)
- De-watering and recharging (deep wells, well points, water sources, surface drainage, design criteria - by whom? Monitoring system)
- Trespassing (employees, material, supplies, equipment operation, spoil disposal parkway, fences, sidewalks, driveways, etc.)
- Pre-job surveys needed by whom? Records?
 Record preservation? Photos? Sketches?
 Previous settlement? (Evaluation by independent experts may be desirable depending on exposures)
- Constant monitoring of elevation points on adjacent structures to detect any evidence of settlement applicable? (Consider Post-job surveys to confirm "Damage" or "No damage")
- Railroad exposure (proximity, number and type of trains, etc)
- Pollution exposures

Exposure to Street Traffic

- Plans for approved barricading and lighting. What standards or requirements apply?
- Construction and maintenance of detour routes (pilot vehicles, Flagman, dust control, weekends, holidays, non-working hours, etc.) Authority (local officials and property owner's consent, etc.).

- Access and exit (track route, material delivery to site, employee parking, etc.)
- Plans to clean vehicles to prevent dirt/mud from reaching public roadways

Project Controls

- Excavations (required sloping and shoring; soil borings tests design criteria)
- Correct equipment for the job
- Evaluate any superimposed loads on area adjacent to excavation (traffic, retaining walls, material storage, stockpile excavation material, etc.)
- Ladders and walkways provided for access and exit as applicable?
- Protection equipment necessary? Design criteria for trench boxes, guard rails, barriers, overhead, etc
- Location of waste material in relation to construction area
- Dirt and spoil disposal; where and how?
- Concrete washout
- Traffic pattern for truck loading and hauling.
- Periodic and frequent inspections for hazardous exposure
- Safe procedures for installing and removing temporary supports and shores
- Effects of weather on various project phases.
- Blasting required? (Handling of explosives.)
- Storm Water Pollution Prevention Plan(SWPPP).
- Sliding Gates at job entrances with Flintco signage
- If vertical structure is being built all exterior columns to have inserted tie off points

Utility Exposure - Existing Facilities

- Overhead lines
- Underground installations (all)
- Temporary protection of existing utilities
- Notification given to all involved utility companies
- Use one call system

Housekeeping Practices

- Housekeeping on a continuous basis.
- Material storage
- Equipment storage and care
- Job layout (owner access, clean-up routes, etc.)

Personal Protection

- Normal protective gear for head, eyes, lungs, etc.
- Safety helmets, gloves, eye protection, safety vest, hearing protection
- Special protection requirements
- CPR/First aid training and supplies

Public Relations

- Noise
- Control of dust and mud
- Traffic (pedestrian and vehicle)
- Public notification
- Driveways
- Debris
- Communications (letters, meetings)

Operations Planning Checklist

Use this checklist as an aid for setting up your project. This checklist shall be completed prior to the commencement of construction activities and maintained on file for future use.

1. I	POSTING REQUIREMENTS
	a. In areas where 911 is not available, the telephone numbers of the physicians, hospitals, fire department or ambulance shall be conspicuously posted (1926.50)[f])
	b. Crane signal poster. (1926.550[a][4])
	c. OSHA Poster
	d. Safety Poster
	e. Jobsite Bulletin Board
	f. Specific Local Requirements

2. FIR	ST AID AND MEDICAL
	a. List of approved doctors or clinics with map for location
	b. Well stocked first aid kit present on the job site
	c. At least one person on each shift with valid First Aid/CPR/AED Certificate (1926.50[c])
	d. At least one litter capable of lowering an injured person from an elevated work site to ground
	d. At least one litter capable of lowering an injured person from an elevated work site to ground level by crane if necessary available on the jobsite

3. PERSONAL PROTECTIVE EQUIPMENT		
	a. Adequate supply of white KASK or Studson safety helmets	
	b. Adequate supply of eye protection (1926.100[a]) / ANSIZ87.1	
	c. ANSI certified reflective/high visibility clothing (vest, jacket, shirt etc)	
	d. Adequate supply of safety harnesses and lanyards (1926.104)	
	e. Adequate supply of hearing protection (1926.101[a])	
	f. Glove/hand protection cut level 2 or greater	

WA	RNING AND DANGER SIGNS
	a. Danger Construction Area Safety Helmets Required
	b. Danger Construction Area Keep Out
	c. No Smoking
	d. Flammable
	e. Danger Flammable
	f. Fire Extinguisher
	g. Danger Men Working Above
	h. Safety Data Sheets (SDS)
	i. Danger Electrical Hazard KeepOut
	j. Caution Cylinders Must Be Chained At All Times
	I. No Alcohol, Drugs, Firearms

5. FALL PROTECTION
a. Fall protection and rescue plan
b. An adequate supply of guardrails, posts, scaffold post brackets, and/or other means to provide fall protection at the slab edge and floor openings is available (1926.500)
c. An adequate supply of portable ladders, in good condition and correct height, is available (1926.1050)
d. An adequate supply of scaffold grade planking is on the job (1926.451[a][10])
f. Mobile scaffolding is provided with positive locking casters and guardrails (1926.451[e])
g. A clear and satisfactory agreement has been reached with the general trade partner on guardrails to eliminate unguarded perimeter conditions (1926.500[d])
h. Adequate safety harnesses
i. Adequate lanyards
j. Adequate lifeline, retractable lifeline and carabineers

6. FA	LLING MATERIAL
	a. A safe access route to the work site has or will be provided and may include:
	(1) Covered walkway(s) at entry of multi-story jobs
	(2) Ramps, stairs, and/or ladders
	(3) Personnel hoists. (1926.552[c])
	b. A plan has been developed to keep workmen from the area under form stripping operations by providing a watchman and warning signs, barricades, or roping off area
	c. A system has been devised to prevent material from accidentally falling from the building
	d. Red danger tape is to be installed around the area under scaffolding

a. During an initial safety meeting, all employees will be instructed in the recognition and avoidance of unsafe conditions, job safety rules, and individual responsibility for safety as well as the reporting process of unsafe conditions (1926.21[b][2]) b. All employees who will be using powder actuated tools (Hilti Gun) have a certificate to verify training (1926.302[e]) c. All employees who will operate heavy equipment must have a valid driver's license and must be trained on

equipment being used (training documentation must be presented to Flintco, LLC staff to have on file)

8. ELECTRICAL

Personnel safety from electrical shock will be provided by ground fault circuit interrupter (GFCI). Each cord set will be checked for damaged insulation/missing ground pins/insulation pulled out of the end plugs. Each electrical tool will be checked for damaged cord/missing ground pin (except on double insulated tool) /missing guards. Each electrical tool will be checked for damaged cord/missing ground pin (except on double insulated tool)/ missing guards. Each project Superintendent will be responsible to have tools and cords checked.

9. HOUSEKEEPING

Scrap containers will be provided and emptied frequently. (1926.25[c])

a. A fire prevention plan has been developed for this job site. (1926.150[a]; 151; 152; 154) b. Fire extinguishers are available on the job site. (1926.150[c])

11. EXCAVATIONS	
a. Excavation and protection plan	
b. Adequate shoring on hand	
c. If applicable, certified shoring plan in place	
d. Competent excavation person onsite	
12. CRANES (IF UNDER FLINTCO, LLC CONTROL)	
a. A qualified employee has been designated to conduct a daily	inspection of the crane (1926.1412[a][1])
b. Rigging equipment of the right type and quantity will be prov	
c. Controls have been instituted that will prevent any crane fron electrical lines (1926.1408)	· · · · · · · · · · · · · · · · · · ·
d. For all type cranes, a barrier with warning signs will be provide counterweights (1926.1424)	ed to protect the swing radius of the
e. Certified operator on site	
f. Certified Rigger on site	
g. Copy of annual inspection and maintenance records on file	
13. ANTICIPATED HAZARDS	
a. Picture taken of existing building condition	
b. Picture taken of surrounding area, i.e. streets, business buildi	ngs. houses wells, nonds, shrubbery
c. In remodel and add-ons, check structure for presence of asbe	<u> </u>
14. MISCELLANEOUS	
14. MISCELLANEOUS a. Drawings and Plans showing all formwork details will be available.	able on the job site (1926.701[a][2])
a. Drawings and Plans showing all formwork details will be available. Drawings and plans for scaffolding systems are on the job site.	able on the job site (1926.701[a][2]) e (1926.451[g])
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THIS FORM IS TO BE KEPT ON FILE AT THE PROJECT SITE.

Prescription Eyewear Policy

- This program is open to all full time Flintco, LLC employees only and is non-transferable.
- The program does not cover the cost of eye exam or prescription. Safety eyewear can be made from an existing prescription.
- The program covers the purchase of ANSI approved safety eyewear only.
- The program pays a maximum of \$165.00. Any additional cost will be the responsibility of the employee to pay at time of purchase. Additional costs may be color, tint, and polarization.
- The program pays for eyewear every two years from the date of purchase. The program does not pay for broken, lost or stolen eyewear or change in prescription during the two-year period. The employee may take eyewear in for change of prescription in existing frames, but the cost will be the employee's responsibility. Any renewal or potential cost to the company must be approved prior to purchase. No reimbursement will be made.
- Employee will need to provide to the safety administrator an active project number. The safety administrator will issue the authorization form for the employee to obtain eyewear. An approved authorization form must be presented to the participating company prior to obtaining eyewear.

- This program is a benefit provided by the company at no cost to the employee.
- This program is provided by Industrial Eyes and is accepted at all Lens Crafters and participating Target Optical and Pearle Vision locations in the US. It is the employee's responsibility to verify acceptance prior to obtaining eyewear. No reimbursements will be made.



Trade Partner's Safety Programs and Site Requirements

The following are general construction site Health, Safety and Environmental requirements that all tiers of trade partners shall comply with.

Before coming onto the project, each employee, which includes any full-time employee, part-time employee, temporary employee, or independent contractor, must complete the Flintco Annual Safety Orientation. This can be done offsite prior to coming onto the jobsite. Users must log into the portal below to complete.

Once complete, each employee must show verification of completion before coming onto the project. This can be done by logging on to their account (from their phone or iPad) and showing Flintco personnel the QR code for completion.

All employees entering the project site must participate in a project specific orientation, and upload any trainings, certifications, etc. prior to coming onto the site.

Flintco Trade Partner Portal: https://tpp.flintco.com

Site Safety is Your Company's Responsibility

Each trade partner and all tiers of trade partners shall comply with the most stringent requirements established in OSHA/CAL-OSHA, Flintco, LLC policies, all applicable State and Federal Laws, local ordinances, rules, and regulations bearing on the safety of persons and property.

Each trade partner is completely responsible for compliance of all their trade partners Health, Safety and Environmental requirements.

Each trade partner's Project Superintendent has full and complete responsibility for the safety and health of their employees and the employees of all tiers of trade partners. Each trade partner's Superintendent shall always be present to provide total supervision for their sub-tier trade partners. In no case will the presence of a Safety Representative relieve the Superintendents of this responsibility.

If your company is going to change onsite management (superintendent/foreman), written notice is to be sent to the Flintco, LLC project manager and/or superintendent a minimum of five days prior to the exchange.

Safety Programs

Each trade partner shall have a written Health, Safety and Environmental Loss Prevention Plan that includes a written Hazard Communication/ Employee Right-to-Know Program which conforms to the requirements addressed in OSHA/CAL-OSHA on the job site. This program shall be available and provided to Flintco upon request.

Each trade partner's Health, Safety and Environmental Loss Prevention Plan shall be the governing document that all tiers of trade partners shall comply with.

As requested, each trade partner shall file a copy of their program in their safety file located in the Flintco, LLC construction office prior to beginning work on the project. A copy of the program shall be maintained on site and available for employee review. Each tier of trade partner shall be provided with a copy of the trade partner's Health, Safety and Environmental Loss Prevention Plan. The trade partner's Hazard Communication Program shall be tailored to reflect the specific exposures encountered on the jobsite by their employees and agents and the employees of all tiers of trade partners.

Employees shall be given specific training to the Hazard Analysis. The training shall be documented and maintained on file.

Each trade partner will hold a pre-work meeting prior to the start of work on a daily basis. This meeting shall consist of identifying the tasks/ hazards/and controls for the work being performed that day.

A PTP (Pre-task Plan) shall be prepared as a supplement to the JHA (Job Hazard Analysis). The PTP is to be completed, documented, and signed by all workers in the pre-work meeting by the trade partner's supervisor and Competent Person.

Record Keeping and Files

The following documentation shall be in the trade partner's Safety Files, located in the Flintco, LLC office, as requested.

- Employee orientation training
- A complete, indexed, and tabbed SDS binder, containing a Table of Contents and Safety Data Sheets for all chemicals and materials to be brought onto the jobsite
- Written Safety and Health Loss Prevention Plan which includes a Job Hazard Communication/ Employee Right-to-Know Program
- Employee training records and certifications
- Designated Competent Person identified

Safety Representatives

Trade partners shall designate a Superintendent/
Foreman and Competent Person to oversee the
trade partner's health, safety, and environmental
activities and to perform the duties outlined under
safety responsibilities. If the Superintendent/
Foreman and Competent Person is unable to
perform the safety duties to the satisfaction of
Flintco, LLC, the trade partner will replace the safety
representative with a full-time safety representative
who will have no other duties other than those
outlined under safety representative responsibilities
of this section.

The Superintendent/Foreman and Competent
Person shall be present on site during all trade
partner and sub-tier work activities. If overtime,
weekend, or double shift work occurs the trade
partner shall provide a written plan outlining how
the trade partner will meet the safety requirements
as outlined above. The trade partner shall identify an
alternate Superintendent/Foreman and Competent
Person in the event the primary Superintendent/
Foreman and Competent Person is absent from the
project.

Safety Representative Credentials

Each trade partner must have a designated Superintendent/Foreman and Competent Person that meet the following requirements:

• Minimum of five years of verifiable experience in the work scope that the Safety Representative will be overseeing (i.e., excavation, electrical or masonry etc.) This means, for example in fire protection, installing sprinkler pipe, sprinkler heads, risers, valves, etc. – actual construction work. Office manager type work, site administrative type work or other non-direct construction work does not meet the experience requirement.

A copy of the Superintendent/Foreman and Competent Person's credentials must be provided if requested and maintained on file in each trade partner's safety file.

Safety Responsibilities

Each trade partner's Competent Person, Project Manager and Superintendent shall attend a Pre-Construction meeting with Flintco, LLC prior to that trade partner's scope of work beginning on the project.

The Flintco, LLC Project Safety Coordinator and/or Superintendent will schedule and chair a monthly Safety Committee Meeting. Each trade partner's safety representative is required to attend the monthly Safety Committee Meeting. Each trade partner's "recordkeeping and files" as outlined in the above subsection shall be accurately maintained

by each trade partner's onsite Superintendent/ Foreman and Competent Person.

Each trade partner's safety representative will ensure Safety Orientation for their employees is completed on the Trade Partner Portal and Site Specific Orientation is completed prior to the employee's start of work and access to the jobsite.

Competent Person Requirements

Each trade partner shall provide a matrix outlining employee(s) designated as a qualified competent person(s) ("Competent Person"). The qualifications for a Competent Person are identified in the various Subparts of OSHA/CAL-OSHA. NOTE: Certain subparts of OSHA/CAL-OSHA have interpretations as to the qualifications and training required to be designated as a Competent Person (i.e., Subpart P-Excavations; Subpart L-Scaffolding; etc.)

Prior to any work activity beginning in which OSHA/CAL-OSHA requires a competent person, each trade partner shall identify an individual(s) and provide it to Flintco, LLC either electronically or in writing.

Accident Investigations & Incident "Near Miss" Investigations

All incidents/injuries shall be reported by each trade partner's Superintendent/Foreman and Competent Person to Flintco, LLC immediately. The trade partner's Superintendent/foreman, injured employee, and any relevant witnesses will participate in Flintco's incident investigation.

Safety Meetings

Each trade partner and all tiers of trade partners shall conduct weekly safety meetings on the jobsite. Attendees and minutes of the weekly safety meetings are to be documented. This document must be kept in the trade partner's Safety File Records shall be maintained in such a manner to distinguish each trade partner and their employees from the trade partner and other trade partners. All trade partners and sub tiers will attend the monthly "All Hands" safety meeting conducted by Flintco, LLC.

Job-Site Inspections and Observations

- Inspection follow-up shall be performed by each trade partner to ensure corrective measures have been accomplished. Documentation of corrective measures with specific actions shall be provided in Procore.
- Each trade partner shall correct all safety and health-related deficiencies during the same working shift in which they were identified.

Site Requirements

- 1. Do NOT work alone. Someone should always be around in case of an emergency.
- 2. It is each employee's responsibility when entering different project work areas to find out what safety precautions are required. Stay alert.
- 3. Safety Glasses with side shields which meet ANSI Z87.1-1989 (this includes prescription eyeglasses with side shields) shall always be worn by all personnel outside the area designated as Trailer Row. Using approved safety glasses that fit over prescription glasses will be acceptable. Flimsy plastic side shields shall not be allowed. Prescription glasses with or without side shields, that do not meet ANSI Z87.1-1989 are NOT safety glasses.
- 4. Face and eye protection must be worn when chipping and grinding or where flying debris activities take place. Examples are but not limited to, powder actuated tools, electric or airoperated grinding tools, electric or air-operated impact tools, chop saws, masonry saws, chain saws, drilling tools going into overhead concrete, etc.
- 5. ANSI certified high visibility/reflective clothing shall be worn on the construction site. Shirts with sleeves (at least t-shirt length 4") and full-length pants shall be required. No Shorts, No Tennis Shoes, and No Tank Tops.

- 6. Gloves/Hand Protection minimum cut level 2 or task appropriate is required to prevent injuries to hands during construction activities.
- 7. Boots with proper leather uppers above the ankle, and hard soled and any other required or appropriate safety equipment for specified task shall be worn at all times.
- 8. All trade partner employees, truck drivers, delivery personnel, visitors and lower tier contractors and suppliers on site shall wear safety helmets that meet the requirements of ANSI Type II or EN12492 with integrated chinstrap fastened and in conformance with manufacturer's recommendations for proper use at all times outside the area designated as Trailer Row. Hearing Protection is required by **OSHA CFR 1926.101** and shall be used when required.
- 9. Fall Protection is required when working at heights greater than 6'. The following must be followed on all Flintco, LLC Projects:
 - All employees shall receive documented training pertaining to the recognition and elimination of fall hazards.
 - Floor and roof openings 2" or greater shall be covered with materials that are capable of supporting at least two times the load expected to be imposed.
 - All floor edges where fall distance is 6' or greater, and all roof edges shall be protected by a standard guardrail with toe board or a warning line system in compliance with OSHA 1926.502(f).
 - When employees are working outside a protective guardrail or warning line system at height greater that 6', employees must where a Personal Fall Arrest System (PFAS) that is attached to a designated anchor point.
 - Flintco requires SRLs (Self-Retracting Lanyards) for all fall protection connection devices. 6' lanyards are not permitted on Flintco jobsites.

- 100% tie off in all aerial and scissor lifts using SRL (Self-Retracting Lanyard).
- PFAS shall be worn while working from a suspended scaffold and connected to an independent lifeline.
- Safety nets shall be provided when workplaces are more than 25' above the ground/floor or where other fall protection devices are impractical.
- Positioning belts of the two D-ring type SHALL NOT be used for fall protection.
- 10. Respiratory Protection shall be provided when the possibility of occupational diseases is present. Engineering controls shall be implemented to prevent exposure to employees, if engineering controls can't be utilized then, the employer shall provide other means of respiratory protection.
- 11. All employers shall develop, implement, and maintain a written hazardous communication program. Employees must be trained on chemicals they can be exposed to and be able to read and understand the Safety Data Sheet/Label.
- 12. All chemical materials used shall have an SDS (Safety Data Sheets) included with the Safety Submittal Package electronically and to be filed at the Flintco, LLC project office in a hard copy indexed, tabbed, in a binder.
- 13. All fuels stored in quantities greater than 25 gallons shall be stored at least 20ft from any storage building and have a fire extinguisher within 25 ft. All fuels stored in excess of 25 gallons shall have a secondary containment.
- 14. Only UL-approved metal fuel cans with flame arresters and self-closing pour spouts shall be allowed on site. Fuel cans shall not be stored inside the building, or inside trailers. Cans shall be brought inside the building only to fuel equipment and then removed immediately.

- 15. Trade Partners are to provide First Aid supplies for their crew and have them readily available in case of use.
- 16. All vehicles on the construction site including the heavy equipment shall have a fire extinguisher in an accessible location.
- 17. Only "ABC" fire extinguishers are allowed on the construction site.
- 18. All equipment inside any building shall have an "ABC" rated fire extinguisher mounted in an accessible location.
- 19. Outside the buildings, gas-powered equipment, and diesel-powered equipment shall have an "ABC" rated fire extinguisher mounted in an accessible location within 25' during operation.
- 20. All "ABC" fire extinguishers shall be fully charged, inspected, and tagged for service.
- 21. Other types of equipment shall have a fire extinguisher as mandated by OSHA/CAL-OSHA.
- 22. Emergency procedures shall be followed. All emergency rally points will be covered in the site-specific orientation and Emergency Action Plan.

23. Incident Notification

- Employees must report all incident to their supervisor immediately. Examples are recordable, lost time, first aid, near miss, property damage and any situation that requires emergency response or emergency rescue.
- Supervisors must report all incidents to Flintco, LLC immediately.
- Trade Partners/Flintco shall conduct an incident investigation after all incidents.

- 24. Post-Incident Drug/Alcohol Testing Protocol If the conduct of a trade partner's employee(s) contributed or could have contributed to an accident while at work which results in an injury to the employee(s) or another person or damage to property, including damage to equipment, the employee(s) may be required to undergo drug and or alcohol testing. The trade partner's company will conduct a post-accident test, and the trade partner's company will require employees whose conduct contributed or could have contributed to the accident to undergo a drug or alcohol test, regardless of whether or not they reported an injury. The cost of the screening shall be the responsibility of the trade partner's company. Screening shall be initiated as soon as possible, but not later than two (2) hours after the incident occurrence. Any worker's refusal to submit to screening shall be treated in the same manner as a "positive" finding. Any worker who withholds notification of an incident for longer than one (1) hour after the alleged event shall be evaluated by the Flintco HSE Area Manager or HSE Regional Director and, if determined to be negligent in the sole discretion of Flintco, shall be subject to being permanently removed from the project.
- 25. All walkways, ramps, stairways, emergency exits, and access points to ladders shall be kept free of debris.
- 26. All laydown areas, parking lots, and temporary facilities shall be kept clean at all times.

- 27. All materials on the construction site shall be stored/staged on dunnage. Do not stack material in such a manner that the material could become unstable and topple.
- 28. There shall be a trash can by all water cans for cup disposal. Water cans must be kept clean at all times with tape around the lid with the current day's date handwritten on the tape.
- 29. Keep all trash clear from electrical panels.
- 30. Remove slip and trip hazards from the floor. Examples are trash, lumber, extension cords, conduit, pipe, and pallets.
- 31. Impalement Protection
 - All reinforcing steel, grade pins, conduit, copper pipe, and all thread that an employee could fall onto or into (this includes horizontal steel) shall have a protective cap.
 - All protective caps must be in suitable condition and shall not be damaged.
 - All protective caps shall be covered with a square, reinforced rebar cap.
 - Goal post protective caps must have a 2X4 placed on top for protection.
- 32. Clean up and housekeeping shall be top priority. The project shall be kept clean and orderly at all times. The work area SHALL be cleaned on a continuous basis; no debris or trash will be permitted.
- 33. Remove all nails and screws from scrap lumber.
- 34. When lifting heavy or awkward material, get help or use a mechanical devise such as a forklift, pallet jack, or team lift.
- 35. Always keep the walk area clear of debris when carrying material.
- 36. All ladders must be inspected daily or prior to use. Ladders that are found unserviceable shall be removed from service immediately.

- 37. All aluminum, metal type or wooden (other than job built per ANSI standard, ANSI A14.4 1992) ladders are prohibited. Ladders shall reach three feet above the landing for safe access. All ladders shall be positioned on a stable surface and secured to prevent displacement.
- 38. Ladders shall be placed in the work area so that the employee is able to face the ladder. Maintain a "three-point" contact with the ladder when ascending or descending.
- 39. Never carrying tools or material while ascending or descending a ladder.
- 40. Job-made ladders may be utilized on the jobsite. Job-made ladders shall be constructed as per the requirements in ANSI A14.4 1992 and have a walk-through handrail which extends three feet above the landing. Offset entrance or gate shall be provided as not to allow direct access to ladder.
- 41. Always choose the appropriate ladder for the work being performed.
- 42. Keep stairs free of tripping hazards.
- 43. Metal stair pans must be filled or blocked before use. Unfilled metal stair pans SHALL NOT be used.
- 44. All scaffolding use must be erected, dismantled, moved, operated, and repaired under the supervision of a Competent Person.
- 45. All scaffolding and components must be inspected by a Competent Person.
- 46. All employees working on a scaffold must be trained by a qualified person on the recognition of hazards associated with scaffolds.
- 47. All scaffolding shall be placed on footing that is sound, ridged, and capable of supporting the intended load without settling or displacement. Mud sills shall be used under all supporting legs of scaffold that is erected on the ground.

- 48. All scaffolding shall be erected plumb and level under the supervision of a qualified or competent person. All scaffolds must be erected per manufactures specifications. A qualified competent person shall conduct a documented inspection of all scaffolding prior to each use and tag the scaffolding in an appropriate manner that is visible for all workers to see.
- 49. Guardrail requirements for scaffolding:
 - Baker/Perry/Narrow Frame type scaffolding shall have guardrails (top, mid and toe) installed on all open sides regardless of height.
 - When the requirement for guardrails (top, mid and toe) to be installed on open sides cannot be met, a personal fall arrest system (PFAS) shall be connected to a self-retracting lifeline (SRL) anchored overhead.
 - ALL supported scaffold poles, legs, frames, and uprights shall bear on base plates that are positively secure to mud sills.
- 50. All scaffolding must be erected per the manufacture's specifications.
- 51. All hand and power tools shall be inspected daily prior to use. Tools shall be maintained in a safe condition (this includes employee furnished tools). Any tool which is not in compliance with any applicable requirement of this part is prohibited and shall be removed from service.
- 52. Guard(s) on tool(s) shall be in operating condition. Any tool that requires a manufactured guard or handle shall not be removed from the tool.
- 53. Tools shall not be altered or used in a manner that it is not intended for.
- 54. Power operated hand tools shall be of the double insulated type or comply with the grounding requirements in **OSHA CFR 1926 subpart K**.

- 55. All electrical extension cords and power tool cords shall be inspected before each use.
- 56. All handheld circular saws, table saws, and radial arm saws shall be locked by means of disconnecting the power source and the male end of the cord tagged or in plain view of the operator at all times while changing the sawblade.
- 57. All cords shall be ran six (6) feet overhead and protected from sharp objects.
- 58. All extension cords must be 12g or larger.
- 59. Damaged or defective equipment shall not be used.
- 60. All pneumatic power tools and hoses shall be secured by a positive means at each connection.
- 61. All fuel operated power tools will be stopped, and motors will not be running while refueling is in progress.
 - A 10 lb. fire extinguisher must be within 5' of all fueling operations.
- 62. Employees operating Powder Actuated Tools must be trained and have their training certifications in their possession.
- 63. Sawhorses or work benches shall be utilized to secure material prior to using handheld circular saws, grinders, bandsaws, drills, and similar tools.
- 64. All electrical power tools and/or equipment shall be plugged into a GFCI (ground fault circuit protection), at the source of electrical power. All frayed and/or damaged electrical cords shall be removed from service and repaired. Cords and tools will be inspected before use.
- 65. All portable generators including generator/ welders used on the jobsite shall have a GFCl that is an integral part of the generator. The GFCl shall function properly. The GFCl when tested shall trip between 3mA and the 7mA settings on a multi-range GFCl tester.

- 66. A weekly documented inspection of each generator shall be conducted to ensure the GFCl is functioning.
- 67. Any generator, in which the GFCI does not function, shall be tagged, and removed from service immediately.
- 68. All generators shall have a unique identification number and the trade partner name in a visible location.
- 69. Electrical Panels and associated devices shall not be accessed by anyone except for those authorized by the electrical trade partner(s). Once one area of the job site is energized, all areas of the job site are considered energized. The electrical trade partner(s) is responsible for the security of the electrical panels and associated devices to prevent access by unauthorized workers.
- 70. Only company vehicles, with company insurance shall be allowed on the construction site. The company's name and/or logo shall be visible from a distance of 25 feet away and shall be located on both sides of all company vehicles including heavy equipment.
- 71. Posted speed limit shall always be adhered to. 10 mph will be the site speed limit unless otherwise posted.
- 72. Trade partners on Flintco, LLC projects are responsible for providing drinking water for their personnel.
- 73. Excavation work shall be performed in accordance with OSHA/CAL-OSHA.
- 74. Prior to any excavation, an excavation plan shall be included in the trade partners Safety Submittal Package for review.
- 75. All soil shall be treated at Class C soil. Soils may be reclassified by a registered professional engineer. The reclassification must be documented and must be specific to a certain work area.

- 76. Flagging and/or suitable warning devices will be required around all trench and excavation work at least three (3) feet (this distance can be exceeded if site specific requires) from the edge of the excavation.
- 77. Spoil piles shall be put at least two (2) feet back from the edge of the excavation.
- 78. A safe means of access and egress shall be provided from excavations regardless of their depth at intervals that provide no more than 25 feet of lateral travel.
- 79. Excavations with vertical walls 6' or greater will present a fall hazard and workers shall be protected.
- 80. A qualified competent person shall be present anytime excavation work is performed.
- 81. All underground utilities shall be located prior to any excavation work occurring. The responsible trade partner shall be notified to assist with this location. As-built drawings and utility locators shall be used to locate all underground utilities. Trade partners working around overhead utility lines shall ensure that all equipment, materials, and personnel are at least 10 feet from the overhead lines.
- 82. All employees shall OBEY all posted safety signs and flagging.
- 83. Flag, barricade, or sign areas to keep employees from exposures to potentially hazardous work conditions. Supervisors contact information to be posted at the flagged, barricaded, or other controlled/limited access areas.
- 84. Trade partners or employees shall not remove or bypass any barricades, barriers or other protective devices from tools, equipment, or hazardous locations. All deficiencies shall be reported immediately to the supervisor.
- 85. Seatbelts shall be worn at all times in vehicles including heavy equipment operated within the limits of construction. All heavy equipment shall have ROPS (roll over protection), and seatbelts.

- 86. Mules, gators, or golf type carts shall have ROPS (roll over protection) and seatbelts for operator and all passengers.
- 87. All vehicles on the construction site including heavy equipment shall have a fire extinguisher in an accessible location.
- 88. No one shall ride in a vehicle or mobile equipment unless they are on a seat. Exceptions: Scissors and Boom Lifts. Riding in the back of pick-ups shall not be allowed.
- 89. Accessories to all mobile equipment (blades, bucket, stringer bits, etc.,) when parked shall be lowered in the down position with ignition keys removed from switch.
- 90. All equipment including cranes, forklifts, skid steer loaders etc. shall have a reverse signal/back-up alarm audible above surrounding background noise.
- 91. All employees who operate equipment shall be educated in the safe operation of that equipment; documentation of this training shall be maintained on file each trade partner's safety records and included on the Trade Partner Portal. Only trained employees shall be allowed to operate that piece of equipment. When mounting or dismounting equipment, employees shall maintain three points of contact.
- 92. Each fuel storage tank brought onto the construction site shall be provided with its own secondary containment unit. All fuel tanks shall be grounded in accordance with NFPA requirements.
- 93. All fuel secondary containment will be pumped out after any rain.

- 94. The following requirements shall be followed for all cranes entering the construction areas.
 - All cranes operating on the jobsite shall be equipped with a functioning "Anti-Two Block" device and a functioning load moment indicator.
 - The operator shall know the weight of every suspended load, regardless of the size.
 - Stable cribbing shall be used for all lifts with outriggers.
 - Outriggers will be fully extended.
 - All crane operators shall be qualified prior to operating any crane on the jobsite.
 - Taglines shall be used on all suspended loads to stabilize the load. Employees shall not use their hands to stabilize the load. All taglines shall be of a continuous length, which are free of knots or other items.
- 95. Critical lifts require approval by the Area VP and HSE Area Manager prior to performing lift. The following are considered critical lifts:
 - Lift exceeding 75% of crane capacity
 - Lifting over an occupied building
 - Tandem picks or multi crane lifts
 - Lifts over "active" Process Piping, in excess of 50,000 lbs.
 - Lifts that either due to the extreme lead-time for replacement or value of the material, could adversely impact the project.
- 96. All crane documentation is to be submitted to the Flintco, LLC project team and HSE Area Manager before the crane is brought onto the jobsite.
 - A copy of the operator's license
 - A copy of all Rigger certifications
 - Current 3rd party annual crane inspection
 - Lift plan for heaviest/furthers pick, including load charts.

- 97. Persons working in any aerial boom-type lifts shall be tied off, at all times.
 - Prior to any aerial lift work, a fall protection and rescue plan shall be presented to the Flintco, LLC project team for review.
 - Documentation shall be provided in the trade partner portal of worker training and a training completion card shall be on employee's person.
 - Workers shall be connected with personal fall arrest system (PFAS) to the self-retracting lifeline (SRL) manufacturers engineered anchor point.
 - Personal fall arrest system (PFAS) shall be rigged such that a worker can neither free fall more than 6' or contact any lower level, one of three methods:
 - Use of a tether anchored to the manufacturers engineered anchor point as a fall restraint.
 - Use of a positioning hooks connected to the manufacturers engineered anchor point as fall restraint.
 - Use of a elf retracting lifeline connected to the manufacturers engineered anchor point as fall arrest.
 - Employees SHALL be tied off using a selfretracting lifeline (SRL). Six (6) foot lanyards are not permitted in lifts.
 - After the working height has been obtained, shut off all lift motors until ready to relocate.
 - Fire extinguishers, fully charged, inspected and tagged shall be installed in an accessible location in the mobile elevated work platform (MEWP) basket.
 - Housekeeping shall be done continuously.
 Employees shall not be allowed to work in lifts cluttered and disorganized.
 - All mobile elevated work platform (MEWP) shall have a unique identification number and the trade partner name posted in a visible location.

- All mobile elevated work platform (MEWP) shall be operated on a level-working surface. The working surface shall be capable of supporting the weight of the lift without the tires sinking into the surface.
- No tools or materials shall be suspended from the outside of the mobile elevated work platform (MEWP) basket. Only approved manufacturer's attachments shall be used. Only company vehicles, with company logos, shall be allowed on the construction site. The company's name and/or logo shall be visible from a distance of 25' and shall be located on both sides of the vehicle.
- 98. As described in each trade partner's Safety Program work permits shall be utilized for those work activities that specifically require them. (Examples are confined space, electrical hot work, welding, painting, work where underground utilities are present, etc.). The use of torches shall not be permitted on formwork/false work at any time. A hot work permit shall be filled out prior to any hot work activity.
- 99. Lockout and tagging disconnects, circuit breakers and supply valves as well as energy isolating devices shall be used.
- 100. Any work creating a spark or using a flame is considered to be "Hot Work" and will require a permit provided by Flintco, LLC and signed off by trade partner's Site Safety Representative or Superintendent and Flintco HSE staff or Flintco Superintendent. A fire watch shall be stationed to provide coverage for each welding, cutting, and other hot work operations. A fire watch may cover multiple operations with a 100-foot radius of them. In order for a fire watch to cover multiple operations, they shall have a clear line of sight to each operation and an unobstructed pathway to each operation.

- 101. There will be no smoking/tobacco products, eating or drinking (except for water) in the building after the installation of finished products begins. The initiation of this policy will be at the discretion of Flintco, LLC. All breaks will be taken in designated locations only.
- 102. All employees shall always conduct themselves in a worker like manner. Any harassment of other personnel, horseplay/fighting or disruptive activities of any kind shall result in immediate dismissal/removal from the job site.
- 103. No one shall knowingly be permitted to work while their ability or alertness is so impaired by fatigue, illness, or other cause that they may expose the individual or others to injury.
- 104. Workers shall report unsafe conditions to their supervisors immediately. No worker shall be required or knowingly be permitted to work in an unsafe place, unless for the purpose of correcting the hazard and then only after all safety precautions have been implemented. Animals of any kind are not permitted on/around the active part of the project site. Animals on the part of the active part of a project site pose a risk and create an unnecessary distraction.
- 105. Animals of any kind are not permitted on/ around the active part of the project site. Animals on the active part of the project site pose a risk and create an unnecessary distraction.
- either completed the employee orientation program or have filled out a Flintco, LLC visitor release form. In either case, the documentation must be in the Flintco, LLC construction office prior to the person entering the jobsite and must be accompanied by a member of that trade partners firm.
- 107. Concrete trucks shall have the chute in the raised and locked position while traveling on the jobsite.

- 108. Trailers- no one will be allowed to move a trailer or any other device for living on site unless written approval has been obtained from Flintco, LLC.
- 109. Glass containers of any kind shall not be brought onto the construction site.
- 110. All arrivals of trailers, storage containers, and large deliveries must be coordinated with Flintco, LLC at least 3 days in advance. The adjacent streets around the jobsite shall not be blocked at any time without approved signage and certified flagmen in place.
- 111. Project drug and substance abuse policy:
- 112. The use, possession, sale, transfer, acceptance, or purchase of illegal drugs at any time is strictly prohibited. The use, possession of an open container, personal sale, transfer, or acceptance of alcohol on the property or while performing business on a Flintco jobsite is strictly prohibited. Any violation of this policy will be grounds for immediate termination and may result in a report to the appropriate law enforcement authorities.
- 113. No prescription drug shall be used by any person, other than to whom it was prescribed. Such substances or non-prescription (over the counter) must be used only as prescribed or indicated.
- 114. A drug-free" workplace plan shall be established which describes the trade partner's commitment to achieving a drug- free workplace as outlined above. Prior to beginning any work activities on site, each trade partner shall provide a copy of their "drug-free" plan.
- 115. Stretch and Flex Program Start each day by warming up the muscles, which improves elasticity and helps to meet the job's physical demands.
- 116. Flintco 4 LIFE Essentials:
 - You have the authority to refuse or stop unsafe work.

- You must attend safety orientation prior to any work.
- You must complete a pre-task plan for each task.
- You must wear a safety helmet.
- You must wear eye protection.
- You must wear high visibility clothing/ vest.
- You must wear work boots.
- You must wear hand protection.
- You must use fall protection above 6'.
- You must use lock-out/tag-out procedures on energized systems.
- You must immediately report incidents/ accidents.
- You must use continuous clean housekeeping procedures.
- Disabling safety devices or guards is prohibited.
- Drug and alcohol use and/or possession is prohibited.
- Concealed or open carry firearms is prohibited.
- Workplace violence or threat of violence is prohibited.

Cell Phone and Personal Radio/ Speakers Usage

The use of personal cell phones/personal electronic devices and earbuds/earphones/Bluetooth devices/ radios while at work present a hazard and/ or distraction to the user and/or co-employees. This policy is meant to ensure that cell phone/personal electronic device use while at work is both safe and does not disrupt business operations.

Therefore, personal cell phones/personal electronic devices and earbuds/earphones/Bluetooth devices are not allowed on any Flintco, LLC jobsite except as described:

Employees of Flintco, LLC on-site project staff is authorized to carry cell phones in accordance with policy below.

Employees of trade partners/ suppliers: Any employee that the trade partner/supplier deems necessary to conduct business operations must get written permission from a member of the Flintco, LLC staff prior to use of cell phone on project site. They must then use the cell phone in accordance with policy below.

Cell Phone/Personal Electronic Devices Policy

Use of cell phones/personal electronic devices is permissible during work hours for company business only. Personal use of cell phones/ electronic devices is only permitted during breaks and at lunch time and in designated areas. Before accepting an incoming or making an outgoing call, make sure that such activity will not compromise safety. When operating equipment, driving a vehicle on the jobsite or while performing any jobsite activity that a distraction may cause a potential safety threat, let all incoming calls go unanswered and texting is prohibited. You then may return the call when you have stopped the equipment, pulled the vehicle to a safe area, or put yourself and those around you in a safe environment before returning the call.

Violating this policy will result in disciplinary action up to and including removal or termination.

Please contact your immediate supervisor should you have any questions or concerns.

Safety Administration

Safety Protection Guidelines Purpose

Flintco, LLC is committed to achieving an Incident and Injury Free workplace environment. Our mission will encourage and support the growth of a culture dedicated to Flintco 4 LIFE by fostering a learning environment accountable to excellence and continual improvement. Achieving this goal largely depends upon the positive actions and attitudes of all employees and their willingness to contribute to the overall team effort.

Each individual Flintco LLC employee and trade partner employee, has an obligation to know, work by and obey all applicable safety and health laws, regulatory requirements, codes and project specific requirements as they apply to their scope of work.

Time, money, schedule nor budget can be used as a defense for violating a safety regulation or policy.

Class A: Willful - Immediate Termination

A Class A violation is one that the employee intentionally and knowingly commits. The employee is aware that a hazardous condition exists, knows that the condition violates a standard or other obligation of policy, and makes no reasonable effort to eliminate it. It is anything that puts a person or persons in immediate and extreme danger with complete disregard of safety practices and the safety program.

Examples include, but are not limited to workplace violence, under the influence or in possession of drugs or alcohol, possession of firearms or weapons, or directing someone to perform unsafe act.

The first, Class A offense for an employee may result in immediate termination from all Flintco, LLC projects for a period of up to one year.

Class B: Serious – Three-day Suspension and Retraining of Employee

A Class B violation is where there is a substantial probability that death, serious physical harm, or major property damage could result. It is an offense that violates the Flintco 4 LIFE Essentials. A poor judgment, a poor choice or the attempt to "workaround" a safety requirement by anyone on a project where it has been determined the employee has training to know better. Additionally, it is a serious offense when a person in an oversight position has the responsibility for the safety of a crew and fails to correct the recognized hazards inherent to being in a management position.

For example, a supervisor or employee is observed in a threatening or dangerous situation. Examples include but are not limited to working from a height greater than six feet without using fall protection/prevention, working in a trench deeper than five feet without cave-in protection, performing energized work.

The first substantiated Class B shall be a suspension from work on Flintco, LLC projects for three consecutive scheduled workdays. After the three-day suspension, and before the employee begins work, the employee shall complete the training requirement and attend another safety orientation for the project.

If the employee works without another Class B offense for a period of 12 consecutive months, the employee's record will be cleared of the offense. The second substantiated Class B Serious offense within the same I2- month period will result in termination of employment from all Flintco, LLC projects for a period of not less than one year.

Class C: Other than Serious - Written Warning

A Class C violation is one that has a direct relationship to job safety and health, but not likely to cause death, serious physical harm or major property damage. One whereas a manager there was no willful intent to put an employee at risk. Examples of Class C offenses will be discussed upon site specific orientation, the project's first Toolbox talk and monthly Toolbox talks thereafter. Examples may not be all inclusive and Flintco, LLC reserves the sole discretion in making the determination.

The first substantiated Class C offense for an employee will result in a written warning. Duplicates of the employee notice will be sent to Flintco Employee Services department, the Flintco Safety Department and the trade partner's management representative, if applicable.

The second substantiated Class C offense for an employee within a 12-month period will result in a suspension from work on all Flintco projects for three consecutive scheduled workdays. Upon returning to work after the three-day suspension the employee shall complete another site-specific safety orientation.

Prior to returning to work on a Flintco, LLC project, the employee must:

- Appear before the Flintco, LLC senior project staff (Project Director, Project Manager, and Project Superintendent) to discuss the employee's understanding of Flintco Safety Program.
- 2. Obtain that group's approval to be reinstated.
- 3. Upon reinstatement approval, the employee will attend another orientation and conduct the Toolbox talk meeting once a week for one month.

The third substantiated Class C offense for an employee within the same 12-month period will result in termination of a Flintco, LLC employee and removal of a trade partner employee indefinitely.

Disciplinary Combinations

If an employee receives a Class B, with a three-day suspension, and has not taken steps to reduce the Class B to a Class C, and then receives a Class C within the 12-month period, the employee shall receive an additional three-day consecutive suspension from work on all Flintco, LLC projects.

If an employee has received a Class B and a Class C within a 12-month period and then receives a second, Class C within that 12-month period, that employee shall receive a six-day consecutive suspension from work on all Flintco projects.

Note: In all cases after each suspension, the employee will be required to attend another orientation of the project safety rules and present the Toolbox talk for four consecutive weeks. The Flintco Safety Department shall lead the effort in training the employee to complete these requirements.

The following additional conditions are for clarification purposes only and are not meant to be all-inclusive. The final discretion in making any determination relating to safety violations will be solely Flintco LLC.

- Offenses can be observed and reported by any employee. Reports of offenses must be given to a member of Flintco, LLC project management staff.
- An offense does not have to be observed to be considered a recordable offense. If an offense can be substantiated by facts, it will be considered a recordable offense. As an example, if an employee falls without wearing a safety harness where one is required, it would be a recordable offense even if no one other than the employee observes the fall.
- The employee or employees who violate Flintco, LLC Safety Program may be charged with an offense regardless of whether their action was willful or unintended. It is the employee's obligation to know the rules and regulations. Flintco, LLC is to respond to the employee's

request for information and/or equipment in order to work safely, but in no event is the employee to put him or herself in an unsafe work situation.

- Any supervisory or management employee who observes an offense and does not actively attempt to rectify the offense will be judged as having also committed the offense. If a Flintco, LLC Foreman or Superintendent has an employee in their crew or crews, and under their supervision for 12 months, that has received two Class B's within a 12-month period, that Supervisor shall meet with the business unit Area Manager and the area Safety Manager. The Supervisor shall present the actions that will be taken for raising the level of Safety compliance within that crew, unless that Supervisor has issued one or both of the Class I notices.
- If any employee disputes the determination of an offense or how an offense is classified, the employee may appeal the determination or classification first to the Flintco, LLC Project Director and then to the Flintco LLC Division President or Vice President.

These disciplinary procedures do not supersede or replace disciplinary actions—including termination of employment—resulting from work rule infractions such as, but not limited to tardiness, excessive absenteeism, insubordination, substance abuse, and related infractions. Suspensions or terminations of Flintco employees are without pay.

Project Safety Services Program

This program is an opportunity for an individual to reduce a Class B Deficiency Notification. A Flintco employee who has received his/her first Class B shall be given the opportunity to reduce that Class B to a Class C, through the Project Safety Service such as Arrowhead Academy or in-house course

completion (a trade partner employee would have to present a course completion certificate from an outside source). The Flintco, LLC employee may request this opportunity from the Project Manager, and if approved by the Project Manager, the individual shall complete the following requirements within two months of the approval. The Flintco, LLC Safety Department shall lead the effort in training the Flintco, LLC employee to complete this requirement. If another Safety Protection Policy Class B or a Class C is written against this individual in a 12-month period, the Project Safety Service shall be cancelled.

The individual, if a Flintco, LLC employee, shall conduct one Toolbox meeting with the Flintco crew on the Project. If the individual is a trade partner employee, that individual shall conduct a Toolbox talk with each Trade partner (same Company) crew on site. The content of the Toolbox talk shall be to review the conditions that resulted in the Class B being issued and to reinforce the need for all Project Site employees to understand and practice the commitment to the Project Safety Rules.

The employee shall conduct a Safety Checklist Audit and complete at least five Improvement Observations per week for a period of two months. The observations shall be thorough and fulfill the intent of the process.

The employee shall conduct four Toolbox talks in a two-month period. The meetings shall be attended by a member of Flintco Project Management and shall be documented.

The previous requirements may be altered to meet project conditions and workforce levels. Any deviation to the requirements shall be approved by the safety professional that is monitoring Project Safety.

Safety Lunch Protocol

GOAL: To have a consistent experience across all offices that educates the attendees and celebrates the milestone.

When to have one (criteria)

- Safety lunches should be held every 90 days
- If a recordable incident has occurred during the 90 days, have the trade partner (foreman, safety rep or the injured worker) give a short 'lessons learned' statement to the group
- That trade partner is NOT eligible to win prizes
- All projects will have safety lunches

Preparation

- Make sure the job site is clean
- Prepare an agenda outlining the subject matter.
 The agenda should be available in English and Spanish
- No work should take place during the safety lunch
- Create a training presentation that applies to the work in progress. The lunches are to be educational in addition to celebratory
- Use the Flintco, LLC Safety Lunch Checklist
- Have standard fare (i.e. hot dogs/ hamburgers); it does not have tobe catered
- Have door prizes
- Have a sound system

Invitees

- Check the availability of the office management prior to scheduling the safety lunch
- Invite your key contacts, owners, owners' reps, safety reps, architects/principles, engineers, and sub tiered consultants as well as the trade partners. The more we can spread the word about Flintco, LLC and make connections the better
- Make sure our staff is spread out during the lunch and fellowshipping with all the guests. This is a 'working' event

Feedback

- Ask how our safety lunches compare to others so we can evaluate our success
- Ask if they have seen consistency from one Flintco, LLC site to another



Safety Lunch Checklist

Project	Date/Time	

Item	Responsibility	Remarks
Location		
Number of Participants		
Banner/Job Sign for Event		
Platform/Stage		
Generator		
Heater		
Sound System		
Invitations		
Tables/Chairs/Tablecloths		
Name Tags		
Restroom Facilities		
Food/Beverages		
Safety Presentation Topic		
Agenda/Speakers		
Parking Arrangements		
Photographer		
Barricades		
Directional Signage for Site/Invite		
Other:		

Smoke Free Workplace

In keeping with the Company's intent to provide a safe and healthful work environment, and to avoid potentially harmful effects of inhaling passive smoke, lighted tobacco, Vapor or "E" cigarettes use is prohibited throughout the indoor workplace whether work is being performed or not, and no lighted tobacco use shall be allowed within twenty-five (25) feet of the entrance or exit of any indoor workplace facility specified in this Policy. This Policy also includes all "vapor" or "E" cigarette type devices.

The indoor workplace includes, but is not limited to, all company offices, warehouses, job site trailers, employee lounges, restrooms, conference rooms, classrooms, lunchrooms and cafeterias, hallways, any other spaces used or visited by employees and the public. (By definition, a building is considered an indoor workplace once framing is started, whether totally enclosed or not.) Company vehicles and any other facility being utilized either permanently or temporarily for company business operations are to be considered "the workplace".

This policy applies and should be enforced equally to all employees, visitors, customers, trade partners, and suppliers. All facilities covered under this Policy will post signs or decals, at least 4"x 2" in size, at each entrance to the building(s) indicating that the site is Smoke/ Vapor and E cigarette - Free. Each facility, other than K-12 educational facilities, may have designated smoking areas outside the interior building footprint, no closer than 25 feet from any entrance or exit of any building specified in this Policy.

This Policy also prohibits lighted tobacco products, the use of snuff, dip, chewing tobacco or any other form of tobacco product, including Vapor and "E" cigarettes, in the buildings and/or on the grounds of any educational facility which offers early childhood education programs or in which children in grades kindergarten through twelve are educated. At the discretion of the owner, Career and Technology Centers may designate smoking/tobacco use areas away from general traffic areas and completely out of sight of children less than eighteen (18) years of age.

Violation of the Company Smoke-Free Workplace Policy may result in disciplinary action up to and including termination of employment and/or removal from the project.

Steve Eikanger, President

Substance Free Workplace

It is the policy of Flintco, LLC/Oakridge ("Company") to maintain a work environment that is safe for all persons, including the community, and conducive to attaining high work standards. To achieve these objectives, the Company is committed to maintaining a drug and alcoholfree workplace. This includes the misuse of legal drugs, any activity with illegal drugs, the presence of alcoholic beverages or alcohol consumption and other matters prohibited by this policy.

Prohibited Conduct

The company prohibits the following conduct in company offices, workplaces, job locations and company vehicles at all times and in all personal vehicles while on company business:

- Distributing, dispensing, manufacturing, possessing, selling, using or the presence in the body of illegal drugs or controlled substances including but not limited to marijuana, cocaine, "crack", heroin, PCP, morphine, hydrocodone, oxycodone, hydromorphone, oxymorphone, cocaine, methadone, methaqualone, LSD, narcotics, amphetamines, opiates, barbiturates, and anabolic steroids. Distributing, dispensing, manufacturing, possessing, selling or using drug paraphernalia.;
- Distributing, dispensing, manufacturing, possessing, selling, or using alcoholic beverages. The presence of alcohol in the body at a blood alcohol level of 0.04% or above during working hours is a violation of this policy.
- The possession of alcohol in original and sealed containers given or received as gifts will not be considered a policy violation. Further, the possession and moderate use of alcohol by individuals who are of the legal minimum drinking age or older as part of an authorized Company social function is not prohibited by this policy.

Abuse of legal ("prescribed") drugs including but not limited to distributing, dispensing or selling prescription drugs or being impaired by legal drugs in any manner contrary to the specified restrictions imposed by a valid prescription. An employee is impaired by legally prescribed drugs when use of the drugs adversely affects the employee's ability to perform job, interact with others, exercise judgment and/or work safely.

Where job related and justified by business necessity in the opinion of management, the company may require that use of prescription and non-perscription drugs be reported to supervisors.

Drug-Free Workplace Commitment

The Company is frequently engaged in federal work for which the Company is required to comply with the Drug-Free Workplace Act of 1988.

As a condition of new and continued employment with the Company, all employees must certify:

- They will abide by the terms of this policy by refraining from manufacturing, distributing, dispensing, possessing, selling, or using illegal drugs and/or controlled substances;
- 2. Notify the Company in writing of any state or federal criminal drug statute conviction, including a plea of no contest (nolo contendere), for a violation occurring in the workplace, no longer than 5 calendar days after the date of conviction (or entering of the plea). Written notice of a conviction described above must be submitted to the employee's supervisor, foreman or company officer within the 5-day period. Failure to submit this notice to the appropriate person within the 5-day period will automatically result in termination.

Disciplinary action for a conviction will be instituted within thirty (30) days of receipt of notice by the Company.

Any employee who has knowledge of any violation of the Company's Drug-Free Workplace Commitment is required to immediately and fully report the matter to the Vice President of HSE. Employees who fail to report violations will be subject to discharge.

Employees and Applicants with Valid State Medical Marijuana Licenses

Under this Policy, employees and applicants with valid state medical marijuana licenses who are not covered by federal substance testing requirements will not be discriminated against or penalized solely based upon their status as a medical marijuana license holder. Nor will the Company take action regarding employees and applicants with valid state medical marijuana licenses who are not covered by federal substance testing requirements solely based upon the results of a drug test showing positive for marijuana or its components.

However, violation by any employee of the Company's Substance Free Workplace Policy may result in discipline, up to and including termination.

Refer to your state's Medical Marijuana Policy, found on the Commons, or contact your Area HR representative for more information.

Testing

Substances for Which Individuals May Be Tested

Applicants who have been offered conditional employment, and current employees may be subject to testing which will be evaluated for the presence of any or all of the following substances: Marijuana (grass, pot, joint, weed, hash); Opiates/synthetic narcotics including codeine (schoolboy), hydrocodone, hydromorphone (juice, dillies, D=s, No. 2's, No. 4's), meperidine, methadone (dolophine, dolly), oxycodone (percodan, percs), oxymorphone, propoxyphene (darvon, darvocet), heroin (smack, junk, horse, H, gum, dust, Mexican brown, china white), and morphine

(morphine sulphate, M., morph, Miss Emma); Cocaine (coke, crack, blow); Phencyclidine (PCP, angel dust, killer weed, super grass, hog, peace pill); Amphetamines including amphetamines (dexadrine, speed, moth, crystal, dexies, hearts, whites, beauties), methamphetamines (desoxyn, uppers, pep pills, bennies, meth, crank), methylenedioxyamphetamine (ecstasy), methylenedioxymethamphetamine, and phentermine; Barbiturates including amobarbital (nembutal, yellow jackets), butalbital (amytal, fiorinal, blue devils), pentobarbital (seconal, reds), and secobarbital (phenobarbital); Benzodiazepines including diazepam (valium), chlordiazepam (librium, tranks, downers), alprazolam (xanax), and clorazepate; Methaqualone; and drugs for which the United States Department of Health and Human Services has established an approved protocol and positive threshold level.

Laboratory

All testing will be conducted on a monitored and controlled basis by a laboratory certified for forensic testing pursuant to guidelines or regulations of the federal Department of Health and Human Services (NIDA) or be accredited for forensic testing by the College of American Pathologists or other organizations that possess additional certifications or licenses required by applicable state statutes.

Testing shall conform to scientifically accepted analytical methods and procedures. Testing shall include confirmation of any positive test result by gas chromatography, gas chromatographymass spectroscopy, or an equivalent scientifically accepted method of equal or greater accuracy as approved by applicable state statutes. Testing methods and cutoff levels will be in compliance with any other applicable state statutes.

Collection

The collection of samples for drug and/or alcohol testing will be performed under reasonable and sanitary conditions by individuals who are qualified by applicable state statutes.

Samples will be collected in sufficient quantity for splitting into two separate specimens, to provide for any subsequent independent analysis in the event of a challenge of the test results of the main specimen. There will be no direct observation of an applicant or employee in the process of producing a urine sample except as allowed by state statutes.

Sample collection will be documented and a written record of the chain of custody of the sample will be maintained from the time of the collection of the sample until the sample is no longer required.

Absent extraordinary circumstances, the inability of an individual to timely submit the required quantity of urine specimen for testing purposes will be deemed a refusal to test and subject the individual to termination.

Split Sample Retest

After notification of a confirmed positive test result, the applicant/employee has seventy-two (72) hours to make a written request for a retest. Upon such a request, a split sample of the applicant's/ employee's original specimen may be retested at a laboratory of the applicant's/employees own choosing. The laboratory chosen by the applicant/ employee to perform retesting of the split sample must possess any certifications and licenses required by federal or state statutes. The applicant/ employee who requests the split sample retest in order to challenge the results of a positive test result will pay all costs of the split sample retest, unless the split sample test result is negative. In that event, the Company will pay the employee for the cost of the split sample retest.

Type of Drug/ Alcohol Testing

All applicants/employees will be subject to drug and or alcohol testing at the discretion of the company under the following circumstances:

 Applicant (Pre-hire) Testing - All applicants who receive a conditional offer of employment for a particular job classification may be required to undergo drug testing.

- 2. Reasonable Suspicion Testing
 - a. When there is reasonable suspicion to believe an employee has violated the provisions of this policy, the employee will be subject to drug and/ or alcohol testing.
 - b. Before an employee is tested for reasonable suspicion, a supervisor and the HSE Corporate Director must substantiate and concur in the decision to test. At least one of the two must have received training for detecting symptoms of drug and /or alcohol use. Any supervisor of the employee and the HSE Corporate Director may substantiate and concur in a decision to test, even though the HSE Corporate Director has not observed behavior of the employee indicating drug and/or alcohol use. The supervisor and HSE Corporate Director may concur by phone.
 - c. Any time the Company reasonably believes an individual is under the influence of drugs or alcohol, the Company may require a drug or alcohol test. Circumstances causing the Company to require testing of an individual may include, but are not limited to:
 - Drugs or alcohol on or about the individual's person or an individual's vicinity;
 - Conduct on the individual's part that suggests impairment or influence of drugs or alcohol;
 - A report of drug or alcohol use while at work or on duty;
 - Information that an individual has tampered with drug or alcohol testing at any time;
 - Negative performance patterns; or
 - Excessive or unexplained absenteeism or tardiness.
- 3. Post-Incident Drug/Alcohol Testing Protocol If an employee's conduct contributed or could have contributed to an accident while at work which results in an injury to the employee or another person or damage to property, including damage to equipment, the employee may be

required to undergo drug and or alcohol testing. If the Company conducts a post-accident test, the Company will require employees whose conduct contributed or could have contributed to the accident to undergo a drug or alcohol test, whether or not they reported an injury. Screening shall be initiated as soon as possible, but not later than two (2) hours after the incident occurrence. Any worker's refusal to submit to screening shall be treated in the same manner as a "positive" finding. Any worker who withholds notification of an incident for longer than one (1) hour after the alleged event shall be evaluated by the Flintco Site HSE Manager and if declared to be negligent shall be subject to being permanently removed from the project.

4. Random Selection Testing

- a. Employees in specific designated job classifications may be required to undergo drug testing on a random selection basis. This includes all regular full time, conditional, part-time and contract employees occupying the designated job classifications.
- b. To assure that the selection process is random, all regular full time, conditional, part-time and contract employees in designated job classifications will be placed in a common random selection pool.
- c. The mechanism for selecting employees for testing will result in an equal probability that any employee from the random selection pool will be selected, and the Company does not have discretion to waive the selection of any employee selected under the mechanism
- d. Management will determine the percentage of employees in the designated job classifications that will be tested every twelve (12) months. All persons in the random selection pool will be subject to be randomly picked more than once or not picked at all during the annual period.
- e. The random selection mechanism will be by a computer program.

5. Scheduled Periodic Testing

- a. Employees in the following specified groups may be required to undergo drug testing that is scheduled routinely for all members of that group.
- Corporate officers.
- When the Company is required to certify that it maintains a drug free workplace pursuant to any statutes, regulations, bid requirements, contract clauses or agency/ownership requirements, affected groups of employees will be subject to testing.
- Employees promoted or transferred to a safety sensitive, security sensitive, management or supervisory position may be administered a drug test prior to assuming the responsibilities and duties of the safety sensitive, security sensitive, management or supervisory position.

6. Post-rehabilitation Unannounced Testing

a. Any employee who successfully completes to the Company's satisfaction an approved drug and/or alcohol rehabilitation/counseling program will be required to undergo a drug and/or alcohol test prior to returning to work. The drug and/or alcohol test will be at the company's expense. The employee must contact the HSE Corporate Director who will schedule the return to work test, the collection facility and laboratory.

b. At the discretion of the Company, employees who have returned to work upon satisfactory completion of a company approved Employee Assistance Program; counseling or rehabilitation program for drug and/or alcohol abuse may be required to undergo unannounced drug and/or alcohol testing. The employee may be required to undergo unannounced drug and/or alcohol testing for a period of two (2) years, based on the written recommendation of the rehabilitation professional.

Conditions of Initial and Continuing Employment

All applicants and employees are required as a condition of initial and continued employment to comply with the following requirements:

- Voluntary, written, continuing consent (as required by the Company) authorizing the collection of specimen(s) from the employee for the purpose of testing to detect Company specified levels of drugs and/or alcohol;
- Submission to any drug and/or alcohol testing, under the terms and conditions imposed by this policy, throughout the employment relationship as a condition of employment;
- 3. Voluntary, written consent to authorize the testing facility to release all test results and conclusions to the Company;
- 4. Acknowledge that test results must be negative for drug and/or alcohol detection at the levels specified in the testing criteria and available to employees upon written request.
- Acknowledge that revocation of any authorization required by this policy constitutes immediate, voluntary termination of employment.
- 6. Employee and Applicant who receives a positive test for marijuana will be asked to demonstrate they possess a valid state medical marijuana license.

Medical Review Officer

The Medical Review Officer ("MRO") will be qualified by applicable state statutes, or any other applicable entity, and have knowledge and training to interpret and evaluate an individual's test results together with the individual's medical history and any other relevant information. Confirmed positive test results may be reviewed by the MRO. As a part of the review, the MRO will notify the individual who received a confirmed positive test result and afford the individual an opportunity to provide a confidential explanation and evidence, if any, why the result should not be deemed positive.

Confidentiality of Testing Records

All drug and/or alcohol testing records and documents generated, as a result of this policy, is confidential and the property of the Company.

- All test results and related records will be maintained separate from other personnel records.
- 2. Test results and related records will not be used in any criminal proceeding, or any civil or administrative proceeding, except: in those actions taken by the Company, or in any action involving the individual tested and the Company, or unless the records are ordered released pursuant to a valid court order. Additionally, the employee grants permission to the Company to release testing records and/or results for purposes of unemployment, Workers' Compensation and other employment-related disputes and/or legal actions.
- 3. Test results and related records will be made available to the applicant or employee for inspection and copying.
- 4. Test results and related records will not be released to any person other than the applicant or employee unless the individual tested grants permission in writing after the receipt of the test results for such release, or such records are required to be released pursuant to a valid court order.

Inspections for Alcohol and Drugs

Reasonable unannounced searches of Company premises and personal searches of employees and others while entering, on, or leaving the premises, including, but not limited to, personal effects, vehicles, lockers, desks, tool boxes, clothing, meal containers and baggage of such persons may be conducted. These searches would be performed by authorized personnel and could include the use of scent trained dogs. Entry upon company premises constitutes consent to such searches. Individuals upon company property have no expectation to privacy to a search of Company property or the individual's personal property.

Individuals refusing to allow an inspection will not be detained or forced to submit to the inspector. Refusal violates Company policy and constitutes voluntary termination of the employment relationship.

Any items prohibited in this Policy which are found during an inspection may be turned over to law enforcement authorities.

Discipline

Refusal to provide consent and/or revocation of consent, failure or refusal to submit to testing and/or inspection

- An employee's refusal to sign the Company's Consent Form, the revocation of signed Company Consent Form, or the refusal/failure to submit to a drug and/or alcohol test when so requested constitutes insubordination and serious misconduct that will subject the employee to:
 - Substance Free Workplace Policy
 - Termination of employment;
 - Immediate removal from the premises; and
 - Barring future access to any Company premises and job locations
- 2. Any applicant who refuses to sign a Company Consent Form, revokes a signed Company Consent Form, or refuses/fails after a conditional offer of employment to submit to a drug test when so requested is considered to have voluntarily withdrawn his/her employment application.
- 3. Absent extraordinary circumstances, the inability of an individual to timely submit the required quantity of specimen for testing purposes will be deemed a refusal to test and subject the individual to termination.

4. Refusal to timely permit inspection or search of personal property or areas under the employee's control when requested to do so by management, or to timely produce and submit a substance to management for content testing and evaluation will subject the employee to termination of employment.

Confirmed Positive Test Results

A "confirmed positive test result" shall mean an illegal or controlled substance level equal to or greater than the threshold limits for a NIDA 5- panel protocol and/or a blood alcohol content of 0.04% or greater.

- Any employee who receives a confirmed positive test result will be subject to termination and barred from Company premises and job locations.
- 2. Any applicant who receives a confirmed positive test result will be considered to have voluntarily withdrawn his/her application for employment.
- 3. Any applicant who receives a confirmed positive test result will not be eligible to reapply for employment for a period of ninety (90) days after the date of the confirmed positive test result.
- 4. Employee and Applicant Positive Marijuana Tests: An employee or applicant who receives a positive test for marijuana will be asked to demonstrate they have a valid state medical marijuana license.

All Other Violations

- 1. All other violations of this policy by employees which are not specifically noted above will subject the employee to disciplinary action, up to and including termination of employment.
- 2. Any invitee or employee of any trade partner who violates any provision of this policy will be subject to penalty action, the severity of which shall be determined in the sole discretion of the Company.

Suspension Pending Investigation

Any employee who is the subject of an investigation regarding possible violation of this policy may be placed on temporary suspension without pay pending full investigation of the matter. If such an investigation results in a finding of no violation of this policy, the suspended employee will be returned to work and will be paid lost wages during the suspension based on a 40 hour work week.

Appeal Procedure

Upon notice that the drug and/or alcohol test result has been confirmed positive by the Medical Review Officer, the individual may appeal the test result by the following procedure:

- Within seventy-two (72) hours of notice, the individual may request a confirmatory retest of the original sample. The request must be in writing and made directly to the Medical Review Officer or HSE Corporate Director,
- If the confirmatory retest result is positive and the individual does not believe the test result is valid, the individual may present any evidence why the test result is not valid to the HSE Corporate Director within three (3) working days,
- If the individual does not believe he/she has violated this policy and is subject to discharge, the individual may present any evidence to support the individual's position to the HSE Corporate Director within three working days and,
- 4. If the individual so desires, he/she may have the opportunity to voluntarily resign prior to management's making a final decision regarding the positive drug and/or alcohol test result.

Employee Assistance Program (EAP)

The management of the Company strongly encourages all employees to seek outside counseling or help for whatever problems they may have that might affect their ability to perform their job as required. Employees are urged to contact

the HSE Corporate Director about the Employee Assistance Program for help in resolving any such problems.

- 1. Any employee who asks for help will be referred to the Company EAP.
- 2. Self-referred participation in rehabilitation through the EAP will not result in disciplinary action. However, successful completion of the company-approved program will be required for continued employment pursuant to the Company's policy.

To avoid possible adverse consequences for refusing to take a drug and/or alcohol test or testing positive, self- referral to rehabilitation must be made prior to notification that the individual is scheduled for a drug and/or alcohol test.

Participation in rehabilitation through the EAP will not waive disciplinary action where warranted for violations of rules and regulations.

Not a Contract/Guarantee of Employment

Nothing in this policy is to be construed as a contract or a guarantee of employment for any period or as altering the at-will relationship of the Company and employee, meaning that either party can terminate employment at any time for any reason, or no reason.

Trade Partners/Suppliers

Every trade partner and supplier and every other person entering the Company's vehicles, offices and work locations shall be required to comply with this policy, to give written certification required by this policy and to supply any other proof requested by the Company from time to time to demonstrate compliance with this policy.

Changes or Modifications

The Company reserves the right to change the provisions of this policy at any time. Written notice of all changes or modifications to the policy will be given to affected employees thirty (30) days prior to implementation of the changes or modifications.

ACKNOWLEDGMENT OF RECEIPT OF POLICY

I acknowledge that I have received Flintco/Oakridge's Statement Marijuana Use, Possession or Impairment Policy for Non-DOT Em abide by all terms of this policy and understand that my failure to employment.	ployees. I certify and promise that I will
Recipient (please print)	
Recipient Signature	Date
EMPLOYEE/ APPLICANT CONSENT AND WAIVER	nt nama) authoriza Elintea II C/Oakrida
I,	ent and/or continued employment. I y and for the Company to use the results
As an applicant, I fully understand and acknowledge that an offer upon several factors including but not limited to voluntary submi satisfactory test(s) results.	
Applicant Signature	Date

Workplace Violence

Scope

Flintco, LLC is committed to provide a workplace that is free from violence by establishing preventative measures against workplace violence, by holding perpetrators of violence accountable, and by aiding and support to victims. Violent acts, whether on-duty or off-duty, affect the ability of all employees to perform their jobs. Flintco, LLC will apply all useful management tools to prevent and reduce the effects of violence on victims, as well as hold perpetrators of violence accountable for their actions. Violations of this policy, by any individual, will lead to disciplinary action, up to and including discharge, and/or legal action as appropriate.

Prohibited Conduct

Prohibited conduct on Flintco, LLC jobsites and facilities includes violent behavior, physical attacks, verbal or physical threats of violence, physical intimidation, stalking, and property damage committed by or against Flintco, LLC staff, contract workers, temporary employees, clients, or anyone else on a Flintco, LLC jobsite or property. Examples of personal situations that could pose a risk of violence in the workplace and should be reported to the appropriate authority at Flintco, LLC include, but are not limited to:

Prohibited Behaviors:

Workplace violence includes, but is not limited to: intimidation, bullying, stalking, threats, physical attack, property damage, or domestic and family violence. This includes acts of violence committed by or against Flintco, LLC staff, contract workers, and temporary employees. Such incidents may also involve clients, visitors or vendors.

- Intimidation includes but is not limited to unwarranted behavior intended to frighten, coerce, or induce duress whether by an individual or group of individuals.
- Physical attack is unwanted or hostile physical contact including but not limited to hitting, fighting, shoving, restraining, or throwing objects.
- Property damage is intentional damage to property and includes property owned by employees, trade partners, clients, visitors or vendors.
- Threat is the expression of intent to cause physical or mental harm. An expression constitutes a threat without regard to whether the party communicating the threat has the present ability to carry out the threat and without regard to whether the expression is contingent, conditional, or future.
- Weapons are any objects that may be used to intimidate, attack, or injure another person or to damage property. Objects understood to have a primary function as a weapon are not allowed on Flintco, LLC jobsites.

Support and Protections

Flintco, LLC will make efforts to protect victims of workplace violence by offering all feasible security measures. Victims may also need special accommodations or adjustments to their work schedule, work location or working conditions in order to enhance their safety. Flintco, LLC and its trade partners will accommodate these requests and needs whenever possible and appropriate.

Reporting Workplace Violence: Violence in process or immediate threats: Remove yourself from the situation.

Employees subject to violence in progress or immediate threats should quickly remove themselves from the situation, to a safe location. Once away from the violent situation any such incident should be immediately reported to your manager, and/or the Flintco, LLC Site Safety representative for emergency response coordination with local police or other authorities if needed. The reporting party should remain away from the situation until permission to return to work is granted by management.

Examples of Immediate Threats:

- Fighting
- Destruction of property
- Direct or veiled threats to kill/harm self or others
- Person displays a gun, knife, or other instrument that could cause harm (possession of weapons will result in removal from all Flintco, LLC jobsites)
- Person makes a statement that they will go get a weapon
- Person is out of control by yelling, screaming, flailing arms, or throwing dangerous objects

Potential threats or threats of an uncertain nature:

Potential threats of violence or threats of an uncertain nature should be immediately reported to your manager, and Flintco, LLC Site Safety Manager.

Examples of Potential Threats:

- Preoccupation with violence or weapons
- Confrontational, angry, unpredictable, or agitated behavior
- History of violent, reckless, or antisocial behavior
- Increased stress in personal life, including suspected domestic or family violence
- Substance Abuse

Flintco, LLC will assess the nature of any threat and may refer the reporting party to local police, depending upon the circumstances.

Incident Analysis

Purpose

The purpose of this SOP is to accurately investigate incidents which result in or have the potential to result in injuries, and/or property damage. Incident investigation in crucial to identify factual information, why they occurred and how to prevent similar incidents.

Definitions

Incident- An unplanned, undesired event that adversely affects completion of a task.

Near Miss- An Incident in which no property was damaged, and no personal injury was sustained, but where, given a slight shift in time or position, damage or injury easily could have occurred.

Injury or Illness- An abnormal condition or disorder. Injuries include cases such as, but not limited to, a cut, fracture, sprain, or amputation. Illnesses include both acute and chronic illnesses, such as, but not limited to, a skin disease, respiratory disorder, or poisoning.

First Aid - A one-time, short-term treatment and requires little technology or training to administer. First aid can include cleaning minor cuts, scrapes, or scratches; treating a minor burn; applying bandages and dressings; the use of non-prescription medicine; draining blisters; removing debris from the eyes; massage; and drinking fluids to relieve heat stress.

Recordable Incident - Injuries are considered by OSHA to be work-related when an event or exposure in the work environment causes or contributes to the condition. These include fatalities, unconsciousness, loss of workdays, restricted work activities, job transfers, or medical care beyond first aid.

Lost Time Incident - An on the job accident that results in an employee being absent from the

workplace for a minimum of one full day workday. The absent day does not include the day during which the accident occurred.

Reportable Incident - Notify OSHA when there is a fatality or suffers a work-related hospitalization, amputation, or loss of an eye on the jobsite.

- A fatality must be reported within 8 hours.
- An in-patient hospitalization, amputation, or eye loss must be reported within 24 hours.

Property Damage - Loss of use of tangible property, whether or not the property has been damaged.

Responsibilities

Employees

- All injuries, incidents, near misses, and property damage shall be reported immediately to supervisor.
- Report any unsafe work conditions to your supervisor that may result in an incident or property damage.

Supervisors

- Evaluate and respond to incidents as appropriate.
- Follow the Crisis Flow Chart. Details for the Crisis
 Flow Chart can be found at each project site.
- Contact local HSE Representative within 1 hour of incident.
- Investigate and submit the Incident Report to the local HSE Area Manager.

HSE Department

- Document incidents for regulatory and internal reporting.
- Coordinate and/or assist in appropriate response to incidents.
- Notify the local HSE Area Manager.
- Submit Incident Report to Director of HSE, HSE Regional Director or HSE Area Manager, and HSE Administrative Assistant.

Procedure

Document Incident Scene

The first priority should ensure the incident site is safe and secure. As you review the scene, record and take pictures of items such as:

- Equipment and devices that were used at the time of the incident
- Positions of appropriate machine guards and controls
- Position of employee at the time of incident
- Housekeeping conditions of the area
- Weather conditions
- Lighting and noise levels

Collect Information

Collect all names and contact information for all witnesses and involved employees. Interview witnesses and effected personnel as soon as possible. The below are some tips for collecting information:

- Gather a team to collect information including injured employee, employee's supervisor, Flintco onsite Superintendent, Flintco onsite Foreman, Flintco HSE and any other necessary team member
- Conduct the interview in a language that the interviewee can understand. Use a translator if necessary
- Receive written statements from witnesses and injured party
- Emphasize the goal of the investigation is to prevent future incidents
- Take notes and be thorough. Only factual information shall be gathered. Avoid opinions and never make assumptions
- Ask the team what they think could have prevented the incident
- Finally, summarize the information that was collected to verify validity

Complete Incident Form

The Flintco Incident Form should be filled out upon completion of the investigation. Only document factual information in the Flintco Incident Form. All parties shall sign off on the form.

The Flintco Incident Form shall be submitted to Flintco HSE Area Manager upon completion for final review. Include pictures, witness statements, Pre-Task Plan, and Incident Form.

Determine Causal Factors

Corrective Actions

Corrective Actions that was determined by Causal Factors shall have the following:

- A person assigned as the responsibility party for the task
- Set a completion date for Corrective Actions to be completed
- Follow up and verify corrective actions have be completed by responsible party

Injury and Incident Reporting

All injuries, incidents and near misses by Flintco LLC employee, trade partner employee, any third party, auto injury, and property damage must be reported immediately. Improper reporting will result in employee discipline.

- All injuries, incidents, near misses and property damage shall be reported immediately to supervisor.
- Incidents that are not reported immediately to your supervisor are subject to denial of worker's compensation benefits. **DO NOT** seek medical attention (unless life threatening) without contacting your supervisor first.
- On the day of injury, the project team will call the HSE Area Manager, Project Director and Area Manager.
- 4. The area HSE Manager, Project Director or Area Manager will notify the Division President and the Director of HSE.
- If the injured is transported by ambulance or is hospitalized notify the Division President and the Director of HSF.
- 6. Once the injured person has been triaged, the incident analysis will begin.
- The incident analysis team will be made up of the Project Superintendent, Project Manager, HSE Area Manager, Project Director or Area Manager.
- 8. The first notification needs to be sent out to injury@flintco.com by the end of shift. The completed incident analysis needs to be to be sent to injury@flintco.com as soon as possible. Sometimes, it is not the same day.
- 9. The HSE Area Manager to update OSHA 300 log when applicable.

- 10. The documentation shall include witness (') statement(s) signed by the witness ('), injured worker(s) statement(s) signed, photos of the scene. Use the "Root Cause Analysis Technique", a method from the Incident Analysis Toolbox found on the Commons.
- 11. The Incident Analysis form is to be filled out **COMPLETELY**.
- 12. After the first notification is sent to injury@
 flintco.com, the project PM, Superintendent,
 Trade Partner supervision, Injured Employee,
 Witnesses, and HSE Regional Director and Vice
 President of HSE are to meet to determine Root
 Cause.
- 13. After all parties have signed the Incident Analysis form, the form will be emailed to the HSE Area Manager for review. The HSE Regional Director and Vice President of HSE will submit the Incident Analysis form to injury@flintco.com.
- 14. If the incident results in a case with restrictions and/or lost time days, the HSE Regional Director and Vice President of HSE will request a telephone conference call to review the incident. The HSE Regional Director and Vice President of HSE will set day/time for review call. The conference call will be attended by the Division President, Area Manager, Project Director, Project Superintendent, Project Manager, and others at the request of the HSE Regional Director and Vice President of HSE or Division President for a personal review of the incident with company President and CEO, Peter Kozicz. A completed, signed copy of the Incident Analysis form will be emailed to injury@flintco. **com** by the HSE Regional Director and Vice President of HSE, prior to the conference call. The time frame for corporate review will be no later than three working days after the date of the incident.

- 15. All other incidents, at the discretion of the HSE Regional Director and Vice President of HSE, may require conference calls. The Area Manager and Division President will be notified when such conference call is required.
- 16. All auto incidents must be reported immediately to injury@flintco.com by the HSE Area Manager.
- 17. For incidents that involve property damage, report immediately to **injury@flintco.com** by the HSE Area Manager.
- 18. When an incident involves a visitor or any third party, a call must be immediately made to the Director of HSE, Division President and/or Area Manger then reported to injury@flintco.com by the HSE Area Manager.
- 19. All forms pertaining to this section are located in the Document Center on the Commons.

Asbestos Management Program

The purpose of this program is to ensure that all employees are safeguarded from the occupational health and safety risks associated with asbestos.

Federal, State, Local Regulations

- NESHAPS 40 CFR Part61
- EPA 600/4-80-005
- OSHA 29 CFR 1926.1101
- OSHA 29 CFR 1910.134
- FPA 40 CFR 260-265
- OSHA 29 CFR 1910.1001
- Enter project-specific requirements

Building Owners

- Prior to any demolition or renovation activities, the building owner is responsible for conducting a survey for asbestos in the affected portion of the building.
- 2. The owner must notify Flintco, LLC of the presence, location, and quantity of asbestos containing material in the building.
- 3. Notification shall be in writing and must be accompanied by an asbestos survey.
- If asbestos abatement is conducted under the direction of the owner Flintco, LLC will not allow work to commence until the owner provides Flintco, LLC a clean air report.

Project Managers

 Prior to any demolition or renovation activities, the project manager shall obtain from the building or facility owner a copy of the asbestos survey identifying the presence, location, and quantity of asbestos containing material in the affected area of the building.

- 2. The project manager shall provide a copy of the asbestos survey to the superintendent and trade partners or any other affected party prior to the start of any work.
- 3. The project manager shall also review local codes and ensure that we are in compliance with any permitting or notification requirements of that locale.

Superintendents

- 1. Prior to any demolition or renovation activities, the superintendent shall review the asbestos survey and become familiar with the location, type, and quantity of asbestos in all work areas.
- 2. The asbestos survey shall be posted and made available to all workers on site.
- 3. The results of the survey must be communicated to all Flintco, LLC field labor, trade partner personnel, and any other affected party prior to start of work.
- 4. The superintendent shall ensure that all employees working on site have sufficient asbestos awareness training. The HSE Department shall be contacted to determine the length and scope to the training required. Documentation of such training shall be kept on file and made available for review upon request.

General Requirements

Flintco, LLC does not and will not perform asbestos abatement related activities under any circumstances. Under normal circumstances Flintco, LLC will not contract directly with a licensed asbestos abatement company, transporter or dumping facility. This policy will not be deviated from without written permission from the Risk Management Vice President.

Building Inspections/ Surveys

- All buildings regardless of age shall be inspected for asbestos prior to any demolition or renovation activities.
- 2. No building shall be considered exempt from the required asbestos inspection based on age or date of last renovation.
- 3. If during construction activities a suspect material is discovered that was not part of the original inspection, work must be stopped immediately. The area will be cordoned off until an inspection of the material can be completed by a qualified inspector.
- 4. Individuals engaged in the sampling of suspected asbestos containing material must meet minimum federal and state training requirements including (but not limited to) the possession of a valid Asbestos Inspector License.
- 5. If the inspection indicates the presence of asbestos-containing material and these materials will be disturbed due to demolition or renovation activities, then they shall be removed by a licensed asbestos abatement trade partner.

Emergency Procedures

- Every effort will be made to identify the presence and location of all asbestos containing material prior to demolition or renovation activities minimizing the chance of accidental disturbance. Upon identification or accidental release of asbestos containing material or the accidental release should occur, the following steps should be followed immediately:
 - a. Stop work immediately, wet material, and vacate the area.
 - b. Notify supervision of the disturbance.

- c. Isolate the area to prevent entry by others.
- d. Post danger signs to inform other personnel of the hazard.
- e. Shut off or temporarily modify the air handling system to prevent the distribution of asbestos fibers to other areas.
- f. Do not attempt to clean up debris.
- g. Suspect material must be evaluated and tested immediately.
- h. Do not re-enter the areas until tests are confirmed.

Training

- 1. All workers shall be trained on the hazards associated with asbestos and the procedures for safely working around asbestos materials without endangering themselves, their coworkers, or other building occupants.
- 2. This is regardless of the fact that the asbestos has already removed, and we are in receipt of a clean building report.
- 3. Training will include:
 - a. Health effects of asbestos
 - b. The types, properties and uses of asbestos
 - c. The hazards of asbestos fiber inhalation and ingestion
 - d. Types of activities which could release asbestos fibers
 - e. The proper response to fiber release episode

Bloodborne Pathogen Program

Purpose

An infection control plan must be prepared for all persons who handle, store, use, process, or disposes of infectious medical wastes. This infection control plan complies with OSHA requirement, 29 CFR 1910.1030, Bloodborne Pathogens. The plan includes requirements for personal protective equipment, housekeeping, training, and a procedure for reporting exposures.

Responsibilities

- Flintco, LLC HSE Department will conduct the Bloodborne Pathogen Program and maintain records of training and inspections for this program.
- Management will ensure proper conduct of the program though inspections, record keeping and periodic audit.

Definitions

Biological Hazard - The term biological hazard or biohazard is taken to mean any viable infectious agent that presents a risk, or a potential risk, to the wellbeing of humans.

Medical Wastes/ Infectious Wastes - All waste emanating from human or animal tissues, blood or blood products or fluids. This includes used first aid bandages, syringes, needles, sharps, material used in spill cleanup and contaminated PPE or clothing.

Universal Precautions - Refers to a system of infectious disease control that assumes that every direct contact with body fluids is infectious and requires every employee exposed to be protected as though such body fluids were infected with bloodborne pathogens. All infectious/medical material must be handled according to Universal Precautions (OSHA Instruction CPL2-2.44A)

Unprotected exposure to body fluids presents the possible risk of infection from a number of bloodborne pathogens notably Hepatitis and HIV.

Hazard Control

Engineering Controls - prevention of exposure to bloodborne pathogens engineering controls include proper storage facilities and containers, syringes designed to prevent accidental needle sticks, autoclaves and disinfectant equipment.

Administrative Controls - prevention of exposure to bloodborne pathogen administrative controls include universal precautions, assignment of PPE, employee training, use of spill kits specifically designed for blood and body fluids, restricted access to waste collection points and waste disposal procedures.

Reporting and Record Keeping

Any reports required by OSHA will be maintained by the Flintco, LLC HSE Department. All reports (Training Certificates, Notice of HBV Vaccinations, exposure reports) will be maintained for the duration of employment plus 30 years. Occupationally contracted HBV or HIV will be recorded on the OSHA 300 Log of Occupational Injuries and Illnesses as an illness. Exposures to bloodborne pathogens from contact with sharps will be recorded on the OSHA 300 Log of Occupational Injuries and Illnesses if treatment such as gamma globulin, hepatitis B immune globulin or hepatitis B vaccine is prescribed by a Physician.

Training

Employees will have access to a copy of the exposure control plan at time of hire and anytime thereafter. Access to a copy of the exposure control plan shall be provided in a reasonable time, place, and manner. All personnel assigned duties as EMT, Paramedics, First Aid Station Staff, HAZMAT responders, Custodial Employees (those that clean

rest rooms, etc.) will receive initial and annual training by a qualified medical practitioner on the Bloodborne Pathogen Program. Additionally, personnel trained in First Aid shall be offered this annual training. All new and current affected employees will be trained initially and annually thereafter. The content of the training program will include:

- 1. Company Policy
- 2. Types and transmission of Bloodborne Pathogens
- 3. General Safety Rules
- 4. Universal Precautions
- 5. Use of Personal Protective Equipment
- 6. Medical Waste Disposal Procedures
- 7. Post Exposure Treatment and Procedures
- 8. HBV Vaccinations

Training will be by Control of Bloodborne Pathogens Training certificate.

All Employees not affected by this Program will receive an overview of the program requirements during scheduled department meetings with documentation.

Hepatitis-B Virus (HBV) Vaccinations

Occupational Health Professionals and those required to provide first aid or emergency response duties or medical care on a routine basis will be offered Hepatitis-B Virus (HBV) Vaccinations at Company expense. Employees that transfer to a job or their job is reclassified to include exposure to bloodborne pathogens will be offered HBV Vaccinations within 10 working days of the transfer or reclassification.

The choice for HBV vaccination is not mandatory. If an affected employee chooses not to have the vaccination at the initial offering, they will have the opportunity to be vaccinated when they are ready. The Company will document the offer, acceptance

or declination, and vaccination dates with the Notice of HBV Vaccinations Form.

Post Exposure Treatment and Notification Procedures

Should an affected Employee or an Employee acting as a "Good Samaritan" be occupationally exposed to HIV/HAV/HBV the affected Employee will report the exposure to their immediate supervisor. Flintco, LLC will provide for the employee to be tested for HIV/HAV/HBV at company expense. Following the initial blood test at time of exposure, seronegative employees will be retested at 6 weeks, 12 weeks and 6 months to determine if transmission has occurred. During this period, the employee will follow the recommendations provided by the Physician or the US Public Health Service.

An "occupational exposure" is defined as blood or body fluid contact from an injured or ill Employee to the affected Employee or injury by a contaminated sharp object.

Following the report of exposure, Flintco, LLC or Company Assigned Medical Clinic will contact the exposure source and request that person be tested for HIV/HAV/HBV at company expense. The request is not mandatory and if refused will not affect that employee's future employment.

The source individual's blood is tested as soon as possible and after consent is obtained to determine HBV and HIV infectivity. (Hepatitis B surface Antigen, Hepatitis C Antibody and HIV Screen)

The exposed employee's blood shall be collected as soon as feasible and tested for HBV (Hepatitis B Antibody, Hepatitis C Antibody) and HIV serological status after consent is obtained (Employee Consent for HIV Antibody Testing).

During all phases of Post Exposure, the confidentiality of the affected Employee and exposure source will be maintained on a "need to know basis". The Bloodborne Pathogens Exposure and Treatment form is used to document the exposure and offer of medical assistance to the

affected Employee and use the Medical Consent for Bloodborne Pathogens Testing form for the exposure source. The results of any HIV/HAV/HBV tests conducted will be provided to the exposed and source Employees within 5 business days of receipt.

General Procedures

The following procedures must be followed by personnel when in medical rooms or laboratories. All supervisors must ensure that their staff is trained in proper work practices, the concept of universal precautions, personal protective equipment, and in proper cleanup and disposal techniques.

Resuscitation equipment, pocket masks, resuscitation bags, or other ventilation equipment must be provided to eliminate the need for direct mouth to mouth contact in groups where resuscitation is a part of their responsibilities.

Eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lenses are prohibited in work areas where there is a potential for exposure to any health hazard. Food and drink must not be stored in refrigerators, freezers, or cabinets where blood or other potentially infectious material is stored or in other areas of possible contamination.

According to the level of risk, wearing laboratory or protective clothing may be required for persons entering infectious disease laboratories. Likewise, showers with a germicidal soap may be required before exit.

Gowns, aprons, or lab coats must be worn whenever there is a possibility that body fluids could splash on skin or clothing.

Gloves must be made of appropriate disposable material, usually intact latex or vinyl. They must be used in the following circumstances:

- When the employee has cuts, abraded skin, chapped hands, dermatitis, or similar conditions.
- When examining abraded or non-intact skin of a patient with active bleeding.
- While handling blood or blood products or other body secretions during routine laboratory procedures.

Handwashing facilities shall be readily available at all work locations or antiseptic solutions/ towelettes will be provided for use. Employees must wash their hands immediately, or as soon as possible, after removal of gloves or other personal protective equipment and after hand contact with blood or other potentially infectious materials.

All procedures involving blood or other potentially infectious agents must be performed in a manner that will minimize splashing, spraying, and aerosolization.

Medical Wastes

Medical/infectious waste must be segregated from other waste at the point of origin. Medical/infectious waste, except for sharps (i.e., razor blades, broken glass, needles, etc.) capable of puncturing or cutting, must be contained in double disposable red bags conspicuously labeled with the words "INFECTIOUS WASTE" and "BIOHAZARD."

Used needles or other sharps (razor blades, broken glass, scalpels, etc.) must not be sheared, bent, broken, recapped, or re-sheathed.

Infectious sharps must be contained for disposal in leak-proof, rigid puncture-resistant containers. Infectious waste contained as described above must be placed in reusable or disposable leak-proof bins or barrels that are conspicuously labeled with the words "INFECTIOUS WASTE" and "BIOHAZARD." These waste barrels are picked up regularly by an outside company licensed to handle infectious wastes.

All infectious agents, equipment, or apparatus must be disinfected in an autoclave or otherwise disinfected before being washed or disposed of. Each individual working with infectious biohazardous agents is responsible for dis-infection and disposal of these agents.

Biological wastes that do not contain radioactive or hazardous substances may be disinfected by steam sterilization (autoclave) then disposed of in the regular trash.

Liquid bio-hazardous waste may be disposed of in the sewage system following chemical decontamination.

Reusable glassware must be decontaminated in sodium hypo chlorite (household bleach) solution (1:9) prior to rinsing and acid washing. The glassware must then be sterilized in an autoclave.

To minimize the hazard to firefighters or emergency response personnel, at the close of each workday and before the building is closed, all infectious or toxic material must be placed in a refrigerator, placed in an incubator, or autoclaved or otherwise disinfected.

Infectious agents must not be placed in an autoclave and left overnight in anticipation of autoclaving the next day.

Floors, laboratory benches, and other surfaces in buildings where infectious agents are handled must be disinfected with a suitable germicide, such as 1:9 sodium hypo chlorite solution (household bleach) as often as necessary as determined by the supervisor.

The surroundings must be disinfected after completion of operations involving planting, pipetting, centrifuging, and similar procedures with infectious agents.

Infectious agents must not be dumped into the building drainage system without prior disinfection.

Cuts

If an employee has a needle stick, cut, or mucous membrane exposure to another person's body fluids he/she must report the incident immediately to the Supervisor on the project and/or HSE Department.

Blood Exposure

All employees exposed to human blood and blood products must report to the HSE Department for information and possible inclusion in the Hepatitis B Immunization Program.

Infection Control Plan

The purpose of the Infection Control Plan is to protect the health and safety of the persons directly involved in handling the materials, Company personnel and the general public by ensuring the safe handling, storage, use, processing, and disposal of infectious medical waste. This plan complies with OSHA requirement proposed for 29 CFR1910.1030, Bloodborne Pathogens.

Universal precautions: Refers to a system of infectious disease control which assumes that every direct contact with body fluids is infectious and requires every employee exposed to be protected as though such body fluids were infected with bloodborne pathogens. All infectious/medical material must be handled according to Universal Precautions (OSHA Instruction CPL2-2.44A).

The following universal precautions must be taken.

- 1. Gloves must be made of appropriate disposable material, usually intact latex or vinyl. They must be used:
 - when the employee has cuts, abraded skin, chapped hands, dermatitis, or the like.
 - when examining abraded or non-intact skin of a patient with active bleeding.
 - while handling blood or blood products or other body secretions during routine procedures.
- 2. Gowns, aprons, or lab coats must be worn when splashes of body fluid on skin or clothing are possible.
- 3. Mask and eye protection are required when contact of mucosal membranes (eyes, mouth or nose) with body fluids is likely to occur (e.g. splashes or aerosolization).

Waste Disposal Plan

- Medical/Infectious waste must be segregated from other waste at the point of origin.
- 2. Medical/Infectious waste, except for sharps (e.g. razor blades, broken glass, needles, etc.) capable of puncturing or cutting must be contained in double disposable red bags conspicuously labeled with the words, "INFECTIOUS WASTE--BIOHAZARD."
- 3. Infectious sharps must be contained for disposal in leak-proof, rigid puncture resistant containers.
- 4. Infectious waste thus contained as described in procedures 2 and 3 above must be placed in reusable or disposable leak-proof bins or barrels which must be conspicuously labeled with the words, "INFECTIOUS WASTE -- BIOHAZARD." These waste barrels are be picked up regularly by an outside company licensed to handle infectious wastes.

- 5. Spills/Disinfectants: a solution of sodium hypo chlorite (household bleach) diluted 1:9 with water must be used to disinfect, following initial cleanup of a spill with a chemical germicide approved as a hospital disinfectant. Spills must be cleaned up immediately.
- 6. After removing gloves, and/or after contact with body fluids, hands and other skin surfaces must be washed thoroughly and immediately with soap or other disinfectant in hot water.
- 7. Other biological wastes that do not contain radioactive or hazardous substances may be disinfected by steam sterilization (autoclave) and then disposed of in the regular trash.
- 8. Liquid biohazard waste may be disposed of in the sewage system following chemical decontamination.
- 9. Reusable glassware must be decontaminated in sodium hyper chlorite (household bleach) solution (1:9) prior to rinsing and acid washing. Then the glassware must be sterilized in an autoclave.

Task	Gloves	Apron	Mask	Eyewea
Control of Bleeding w/spurting blood	X	X	X	X
Bleeding Control w/minimal bleeding	X			
Emergency Child Birth	X	X	X	X
Blood Drawing	X			
Handling & Cleaning Instruments	X			
Cleaning Bio Spills	X			
Taking Temperature				
Giving Injection	X			
Measuring Blood Pressure				

The examples provided in this table are based on application of universal precautions. Universal precautions are intended to supplement rather than replace recommendation for routine infection control, such as hand washing and using gloves to prevent gross microbial contamination of hands (e.g., contact with urine or feces). Appropriate PPE shall be provided at no cost to the employee.

Cell Phone and Electronic Devices

Usage of Cell Phones/Personal Electronic Devices on Projects

The use of personal cell phones/personal electronic devices while at work presents a hazard or distraction to the user and/or co-employees. This policy is meant to ensure that cell phone/personal electronic device use while at work is both safe and does not disrupt business operations.

Therefore, personal cell phones/personal electronic devices are not allowed on any FLINTCO, LLC or its subsidiary jobsites except as described:

Employees of FLINTCO, LLC or its Subsidiaries

The on-site project staff is authorized to carry cell phones in accordance with policy below.

Employees of Trade partners / Suppliers

Any employee that the Trade partner / Supplier deems necessary to conduct business operations must get written permission from a member of the Flintco, LLC or subsidiary staff prior to use of cell phone on project site. They must then use the cell phone in accordance with policy below.

Cell Phone/ Personal Electronic Devices Policy

use of cell phones/ personal electronic devices is permissible during work hours for company business only. Personal use of cell phones/ electronic devices is only permitted during breaks and at lunch time and in designated areas. Before accepting an incoming or making an outgoing call, make sure that such activity will not compromise safety. When operating equipment, driving a vehicle on the jobsite or while performing any jobsite activity that a distraction may cause a potential safety threat, let all incoming calls go unanswered. You then may return the call when you have stopped the equipment, pulled the vehicle to a safe area or put yourself and those around you in a safe environment before returning the call.

Violating this policy will result in disciplinary action up to and including removal or termination.

Please contact your immediate supervisor should you have any questions or concerns.

Confined Spaces

Purpose

The purpose of this program is to protect employees including contract employees from the potential hazards of some confined spaces. This is to be accomplished using a permit system that is designed to prevent unauthorized entry into a potentially hazardous confined space and assure that potential hazards have been identified and eliminated or controlled prior to entry.

Definitions

Confined Space – A confined space means a space that:

- Is large enough and so configured that an employee can bodily enter and perform assigned work; and
- Has limited or restricted means for entry or exit (for example: tanks, vessels, silos, storage bins, manholes, hoppers, vaults and pits); and
- Is not designed for continuous employee occupancy.

Non-permit Confined Space - A non-permit confined space means a confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

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

- Contains or has a potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an entrant.

- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section; or
- Contains any other recognized serious safety or health hazard.

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

General Requirements

- When planning any type of work involving a confined space the supervisor in charge must determine whether it is a non-permit confined space, or a permit required confined space. It must be assumed to be a permit required confined space unless the supervisor can assure that no actual or potential atmospheric hazards exist, and all hazards have been eliminated without entry into the space.
- If a permit required confined space exists at one of our facilities, employees at that facility are to be informed of its existence and location. If it is a permanent confined space this may be done by posting a sign reading "DANGER – PERMIT REQUIRED CONFINED SPACE, DO NOT ENTER".
- 3. If trade partners are to be used to perform work that involves a permit required confined space the supervisor in charge must:
 - a. Inform the trade partner that a confined space is involved in the work to be performed.

- b. Obtain a copy of the trade partner's confined space program and submit it for review.
- c. Apprised the trade partner that potential atmospheric hazards may exist and that the trade partner is responsible for conducting complete atmospheric evaluation for known and suspected hazards.
- d. Coordinate entry operations with the trade partner and our employees
- e. Debrief the trade partner at the conclusion of the entry operations regarding any problems that may have been encountered
- 4. An alternate procedure may be used to enter a permit required confined space provided the following conditions are met:
 - a. The only hazard posed by the permit space is an actual or potential hazardous atmosphere.
 - b. Forced air ventilation alone is sufficient to maintain the permit space safe for entry.
 - c. Monitoring and inspection data have been developed to demonstrate that the only hazard is a hazardous atmosphere and that forced air ventilation is sufficient to eliminate that hazard and the data has been documented and made available to each employee at the facility;
 - d. If an initial entry of the permit space is necessary to obtain the data, the entry is made in compliance with the permit required confined space entry procedure.
 - e. Entry into the permit space is performed in accordance with the following alternate procedure.

Alternate procedure For Permit Required Confined Space Entry

- 1. Any conditions making it unsafe to remove an entrance cover shall be eliminated before the cover is removed.
- 2. When a cover is removed, the entrance must be promptly guarded by a railing or temporary barrier.
- 3. The internal atmosphere shall be tested with a calibrated direct reading instrument. The following conditions shall be tested in the order given.
 - a. Oxygen content must be 19.5% to 23.5%
 - b. Flammable gases must be <=10% of lower explosive limit (L.E.L.)
 - c. Toxic air contaminants Hydrogen sulfide (H2S) and Carbon Monoxide (CO).
- 4. There may be no hazardous atmosphere present whenever any employee is inside the space.
- 5. Continuous forced air ventilation from a clean source shall be used and shall be so directed as to ventilate the immediate areas where an employee is or will be present.
- 6. The atmosphere within the space shall be continuously tested to ensure a safe environment. If a hazardous atmosphere is detected each employee shall leave the space immediately and the cause of the hazardous atmosphere shall be determined.
- 7. The supervisor in charge shall verify that the space is safe, and this alternate procedure has been followed. The verification shall be made through a written certification signed by the supervisor in charge and shall be made available to each employee entering the space.

If this alternate procedure is followed entrants will not have to be authorized, attendants will not be required and the requirements of CFR 1926.1211(k) concerning rescue and emergency services will not be applicable.

Permit Required Confined Space Entry Procedure

Hazard Identification

If a permit required confined space is involved in the work to be accomplished, then all potential hazards of that particular confined space must be identified. Some of the potential hazards of confined spaces may include:

- Oxygen deficiency
- Hazardous gases, liquids, or solids
- Energy sources
- Engulfment
- High temperatures
- Pyrophoric materials
- Hazards outside the confined space

Hazard Control

Once the potential hazards of a confined space have been identified measures must be taken to remove or control them. The methods used will depend upon the confined space to be entered and may include:

- 1. Control of hazardous gases or liquids by blinding
 - All piping that could potentially carry product or other material into the confined space must be isolated from the space by absolute closure of the pipe by fastening across its bore a solid plate which completely covers the bore.
 - Blinds should be as close as possible to the confined space to be entered. Control of hazardous gases, oxygen deficiency and high temperatures by ventilation
 - Excavations that are to be entered as permit required confined spaces may require air movers to ensure a safe atmosphere.

- All entry manways to a vessel should be opened for ventilation after the vessel has been properly depressurized, purged, blinded and isolated. Entry during this time is forbidden. Air movers may be necessary to speed up or ensure complete ventilation.
- Air educators should be used to educt air from vessels. The use of air eductors to blow air into vessels should be discouraged.
- Depending upon ambient temperature and other conditions, the temperature inside a confined space may become elevated. Proper ventilation will aid in improving the working environment.
- Control of solids engulfment by excavation safety - The potential for solids engulfment by our personnel occurs primarily in excavations. This potential can be eliminated by proper excavation safety. Our personnel will follow the safety procedures outlined in 29 CFR Part1926.650.
- 3. Control of energy sources by lockout/ tagout -All energy sources associated with the confined space such as isolation valves and electrical circuits must be identified and locked out and/or tagged out as specified in the owner's lockout/tagout procedure (OSHA1910.147).
- Control of pyrophoric materials Certain vessels may contain Iron Sulfide deposits which will spontaneously ignite when dry. Such vessels should be thoroughly cleaned and purged prior to entry.
- 5. Control of external hazards Control of hazards outside the confined space may be controlled by erecting barriers and posting signs.

Atmosphere Testing

To ensure a safe atmosphere within the confined space prior to entry the following procedure should be followed:

 There must be adequate ventilation within the confined space to assure a representative sample of the atmosphere is being tested.

- The test instrument used to determine oxygen, combustible gas, and hydrogen sulfide must be calibrated prior to use to ensure accurate results.
- 3. Immediately prior to issuing a confined space entry permit the following contaminant levels must be measured in the order stated:
 - a. Waste Disposal facilities Oxygen and Combustible Gas
 - b. LPG facilities Oxygen, combustible gas, hydrogen sulfide
 - c. NGL, Crude Oil, and Refined Products facilities Oxygen, Combustible Gas, Hydrogen Sulfide, and Benzene.
- 4. The Oxygen content must be between 19.5% and 23.5% before entry is permitted.
- 5. The Combustible gas level must be not greater than 10% of the lower explosive limit (L.E.L.).
- 6. The Hydrogen Sulfide concentration must not exceed Oppm.
- 7. The Carbon Monoxide concentration must not exceed 25ppm.
- 8. The analyzer sample probe must be inserted well into the confined space environment to ensure a representative test of the atmosphere. Sampling shall be taken at top, middle, and bottom of confined space.
- 9. Continuous testing of the confined space atmosphere shall be conducted. The frequency of testing shall be the judgment of the employee in charge based on the conditions that exist.
- 10. If the prescribed levels for Oxygen, Carbon Monoxide, Hydrogen Sulfide, cannot be obtained then respiratory protection must be used in accordance with our respiratory protection program

Confined Space Entry Permit

A confined space entry permit shall be completed and signed by the supervisor or other designated employee in charge of work involving a permit required confined space. The permit must include the following information.

- 1. Identity of permit space
- 2. Purpose of entry
- 3. Date of entry
- 4. Duration of entry
- 5. List of authorized entrants
- 6. List of eligible attendants
- 7. Hazards of the permit space
- 8. Methods to eliminate or control hazards
- 9. Acceptable environmental conditions
- Testing equipment and procedures used to verify that acceptable environmental conditions are being met
- 11. Rescue and other services to be used in case of an emergency and means of communication with those services.
- 12. Rescue services to be provided on site if necessary
- 13. Personal protective equipment provided such as respirators, clothing, and retrieval lines
- 14. Name of person in charge
- 15. Signature of person authorizing entry
- 16. Attendant name
- 17. Communication Method

Equipment

The person in charge of work to be performed in a permit required confined space shall ensure the following equipment is available as needed based on existing conditions and is in good repair and used by the employees involved.

- Testing and monitoring equipment
- Ventilating equipment
- Communications equipment
- Lighting equipment
- Barriers
- Equipment such as ladders needed for safe ingress and egress
- Personal protective equipment
- Rescue and emergency equipment

Attendant

- 1. An attendant must be posted outside the confined space at all times anyone is inside.
- 2. Maintain an accurate count of entrants during entry.
- 3. Recognize potential permit space hazards.
- 4. Monitor activities inside and outside the permit space.
- 5. Maintain communication with entrants.
- 6. Order entrants to evacuate the permit space when:
 - a. He observes a condition not allowed in the entry permit.
 - b. He detects behavioral effects of hazard exposure.
 - c.He detects a situation outside the space which could endanger the entrants.
 - d. He detects an uncontrolled hazard within the permit space.
 - e. He must leave the workstation.
- 7. Summon rescue and other emergency services, if necessary, when entrants need to escape.
- 8. Prevent unauthorized persons from entering the confined space.
- 9. Never enter the confined space to attempt rescue.

- 10. Properly use any rescue equipment provided and perform any other assigned rescue and emergency duties, without entering the confined space.
- 11. Confined Space Attendant shall have no other duties.

Person in Charge of or Authorizing Entry

- 1. Determine that the entry permit contains the requisite information before authorizing or allowing entry.
- 2. Determine at appropriate intervals that entry operations remain consistent with the entry permit, and that acceptable entry conditions are present.
- 3. Cancel the entry authorization and terminate entry whenever acceptable conditions are not present.
- 4. Assure that permit space is closed off and cancel permit when work is complete.

Rescue Team

- If company personnel are used for rescue, they must be trained to use personnel protective and rescue equipment.
- 2. Company personnel used to rescue shall practice making permit space rescues at least once every 12 months. The practice must simulate anticipated types of permit spaces from which rescue are to be performed.

Training

All employees involved in permit required confined space work shall have received training on the requirements of this program and training appropriate to their assigned position prior to assignment.

Additional training shall be provided whenever there is a change in permit space operations that presents a hazard about which an employee has not previously been trained.

The supervisor in charge shall certify each employee's name, the signature or initials of the trainers, and the dates of training.

Construction Equipment, Mobile Elevated Work Platforms (MEWP)

- Upon delivery, each, piece of equipment shall be checked to ensure all safety features are properly operating. If deficiency is found, equipment shall be red tagged out of service until repairs are made and equipment is rechecked. This applies to all company-owned, rented and trade partner's equipment.
- 2. All vehicles in use shall be checked at the beginning of each shift to assure that the following parts, equipment, and accessories are in safe operating condition and free of apparent damage that could cause failure while in use: service brakes, including trailer brake connections; parking system (hand brake); emergency stopping system (brakes); tires; horn; steering mechanism; coupling devices; seat belts; operating controls; and safety devices. All defects shall be corrected before the vehicle is placed in service. These requirements also apply to equipment such as lights, reflectors, windshield wipers, defrosters, fire extinguishers, etc., where such equipment is necessary.
- 3. Heavy machinery, equipment, or parts thereof, which are suspended or held aloft by use of slings, hoists, or jacks shall be substantially blocked or cribbed to prevent falling or shifting before employees are permitted to work under or between them. Bulldozer and scraper blades, end-loader buckets, dump bodies, and similar equipment, shall be either fully lowered or blocked when being repaired or when not in use. All controls shall be in a neutral position, with the motors stopped and brakes set, unless work being performed requires otherwise.

- 4. When equipment is parked the parking brake shall be applied and equipment such as blades and buckets shall be placed on the ground.
- 5. All equipment including cranes, forklifts, skid steer loaders, aerial/scissor lifts, etc. shall have a reverse signal/back-up alarm audible above surrounding background noise. All equipment with reverse gears shall be equipped with back-up alarm. This will include concrete delivery trucks.
- 6. The operator must verify trailer chocks, supports, and dock plates are in place prior to loading/unloading.
- 7. A fire extinguisher is to be mounted on each vehicle and/or piece of equipment.
- 8. At the beginning of each shift, the operator shall check equipment prior to putting into service. All lift controls and equipment are tested/inspected before each use. All equipment will operate per manufacturer standards and training content shall include load capacity, instructions, distances, refueling, ramps, visibility, and balancer and counterbalances.
- No modifications or additions which affect the capacity or safe operation of the equipment shall be made without the manufacturer's written approval. This includes attachments for lifting personnel.
- 10. All equipment that is fitted with roll over protection system (ROPS) shall also be equipped with seatbelts that shall be worn by operator and all passengers.

- 11. All vehicles with cabs that were manufactured with wind shields shall be equipped with wind shields and powered wipers. Cracked and broken windows are to be replaced.
- 12. Passengers are not allowed to ride on equipment unless a seat with a seatbelt is provided for that purpose.
- 13. All operators of company-owned, hired or rented equipment or motor vehicles must have a valid, appropriate driver's license, and have training for the piece of equipment they are operating.
- 14. "Free rigging" to the tines of a forklift is **prohibited.**
- 15. Load limits of equipment shall not be exceeded at any time.
- 16. All employees working in a mobile elevated work platform (MEWP) shall stand firmly on the floor and shall not climb on the rails or the edge of the basket and shall wear personal fall arrest system (PFAS).
- 17. Rated capacity of the lift shall not be exceeded and includes tools and equipment
- 18. Spotters must be used in close quarters where there is a chance of striking other equipment.
- 19. Mobile elevated work platform (MEWP) shall have both (upper) and lower controls. Upper controls shall be in or beside the platform within easy reach of the operator. Lower controls shall provide for overriding the upper controls. Controls shall be plainly marked as to their function. Lower level controls shall not be operated unless permission has been obtained from the employee in the lift, except in case of emergency.

- 20.100% personal fall arrest system (PFAS) is required in all mobile elevated work platform (MEWP) at all times to the manufacturer's engineered anchor point.Lanyards are not to be used in mobile elevated work platform (MEWP). A self-retracting lifeline (SRL) shall be used to connect personnel to the manufactured anchor point.
- 21. Tying off to an adjacent pole, structure, or equipment while working from a mobile elevated work platform (MEWP) shall not be permitted.
- 22. All equipment covered by this subpart shall comply with the following requirements when working or being moved in the vicinity of power lines or energized transmitters, except where electrical distribution and transmission lines have been de-energized and visibly grounded at point of work or where insulating barriers, not a part of or an attachment to the equipment or machinery, have been erected to prevent physical contact with the lines:
 - a. For lines rated 50 kV or below, minimum clearance between the lines and any part of the crane or load shall be 10 feet.
 - b. For lines rated over 50 kV, minimum clearance between the lines and any part of the crane or load shall be 10 feet plus 0.4 inch for each 1 kV over 50 kV, or twice the length of the line insulator, but never less than 10 feet;
 - c. In transit with no load and boom lowered, the equipment clearance shall be a minimum of 4 feet for voltages less than 50 kV, and 10 feet for voltages over 50 kV, up to and including 345 kV, and 16 feet for voltages up to and including 750 kV;

- d. A person shall be designated to observe clearance of the equipment and give timely warning for all operations where it is difficult for the operator to maintain the desired clearance by visual means.
- e. Cage-type boom guards, insulating links, or proximity warning devices may be used on cranes, but the use of such devices shall not alter the requirements of any other regulation of this part even if such device is required by law or regulation;
- f. Any overhead wire shall be considered to be an energized line unless and until the person owning such line or the electrical utility authorities indicate that it is not an energized line and it has been visibly grounded.
- g. Prior to work near transmitter towers where an electrical charge can be induced in the equipment or materials being handled, the transmitter shall be de-energized, or tests shall be made to determine if electrical charge is induced on the crane.

- h. The equipment shall be provided with an electrical ground directly to the upper rotating structure supporting the boom.
- i. Ground jumper cables shall be attached to materials being handled by boom equipment when electrical charge is induced while working near energized transmitters. Crews shall be provided with nonconductive poles having large alligator clips or other similar protection to attach the ground cable to the load.
- j. Combustible and flammable materials shall be removed from the immediate area prior to operations.

Cranes and Rigging

Crane Procedure

Cranes are a vital part of any construction operation. To ensure that they handle loads properly, safely and with greatest efficiency, the following guidelines are provided.

Operator Qualifications and Operating Procedures

Crane Operator Certification Procedure

All crane operators shall be evaluated and certified to operate the crane. Flintco's Crane Operator Certification documents shall be kept in the corporate office, available for review on the share drive and a copy shall be kept onsite.

Certified Crane Operator (CCO) designation shall be required. However, much training an Operator may have, the most important aspect of their work is how safely and efficiently they operate their designated piece of equipment. Crane Operators' skills **must be field verified** before their placement on a piece of equipment.

Cranes shall be operated only by the following personnel:

- Designated operators who have been licensed by an approved agency or union and meet the requirements of Chapter 5, ANSI B30.5c-1992. Even if there are others on site that are qualified to operate the crane, only the designated operator assigned by Flintco project staff.
- 2. Trainees who are under the direct supervision of the designated operator
- 3. Inspectors certified for crane inspection
- 4. Test and maintenance personnel, when necessary

No one other than the above personnel shall be in or on the crane during operations. Exceptions

to the above are oilers, apprentice operators or supervisors whose duties may require their presence on the equipment.

Operating Procedures

The operator shall:

- Not engage in any practice that may divert his or her attention while engaged in crane operations. This includes talking on a phone, (with or without hands-free equipment) listening to a radio station or listening to or watching television during the activity of moving or operating the crane.
- 2. Not operate the crane if physically or mentally unfit or taking prescription drugs that may affect judgment.
- 3. Not respond to any signal that is unclear or is given by anyone other than appointed signalmen. Exception: The operator shall respond to a stop signal given by anyone.
- 4. Not permit trainees to make initial lift. The operator shall perform the first lift to determine lift stability, crane function and general safety.
- 5. Have final responsibility and control over the crane operations. Whenever there is any doubt as to safety, the operator shall have the authority to stop and refuse to handle loads until safety has been assured.
- 6. Be familiar with the crane and its care, the operator's manual and load charts. He or she shall be responsible for notifying his or her supervisor of any needed adjustments or repairs, and for logging his or her findings in the crane log.
- 7. Shall, upon request, demonstrate his or her ability to determine total load weight and its relationship to the crane load charts.

Mobile Cranes

Operating Procedures

Rated load capacity charts recommended operating speeds, special hazard warnings, and other essential information must be conspicuously posted in all cranes, hoists and other equipment. Follow them at all times. All written reports on rated load tests showing the test procedures and confirming the adequacy of any repairs or alterations shall be kept on the equipment and in the Corporate Office and confirmed before use of the equipment.

Note: Never attempt to lift more than the rated capacity of any machine or its rigging.

The operator shall be responsible for:

- The proper placement of the crane in relationship to the load to be handled and the landing area so as to obtain the best-rated lift capacity
- 2. Leveling the crane to within one degree of level and rechecking the level a minimum of three times during the eight-hour work shift
- The proper placement and use of outriggers for all lifts except where the manufacturer permits otherwise
- 4. The determination of stable or unstable ground or footing. Should additionally floats, cribbing, timbers or other structural members be needed, they shall be of proper design and sufficient to uniformly distribute the load and are discussed in depth after Lattice Boom Cranes
- 5. The installation and maintenance of crane-swing radius protection
- 6. Assuring the correct load chart is available
- 7. Daily inspection of the crane before use
- 8. Maintaining a current inspection approved 20-pound ABC and/or CO2 fire extinguisher on the crane at all times
- 9. Reporting any defects and ensuring safety related items are corrected prior to use
- 10. Any changes in the setup of a crane on the project sites will be under the supervision of the Operator Superintendent or Warehouse Manager.

Load Rating

Determination:

- 1. The weight of all auxiliary handling devices, such as hoist blocks, headache balls, hooks and rigging shall be considered as part of the total load. Additionally, the weight of all items added to the load at the site must be determined and added to the total weight.
- 2. The operator shall be provided with a copy of the Bill of Lading, with the item weight clearly legible, to determine total load weight.

Crane Inspection

- Cranes are required to be inspected daily, periodically and annually. Daily inspections are to be performed by the Operator prior to the start of any activity involving the use of the crane. The periodic inspection is to be performed by a designated Competent Person. His/her responsibility is to inspect all machinery and equipment prior to use on a monthly basis, or per manufacturer's recommendations, to make sure that it is in safe operating condition. Any defective equipment will be repaired before continued use. A record of the results of this inspection will be maintained by the Operator/Flintco project personnel and must be on record at the project.
- 2. A thorough, annual inspection of all hoisting equipment is required to be performed by a Competent Person certified for inspection by an outside third party-agency. A record of the date and result of this inspection must be maintained in job-site records.
- 3. Cranes used in marine applications require annual certification by a government-licensed inspector.
- 4. All ropes must be thoroughly inspected before crane is used. The inspection must certify by record of date of inspection, ID of the rope inspected and signature of the individual performing inspection.

Cranes shall be inspected:

- 1. After setup and prior to initial lift
- 2. Before each shift
- 3. Monthly
- 4. After every malfunction
- 5. Completely, on an annual basis

There needs to be a daily inspection to check:

- All control mechanisms for mal adjustment interfering with proper operation
- All control mechanisms for excessive wear of components and co-lamination by lubricants or other foreign matter
- 3. All safety devices formal function
- Deterioration or leakage in air or hydraulic systems
- 5. Crane hooks with deformation or cracks, sling and chokers for broken strands, fraying or linking
- 6. Electrical apparatus for malfunctioning, signs of excessive wear, dirt and moisture accumulation
- 7. Hooks, which must have spring-actuated closures that operate correctly
- 8. Adequate and readily available fire extinguisher on crane

Periodic and annual inspections shall be performed in accordance with the manufacturer's recommendations.

Manufacturer's rated load test showing test procedures and confirming the adequacy of all repairs and alterations

Record-keeping:

- All records pertaining to the crane inspections shall be kept in the maintenance shop with a copy on the project site in the trade partner's site field office.
- If, during any safety inspection, the operator or supervisor cannot produce the required crane inspection sheets, the crane shall as soon as possible be shut down and inspected.

Lattice Boom CranesAssembly and Disassembly

- 1. 100% tie off policy when working at heights greater than six feet. Use double self-retracting lifeline (SRL) and full body harness.
- 2. Use JLG in lieu of climbing on boom lattice work, if available.
- 3. Use ladder to access top of crane cab and maintain tie off with static line.
- 4. Use ladder to access truck beds.
- 5. Worker awareness stressed at morning Safety Meetings.
- 6. Use caution when positioning body to pull wenches or align pins.
- 7. Use pry bar or extension to keep fingers and hands out of pinch points.
- 8. Wear substantial work gloves.
- 9. Operator is responsible to barricade swing radius of crane.
- 10. Assembly/Disassembly Director to check all rigging and lift weights/balances prior to assembly of boom or jib sections.
- 11. Inspect all rigging daily, nylon straps, ropes, shackles and chain hook assembly.
- 12. Use tag line to control pieces.
- 13. Keep all persons from underneath load line or in recoil range while stringing load line.
- 14. All equipment movement, truck deliveries of rock, crane pieces or cab movement are to be escorted in and out of assembly area.
- 15. Ensure truck driver is wearing proper PPE when out of his truck.
- 16. Ensure load is stable prior to allowing binders to be released.
- 17. Assembly/Disassembly Director is the designated competent person for erection requirements and stringing. The Assembly/Disassembly Director is in charge of the operation.

- 18. Competent person to check for all lift charts, fire extinguisher, boom angle indicator, overload indicator, load line inspection, brakes, lights, etc. Ensure annual inspection and acceptance inspections are complete.
- 19. Keep all unnecessary personnel out of the assembly area.
- 20. No one is to be underneath a suspended load.
- 21. Operator to barricade swing radius of crane.
- 22. Repeatedly sound horn if load becomes unstable.
- 23. No manual lifting over 50 pounds per person.
- 24. Warm up muscles before driving drift pins.
- 25. Perform morning Stretch Don't Strain routine.
- 26. Keep stair treads and work boots free from mud.
- 27. Use extra caution when getting on and off rig during inclement weather.
- 28. Erect crane on level rock surface; check track compression when test loaded.
- 29. Check crane for level at multiple use positions.
- 30. Engineer to review ground compressive strength for planned picks where crane will be used.
- 31. Identify and protect overhead interferences including powerlines.
- 32. Lower boom to 45 degrees and protect from wind as possible during high winds or severe thunderstorms.
- 33. Verify top wind speeds crane is allowed to operate in by manufacturer.
- 34. Work team to have daily safe card meeting.
- 35. Test load Only personnel involved in testing in immediate area! All other spectators are removed from immediate area.

Crane Use

- 1. Competent Person to assess piece weights and assembly sequence prior to lifts. This activity is to be supported by the Site Engineer.
- 2. No employees are required to work beneath a suspended load.
- 3. Connectors may momentarily be under suspended loads in certain conditions.

- 4. Operator shall sound horn before swinging loads over people.
- 5. Complete and submit a Critical Lift Plan for any picks in excess of 75% rated capacity of crane/ stick configuration, or if the lift will be a multiple crane lift.
- 6. All rigging inspected and sized by a qualified rigger, IW. Rigger responsible for load balance, wind condition assessments, all elements erecting lift.
- 7. Specialty rigging, i.e. spreaders and multichoker assemblies to have capacity tags.
- 8. Tag/remove damaged or worn rigging.
- 9. Use mechanical equipment to move rigging as much as possible.
- 10. Use qualified crane Operator.
- 11. Inspect crane daily and fill out daily ticket book.

 Operator is the competent person to inspect crane prior to shift and is fully authorized to stop work for equipment safety deficiencies.
- 12. Operator has last call on all picks.
- 13. Maintain load chart on board and assess lifts per load weight and reach.
- 14. Responsible to maintain swing radius barricades.
- 15. Signals are to come from one designated person.
- 16. Where radios are used because of an inability to maintain visual contact with the signal person, maintain a separate channel for communications.
- 17. Signals from anyone other than the designated signal person, will be considered a stop signal and the lift stopped, until the unsafe condition has been corrected.

Crane Setup

One of the critical factors of proper crane setup is a "firm-supporting surface." For maximum capacity, the crane must be level. To maintain a level condition, however, the ground surface must be adequate to support the dynamic load of a "working" crane. The most common cause

of accidents using rough terrain cranes is poor or improper setup. In order to clarify Flintco's procedure on setup and operation of rough terrain cranes, the following shall apply:

In all cases, the crane manufacturer's recommendations shall not be exceeded.

A firm, level foundation capable of supporting the load and crane shall be provided. Regardless of the weight of the load, all lifts and sets must be performed with all four outriggers fully extended and holding all tires within the boundary of the outriggers off the ground.

Exception: If, due to configuration or physical location, all outriggers cannot be fully extended and grounded, <u>approval*</u> must be obtained from the Site Manager or Project Superintendent prior to making the lift or setting the load.

*Prior to approval from Site Manager or Project Superintendent being rendered under this exception, each individual crane setup must be physically reviewed. This procedure does not allow for blanket approvals to be given by the Site/Project Manager.

Pick-and-carry operations are allowed within the following guidelines:

- A firm, level foundation that will support the load and the weight of the crane combined is provided.
- 2. On all lifts and sets, all four outriggers must be fully extended and holding all tires within the boundary of the outriggers off the ground, or approval is obtained from the Site/Project Manager.
- Calculations to determine capacity shall be made based on "on rubber" configuration of the load chart. If the manufacturer prohibits lifting "on rubber," pick-and-carry operations are prohibited.
- 4. Investigate route to be followed for solid and level footing.
- 5. During carry, the load shall be secured or lashed to ensure stability.

- 6. An observer must be stationed to warn the Operator while the crane, boom or load is in motion.
- 7. No one must come in contact with the motorized equipment or load while the equipment is in motion.
- 8. All tag lines must be constructed of nonconductive material.
- 9. Another precaution in order to avoid contact with the line includes installation of temporary sleeves on the power line. There is considerable hazard involved in this procedure, and the use of temporary sleeves must be evaluated on a case-by-case basis. Warning flags or other suitable devices may be positioned to define the allowable operating crane of the personnel or equipment.

Evaluating Amount of Support Needed

Four basic elements are to be considered:

- 1. Total Imposed Load
- 2. Supporting Surface Area
- 3. Pounds per Square Foot
- 4. Soil Stability

Total Imposed Load - The total imposed load includes the weight of all equipment on the outriggers, including the wind load.

Supporting Surface Area - The total surface of the outrigger area in contact with the ground and weight of the entire unit will determine the bearing pressure the crane and load exerted on the soil. When it is determined that the load bearing pressure exceeds soil stability the bearing area of the soil must be increased using additional cribbing; or the load must be reduced.

Cribbing to be used must be:

- 1. Strong enough to withstand the weight of the crane without major deflection, thus actually increasing the bearing surface
- 2. Bolted or secured together to prevent slippage or collapsing
- 3. In complete contact with the soil—no voids, unsupportable areas, etc.

Pounds Per Square Foot - Divide the load by the bearing area. Sample: What do you do with a crane and load that weighs 150 tons? Solution: Use four 2 ft. X 2 ft. floats = 16 sq. ft. = 9.38tons/sq. ft.

REMEMBER: Here it is assumed that each outrigger float is carrying 25% of the total load. This is not true in all cases. For example, moving the load over the corner outrigger concentrates a greater percentage of the load on that outrigger. The load percentage on each "corner" will vary, depending on the type of crane and operating radius. A good rule to follow is to assume each corner is carrying 85% of the total load. Thus,

One 2 ft. X 2 ft. float = 150 tons/4 sq. ft. = 37.5 X .85 = 31.8 tons/sq. ft.

Soil Stability - In the above step, bearing pressure was determined. This pressure is compared to the load-bearing qualities of the soil. There are basically three types of soils:

- 1. Granular soils, including sand and gravel
- 2. Fine-grained soils, including silts and clays
- 3. Organic soils, including peat

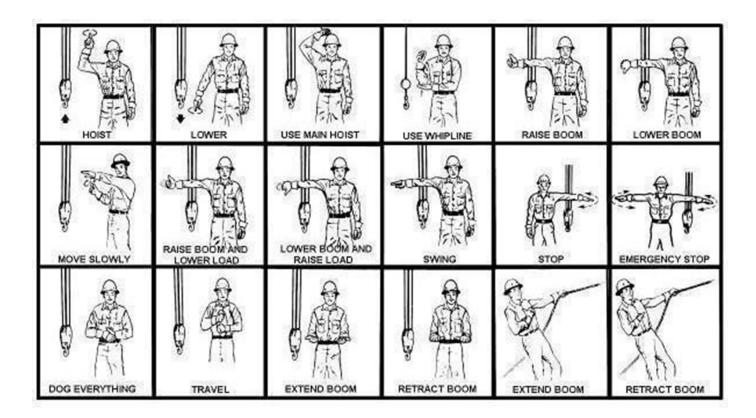
Different types of soils give different load-bearing pressure capability. When setting up a machine, the competent person should be able to distinguish between the three groups of soil, the approximate mixture of each, their moisture contents and their depth. Factors such as water tables and distance to excavation affect the soil's ability to withstand the pressure without collapsing and must also be considered by the designated person.

Various tables are available that give the relative load-bearing capabilities of the soil types under static loads. Local building code departments are usually a good source for the tables.

Tower Cranes

 Tower cranes will be equipped with a working wind gauge, windshield wiper, heater/air conditioner and two-way radio before the crane is placed in operation.

- 2. Riggers and others using the crane are free to recommend to their superintendent, foreman, project manager and/or the crane operator that crane operations are limited when conditions warrant, but the final decision to limit operation will be made by the Operator using manufacturer's guidelines. The tower crane operator is responsible for notifying the Project Manager when conditions are nearing the manufacturer's safe operation limits, so the Project Manager has the opportunity to decide to limit crane operations before the manufacturer's limits are reached or exceeded. This responsibility should be communicated to the tower crane operator when he or she is first employed and at least annually thereafter.
- 3. Tag lines should be limited in length to not more than 20 feet, except as approved by the Safety Director or Project Manager.
- 4. A means of clear communication must be provided to the operator and ground personnel. Radio communication is required between the operator and the riggers and should include the project office as well.
- 5. In some instances, it may be necessary to provide a set of binoculars for the operator, depending on the project site conditions.
- 6. Provision should be made to rescue the operator in the event of a medical condition or other emergency while he or she is aloft. If the tower crane is to be used for emergency lifting of personnel who are injured, proper rigging must be made available and maintained in good condition.
- 7. These requirements apply to all tower cranes, whether owned and/or rented.
- 8. Operators must take signals from only one person. In an emergency, however, a STOP signal can be given by anyone. Only standard hand signals will be acknowledged.
- 9. Routine maintenance, fueling or repairs must not be performed while the equipment is in use.



Critical Lift Parameters

Certain situations require additional attention, crew coordination, use of additional equipment and sometimes changing equipment for larger capacity if the current crane in use would be over-loaded for a given load. These situations always involve the need for approval from Flintco managers before the lift is to be made. Approval is conditional upon the Project Manager's, Equipment Manager's and Crane Operator's signatures on the critical pick document. The critical pick lifting parameters document must be maintained at the site in the project safety files.

- Project management will need to consider the impact the loss of a load could have on the project:
 - Loss of life, property damage, equipment damage.
 - Possible shutdown of an operating facility and the ensuing litigation.
 - Damaged Flintco reputation, and loss of future work; and
 - The inability to meet scheduled deadlines due

to lead times for damaged material.

- 2. Critical lifts approval shall be requested for all of the following situations:
 - Lifts in excess of 75% of the crane's rated capacity.
 - Multiple crane lifts, regardless of percent of rated capacity.
 - Lifts over "active" Process Piping, in excess of 50,000#, unless the Client's Process Safety
 Management (PSM) procedures have a stricter limit.
 - Lifts that either due to the extreme lead-time for replacement or value of the material, could adversely impact the project, shall have Critical Pick Lifting Parameters approved prior to proceeding with the lifts.
 - Flying loads over occupied buildings.

Handling the Load Load Weight:

- 1. No crane shall be loaded beyond its rated capacity.
- 2. Weight of the load must be positively established

- prior to handling. Check brakes and machine stability when load is still only inches above the ground.
- 3. When loads that are limited to structural competence rather than by stability are to be handled, the operator and supervisor shall, concurrently, determine that the weight of the load has been determined within plus or minus five percent (± 5%) before the load is lifted.

Attaching the Load:

- 1. The load shall be attached to the hook by means of slings or other approved devices.
- 2. Shake out hooks are to be used for unloading trucks, and for moving steel in the laydown area only.
- 3. The material in the laydown area is to be raised only high enough to clear other material.
- 4. All other hooks will have safety latches installed or removed from service until they can be replaced.
- 5. Side loading of the boom is never permitted.

Moving the Load:

- The operator shall be responsible for determining that the load is properly secured and balanced before making the hoist.
- 2. The operator shall position the hook over the load in a manner to prevent load swing.
- 3. The operator shall determine that the rope is properly seated on the drum and in the sheaves; the load line is non-kinked; and multiple part lines are not twisted around each other.
- 4. There shall be at least three wraps of line on the drum at all times.
- 5. Loads shall be controlled by the use of tag lines free of knots, splices or defects.
- 6. Employee in the area will stand clear of the load being raised.
- 7. Loads will not be moved over personnel.
- 8. Operator will repeatedly sound horn if load becomes unstable.

9. Operator shall sound horn before swinging load over people to give them time to move.

When leaving the control station of a machine, the following precautions should be observed:

- 1. Disengage the master clutch or shut off the engine.
- 2. Lower the crane load to the ground.
- 3. Set safety pawls on all drums where these are manually operated.
- 4. Set the swing brake and both traction brakes and/or locks to prevent machine movement.
- 5. Do not get on or off a machine when it is in motion. Adjustments, repairs or lubrication is not permitted on moving machinery.
- 6. No toolboxes, oil cans, choker racks, water coolers or similar additions may be placed in the barricaded radius of the swing or the counterweight where a person could conceivably be crushed. (Swing radius barricades must be in place.)
- 7. All crawler type equipment shall not be moved unless a Designated Flagger is in full view of the Operator giving signals.
- 8. Accessible areas within the swing radius of the superstructure of the crane will be barricaded to prevent an employee from being struck or crushed. Barricading must be substantial enough to prevent an employee from readily passing through the barrier.

Crane Work Near Overhead Electric Lines

- Using guidelines of OSHA 1926.550 (a)(15)
 (i-vii) lines shall be de-energized or grounded or other protective measures shall be provided before work is started.
- 2. Any overhead line must be considered energized unless it is disconnected and physically grounded.

3. No part of motorized equipment, including the load, may be allowed to get closer to bare live circuits or apparatus than the spacing indicated below:

Required Clearances from Live Electrical Lines					
Nominal Voltage, KV (Phasee to Phase)	Minimum Required Clearance (in feet)				
0-50	10				

For voltages over 50 kV, the minimum clearance between the lines and any part of the crane is 10 feet + 4 inches for each 1 kV over 50 kV or twice the length of the line insulator but never less than 10 feet.

In transit, with no load and the boom lowered, the equipment clearance is a minimum of 4 feet for voltages less than 50 kV, and 10 feet for voltages over 50 kV up to 345 kV, and 16 feet for voltages above 345 kV up to and including 750 kV.

- 4. When it becomes necessary for a crane boom or any part of a crane or similar equipment to be swung, worked or moved (including in transit between worksites) within the required clearances listed above, the work is to be stopped immediately.
- 5. The Rigging Superintendent, the Site Manager and the Corporate Health and Safety Department are to be contacted.
- 6. These individuals in conjunction with Client personnel will decide which of the following steps must be taken.
- 7. The line must be identified, de-energized and properly tagged and locked out. The line must also be visibly grounded at the point of work.

Crane or Derrick Suspended Personnel Platforms

The use of crane of derrick suspended personnel platforms is prohibited, except when the erection, use, and dismantling of conventional means of reaching the worksite, such as a personnel hoist, ladder, stair way, aerial lift, elevating work platform or scaffold, would be more hazardous, or is not

possible because of structural design or worksite conditions. All requirements of **OSHA 29 CFR 1926.550 (g)** shall be met prior to use of any Crane or Derrick Suspended Personnel Platform.

Rigging Requirements General

- 1. All rigging equipment shall be inspected prior to each shift and as necessary during the shift to ensure safety. Damaged or defective slings shall be immediately removed from service.
- 2. All rigging devices, including slings, shall have permanently affixed identification stating size, grade, rated capacity and manufacturer.
- 3. Rigging not in use shall be removed from the immediate work area.
- 4. Rigging, including slings, shall be hung on a rigging frame so that bends and kinks do not set in.
- 5. Wire rope slings shall be lubricated as necessary during use. Slings shall be lubricated no less than every four months when in storage. On long term projects, an individual must be designated to perform this task.
- 6. "Shop-made" grabs, hooks, clamps or other lifting devices shall not be used unless prooftested to 125% of their rated load by an approved testing agency. Approved devices shall have the capacity permanently affixed. A letter verifying conformance must be received by the project prior to use.
- 7. Slings shall not be left lying on the ground or otherwise exposed to dirt and the elements.
- 8. Eyes in wire-rope bridles, slings or bull wires shall not be formed by wire clips or knots.
- 9. Protruding ends of strands in splices on slings or bridles shall be covered or blunted.
- 10. All rigging equipment in use shall have a safety factor of five.

Safe Operating Practice

Slings shall not be used when shortened by knots, bolts or other makeshift devices.

- When determined by the competent person wire rope and nylon slings shall be padded or softeners used to protect from damage resulting from sharp corners.
- 2. Slings used in a basket hitch shall have the loads balanced to prevent slippage.
- 3. Loads handled by slings shall be landed on cribbing or dunnage so that slings need not be pulled from under or be crushed by the load.
- 4. Slings subjected to shock loading shall be immediately removed from use and destroyed.
- 5. U-Bolts and/or wire-rope clips are not permitted for use on slings.
- 6. Chain slings, wire rope chokers, and synthetic

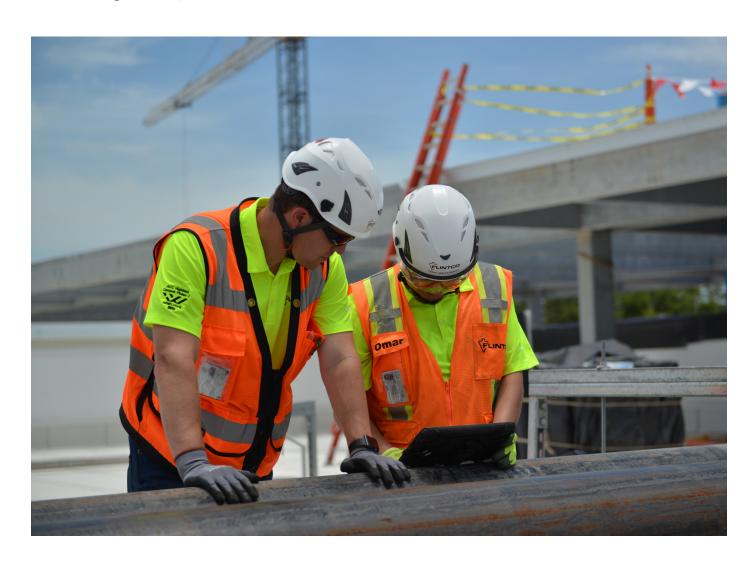
- web slings shall have identification denoting capacity for various sling configurations.
- 7. The rigger must be competent in rigging practices and knowledgeable regarding rigging limitations.

Inspection and Record Keeping

Thorough inspection of slings in use shall be made on a regular basis, as determined by:

- 1. Severity of service conditions
- 2. Frequency of sling use
- 3. Nature of lifts being made
- 4. Experience gained on the service life of slings similarly used

Inspection periods shall not exceed once in 12 months and a record of inspections shall be maintained.



Inspection Criteria:

- 1. Alloy steel chains shall be removed from service and repaired or replaced when:
 - Master links, coupling links or other components are cracked or deformed
 - Sling hooks have opened more than 15% of the normal throat opening or twisted more than 10 degrees off center
 - Stretch exceeds 5% of the original reach
 - They have been exposed to temperatures more than 600 degrees
 - Only the manufacturers or an equivalent entity shall repair or recondition slings covered in this section
 - Mechanical coupling links or "cold sheets," bolts or clevis pins shall not be used for chain repairs
 - Any chains used for hoisting must be grade eight or higher
- 2. Wire rope slings shall be removed from service when:
 - There are two randomly distributed broken wires in one rope lay or five broken wires in one strand on one rope lay
 - There is wear or scraping of one-third the original diameter of outside individual wires
 - Kinking, crushing, bird-caging or similar damage results in distribution
 - End attachments are cracked, deformed or worn
 - Exposed to temperatures exceeding 200 degrees Fahrenheit (fiber-core) or 400 degrees Fahrenheit (non-fiber core)
 - Corrosion of the rope or end attachments occurs

All lifting and hoisting equipment should be assigned to or through the Arrowhead Equipment & Supply Warehouse.

- 3. Natural and synthetic fiber rope slings shall be removed from service when:
 - Abnormal wear is observed
 - Powdered fibers are found between strands
 - Fibers are out or broken
 - There are variations in the size or roundness of strands
 - There is discoloration or rotting
 - There is distortion of sling hardware
 - Exposed to temperatures exceeding 180 degrees Fahrenheit
- 4. Synthetic web slings shall be removed from service when:
 - Subjected to acid or caustic burns
 - Melting or charring of any part of the sling surface occurs
 - Snags, punctures, tears or cuts are observed
 - Stitches are worn or broken
 - Fittings are distorted
 - Exposed to temperatures in excess of 180 degrees Fahrenheit (synthetic web) or 200 degrees Fahrenheit (polypropylene web)

Crane/Hoisting

Purpose

The purpose of this SOP is intended for use in the precautionary measures and hazard identification when dealing with Crane/Hoisting protocols.

Definitions

- Annual Crane Inspection- Active cranes must be inspected and documented once a year at a minimum.
- Anti-Two Blocking- The load block or load suspended from the hook becomes jammed against the crane structure preventing further winding up of the hoist drum.
- 3. Blind Pick- Lifts made out of the view of the operator (blind picks), lifts involving non- routine or technically difficult rigging arrangements, and any lift which the crane operator believes is critical.
- 4. Hoist- A mechanism used for lifting and lowering a load.
- Personnel Hoisting Basket- Also known as man-baskets, personal platforms used to hoist employees at heights.
- 6. Suitable Soil- The equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met.

Responsibilities

- 1. Employees
 - a. Provide all plans, certifications, and inspections as necessary
 - b. Inspect crane daily for defects and after conditions change including but not limited to
 - Saturated ground
 - Wind
 - Ice
 - Snow
 - Lightning
 - c. Complete a thorough hazard analysis, Pretask Plan, and any required work permits
- 2. Supervisors
 - a. Contact the HSE Area Manager and Project Director for notification of activities 2 weeks prior to any crane entering the project site
 - b. Walk and identify crane set up location with crane company and crane operator
 - c. Obtain permits, FAA permit, Pre-task Plans, Traffic Control Plans, Critical Lift Plans, Rigging Plans and/or documents required by the client and/or authorities having jurisdiction
 - d. All required documentation must be sent to the HSE Area Manager and Project Director for review
 - Annual Crane Inspection
 - Operator(s) / Rigger(s) Certifications
 - Crane location
 - Pick plan
 - Load weight(s) and sequence of picks

HSE Department

- 1. Review all crane permits/plans submitted
- Walk and identify crane set up location with crane company and crane operator and Flintco Superintendent
- Verify annual crane inspection and operator/ rigger(s) certifications
- 4. Audit for daily crane inspections as necessary
- 5. Review/approve personal crane hoisting baskets
- 6. Coordinate and/or assist in appropriate response to Crane/Hoisting activities

Procedure

Before Work Can Commence

- Project staff shall conduct a safety stand-down meeting
- Complete a thorough hazard analysis, pretask plan and any required work permits and communicate to all involved parties
- Include swing radius of other cranes (on Flintco projects or any adjacent sites that will overlap each other) and when the radius will be over public streets
- Obtain all required permits or easements with authorities having jurisdiction
- Establish the scope of work and ensure everyone understands their responsibilities
- Public or good neighbor notification may be necessary to adjacent business/residences
- Suitable soil conditions which are to be level, solid, and stable prior to crane arrival

Means/Methods

- Swing radiuses shall be mapped out, including coordination with adjacent properties and other construction sites that may have crane activity
- Ensure the crane/hoisting equipment is the right piece of equipment for the task
- Inspect all hoisting equipment before use
- Swing radiuses shall be mapped and included in the plans
- Site Logistics- stored materials, vehicles and equipment shall be relocated and made safe
- Initiate a back out plan for weather, change of tolerance conditions, and/or any unforeseen plan changes
- All Critical picks shall be reviewed by project team and HSE Area Manager/Project Director.

Critical Lifts

- Lifts in excess of 75% of the cranes rated capacity
- Multiple crane lifts regardless of percent of rated capacity
- Lifts over "active" Process Piping, in excess of 50,000#, unless the clients Process Safety Management (PSM) procedures have a stricter limit
- Blind Picks
- Lifts due to the extreme lead-time for replacement or value of the material, could adversely impact the project
- Flying loads over occupied buildings

Personnel Hoisting Baskets

- Personnel hoisting baskets operations must be reviewed and approved by HSE managers
- All other possible means of access must be explored and ruled out prior to considering the use of a man basket
- A separate critical lift plan would need to be implemented and include all applicable information for the basket, rigging, anti-two block etc.

WIRE ROPE SLING CAPACITIES (LBS.) - FLEMISH EYE - ANSI B 30.9

6 x 9 and 6 x 37 Improved Plow Steel – IWRC 5/1/Design Factor Refer to ANSI B30-9 For Full Details

Horizontal Sling Angles Of Less Than 30 Degrees Are Not Recommended

Horizontal Sling Angles Of Less Than 30 Degrees Are Not Recommended							
Wire Rope Size	Minimum Shackle Size For A D/d> 1 At Load Connection	Vertical	Chocker	Two Leg	60 Degree Sling Angle	45 Degree Sling Angle	30 Degree Sling Angle
1/4	5/16	1120	820	2200	1940	1500	1100
5/16	3/8	1740	1280	3400	3000	2400	1700
3/8	7/16	2400	1840	4800	4200	3400	2400
7/16	1/2	3400	2400	6800	5800	4800	3400
1/2	5/8	4400	3200	8800	7600	6200	4400
9/16	5/8	5600	4000	11200	9600	7900	5600
5/8	3/4	6800	5000	13600	11800	9600	6800
3/4	7/8	9800	7200	19600	16900	13800	9800
7/8	1	13200	9600	26400	22800	18600	13200
1	1-1/8	17000	12600	34000	30000	24000	17000
1-1/8	1-1/4	20000	15800	40000	34600	28300	20000
1-1/4	1-3/8	26000	19400	52000	45000	36700	36000
1-3/8	1-1/2	30000	24000	60000	52000	42400	30000

CHAIN SLING CAPACITIES (LBS) - ANSI B30.9 DESIGN FACTOR 4/1

Chain - Facts	Tab	le 1		
Inspection and removal from service per ANSI N30.9	MAXIMUM ALLOWABLE WEAR AT ANY POINT OF LINK			
Frequent inspection	Normal Chainor Coupling Link Cross Section	Maximum Allowable Wear Diameter Inches		
Normal Service – Monthly				
 Severe service – Daily to Monthly check chain and attachments for wear, nicks, cracks, breaks, gouges, 	9/32	.037		
stretch, bends, weld spatter; discoloration from excessive temperature, and throat openings of hooks.	1/3	.069		
Chain links and attachments should hang freely	5/8	.064		
to adjacent links. 2. Latches on hooks, if present should hang freely	3/4	.105		
and seat properly without evidence of permanent distortion	7/8	.116		
	1	.137		
Periodic Inspection – Inspection Records Required	1-1/4	.169		
Normal service –Yearly	Refer to ANSI B30.9 for full details Horizontal sling angles of less Than 30 degrees are not recommended.			
Severe Service – Monthly				
This inspection shall include everything in a frequent inspection plus each link and end attachment shall be examined individually, taking care to expose inner link surfaces of the chain and chain attachments.				
1. Worn links should not exceed values given in Table 1 or recommended by the manufacturer.				
2. Sharp transverse nicks and gouges should be rounded out by grinding and the depth of the grinding should not exceed values in Table1 .				
3. Hooks should be inspected in accordance with ANSIB30.10.				
4. If present, latches on hooks should seat properly, rotate freely, and show no permanent distortion.				

Chain Gr-8 Design Factor 4/1	Vertical	Two Leg	60 Degree Sling Angle	45 Degree Sling Angle	30 Degree Sling Angle	Single Leg MasterLink Size	Double Leg Master Link Size
1/4 - (9/32)	3500	7000	6100	4900	35000	1/2	1/2
3/8	7100	14200	12300	10000	7100	3/4	3/4
1/2	12000	24000	20800	16950	12000	1	1
5/8	18100	39200	31300	25500	18100	1	1-1/4
3/4	28300	56600	49000	40000	28300	1-1/4	1-1/2
7/8	34200	68400	59200	48350	34200	1-1/2	1-3/4
1	47700	95400	82600	67450	47700		
1-1/4	72300	144600	125200	102200	72300		

WEB SLING CAPACITIES - ANSI B30-9 - DESIGN FACTOR 5/1

Web Sling Inspection and Removal From Service Per ANSI B30.9

Frequent Inspection

This inspection shall be made by the person handling the sling each day the sling is used.

Periodic Inspection: Written inspection records should be kept for all slings. This inspection should be conducted by designated personnel, frequency of the inspection should be based on the following

- 1. Frequency of Sling use
- 2. Severity of service conditions
- 3. Experience gained on the service life of Sling used in similar applications
- 4. At least ANNUALLY

Removal Criteria

- 1. Acid or caustic burns
- 2. Melting or charring of any part of the Sling
- 3. Broken, tears, cuts or snags.
- 4. Broken or worn stitching in load bearing splices
- 5. Excessive abrasive wear.
- 6. Knots in any part of the Sling
- 7. Excessive pitting or corrosion, or cracked distorted or broken fittings
- 8. Other visible damage that causes doubt as to the strength of the Sling.

Vertical	Choker	Two Leg or Basket	60 Degree Sling Angle	45 Degree Sling Angle	30 Degree Sling Angle
100 % of Single	80 % of Single	200 % of Single	170% of Single	140 % of Single	Same as Single
Leg	Leg	Leg	Leg	Leg	Leg

SLING ANGLES

	Two-Leg	ged Sling – Wire Rope, Chain, S	Synthetics	
A = Horizontal Sling Angle Load on each leg of sling = Vertical load x load angle factor		Horizontal Sling Angle (A) Degrees 90 60 50 45	Factor = L/H Factor = L/H 1,000 1,155 1,305 1,414 2,000	
Choker Hitch	es WireRope	Choker Hitches WireRope	Basket Hitches	
Angles of Choke 120 – 180 90 – 119 60 – 89 30 – 59	Sling Rated Load Percentage of Sling Leg Capacity 75% 65% 55% 40%	A choker hitch has 75% of the capacity of a single leg only if the corners are softened and the horizontal angle is greater than 30 degrees. Use blocks to prevent angles less than 30 degrees.	Wire Rope A basket hitch has twice the capacity of a Single Leg only if D/d Ratio is 25/1 and it is vertical. Wire Rope, Chain & Switches Angles Percentage of Single Degrees Leg Capacity 90 200% 60 170% 45 140% 30 100%	

LOAD DISTRIBUTION -RIGGING

Loadwalking	Unequal Legs	Triple and Quad Leg Sling
Load on Sling Calculated Tension 1 = Load x D2x S1/H(D1 + D2) Tension 2 - Load x D1x S2/H(D1 + D2)	Load on Sling Calculated Tension 1 = Load xD2x S1/H(D1+D2) Tension 2 = Load xD1x S2/H(D1+D2)	Triple leg Slings have 50% more capacity than double leg only if the center of gravity is in center of connections point and legsare adjusted properly (equal share of the load). Quad leg Slings offer improved stability but does not provide increased lifting capacity.
Types of Hitch Consideration		Reeving Increases Loads
Load Control The ability of the Sling to control the movement of the load being lifted. Capacity The load capacity of the Sling and type of hitch Type of Sling The location of the center of the load's weight.		Reeving through connections to load increases load on connections fittings by as much as twice. DO NOT REEVE!!!

RIGGING HARDWARE

SHAC	KLES	QUENC	HED AND TEN	IPERED		ноокѕ		QUEN	CHED AND TEI	MPERED
Screw, Pin & Bolt Type	Carbon Shackle Design Factor 5/1	Alloy Shackle Design Factor 5/1			Shank Hook, Swivel Hook, Eye Hook					
Nominal Size (IN) Diameter R of Bows	Carbon Maximum Working Load Tons	Alloy Maximum Working Load Tons	Inside Width at Pin (inches)	Diameter of Pin	Carbon Maximum Working Load Tons	Code	Allow Maximum Working Load Tons	Code	Throat Opening (inches)	Deformation Indicator or A-A
3/16	1/3		.38	.25	3/4	DC	1	DA	.88	1.50
1/4	1/2		.47	.31	1	FC	1-1/2	FA	.97	1.50
5/16	3/4		.53	.38	1-1/2	GC	2	GA	1.00	2.00
3/8	1	2	.66	.44	2	HC	3	HA	1.12	2.00
7/16	1-1/2	2.6	.75	.50	3	IC	4-1/2/5	IA	1.06	2.50
1/2	2	3.3	.81	.63	5	JC	7	JA	1.50	3.00
5/8	3-1/4	5	1.06	.75	7-1/2	KC	11	KA	1.75	4.00
3/4	4-3/4	7	1.25	.88	10	LC	15	LA	1.91	4.00
7/8	6-1/2	9.5	1.44	1.00	15	NC	22	NA	2.75	5.00
1	8-1/2	12.5	1.69	1.13	20	OC	30	OA	3.25	6.50
1-1/8	9-1/2	15	1.81	1.25	25	PC	37	PA	3.00	7.00
1-1/4	12	18	2.03	1.38	30	SC	45	SA	3.38	8.00
1-3/8	13-1/2	21	2.25	1.50	40	TC	60	TC	4.12	10.00
1-1/2	17	30	2.38	1.73						

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WIRE ROPE CLIPS

Size	Efficiency	Number of Clips	Turnback Length (IN)	Torque FT - (LBS)
1/8	80%	2	3-1/4	4.5
3/16	80%	2	3-3/4	7.5
1/4	80%	2	4-3/4	15
5/16	80%	2	5-1/4	30
3/8	80%	2	6-1/2	45
7/16	80%	2	7	65
1/2	80%	3	11-1/2	65
9/16	80%	3	12	95
5/8	80%	3	12	95
3/4	80%	4	18	130
1	80%	5	26	225

Apply U-Bolt over dead end of the wire rope, live end of the rope rests in the saddle. A termination is not complete it has been re-torqued a second time. <u>NEVER SADDLE A DEAD HORSE!</u>

TURNBUCKLE

Size	Working Load Limit Jaw and Eye Fittings 5/1 Design Factor	Working Load Limit Hook End Fitting 5/1 Design Factor (LBS)
1/4	500	400
5/16	800	700
3/8	1200	1000
1/2	2200	1500
5/8	3500	2250
3/4	5200	3000
7/8	7200	4000
1	10000	5000
1-1/4	15200	5000
1-1/2	21400	7500

THE USE OF LOCKNUTS OR MOUSING IS AN EFFECTIVE METHOD OF PREVENTING TURNBUCKLES FROM ROTATING.

RIGGING HARDWARE

Shank Diameter	Working Load Limits in Line Pull (lbs)	Working Load Limits 60 Degree Sling Angle (lbs)	Working Load Limits 45 Degree Sling Angle (lbs)	Working Load Limits Angle Less Than 45 Degrees (lbs)
1/4	650	420	195	160
5/16	1200	780	360	300
3/8	1550	1000	465	380
1/2	2600	1690	780	650
5/8	5200	3380	1560	1300
3/4	7200	4680	2160	1800
7/8	10600	6890	3180	2650
1	13300	8646	3990	3325
1-1/4	21000	13600	6300	5250
1-1/2	24000	15600	7200	6000

Shoulder Eyebolts

- Never exceed working loadlimits
- Never use regular nut eyebolts forangular lifts
- Always use shoulder nut eyebolts for angular lifts
- For angular lifts, adjust working load as follows
- Always tighten nuts securely against the load
- Always apply load to eye bolt in the plane of the eye

SWIVEL HOIST RING | DESIGN FACTOR 5/1

Working Load Limit Pull Full 180 Degree Pivot (LBS)	Thread Shank Size U.N.C.	Torque FT – (LBS)
800	5/16	7
1000	3/8	12
2500	1/2	28
4000	5/6	60
7000	3/4	100
8000	7/8	160
10000	1	230
15000	1-1/4	470
24000	1-1/2	800
30000	2	1100

Swivel Hoist Ring

When using lifting slings of two or more legs make sure the forces in the leg are calculated. Select the proper size swivel hoist ring to allow for load in sling leg.

USER'S GUIDE TO LIFTING

RISK MANAGEMENT	TERMINOLOGY	INSPECTIONS OF FITTINGS
Definition	Will	Deformation
Comprehensive set of actions that reduces the risk of a problem, a failure, an accident	 The maximum mass of force which the product is authorized to support in a particular service. 	Crosby recommends that no significant deformation be allowed
You Need	Proof Test	Wear
 Product Knowledge Application knowledge Manufacturer of known capability Products that are clearly identified with the following: Manufacturer's Name and logo Load Rating or size that referenced ratings Traceability Code 	Test applied to a product solely to determine injurious material or manufacturing defects.	Acceptable Limits: 5% Wear in the throat and eye of hooks and other critical sections of all fittings. 10% Wear in other areas.
A Good Risk Management Program Recognizes	Ultimate Strength	Cracks
Performance requirements include the following Load Rated Products Quench and Tempered Ability to deform when overloaded Ability to withstand real world loading in day to day use toughness	The average load or force at which the product fails or no longer supports the load.	Remove fittings from service with cracks.
	Design Factor	Welding and Modifications
	An industrial term denoting a products theoretical reserve capability; usually computed by dividing the catalog ultimate load by the working load limit. Generally expressed as a ratio, e.g., 5 to 1.	Do not weld on or modify fittings or blocks.

WIRE ROPE SLING FACTS

INSPECTION AND REPLACEMENT PER ANSI B30.9

Inspection

All slings shall be visually inspected by the person handling the sling each day they are used. In addition, a periodic inspection shall be performed by a designated person, at least annually, and shall include a record of the inspection.

- Distortion of the rope in the sling such as kinking, crushing, un-stranding, birdcaging, main strand displacement or core protrusion, loss of rope diameter in short rope lengths or unevenness of outer strands should provide evidence the sling should be replaced.
- General Corrosion
- Broken or cut strands
- Number, distribution, and type of visible broken wires

Replacement

Condition such as the following should be sufficient reason for consideration of sling replacement

- For strand laid and single part slings ten randomly distributed broken wires in one rope lay, or five broken wires in one rope strand in one rope lay.
- Severe localized abrasion or scraping
- Kinking, crushing, birdcaging, or any damage resulting in distortion of the rope structure.
- Evidence of heat damage
- End attachments that are cracked, deformed, or worn to the extent that the strength of the sling is substantially affected, hooks should be inspected in accordance with
 ANSI B30.10
- Severe corrosion of the rope or end attachments

Multi-part Removal Criteria For Cable Laid And Braided Sling

Sling Body	Allowable Broken Wire Per Lay <u>Or One Braid</u>	Allowable Broken Strands <u>Per Sling Lay</u>
Less than 8 per braid	20	1
Cable Laid 8 Parts and More	20 40	1

Refer to ANSI B30.0 For Full Details

Environmental Policy

It is Flintco's policy to comply with all applicable environmental laws and regulations and the Flintco Health, Safety and Environmental (HSE) Department assists project teams for Flintco, LLC and its affiliated entities, including, but not limited to, Flintco Residential, Flintco Industrial, and Oakridge Builders in meeting their environmental regulatory compliance obligations including Clean Air Act regulations, Clean Water Act regulations, Resource Conservation and Recovery Act regulations, Emergency Planning and Community Right to Know Act regulations, Toxic Substance Control Act regulations, Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) regulations and National Environmental Policy Act regulations.

In addition to meeting the general compliance obligations associated with environmental regulations, Flintco will follow any specific environmental permits that contain requirements for compliance.

Environmental permitting requirements specific to Flintco may include testing, monitoring, record keeping and reporting functions associated with specific regulatory compliance permits for managing air pollutant emissions, managing and maintaining storm water quality, and the management, transport and disposal of wastes including hazardous and universal wastes, PCB waste, construction and demolition (C&D) waste, asbestos containing building material (ACBM) waste and municipal solid waste.

The purpose of this policy is to provide oversight and programmatic management of Flintco operations that are subject to compliance with environmental regulatory requirements including air emissions from combustion sources and fugitive emissions sources, the protection and preservation of storm water quality associated with storm water runoff during precipitation events, work involving grading

or digging in and around stream channels and flood plains, managing treated wastewater for beneficial reuse e.g., irrigation and cooling tower water, and managing wastes, including those from facility maintenance and operations.

The scope of the department's oversight and management includes:

Assuring regulatory compliance in waste management, including:

- 1. Hazardous waste
- 2. Mixed waste
- 3. Construction & demolition waste
- 4. Asbestos containing building material waste (ACBM)
- 5. Polychlorinated biphenyl waste (PCB)
- 6. Municipal solid waste (MSW)

The company also manages fuel storage tanks and containerized lubricants and oils at Flintco warehouse operations and maintenance facilities, including project sites.

The purpose of this Policy is as follows:

- 1. Assure compliance with clean air quality requirements and EPA requirements.
- 2. Improve the quality of surface water and ground water within any watershed areas owned and maintained by Flintco by preventing illicit discharges and illicit connections.
- 3. Prevent the discharge of contaminated storm water runoff from Flintco properties and operations into the storm drainage system and natural waters.
- 4. Comply with the requirements of Flintco storm water pollution plan permits.

5. Comply with all United States Environmental Protection Agency and State laws applicable to storm water discharges.

Definitions

An Illicit Discharge is the discharge of pollutants or non-storm water materials to the storm drainage system via overland flow or direct dumping of materials into a catch basin or inlet. Examples of illicit discharges include overland drainage from car washing or cleaning paint brushes in or around a catch basin.

An Illicit Connection is the discharge of pollutants or non-storm water materials into the storm drainage system via a pipe or other direct connection. Sources of illicit connections may include sanitary sewer taps, wash water from laundry facilities, wash water from sinks, or other similar sources.

No Flintco employee, contractor, department, or unit will cause or allow discharges into storm drainage system which are not composed entirely of storm water, except for the allowed discharges listed below.

Prohibited discharges include but are not limited to: oil, anti-freeze, grease, chemicals, wash water, paint, animal waste, garbage, and litter.

The following connections are prohibited, except as provided in "Allowed Discharges" below:

a. Any drain or conveyance, whether on the surface or subsurface, which allows any non-storm water discharge, including but not limited to sewage, process water, waste water, or wash water, to enter the storm water drainage system, and any connections to the storm drain system from indoor drains or sinks.

The following discharges to the storm drainage system are allowed:

a. Discharges that are specifically permitted under a State or federal storm water program.

b. Incidental non-storm water discharges which do not significantly contribute to the pollution of Flintco surface waters and are limited to the following:

- water line flushing
- reclaimed water line flushing
- landscape irrigation, including but not limited to reclaimed water
- diverted stream flows
- rising groundwater
- uncontaminated groundwater infiltration
- uncontaminated pumped groundwater
- discharges from potable water sources
- foundation drains
- air conditioning condensate (that does not contain biocide)
- springs
- water from crawl space pumps
- footing drains
- flows from riparian buffers and wetlands
- dechlorinated swimming pool discharges
- flows from emergency fire fighting
- building wash water without detergents, cleaners, or corrosive additives

Should Flintco determine that any of the above discharges contribute to pollution of a watershed or other surface waters or is notified by a state or federal government agency that the discharge must cease, the Flintco project management team or safety department will instruct the responsible person to cease the discharge.

a. When instructed to cease the discharge, the discharger of substances newly classified as pollutants shall cease the discharge immediately and be given reasonable time to make corrections so that the discharge will not continue.

Nothing in this Policy affects a discharger's responsibilities under federal or state law.

Whenever Flintco finds that a violation of this Policy has occurred, Flintco may order compliance by written notice to the responsible person. Such notice may require without limitation:

- The performance of monitoring, analyses, and reporting
- The elimination of prohibited discharges or connections
- Cessation of any violating discharges, practices, or operations
- The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property
- Payment of any fee, penalty, or fine assessed against Alberici Constructors, Inc. or its entities to cover remediation cost
- The implementation of new storm water management practices
- Disciplinary action up to and including dismissal, where appropriate

Notification from the company will set forth the nature of the violation(s) and establish a time limit for correction of these violation(s). Said notice may further advise that, if applicable, should the responsible person or party fail to take the required action within the established deadline, then Flintco's safety department will work with our legal and operations departments to initiate work orders for the appropriate corrective actions and the applicable group will be charged for the cost.

Flintco will visually inspect outfalls at their office and warehouse locations each year, or more often, during dry weather conditions. A third-party inspector may be selected.

Flows suspected of containing illicit discharges due to the presence of odors, colors or sheens shall be tested. Test parameters may include but are not limited to ammonia, detergent, chlorine, phosphorus, nitrogen, pH, conductivity, turbidity, temperature, and dissolved oxygen. The results of the inspections and testing shall be maintained in a database that links outfall locations to inspection dates, chemical tests conducted, and follow-up procedures implemented to correct any detected illicit discharge. The physical condition of the outfall shall also be noted during the inspections. Illicit discharge data from the database will be used in the preparation of any report to the authorities having jurisdiction.

Training on how to identify and report illicit discharges and implement good housekeeping and pollution prevention best management practices shall be presented to affected employees. Training shall consist primarily of classroom training, with online training serving as backup for those unable to attend the classroom training.

Following the initial training, training shall be repeated once every three years. Flintco maintains a database of employees who have completed the training and the date that training occurred.

Electrical Work

No employee or trade partner will work on any energized system including but not limited to mechanical, electrical, hydraulic, or pneumatic; until it has been totally deenergized. All de-energized systems must be locked out and tagged out according to Flintco LOTO procedure.

- Safe work practices shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized. Only qualified electrical workers are allowed to work around electrical equipment. Employees who face a risk of electric shock but who are not qualified persons shall be trained & familiar with electrically related safety practices prior to the start of work.
- Breaker panel shall be labeled on the outside cover with the voltage. Each breaker will be numbered with a corresponding number of the receptacle it controls.
- Ground fault circuit interrupter (GFCI) will be used on all temporary electrical 15 and 20 amp 120 volts, this includes cord sets that are plugged into permanent building outlets.
- 4. The **GFCI** system shall be checked on a weekly basis.
- 5. Extension cords shall be of the three-wire type and shall be designed for hard or extra hard use.
- 6. Extension cords shall be ran at least six (6) feet overhead (and protected from sharp edges).
 - a. Extention cords shall not be fastened with staples, hung from nails, or suspended by wire.

- 7. Extension cords shall be visually inspected each day prior to use for:
 - a. Missing ground pin
 - b. Cuts in outer insulation
 - c. Proper strain relief at male and female fitting.
- 8. All temporary lighting must be constructed and installed in accordance with OSHA standards, National Electric Code, and manufacture specifications.
- 9. Factory Assembled Temporary Lighting Strings shall be installed in accordance with UL 1088.
- 10. All lamps shall be protected from accidental contact by protective covers.
- Temporary light shall not be suspended by their cords unless the cord and light is designed for this means of suspension.
- 12. All electrical tools shall be inspected each day prior to being put into service.
- 13. When pull boxes, switchboards or panel boards become energized, they shall be equipped with covers or the area will be secured so only qualified persons will have access.
- 14. Where cord sets are routed through floor holes, wall holes, doorway or where subject to potential physical damage, the cord set will be protected from damage by bushing or fittings that will eliminate the possibility of damage.

- 15. All 4-way and 2-way electrical boxes used in conjunction with temporary electrical will be UL approved. Job made boxes are **prohibited**.
- 16. Prior to working on Energized Equipment/ Circuits the electrical trade partner will complete an Energized Work Permit daily. The Energize Work Permit should be turned into the site superintendent prior to the start of the work.
- 17. When working on or near exposed de-energized parts they are treated as live. Only qualified electrical workers may work on energized parts. All areas where possible energized parts are located shall be protected by a positive barrier to keep all unnecessary employees out of the area.
- 18. When working under overhead lines clearance distance must be provided or lines shall be de-energized and grounded. Unqualified employees must maintain a 10' clearance

- distance. Qualified employees must adhere to the approach distances in TableS5.
- 19. All vehicular and mechanical equipment must maintain clearance distances of 10 ft. and if this cannot be obtained appropriate protective measures shall be enforced.
- 20. Protective shields, protective barriers or insulating materials as necessary shall be used when working in confined or enclosed workspaces where electrical hazards may exist.
- 21. Conductive apparel shall not be worn unless the items are rendered non-conductive by covering, wrapping or other insulating means.
- 22. Employees may not enter spaces containing exposed energized parts unless proper illumination is provided that enables the employees to work safely.

Excavations and Ground Disturbance

Ground Disturbance

The purpose of this SOP is intended for use in determining the precautionary measures and hazard identification when dealing with underground utilities, excavations, and trenching.

Definitions

- Ground Disturbance- Any work requiring a penetration into the ground surface or any area where the ground will be displaced.
- 2. Competent Person- One who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

Responsibilities

- 1. Employees/Trade Partner
 - Notify line locate service
 - Walk and identify route of Ground Disturbance
 - Complete PTP and Ground Disturbance
 Permit, turn into Flintco Supt. or PM or HSE
 upon completion (Appendix A)

2. Supervisors

- Walk and identify route of Ground Disturbance with Trade Partner
- Review As-Built Drawings, BIM Models and property owner to identify active line conflicts
- Determine what means of excavation is necessary
- Review trade contractors PTP and Ground Disturbance Permit

3. HSE Department

 Coordinate and/or assist in appropriate response to Ground Disturbance

Procedure

- 1. Call Utility Locate
 - The first priority before any penetration to the ground is to call a utility locate service
 - Understand uniform color code for underground utility lines (Figure 1)

2. Collect Information

- Flintco, LLC Superintendent and Trade Partner shall walk the proposed excavation route
- Review As-Built drawings, BIM models and consult property owner to identify active lines
- Determine if any other trade partners have previously disturbed area and walk with those trades to identify markers

3. Soil Classification

- All soil shall be treated as Class C soil
- Soils may be reclassified by a professional registered engineer
- Reclassifications must be documented and specific to the area of work

Means/Methods

Determine what methods are to be used to identify existing lines.

- Ground penetrating radar
- Hydro-excavation
- Qualified competent equipment operator with designated spotter
- Other means of "daylighting" utilities
- All energized sources shall be controlled as needed

Performing the Task

- Trade Contractor's competent person shall prepare a Pretask Plan and review with Flintco Superintendent or PM or HSE prior to operations starting
- Excavation safety protocols contained within the contract documents shall be followed
- Hand/Soft digging must be performed if any live or installed utilities are within 5 feet of proposed pathway (ex. if an existing utility is 4 ft underground and the new excavation is only 2 ft down, you must hand dig/soft dig at the crossing of the utilities.)
- Hand/Soft digging <u>must</u> also be performed when digging is within 5 ft in any direction of the utility
- Utilize temporary support systems to help with utility stressing as necessary

Complete Ground Disturbance Permit

Multiple permits **must** be issued for each independent disturbance area.

- Include drawing of the proposed pathway and drawings of other trades drawings
- Attach BIM model if available
- Required signatures
 - Performing authority
 - Authorizing/ Issuing party (Flintco Supt. or PM or HSE)
 - Trades that previously disturbed area

Ground disturbance should not commence prior to obtaining all signatures.

Figure 1: Uniform Color Code for Marking Underground Utility Lines:



White - Proposed Excavation



Pink - Temporary Survey Markings



Red - Electric Power Lines, Cables, Conduit and Lighting Cables



Yellow - Gas, Oil, Steam, Petroleum or Gaseous Materials



Orange - Communication, Alarm, or Signal Lines, Cables or Conduit and Traffic Loops



Blue - Potable Water



Purple - Reclaimed Water, Irrigation and Slurry Lines



Green - Sewer and Drain Lines

Excavations

- Excavation work shall be performed in accordance with all OSHA/CAL-OSHA regulations.
 - a. Each employee in an excavation shall be protected from cave-in by adequate protective system in accordance with OSHA Standards at 5 feet or deeper.
 - b. All soil shall be treated at Class C soil. Soils may be reclassified by a professional registered engineer. The reclassification must be documented and must be specific to a certain work area.
 - c. Flagging and/or suitable warning devices will be required around all trench and excavation work at least three (3) feet (this distance can be exceeded if site specific requires) from the edge of the excavation. For excavations six (6) feet or deeper, one of the following options will be used:
 - a hard barricade will be installed and shall conform to OSHA 1926.502 a and b.
 - If a soft barricade is installed, it shall be installed at least six (6) feet from the edge of the excavation.
 - d. Spoil piles shall be put at a minimum two (2) feet back from the edge of the excavation.
 - e. A safe means of access and egress shall be provided for excavations regardless of depth at intervals that provide no more than 25 feet of lateral travel.
 - f. A competent person shall be present anytime excavation work is performed.
 - g. Backfilling shall progress together with the removal of support systems form excavations
- 2. Prior to starting any excavation the following SHALL be done:
 - a. Contact local one call system and/or affected utility company

Figure B-1					
Soil or Rock Type	Maximum Allowable Slopes (H:V)(1) for Excavations Less Than 20 Feet Deep (3)				
Stable Rock Type A (2) Type B Type C	Vertical (90Degrees) 3/4:1 (53 Degrees) 1:1 (45 Degrees) 11/2:1 (34 Degrees)				

- b. Insure that competent person is on site and performs a daily inspection or an inspection if conditions change (if excavation is part of trade partners work, secure name of competent person).
- c. Determine if sloping or shoring method of protection is going to be used.
- d. Make sure that employees are protected from vehicular traffic and tests are to be conducted for hazardous atmospheres
- e. Excavations over 20 feet must be designed by a registered engineer
- f. If shoring method other than that outlined in **OSHA 1926 subpart P** is to be used
- Has a registered engineer been contacted for shoring design?
- A copy of engineering design must be maintained at the jobsite.
- g. Where the stability of adjoining buildings, walls, or other structures is endangered by excavation operations, support systems such as shoring, bracing, or underpinning shall be provided to ensure the stability of such structures for the protection of employees.
- h. Walkways shall be provided where employees or equipment are required or permitted to cross over excavations. Guardrails which comply with **OSHA 1926.502(b)** shall be provided where walkways are 6 feet (1.8 m) or more above lower levels. If ground water is encountered, have equipment available to initiate water removal.
- All water must be removed from excavation before entry can be made.

- 3. Establish a daily inspection procedure and procedures for inspecting after rain.
- 4. Each employee that will be associated with the excavation is to be trained to recognize the hazards associated with the excavation.
- 5. Where possible, a means of diverting water runoff from entering the excavation shall be used.
- 6. Where employee or equipment are permitted to use walkways or bridges to cross an excavation, a standard guardrail shall be provided on walkway or bridge.
- 7. All surface encumbrances that create a hazard shall be removed or supported prior to starting the excavation, to make sure all employees are protected against potential falling loads and are not permitted to work under loads of digging equipment where loads may fall.

Fall Protection

- All employees shall receive documented training pertaining to the recognition and elimination of fall hazards. Training shall enable each employee to recognize the hazards of falling & shall train each employee in the procedures to follow to minimize these hazards. Re-training shall be provided when there are deficiencies in training, workplace change, or fall protection systems or equipment changes that render previous training obsolete.
- 2. Floor and roof openings shall be covered with materials that are capable of supporting at least two times the load expected to be imposed. The cover shall be identified by signage that says HOLE DO NOT REMOVE (in languages that employees can fully understand) and secured to avoid displacement. In lieu of a cover, a standard guardrail with toe board can be erected around same.
- 3. All floor edges where fall distance is six (6) feet or greater, and roof edges shall be protected by a standard guardrail.
 - If cable is used in lieu of a wooden guardrail, the following conditions must be met:
 - The cable must be kept taut so that a minimum of two (2) inches deflection from horizontal is maintained including sag
 - Cable must be at least 3/8 inch in diameter (steel or plastic banding is unacceptable)
 - Flagged every six (6) feet or less with a high visibility material
 - Inspected by supervisor\foreman daily to ensure strength and stability
 - Top cable/rail shall be forty-two (42) inches (plus or minus three (3) inches) above the walking/working level and shall not deflect more than 2 inches in any direction, under 200 lbs of force.

- Mid rail/cable shall be twenty-one (21) inches or half the distance between walking surface and the top rail and shall not deflect more than 2 inches in any direction, under 150 lbs of force.
- Toe board shall be minimum (three) 3 1/2" high four (4) inches nominal).
- Vertical post shall be 8' on center maximum.
- 4. Personal fall arrest system (FPAS) that meets the requirements of applicable ANSI, ASTM, or OSHA requirements shall be worn by all employees when working six (6) feet or more above the walking surface when no other type of fall protection is provided. **100%** tie off is mandatory.
 - a. Flintco requires SRLs (Self Retracting Lanyards) for all fall protection connection devices. 6 ft lanyards are not permitted on Flintco jobsites.
 - b. Fall protection requirements for ladder to comply with **OSHA 29 CFR 1926**, Subpart X. For California projects see **OSHA Article 25**, **Section1669-1672**.
 - c. On scaffolds, either complete handrails (green tagged scaffold) or 100% tie-off is required at six (6) feet and above.
 - d. During steel erection, 100% tie-off is required at six (6) feet and above.
 - e. Self-retracting lanyard (SRL) will be utilized at all times in mobile elevated work plateforms (MEWP).
 - f. When a personal fall arrest system (FPAS) is exposed or has the potential to be exposed to sharp edges, steel cable connection devices shall be used. Example situations include steel erection, metal decking, leading roof edges or floor openings with rigid edges.

- g. Flintco, LLC does not allow roof monitors in place of fall protection.
- h. In the event that a guardrail system cannot be used on a flat roof, a warning line system in accordance to **OSHA CFR 1926.502(f)** shall be established no less than six (6) feet from the edge of the roof for roofing trades and 15 feet for all other trades. Flagging shall be spaced 6 ft apart, durable, highly visible, and continuously maintained. 100% tie off is required outside of the warning system.
- i. When using a warning zone, the supervisors name and contact information shall be posted.
- 5. Personal fall arrest system (FPAS) shall be worn by all employees working outside a protective guardrail (100% tie-off).
- 6. Personal fall arrest system (FPAS) shall be worn and connected to a designated anchorage point when working out of extensible and articulating boom platforms.
- 7. Personal fall arrest system (FPAS) shall be worn by employee working out of suspended scaffolding. Self-retracting lifeline (SRL) will be secured to an independent lifeline separate from any line that is attached to the scaffolding.
- 8. Safety nets shall be provided when workplaces are more than twenty-five (25) feet above the ground or floor where the use of other fall protection devices is impractical.
- Positioning belts of the two (2) D ring type <u>SHALL NOT</u> be used for fall protection.
- Fall protection for low pitched roof perimeters during the performance of <u>BUILT UP</u> roofing work will be in accordance with CFR 1926.502(g).

- 11. Each employee who will be climbing and or working on concrete forms will be equipped with the following fall protection equipment:
 - a. Personal fall arrest system (FPAS) harness with a D ring in the center of the back and side D rings for positioning.
 - b. When ascending or descending the forming system, the employee will attach the self-retracting lifeline (SRL) to the full body harness.
 - c. Gang forms are to have a 3/8" or 1/2" steel cable run continuously between the two, outside stiff- backs of each individual form section. The cable will be attached to the stiff-backs in a manner that will prohibit the cable from sliding down or up the stiff-back. The cable will lap back over itself on both ends by a minimum of 18" three cable clamps will be evenly spaced on each overlap and torqued to the manufacturer's specifications. The cables should be attached while the forms are still on the ground.
 - d. Column forms are to have one of the following. The manufacture of modular forming systems will have a connection device that can be attached to the form itself. On job-built forms where angle iron clamps are used, a 3/8" or 1/2" cable will be attached to one of the vertical 2x6 framing members by drilling a hole through the plywood on the 2x6 vertical member. The cable is to be run through the drilled hole with the ends overlapping by a minimum of 18" with three cable clamps evenly spaced and torqued to the manufacturer's specifications.
- 12. Hoist/Loading Areas Guardrail systems or personal fall arrest system (FPAS) will be used in hoist/loading areas when an employee may fall six (6) feet or more. If guardrail systems must be removed for hoisting, employees are required to use personal fall arrest system (FPAS).

- 13. Warning line systems are erected at least six (6) feet from the edge, except in areas where mechanical equipment is in use. When mechanical equipment is in use, warning line systems are erected at least six (6) feet from the parallel edge, and at least ten (10) feet from the perpendicular edge.
- 14. All personal fall arrest system (FPAS) shall be inspected annually by a competent person and inspections documented.
- 15. All personal fall arrest system (FPAS) shall be inspected before each use for wear, damage, deterioration, or any other defects by the user.

- 16. Damaged or defective personal fall arrest system (FPAS) shall not be used and shall be taken out of service immediately.
- 17. A fall protection plan must be developed in writing before activities requiring fall protection can be performed.
- 18. A rescue plan shall be provided in writing for prompt rescue of employees in the event of a fall or shall assure the employees are able to rescue themselves.

Fire Protection

- General fire protection and emergency equipment must be kept free and clear from obstructions at all times and be properly located.
- 2. Fire extinguisher rated not less than **2A** shall be provided for each 3000 sq. ft. of building area and travel distance shall not exceed 100'.
- 3. If fire barrels are substitutes for **2A** fire extinguisher, they must be 55 gallon open top with 2 each fire pails at each barrel.
- 4. A fire extinguisher rated not less than **10B** must be located within 50 feet of wherever 5 gallons or more of flammable or combustible liquid or gas is being used.
- 5. All flammable or combustible liquids or gases must be stored a minimum of **20'** from all buildings (this includes office trailers).
- Oxygen and acetylene cylinders must be separated by 25' while in storage (ANSI Z 49.1-1967) or be separated by a 30-minute rated fire wall.
- 7. A fire extinguisher shall be located within **5'- 0"** of each set of oxygen and acetylene bottles, while welding and cutting operation is being performed. All combustible materials shall be removed to a distance that will not allow heat, sparks or slag to pose a fire hazard.
- 8. Outdoor portable fuel storage tanks shall be contained within a diked area with curb of a minimum of 12" in height around the perimeter of the tanks. Tank shall be provided with emergency venting & other devices as required by NFDA 30-1969 a minimum of one (1) portable fire extinguisher having a rating of not less than 20B will be located not less than 25' and not more than 75' from liquid storage area.

- 9. No smoking signs shall be posted at <u>ALL</u> flammable storage areas, i.e. fuel tanks, paint storage.
- 10. As warranted by the project, a trained and equipped firefighting (Fire Brigade) organization will be established and maintained.
- 11. Hot Work Permit will be required for certain projects. Upon completion, the work area will be examined by the person in whose name the permit is issued to ensure that all sparks, or embers are extinguished. The permit will be signed and returned to the Project Superintendent.
- 12. Fire watch shall be required while cutting and burning until all glowing embers are extinguished or a minimum of thirty minutes.
- 13. An alarm system shall be installed to alert employee in the event of an emergency.
- 14. Key employees will be trained in the emergency operation of the alarm system.
- 15. All employees will receive training in the alarm procedure.
- 16. Each trade partner shall be informed of the alarm code.
- 17. Each trade partner is to train his/her employees.
- 18. Fire extinguisher use training will be conducted prior to initial assignment and at least annually thereafter. Any person that discharges an extinguisher for other than fire extinguishing or other valid reason will be removed immediately from the project and will subject to immediate termination.
- 19. All portable fire extinguishers shall be visually inspected monthly and must be inspected and tagged by a third party inspector annually.

First Aid Kit

- The first aid kits inventory shall be periodically assessed to ensure the availability of adequate first aid supplies.
- A fully stocked first aid kit shall be available in the project office
- Eye wash shall be available on all projects in the first aid kits. If any situation occurs that the SDS for a product requires a major eye wash station or drenching station, one will be provided.

First Aid Kit Contents	51 - 100 Employes	26 - 50 Employees	1 - 25 Employees
Adhesive Tape 1/2" x 5 Yards	2	2	2
Ammonia Inhalants	10	10	5
Antiseptic Wipes	30	20	12
Burn Cream	12	6	3
Combine Pad 5" x 9"	2	2	1
Disposable Examination Gloves	6	6	2
Disposable Instant Cold Packs	2	1	1
Elastic Bandages 2" x 5 Yards	2	1	1
Eye Wash 4 oz.	5	2	2
First Aid Cream ½ oz.	2	1	1
Forceps	1	1	1
³/4" x 3" Strips Box 100 ct	2	1	1
1" x 3" Strips Box 100 ct	2	1	1
1 1/4" Oval Box 100 ct	1	1	1
2" x 3" Patch Box 50 ct	2	1	1
11/2" x 3" Knuckle Box 100 ct	2	1	1
Small Finger Tip Box 100ct	1	1	1
Large Finger Tip Box 100ct	1	1	1
PVP Iodine Wipes	100	50	25
Rescue Blanket	1	1	1
Scissors	1	1	1
Sterile Dressing Pads 3" x3"	10	10	5
Stretch Bandage	6	2	2
Triangle Bandage	2	2	2
Biohazard Kit	1	1	1
CPR Micro-mask Kit	2	2	2

NO INTERNAL MEDICATION ALLOWED

Hazardous Communication Program

This program has been prepared to comply with the requirements of the Global Harmonization System and Federal **OSHA standard 1926.59** to ensure that information necessary for the safe use, handling and storage of hazardous chemicals is provided to and made available to employers and employees. The Flintco Hazard Communication Program, a list of chemicals used at our jobsite, and the Safety Data Sheets can be obtained by contacting the job site office.

This program includes guidelines on identification of chemical hazards and the preparation and proper use of container labels, placards and other types of warning devices.

Chemical Inventory

- 1. Flintco, LLC maintains an inventory of all known chemicals in use on this worksite. A chemical inventory is available from the Project Superintendent. All chemical materials used shall have a Safety Data Sheet (SDS) filed with Flintco to be posted in the jobsite office.
- 2. Hazardous chemicals brought onto the worksite by Flintco, LLC will be included on the hazardous chemical inventory list.

Container Labeling GHS

- All chemicals on site will be stored in their original or approved containers with a proper label attached, except small quantities for immediate use. Any container not properly labeled should be given to the Project Superintendent for labeling or proper disposal.
- Workers may dispense chemicals from original containers only in small quantities intended for immediate use. Any chemical left after work is completed must be returned to the original container or the Project Superintendent for proper handling.

- 3. No unmarked containers of any size are to be left in the work area unattended.
- 4. Flintco will rely on manufacturer and or supplier applied labels whenever possible and will ensure that these labels are maintained. Containers that are not labeled or on which the manufacturer's label has been removed will be relabeled.
- 5. Flintco LLC will ensure that each container is labeled with the identity of the hazardous chemical contained and any appropriate hazard warnings.
- 6. Four standardized GHS label elements:
 - Symbols (Hazard Pictograms) that convey health, physical, and environmental hazard information assigned to a GHS hazard class and category
 - Signal Words "Danger" or "Warning" used to emphasize hazards and relative level of severity of the hazard and assigned to a GHS hazard class and category
 - Hazard Statements, which are standard phrases, assigned to a hazard class and category that describe the nature of the hazard
 - Identification: product ID and supplier ID



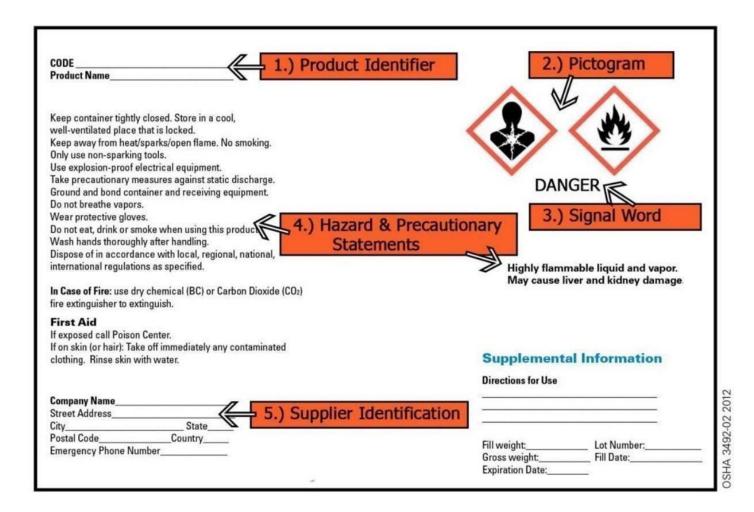
- 1. Product Identifier Should match the product identifier on the Safety Data Sheet.
- 2. **Signal Word** Either use "Danger" (severe) or "Warning" (less severe)
- 3. Hazard Statements A phrase assigned to a hazard class that describes the nature of the product's hazards
- 4. Precautionary Statements Describes recommended measures to minimize or prevent adverse effects resulting from exposure.
- 5. **Supplier Identification** The name, address and telephone number of the manufacturer or supplier.
- 6. Pictograms Graphical symbols intended to convey specific hazard information visually.

Sample label courtesy of Weber Packaging Solutions • www.weberpackaging.com



Safety Data Sheets (SDS)

- Employees working with a Hazardous Chemical may request a copy of the Safety Data Sheets (SDS). Requests to review SDS's should be made to the Project Superintendent.
- 2. SDS shall be available and standard chemical reference may also be available on the site to provide immediate reference to chemicals safety information.



Employee Training

Employees will be trained to work safely with hazardous chemicals. Employee training will include:

- 1. Methods that may be used to detect a release of a hazardous chemical(s) in the workplace,
- 2. Physical and health hazards associated with chemicals,
- 3. A review of protective measures to be taken,

- 4. Safe work practices, emergency responses and use of personnel protective equipment,
- 5. Information on the Hazard Communication Standard including
- Explanation of Labeling and warning systems, and
- An explanation of Safety Data Sheets
- A review of chemicals used on site
- Location of work areas using hazardous products

Personal Protective Equipment (PPE)

Required PPE is available from the Project Superintendent. Any employee found in violation of PPE requirements may be subject to disciplinary actions up to and including discharge.

Emergency Response

- Any incident of over exposure or spill of a hazardous chemical/substance must be reported to the Project Superintendent at once.
- The foremen or the immediate supervisor will be responsible for ensuring that proper emergency response actions are taken in leak/ spill situations.

Hazards of Non-Routine Tasks

- Supervisors will inform employees of any special tasks that may arise which would involve possible exposure to hazardous chemicals.
- Review of safe work procedures and use of required PPE will be conducted prior to the start of such tasks as confined space, unlabeled pipe containing chemicals.
- 3. Where necessary, areas will be posted to indicate the nature of the hazard involved.

Informing Other Employers

- Other on-site employers are required to adhere to the provisions of the Hazard Communication Standard.
- Information of hazardous chemicals known to be present will be exchanged with other employers during the preconstruction meeting. Employers will be responsible for providing necessary information to their employees.
- 3. Other on-site employers will be provided with a copy of the hazard communication program of Flintco, LLC.
- Flintco, LLC will supply central location for SDS so all employees of all trade partners will have access.

Posting

Flintco, LLC has posted information for employees at this job site on the Hazard Communication Standard. This information can be found at the Project Office.

Hearing Conservation Plan

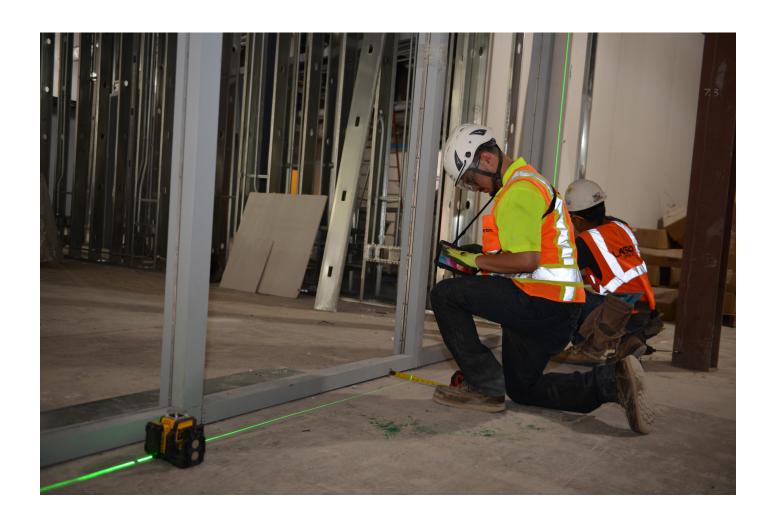
If engineering controls cannot be used or when engineering controls do not reduce the DBA levels below the permissible exposure level found in **OSHA 29 CFR 1926.52, Table D2** and/or ANSI S3.19, then employees who are exposed will be fitted with adequate hearing protection. Noise reduction levels should be maintained at 85 dba or lower per 8 hour work shift.

In order to determine the actual DBA level employees will be exposed to, the project superintendent or competent person appointed by the superintendent shall monitor the DBA level by the use of an analogue sound level meter.

During the monitoring process, all employees including the monitor will be fitted with adequate hearing protection which will reduce the DBA to NRR: 31 and meets ANS I S12.6-1984.

Upon completion of the monitoring period, if the DBA exceeds the permissible noise level for the time duration as outlined in **OSHA 29 CFR 1926.52**, **Table D2** and/or ANSI S3.19, all employees who will be exposed shall be issued adequate hearing protection and receive training in proper wearing and fitting per manufacturing instructions.

Any employee who cannot wear ear plugs will not be assigned to an activity that requires the use of ear plugs.



Heat Stress Prevention

When "hot weather" approaches, we should be aware of the types, symptoms, first aid measures, and factors of Heat Stress Illnesses and proper hydration of our employees. The following information will be used to instruct our employees on potable water consumption and the recognition of heat stress hazards.

California projects shall follow the **Cal OSHA Title 8**, **Chapter 4**, **and Section 3395**.

Potable Water

All Flintco, LLC project personnel are provided access to the jobsite office at all times throughout the work shift.

- 1. An adequate supply of water shall be provided for Flintco, LLC personnel in the office.
- Water will be supplied by a water dispenser, individual bottles of drinking water or a water container.
- 3. When using a water dispenser or a water container, individual drinking cups will be provided and used.

Trade partners on Flintco, LLC Projects are responsible for providing drinking water for their personnel. Each Trade partner shall have and follow their company Heat Stress Program, or they may adopt the following guidelines for their personnel.

- 1. An adequate supply of water shall be provided on all jobsites.
- 2. A sufficient number of water containers will be kept on each jobsite.
- 3. Portable water containers shall be capable of being tightly closed.
- 4. Water shall not be dipped from the containers and the use of a common drinking cup is prohibited.

- 5. Maintain a supply of new drinking cups, do not recycle drinking cups.
- 6. Provide a cup dispenser at each water station.
- 7. Provide a trash container in the immediate area of the drinking water to depose of used cups.
- 8. Containers shall be inspected and cleaned prior to each workday.
- 9. The containers should be cleaned with soap, or another approved sanitary cleaner.
- 10. The jobsite foreman will assign a person to fill the containers at the beginning of each workday and replenish as needed during the workday.
- 11. Container lids shall be tightly secured, taped and labeled with current days date.
- 12. Discuss with your employees the importance of sanitation and cleanliness.

Training

Heat Illness Prevention Training will be provided for Flintco, LLC supervisors and employees. Each Trade partner is responsible for training their employees. The content of the training will include, but is not limited to:

- The environmental and personal risk factors for heat illness.
- The employer's procedures for complying with the required heat illness prevention plan.
- The importance of frequent consumption of small quantities of water.
- The importance of acclimatization.
- The different types of heat illness and the common signs and symptoms of heat illness.
- The importance of employees immediately reporting to the employer, directly or through their employee's supervisor, symptoms or signs

of heat illness they may experience or observe in co-workers.

- The employer's procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary.
- The employer's procedures for ensuring that in the event of an emergency, clear and precise location of the work site can and will be provided as needed to emergency responders.

Heat Exhaustion- Types, Symptoms and First Aid

Heat exhaustion is the body's response to an excessive loss of the water and salt, usually through excessive sweating. Workers most prone to heat exhaustion are those that are elderly, have high blood pressure, and those working in a hot / humid environment. If not treated properly it can result in the individual having a heat stroke.

Symptoms of heat exhaustion include:

- Heavy sweating / fast and shallow breathing
- Extreme weakness or fatigue
- Dizziness, confusion
- Headache/ light headedness
- Nausea or vomiting
- Clammy, moist skin
- Pale or flushed complexion / slightly elevated body temperature
- Muscle cramps

First Aid: Treat a worker suffering from heat exhaustion with the following:

- Have them rest in a cool, shaded or airconditioned area.
- Cool worker with cold compresses/ ice packs
- Have them drink plenty of water or other cool, non-alcoholic beverages.

Heat Syncope – Types, Symptoms and First Aid

Heat syncope is a fainting (syncope) episode or dizziness that usually occurs with prolonged standing or sudden rising from a sitting or lying position. Factors that may contribute to heat syncope include dehydration and lack of acclimatization.

Symptoms of heat syncope include:

- Light-headedness
- Loss of consciousness
- Dizziness
- Fainting

First Aid Workers with heat syncope should:

- Sit or lie down in a cool place when they begin to feel symptoms to decrease their body temperature.
- Elevate legs to promote blood returning to the heart
- Slowly drink water, clear juice, or a sports beverage.

Dehydration – Types, Symptoms and First Aid

Dehydration occurs when the amount of water leaving the body is greater than the amount being taken in. **Symptoms of Dehydration include:**

- Fatigue
- Cramp and tightness in muscles, especially in the legs
- Headaches, dizziness, and confusion
- Reduction in the amount of frequency of urination, with dark colored urineReduced Movement

First Aid: Workers with dehydration should:

- Increase water intake
- Rest in shade/cool environment

Heat Cramps – Types, Symptoms and First Aid

Heat cramps usually affect workers who sweat a lot during strenuous activity. This sweating depletes the body's salt and moisture levels. Low salt levels in muscles cause painful cramps. Heat cramps may also be a symptom of heat exhaustion.

Symptoms

 Muscle pain or spasms usually in the abdomen, arms, or legs.

First Aid: Workers with heat cramps should:

- Stop all activity and sit in a cool place.
- Drink clear juice or a sports beverage.
- Not return to strenuous work for a few hours after the cramps subside because further exertion may lead to heat exhaustion or heatstroke.

Seek medical attention if any of the following apply:

- The worker has heart problems.
- The worker is on a low-sodium diet.
- The cramps do not subside within one hour.

Heat Stroke – Types, Symptoms and First Aid

Heat stroke is the most serious heat-related disorder. It occurs when the body becomes unable to control its temperature: the body's temperature rises rapidly, the sweating mechanism fails, and the body is unable to cool down. When heat stroke occurs, the body temperature can rise to 106 degrees Fahrenheit or higher within 10 to 15 minutes. Heat stroke can cause death or permanent disability if emergency treatment is not given.

Symptoms of heat stroke include:

- Hot, dry skin (no sweating)
- Hallucinations
- Fainting
- Chills

- Throbbing headache
- High body temperature
- Confusion/dizziness
- Slurred speech

First Aid: Take the following steps to treat a worker with heatstroke:

- Call 911 and notify their supervisor / MEDICAL FMERGENCY.
- Move the sick worker to a cool shaded area.
- Drink fluids (preferably water) as soon as possible.
- Cool the worker using methods such as:
 - Soak their clothes with water
 - Spraying, sponging, or showering them with water
 - Fan their body

Preventive Measures Employees Can Take

- Drink small amounts of cool water frequently to prevent dehydration
- Drink throughout the day to relieve thirst and maintain an adequate urine output
- Plain water is usually adequate without need to take additional salt or minerals beyond those in your diet. A sports beverage can replace the salt and minerals you lose in sweat. (Not company provided)
- Wear appropriate clothing
- During periods of elevated temperature, employees should wear light-colored, lightweight, loose-fitting cotton clothing that allows ventilation of air to the body.
- Protect yourself from the sun by wearing a sun visor on your safety helmet and approved safety glasses.
- Sunscreen—SPF 15 or higher—are also recommended
- Pace yourself. Start slowly and pick up the pace gradually

- Stand or sit up slowly. Flex leg muscles before moving
- Take time to cool down
- Rest often in shady areas
- Take time to acclimate to heat and humidity

Medical Emergencies

Employers will identify the First Aid/Competent Persons on each jobsite; and advise employees who to contact in the event of an emergency. Heat related illness and treatment is to be covered in all recognized First Aid Training.

In the event of a heat related illness, immediately summon the jobsite designated First Aid/
Competent Person. The First Aid/Competent Person will assess the severity of the illness, designate a responsible individual to call 911 for emergency medical assistance, if deemed necessary; begin

first aid treatment until such emergency assistance arrives. The First Aid/Competent Person is to remain with the injured/ill employee until relieved by emergency personnel in response to the 911 call. The First Aid/Competent Person may require a break from rendering treatment and may do so when relieved by another jobsite First Aid/Competent Person. At no time is the injured/ill employee to be left alone.

The supervisor responding to the incident is responsible for documenting all pertinent information relating to the emergency.

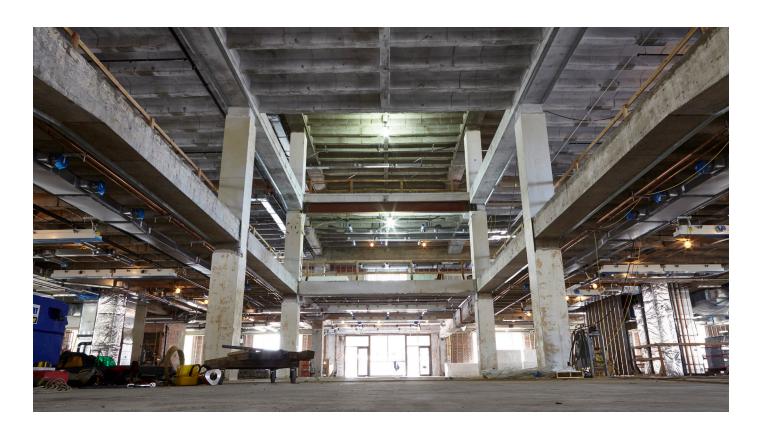
Documentation would include witness statements, details pertaining to the events that led to the employee's heat illness, and the subsequent actions that followed, such as medical treatment rendered, and the outcome.

HEAT CONDITIONS					
Condition	Signs/Symptoms	First Aid			
Heat Cramps	Painful muscle spasms Heavy sweating	Increase Water intakeRest in shade/cool environment			
Heat Syncope	Brief fainting Blurred vision	Increase Water intake Rest in shade/cool environment			
Dehydration	Fatigue Reduced movement	Increase Water intake Rest in shade/cool environment			
Heat Exhaustion	Pale and clammy skin Possible fainting Weakness, fatigue Nausea Dizziness Heavy sweating Blurred vision Body temp slightly elevated	Lie down in cool environment Water intake Loosen clothing Call 911 to summon ambulance if symptoms continue once in cool environment			
Heat Stroke	Cessation of sweating Skin hot and dry Red face High body temperature Unconsciousness Collapse Convulsions Confusion or erratic behavior Life threatening condition				

Housekeeping

- 1. Housekeeping shall be done on a continuous basis.
- 2. All walkways, ramps, stairways and access points to ladders shall be kept free of debris.
- 3. All trash and debris shall be cleaned up and disposed of on a daily basis.
- 4. Laydown areas, parking lots and temporary facility shall be kept in a clean and orderly manner at all times.
- 5. All Materials must be kept on dunnage.
- 6. Trash barrels shall be located at each water can location and used cups shall be deposited in trash barrel.
- All combustible material, such as oily rags, shall be kept in fire resistant covered containers until removed from worksite to avoid the possibility of fire.

- 8. No glass bottles are allowed on the jobsite.
- 9. Construction materials such as scrap sheet rock, broken block, brick, and loose conduit shall be picked up on a daily basis.
- 10. All material shall be stacked in a manner to avoid spreading, tilting, falling or rolling.
- 11. If a trade partner fails to keep his/her portion of work area cleaned, they will be notified by Flintco, LLC. After 24 hours written notice, Flintco, LLC shall perform the necessary clean up and charge the appropriate trade partner for the cleanup.
- 12. All scraps that are produced from employee lunches shall be removed from the job site daily by the employee. Employee's failure to comply may result in his/her removal from the project.



Infection Control Policy

This infection control policy applies to all facilities that are classified as a medical establishment. A medical establishment includes, but is not limited to; hospitals, clinics, doctor's offices, nursing homes, assisted living centers, rehab treatment centers and laboratories.

Construction activities can affect the environmental stability of a facility and expose our employees and the occupants of the facility to infection contaminates. To protect the health and safety of all individual's strict adherence to this policy is required.

For the purpose of clarification construction is presented in three levels: Construction Type, Construction Class and Risk Level.

Definition

Construction Type

Type A - Inspection and non-invasive activities include, but are not limited to; removal of ceiling tiles for visual inspection (limited to 1 tile per 50 square feet), painting (but not sanding), removing wall covering, electrical trim work, minor plumbing, and activities which do not generate dust or require cutting of walls or access to ceilings other than for visual inspection.

Type B- Small scale, short duration (equal to or less than one 8-hour shift) activities which create minimal dust. Includes but is not limited to; installation of telephone and computer cabling, access to chase spaces, cutting of walls or ceiling where dust migration can be controlled.

Type C - Any work which generates a moderate to high level of dust or requires demolition or removal of any fixed building components or assemblies. This type of construction may include but is not limited to; sanding of walls for painting or wall covering, removal of floor coverings, removal of

ceiling tiles and casework, new wall construction, minor duct work or electrical work above ceilings, major cabling activities, and any activity which cannot be completed within a single 8 hour work shift.

Type D - Major demolition and construction projects. Including but not limited to; activities which require consecutive work shifts, require heavy demolition or removal of a complete cabling system, and new construction.

Construction Class

Class I

- Utilize appropriate signage to direct staff, patients, and visitors away from the construction site.
- 2. Minimize dust production.
- 3. Wipe up dust with damp cloth when work is complete.
- 4. Immediately replace any ceiling tile displaced for visual inspection.

Class II

- 1. Utilize appropriate signage to direct staff, patients, and visitors away from the construction site.
- 2. Minimize dust production.
- 3. At completion, remove all debris and as much dust as possible from site.
- 4. Wipe up dust with damp cloth using facility approved disinfectant.
- 5. Damp mop using facility approved disinfectant or vacuum with HEPA filtered vacuum.

Class III

- 1. Requires facility infection control department approval before construction begins.
- 2. Establish construction crew's path of entry and exit from construction area.
- 3. Place dust mat(s) at entrance/exit of work area. Dust mats are to be HEPA filter vacuumed at least daily and replaced with clean mats at least weekly. The placing and cleaning of dust mats are the trade partner's responsibility.
- 4. Establish a pathway for workers who may need to leave the construction site and enter another area of the facility.
- 5. Workers are to remove as much dust as possible from clothing and shoes before leaving construction site to enter another area of the facility. Use a HEPA filtered vacuum for dust removal.
- 6. Complete all critical barriers before construction begins.
- 7. Establish and confirm negative air pressure within the work site. Negative air pressure is to be maintained within the work site and confirmed on a daily basis or as requested by facility infection control department. Trade partner is responsible to document and maintain records of negative air pressure checks and any corrective action taken.
- 8. Seal unused doors with duct tape.
- 9. Block/seal air supply and return vents.
- 10. Seal holes, pipes, conduits, and punctures appropriately.
- 11. Minimize dust production as much as possible. HEPA vacuum construction site floor daily.
- 12. Establish path for transportation of construction waste. Transport construction waste in covered containers.

- 13. Utilize appropriate signage to direct staff, patients, and visitors away from construction site.
- 14. Do not remove barriers from work area until project is complete and initial cleaning is done.
- 15. At project completion, remove all debris and as much dust as possible from the construction site. Vacuum flooring and other surfaces with HEPA filtered vacuum.
- 16. Remove barrier material carefully to minimize spreading of dirt and debris.
- 17. Wipe work surfaces with facility approved disinfectant.
- 18. Damp mop flooring or vacuum with a HEPA filtered vacuum
- 19. Approval by the facility infection control department is required upon completion.

Class IV

All of class III recommendations, plus

- Construct a secondary clean room attached to the exterior of the entrance/exit barrier to the site.
- 2. All workers and tools must pass through the clean room in order to leave the work site.
- 3. Workers must wear disposable coveralls that are removed and placed in containers in the clean room each time they leave the work area. Containers are to be lined with plastic bags. Bags are to be tied and removed from the clean room daily for disposal with other construction waste.
- 4. Workers leaving the work site are to remove as much dust as possible from shoes using HEPA filtered vacuum.
- 5. Tools and container must be wiped in the clean room before removal from work site.

Risk Levels

As a general standard, the following risk level has been assigned to the areas listed below. Consult the facility infection control department for additional areas of concern and clarification per their policy.

Low Risk

Office areas, corridors/space adjacent to these areas.

Moderate Risk

Laboratory, admitting, Pre-admission, doctors' offices, all patient care areas not listed below as high or critical risk, and the corridors/spaces adjacent to those areas.

High Risk

ER, same day surgery, labor and delivery, newborn nursery, medical-surgical nursing units, and corridors/spaces adjacent to those areas.

Critical Risk

Surgery, radiology, oncology, critical care units, cardiac-cath lab, dialysis, pharmacy, labor and delivery, surgical sites, and corridors/spaces adjacent to those areas

Refer to table below.

TYPE AND CLASS OF CONTSTRUCTION TO DETERMINE RISK LEVEL				
Construction Type	Type A: Inspection Non-Invasive Activity	Type B: Small Scale, Short Duration, Minimal Dust Generating Activity	Type C: Generates Moderate To High Levels Of Dust Requires More Than One Shift To Complete	Type D: Major Duration And Construction Activities Require Multi-Work Shifts
Risk Level				
Low Risk	Class I	Class II	Class III	Class III
Moderate Risk	Class I	Class II	Class III	Class III
High Risk	Class II	Class II / III	Class III / IV	Class III / IV
Critical Risk	Class II	Class III	Class IV	Class IV

General Requirements

- All company employees and employees of its trade partners participating in the construction of a Medical Establishment, covered by this policy, will be required to complete training on infection control, as it pertains to this policy.
- All participants/employees will receive a copy of the Infection Control Policy, and will sign a certification of acknowledgement (Appendix A.) A copy of the Certification of Acknowledgment will be maintained on file in the Flintco, LLC office.
- Violation of any portion of the Infection Control Policy or the policy and practices of the Facility will require the offending employee to repeat the training process.
- A second violation of the Infection Control Policy will require removal of the offending employee/ participant.
- 5. Compliance monitoring inspections will be conducted and documented (Appendix B) at the start and end of each shift.
- 6. A Life Safety Inspection shall be conducted and documented (Appendix C) on a weekly basis.

Training

- 1. At no time should an employee pick up or touch any medical equipment such as needles, syringes, containers or bodily fluids.
- If an employee should discover any medical equipment or bodily fluids, they are to immediately contact their supervisor.
 Supervisors are to immediately report such findings to the Facilities Infection Control Department for proper removal.
- 3. For their own personal safety, employees must consult with their Supervisor before entering the work site if they have open cuts or wounds. The supervisor will consult with the safety department prior to giving permission to the employee to enter the worksite.

- 4. Each employee will be instructed as to the pathway they are to use to and from the work area. Each employee will be instructed where they are to park/workers parking.
- 5. Each employee will be instructed on how to clean tools prior to entering and exiting the work site.
- 6. Each employee will receive instruction to secure and cover materials in containers prior to leaving the work site.
- 7. Each employee will receive instruction to identify the pathway for use in removing debris and materials to and from the work site, and the location of the dumpster.
- 8. Each employee will be instructed, prior to entering the work site, when special clothing or covering is required.
- 9. Each employee will be instructed to identify trade partner facilities such as lunch and break area, smoking and toilet facilities.
- 10. Each employee will receive instruction for special procedures such as dust removal from shoes, clothing, carts and equipment prior to exiting the worksite.
- 11. Each employee will be instructed of any restrictions associated with specific work activities, such as the time of day it can be conducted.
- 12. Each employee will be instructed to use specific elevators and stair wells designated for construction employees.
- 13. Each employee will be instructed on the location of emergency contact names and phone numbers in case of emergency.

Equipment

- 1. Negative air machines with supply of filters
- 2. Negative air flow meter with alarm
- 3. Sticky mats with removable strips
- 4. Dump carts with lids
- 5. Trash bags with ties
- 6. Disposable coveralls (if working in a critical risk class IV area)
- 7. Rubber gloves
- 8. Double strap dust mask
- 9. Directional signage
- 10. Mop and mop bucket
- 11. HEPA filtered vacuum
- 12. Facility approved disinfectant
- 13. Clean room (area large enough to accommodate one person and one dump cart at a time)
- 14. Wipe cloths
- 15. Disinfectant hand wipes
- 16. Self-contained wash facility
- 17. Disinfectant for cleaning up (approved by Facility I. C. Department)

Monitoring

- Establish an air quality baseline prior to starting contract work
- 2. Document negative air pressure as shown on negative air machine meter
- 3. Continually monitor areas outside of work area for dust

- 4. Check containment barrier for leaks
- Check air quality at work completion after final cleanup is complete and prior to removal of barriers
- 6. All monitoring results are to be on file at the Flintco, LLC office.

Start-Up Requirements

- 1. Hook up negative air machine
- 2. Install temporary partitions to the deck
- 3. Cap off existing air supply and air return vents
- 4. In class IV operation install secondary clean room
- 5. Install door closers on doors in temporary barrier walls
- 6. Install sticky mats at entrance and exit doors

Continuing Requirements

- Cover dump carts when hauling materials out of work area
- 2. Clean and mop daily (more often as needed)
- 3. Replace sticky mats if mats no longer remove all dust from shoes

Lead Written Program

The purpose of this program is to ensure that all employees are safeguarded from the occupational health and safety risks associated with Lead.

Flintco, contractors and owners shall be in compliance with **OSHA 29 CFR 1926.62 and OSHA 29 CFR 1910.1025**

Building Owners

- Prior to any demolition or renovation activities, the building owner is responsible for conducting an inspection for lead in the affected portion of the building.
- The owner must notify Flintco, LLC of the presence, location, and quantity of Lead containing material in the building.
- Notification shall be in writing and must be accompanied by a Lead survey.
- If Lead abatement is conducted under the direction of the owner, Flintco, LLC will not allow work to commence until the owner provides Flintco, LLC a clean air report.

Project Managers

- Prior to any demolition or renovation activities, the project manager shall obtain from the building or facility owner a copy of the Lead survey identifying the presence, location, and quantity of Lead containing material in the affected area of the building.
- The project manager shall provide a copy of the Lead survey to the superintendent and trade partners or any other affected party prior to the start of any work.
- The project manager shall also review local codes and ensure that we are in compliance with any permitting or notification requirements of that locale.

Superintendents

- Prior to any demolition or renovation activities, the superintendent shall review the Lead survey and become familiar with the location, type, and quantity of Lead in all work areas.
- The Lead survey shall be posted and made available to all workers on site.
- The results of the survey must be communicated to all Flintco, LLC field labor, trade partner personnel, and any other affected party prior to start of work.
- The superintendent shall ensure that all employees working on site have sufficient Lead awareness training. The HSE Department shall be contacted to determine the length and scope to the training required. Documentation of such training shall be kept on file and made available for review upon request.

General Requirements

Flintco, LLC does not and will not perform
Lead abatement related activities under any
circumstances. Under normal circumstances Flintco,
LLC will not contract directly with a licensed Lead
abatement company, transporter or dumping
facility. This policy will not be deviated from without
written permission from the Risk Management Vice
President.

Building Inspections/ Surveys

- All buildings regardless of age shall be inspected for Lead prior to any demolition or renovation activities.
- No building shall be considered exempt from the required Lead inspection based on age or date of last renovation.
- If during construction activities a suspect material is discovered that was not part of the original inspection, work must be stopped immediately. The area will be cordoned off until an inspection of the material can be completed by a qualified inspector.
- Individuals engaged in the sampling of suspected Lead containing material must meet minimum federal and state training requirements including (but not limited to) the possession of a valid Lead Inspector License.
- If the inspection indicates the presence of Leadcontaining material and these materials will be disturbed due to demolition or renovation activities, then they shall be removed by a licensed Lead abatement trade partner.

Emergency Procedures

Every effort will be made to identify the presence and location of all Lead containing material prior to demolition or renovation activities minimizing the chance of accidental disturbance. Upon identification or accidental release of Lead containing material or the accidental release should occur, the following steps should be followed immediately:

- Stop work immediately, wet material, and vacate the area.
- Notify supervision of the disturbance.
- Isolate the area to prevent entry by others.
- Post danger signs to inform other personnel of the hazard.
- Shut off or temporarily modify the air handling system to prevent the distribution of Lead fibers to other areas.

- Do not attempt to clean up debris.
- Suspect material must be evaluated and tested immediately.
- Do not re-enter the areas until tests are confirmed.

Training

- All workers shall be trained on the hazards associated with Lead and the procedures for safely working around Lead materials without endangering themselves, their coworkers, or other building occupants.
- This is regardless of the fact that the Lead has already removed, and we are in receipt of a clean building report.
- Training will include:
 - 1. Health effects of Lead
 - 2. The types, properties and uses of Lead
 - 3. The hazards of Lead fiber inhalation and ingestion
 - 4. Types of activities which could release Lead fibers
 - 5. The proper response to fiber release episodes

Lock Out – Tag Out Program

Lockout/Tagout - OSHA 29 CFR 1910.147 Control of Hazardous Energy

No employee or trade partner will work on any energized system including but not limited to mechanical, electrical, hydraulic, or pneumatic; until it has been totally de-energized. All de-energized systems must be locked out and tagged out according to Flintco LOTO procedure.

Policy

All equipment, pipelines, pumping units, pumps, compressors, vessels, or systems containing hazardous substances, mechanical, hydraulic, pneumatic, electrical, chemical thermal, or other sources of energy that could cause injury to personnel shall be rendered inoperative during repair, cleaning, modification, servicing and maintenance activities. Lockout and tagging disconnects, circuit breakers and supply valves as well as energy isolating devices shall be used.

Purpose

The purpose of this procedure is to establish the minimum requirements necessary to ensure the physical safety of all personnel required to perform work on any energy source. It shall be used to ensure that machines or equipment are isolated from all potentially hazardous substances and energy.

Scope

This standard shall apply to all locations and employees in all instances where work occurs on or inside equipment with moving parts, or which could contain dangerous vapors, chemicals, pressure, temperature or electricity.

Responsibility

It is the responsibility of all levels of supervision to assure that the requirements set forth in this standard are followed without deviation. Employees authorized to lockout and tagout shall be instructed in the safety significance of lockout/

tagout procedures. (Employees authorized for group lockout – see attachment "A"). Each new or transferred affected employee whose work operations are or may be in the area shall be instructed in the purpose and use of the lockout/tagout procedures. (See attachment "A").

Definitions

Lockout/Tagout – The placement of a lock/tag on the energy isolating device in accordance with an established procedure indicating that the energy isolating device shall not be operated until removal of the lock/tag in accordance with the procedure.

Note: All equipment significantly repaired, modified or installed after 10/31/89 must accept lockout device.

Lockout Device – A device that utilizes a lock and key to hold an energy isolating device in the safe position for the purpose of protecting personnel. Each lock shall be identified and assigned to individual craft personnel as required.

Tagout Device – A prominent warning device that is capable of being securely attached and that, for the purpose of protecting personnel forbids the operation of any energy isolating device and identifies the applier or authority that has control of the procedure. Minimum information required on a tag shall be the name and department of the person attaching the tag, date and time of attachment.

Energy Source – Any electrical, mechanical, hydraulic pneumatic, chemical, thermal, pipeline, pumping units, pumps, compressors, a system containing hazardous substances or other energy source that could cause injury to personnel.

Energy Isolating Device – A physical device that prevents the transmission or release of energy, including but not limited to the following: a manually operated electrical circuit breaker, a disconnect switch, a slip blind, blind flange, a line valve, blocks, chains and similar device with a visible indication of the position of the device. (Push button, selector switches, and other control-circuit devices are not energy isolating devices).

Affected Employee – A person whose job includes activities such as erecting, installing, constructing, repairing, adjusting, modifying, inspecting, operating, or maintaining the equipment/process.

Supervisor – Any person having direct first line supervisory responsibilities over the work location, as defined. The term shall also mean any knowledgeable person designated by the first line supervisor to accept the responsibility of complying with this procedure.

Authorized Individual – A knowledgeable person to whom the authority and responsibility to perform a specific assignment has been given by his/her supervisor.

Standard

- 1. On each individual job, make a survey to locate and identify all energy sources to be isolated and to be certain which switch(s), valves(s) or other energy isolating devices apply to the equipment to be locked and/or tagged out. More than one energy source such as electrical, mechanical, pressure, etc. or others may be involved. Questionable energy source problems shall be resolved with applicable supervision (operations or maintenance) before lockout/tagout commences and the job continues.
- 2. Notify all affected employees that a lockout/ tagout system is going to be utilized and the reason, therefore. The authorized employee shall know the types and magnitude of the energy that the machine or equipment must identify and list the numbers of energy isolation devices either on work permits or attachment to work permit.

- 3. Each department/craft will have separate color-coded locks and will be controlled by the first line field supervisor of that department or group (see attachment "A").
- 4. Lockout padlocks shall be made available to authorized personnel who must clean, modify, perform maintenance on, or otherwise work on equipment.
 - Padlocks shall be tamper proof.
 - If duplicate keys are desired, they must be kept in a central location and closely supervised to prevent unauthorized removal.
- 5. "Danger Do Not Operate" tags (attachment "b") shall be used in connection with the padlock.
 - Each time an employee uses a padlock, he shall attach a completely filled out "DANGER DO NOT OPERATE" tag to the lock.
- 6. The following minimum requirements shall be met when shutting down equipment for repair or servicing.
 - The employee shall assure, through proper positioning of valves, switches, or other mechanical devices, that the equipment or system is rendered inoperable. The machine or equipment shall be turned off or shutdown using the procedures established for the machine or equipment
 - Each employee or group who will be working on the equipment or system must place his lock and tag on the proper disconnect, circuit breaker, or valve, etc...
 - After locking out, the employee shall operate the switch, valve or other energy isolating device so that employee is sure equipment is isolated from energy sources. Stored energy such as that in springs, elevated machine members, rotating flywheels, hydraulic system, and air, stream, gas or water pressure, etc., must be dissipated or restrained by methods such as repositioning, blocking, bleeding down, etc.

- If work on the equipment is to be halted for any length of time during a shift or will not be resumed until the following day, no change in the tags or locks would be necessary if it is expected the same workers will be returning.
- If work on the equipment extends into the following shift or day, or the worker is removed from the job permanently, then he must remove the "DANGER DO NOT OPERATE" tag and lock as he leaves, the person relieving him must attach his own tag and lock in its place.
- 7. Minimum requirements which shall be met when returning the equipment or systems back to operations.
 - As each worker or group of workers finishes with their portion of the job, they shall remove their "DANGER" tags and locks and notify the operating supervisor of this action.
 - When the employee who attached the lock and tag is not available, the first line field supervisor of the person signing the tag will have authority to remove the tag and lock after taking the following precautions.
 - a. Determining the reason for lock and tag.
 - b. Determining the status of the job.
 - c. Inspecting the equipment or system involved.
 - d. Assuring himself that it is safe to remove the energy isolating device.
 - After all the locks and "DANGER" tags have been removed, the equipment or system must be checked for proper operations by the operator or supervisor. If a problem still exists, then all steps in the procedure should be followed again.

Selection of Protective Materials/ Hardware

The requirement for tags, chains, blinds, locks adapters, pins, blocks and the life shall be determined for each work location by the operations and maintenance supervisor assigned to the work

location, with the suggestions and assistance of the Safety Department. An adequate supply of the above listed devices shall be maintained, distributed, or assigned as needs dictate.

Lockout/tagout devices shall be of a distinctive design and appearance and shall be used solely for the purpose of providing personal protection.

Lockout devices shall be attached in such a manner as to hold the energy isolating devices in a safe position. Tagout devices shall be attached in such a manner as to hold the energy isolating devices in a safe position. Tagout devices shall be attached in such a manner as to forbid the operation of energy isolating devices.

Periodic Inspections

It shall be the responsibility of the supervisor and the maintenance supervisor at each work location to verify, through regular and periodic inspections, each location's compliance with this procedure. The periodic inspections shall be documented. A certified review of the inspection including date, equipment, employees & the inspector must be documented. Annual inspections shall be conducted to ensure procedures and requirements are being followed.

Individual jobs shall be audited, on a random basis, for compliance to this lockout/tagout procedure by management and the Safety Department. Nonconformance to establish procedures will result in disciplinary action.

Training

Each employee who is authorized or affected by lockout/tagout procedures will go through initial program implementation training and annual documented training thereafter. Retraining is required when there is a change in machines, a change in the energy control procedures, or a new hazard is introduced. Retraining is required when there is a change in job assignments, in machines, a change in the energy control procedures, or a new hazard is introduced. See (attachment "C") for outline of training. New employees and reassigned employees will receive lockout/tagout training.

Note: All equipment significantly repaired or modified after 10/31/89 must accept a lockout device.

Trade partners

Trade partners working on the company's equipment must be notified of the company's lockout/tagout procedure. All equipment requiring isolation must first be locked out and tagged out by a company employee. It is the responsibility of the trade partner to comply with all aspects of **OSHA 1910.147** lockout/tagout procedure.

Training Outline Lockout/Tagout Procedure

Topic:

Control of Hazardous Energy (Lockout/Tagout)

Content Overview:

Practices, Procedures for the use of lockout and tagout devices

Objective:

After completing this training, employee will:

- Know the hazards involved in unexpected energized or startup of machines and equipment.
- 2. Know the importance of lockout/tagout
- 3. Understand procedures used in lockout/tagout.
- 4. Know the devices used in lockout/tagout

Handouts:

Training Outline

Other Materials:

Samples of lockout and tagout devices.

Training Activity Outline:

The purpose of the Standard and Hazards.
 What Hazardous Energy is. Specific Sources of
 Hazardous Energy at this Facility. The Purpose of
 the Standard.

- When the Standard applies. Unexpected Energizing during servicing or maintenance. Normal Production Operation Not Covered. Exceptions to the Rule
- 3. Definitions. Authorized and affected employees. Other specific definitions applicable to your operation.
- 4. Equipment used for Lockout/Tagout Locks and Tags. Standardized appearance.
- 5. Personal identification on tags. Lockout/Tagout procedures.
 - Type and magnitude of the energy hazards to be controlled. Method or means of control.
 - Notification of affected employee's shutdown.
 - Isolation from all energy sources.
 - Physical blocking and securing if necessary.
 Placement of lockout/tagout devices.
 - Release of stored energy.
 - Testing to verify effectiveness of energy control. Release from Lockout/Tagout.
 - Inspection of the work area. Nonessential items removed. Equipment operationally intact.
 - Employees safely positioned and notified of re-energization, release of employee who applied device is no longer at facility.
- 6. Special rules to Tagout System.
 - Warning devices, not physical restraints not to be removed, bypassed or ignored
 - All signage or pictograms to be made legible and understandable
 - Materials
 - Attachment
 - Personal identity of employee using tag
 - Group Lockout and Tagout
 - Types of groups
 - Application

Masonry

- 1. Prior to the start of masonry walls, a Limited Access Zone (LAZ) will be established:
 - The limited access zone shall be the height of the wall plus 4'-0".
 - Limited Access Zone shall run the full length of the wall.
 - Limited Access Zone shall be established on the un-scaffolded side of the wall
 - Only employees who are actively engaged in the construction of the wall are permitted to enter the Limited Access Zone.
 - Limited Access Zone will remain in place until the wall is adequately braced.
- 2. All masonry walls over 8'-0" high shall be adequately braced to prevent overturning or collapse until permanent supporting elements of the structure are in place.
- 3. Concrete mixers shall be equipped with guards on all moving parts.
- 4. At no time shall an employee attempt to clean out the hopper until the power to the equipment has been shut off and locked out by an authorized individual.
- 5. Concrete sacks are to be disposed of properly not to create a housekeeping issue.
- 6. Mixer operator shall wear proper personal protective equipment while performing mixing operation.
- 7. Employees operating masonry saws will wear both ANSI Z87 approved safety glasses with side shields and full-face shield.



- 8. Cutting of masonry will be performed in a wet cut method unless the saw is equipped with a dust collection system.
- 9. The area around the masonry saw shall be kept free of cut off masonry units to prevent trip hazards.
- 10. Masonry saws shall be guarded with a semicircular enclosure over the blade.
- 11. The motor frame on all stationary electrical saws shall be grounded.
- 12. Masonry units shall not be stacked that exceed 7 feet in height. All stockpiles over 4'-6" shall be stepped back at least 1" per foot above 4'-6".

Mold Protocol

Water Infiltration

- Any employee who observes unintended water infiltration into a completed building (or ongoing construction site) should immediately report the condition to the Project Superintendent.
- The Project Superintendent should take immediate steps to investigate the source of the water infiltration, identify the responsible party, and devise a procedure to eliminate the infiltration.
- If the water infiltration persists or cannot be corrected within 12 hours, the Project Superintendent should contact the Project Director and Corporate HSE Director for further instruction.

Water Damaged Building Materials

- All building materials delivered to the construction site should be closely inspected for pre-existing water damage and/or mold growth.
- If installed construction materials become wet, the Project Superintendent should be notified immediately and will determine whether the work must be removed, replaced, or allowed to dry. If the choice is to allow the material to dry, the Project Director and Corporate HSE Director should be immediately notified.
- Under no circumstances will new or additional construction be placed over, or otherwise enclose wet building materials.

Visible Mold

Any employee who observes any substance that appears to be mold or other fungal growth (or other unidentified substance) within a completed building or an ongoing construction site shall immediately suspend all construction operations in the area and report the condition to the Project Superintendent.

- The Project Superintendent shall immediately contact the Project Director and Corporate Safety Director to discuss the appropriate course of action. No one shall be allowed back into the affected area without the permission of the Corporate HSE Director.
- If an environmental consultant and/or remediation trade partner is required, they must be pre-qualified by the Corporate HSE Director.

Enclosed Spaces

- Project Superintendents and Project Managers shall review all plans and specifications in an effort to determine whether the building design creates any tightly enclosed spaces or other conditions that could create water or humidity problems on the project. Particular attention must be paid to the movement of air within the enclosure, including the use or lack of ventilation.
- If such conditions are discovered, they shall be brought to the attention of the owner and architect for resolution and/or direction.
- If a lack of ventilation or moisture build-up is discovered during construction, the Project Superintendent must take steps to ventilate the area and immediately bring the issue to the attention of the Project Director and Corporate Safety Director.
- If the actions of the owner and/or architect do not resolve the matter to the Corporate Safety Director's satisfaction, or if the water/humidity problems persist, the Project Director and Corporate Safety Director shall immediately bring the matter to the attention of the Area Vice President.

Vinyl Wall Covering

- The installation of vinyl wall covering on exterior walls is not to be done, unless the Owner or the Owner's Representative has signed a Vinyl Wall Coverings Exterior Wall Waiver, releasing Flintco, LLC of all liability with regard to mold growth between the vinyl wall covering and the drywall.
- Sample Waiver (below)

WAIVER Vinyl Wall Coverings – Exterior Walls				
This waiver is intended to hold Flintco, LLC and its associated trade partners harmless for the effects of mold and mildew growth from the installation of vinyl wall coverings on exterior walls. Owner(s)				
The Owner(s) has directed Flintco, LLC to install the wall coverings on exterior walls regardless of the warning of mold growth anticipated for this type of application.				
Name	Title	Date		
Name	Title	 Date		

OSHA Inspection Policy

- Ask for his/her credentials. If the inspector does not object, make a copy of his/her identification card. If a copy cannot be made, write down inspector's I.D. number and name.
- 2. Ask the reason for the inspection. If the answer includes an employee complaint, request a copy.
- 3. Ask if there is a complaint. If a complaint has been filed, ask for a copy of the complaint.
- 4. Tell the inspector that you are not denying entry, but it is the company's policy that you contact the company's authorized representative.
- 5. Do not ask the inspector for a warrant. This issue of a warrant will be discussed during the phone conversation with the company representative.
- To protect our rights to the fullest extent when entry is permitted, under warrant, we will advise the inspector that such permission is being granted under protest.
- 7. A management person (escort) will accompany the inspector at all the times while he/she is on the jobsite, or in the plant, and make notes of everything the inspector does. The escort will carry a copy of the warrant during this time. The escort should be the same person throughout the inspection.
 - Do not answer any general "fishing" type questions.
 - Do not demonstrate any equipment, machinery, or apparatus during the inspection. Do not let anyone else do so either. Do not tell the inspector whether or not it is operable, or when it will be in operation, or when it has operated in the past.

- 8. During the walk around on a routine inspection, the escort is to stay with the inspector.
- 9. Any time the inspector takes pictures, the escort should take a picture from the same angle plus at least two from different angles.
- 10. The inspector has the right to interview any employee in private. Do not attempt to stop such interview; however, the escort should ask the employee if the employee has any objection to the escort being present and listening to the interview. Assuming the employee has no objection; the escort may attend the interview, if the inspector will allow, and should listen and take notes.
 - Never attempt to stop an OSHA inspector physically.
- 11. When the inspector has left the job, notify the Area Safety Manager and Area Manager, complete the OSHA Inspection Form. Be specific. The more information, the better.
- 12. All OSHA requested Flintco company information shall be submitted to Legal Counsel for review and submission to OSHA, unless Legal Counsel directs otherwise.
- 13. Flintco shall have or attempt to have a company representative, HSE Area Manager, HSE Regional Director, HSE Director, Superintendent, Project Manager or Legal Counsel, preferably in person or by phone, present when an OSHA compliance officer is requesting to interview a Flintco employee.
- 14. Reference Appendix for OSHA Inspection form.

Personal Protection Equipment (PPE)

- 1. All Flintco employees shall wear Flintco issued white Kask, Studson, Milwaukee, or Ironwear Type 2 safety helmets at all times except in designated break rooms and office trailers. Safety helmets shall be worn in such a manner that complies with manufacturers recommendations and the chin strap shall be connected under the chin at all times.
- 2. Construction work boots shall be worn at all times during construction activities. Tennis shoes, track shoes, sandals, loafers or athletic shoes are not considered proper footwear for a construction site. Steel-toed boots or foot guards will be required for certain construction activities i.e. operating hand operated compaction equipment, operating jack hammer or when the hazard of foot injury exists.
- 3. Eye and face protection shall be utilized in accordance with OSHA CFR 1926 102 Table E1. Z87.1-2010 rated Safety glasses with side shields shall be worn at all times. Clear, nontinted, safety glasses shall be worn indoors. Contact your area HSE Manager, Regional HSE Director or Corporate HSE Director for information and documents to order prescription safety glasses.
- 4. ANSI certified high visibility/reflective vest, shirt, or jacket shall be worn at all times. Variances will be at the discretion of the area HSE Manager, Regional HSE Director or Corporate HSE Director.
- 5. Shirts with at least 4" sleeves are required. Tank tops, muscle shirts and sleeveless shirts are prohibited on construction site. Loose fitting garments, jeans with holes in them, shirt tails or floppy sleeves shall be contained at all times.

- 6. Long pants are required at all times.
- 7. Hearing protection per **OSHA CFR 1926.101** shall be used as required.
- 8. Safety belts or harnesses shall be used where required. Double D ring positioning belts are not to be used for fall protection.
- 9. Gloves, cut level 2 or task appropriate, shall be worn at all times.
- 10. Burns from wet concrete will cause painful and serious injury to skin. Skin can be protected by wearing either disposable type pants or rain gear pants over your regular work pants. Tape the protective pant cuffs on the outside of rubber boots. Wear rubber gloves and proper eye protection. Refer to the material specific Safety Data Sheets (SDS) for additional PPE.
- 11. All employees will receive documented training on proper PPE usage and retrained when required by change of task.
- 12. All PPE will be maintained in a sanitary and reliable condition; this includes employee owned equipment.
- 13. Selected PPE must be fitted to each affected employee. Any damaged or defective equipment shall be taken out of service and replaced.
- 14. Protective equipment as outlined in the Safety Data Sheet (SDS) shall be worn when working with hazardous materials that are under the guidelines of **OSHA CFR1926.59**.

Respirable Crystalline Silica

General Requirements

Silica is the main component found in sand, quartz and granite rock. During concrete operations, excessive amounts of silica dust may be generated during activities such as: chipping, cutting, sawing, drilling, grinding, sanding, and crushing of; concrete, brick, CMU, rock, stone, or any other silica containing material.

In order to determine whether a product contains silica, the Safety Data Sheet shall be obtained. In the event silica is present, the following safe working procedures shall be followed to eliminate or control silica dust.

- 1. Prior to the start of silica operations the following must be established:
 - Supervisor to prepare, review and maintain
 Pre-Task Plan with all employees in a
 language they understand and all to sign off.
- 2. Employees shall inspect all tools and equipment before use.
- 3. All employees shall be trained to perform the task they have been assigned.
- 4. Engineering controls shall be utilized to eliminate the hazard whenever feasible.
- 5. Air tests or historical data are required unless engineering controls are properly implemented.
- 6. Wet down dry materials and surfaces before cutting, chipping, grinding, sanding, sweeping or cleaning.
- 7. Use power tools with integrated water delivery system or built-in dust extraction units to capture the dust before it is released.

- 8. Respirators are required where specified in Table 1 below or where exposures above the Permissible Exposure Limit (PEL) are likely to persist despite full and proper implementation of the specified engineering and work practice controls.
 - PEL= 50 µg/m³ as an 8-hour Time Waited Average (TWA)
 - Action Level= 25 μg/m³ as an 8-hour TWA

For each employee engaged in a task identified, shall fully and properly implement the engineering controls, work practices, and respiratory protection specified.

See Table 1 on the following pages.

Training

Individuals with silica containing products shall be trained in the hazardous effects of being exposed to silica dust. All individuals performing tasks involving chipping, cutting, sawing, drilling, grinding, sanding, and crushing of concrete, brick, block, rock, and stone are required to be trained in the proper use of such tools, in addition to the proper methods of reducing or eliminating silica dust.

When respiratory protection is required the employee shall be trained in accordance with **OSHA 29 CFR1910.134**.

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIAL CONTAINING CRYSTALLINE SILICA				
Equipment /Task I	Engineering and Work Practice Control Methods	Required Respiratory Protection and Minimum Assigned Protection Factor (APF)		
		≤ 4 hours / shift	≥ 4 hours / shift	
Handheld power saws sy Opm er	When asea oataoors	None APF 10	APF 10 APF 10	
	When used indoors or in an enclosed area			
Walk-behind power saws sy	Ise saw equipped with integrated water delivery ystem that continuously feeds water to the blade. Operate and maintain tool in accordance with nanufacturer's instructions to minimize dust missions. When used outdoors.	None APF 10	None APF 10	
•	When used indoors or in an enclosed area			
Handheld and stand- mounted drills re	Ise drill equipped with commercially available shroud in cowling with dust collection system. Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. Oust collector must provide the air flow ecommended by the tool manufacturer, or greater, and have a filter with 99% or greater efficiency and filter-cleaning mechanism. Use a HEPA-filtered accuum when cleaning holes.	None	None	
Jackhammers and handheld power chipping rocks Us ar Op mer er re ar fil		None APF 10	None APF 10	

TABLE 1: SPECIFIED EXPOSURE CONTROL METHODS WHEN WORKING WITH MATERIAL CONTAINING CRYSTALLINE SILICA (CONTINUED) **Required Respiratory Protection Equipment /Task Engineering and Work Practice Control Methods** and Minimum Assigned Protection Factor (APF) ≤ 4 hours / shift ≥ 4 hours / shift For tasks performed outdoors only: Use grinder equipped with integrated water delivery system that continuously feeds water to the grinding surface. None None Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. OR Handheld grinders Use grinder equipped with commercially available for other than mortar shroud and dust collection system. removal Operate and maintain tool in accordance with manufacturer's instructions to minimize dust emissions. None None Dust collector must provide 25 cubic feet per minute ABF 10 None (cfm)or greater of airflow per inch of wheel diameter and have a filter with 99% or greater efficiency and a cyclonic pre-separator or filter-cleaning mechanism. When used outdoors When used indoorsor in an enclosed area Use machine equipped with integrated water delivery system that continuously feeds water to the cutting surface. Operate and maintain tool in accordance with None None manufacturer's instructions to minimize dust emissions. OR Use machine equipped with dust collection system Walkbehind milling recommended by the manufacturer. Operate and machines and floor maintain tool in accordance with manufacturer's grinders instructions to minimize dust emissions. Dust collector must provide the air flow recommended by the manufacturer, or greater, and have a filter with 99% or greater efficiency and a filter- cleaning mechanism. None None When used indoors or in an enclosed area, use a HFPA- filtered vacuum to remove loose dust in between passes.

^{*}For complete Table 1 Equipment List: https://www.osha.gov/silica/

Scaffolding

- All scaffolding that is (assembled in place), shall be placed on footing that is sound, ridged and capable of supporting the intended load without settling or displacement.
- Base plates shall be used and fastened to mud sills under all supporting legs of scaffold that is erected on the ground. Unstable objects such as bricks, concrete blocks and similar materials shall not be used to support the mud sill or scaffold legs.
- 3. All scaffolding shall be erected plumb and level, under the supervision of a competent person.
- 4. Guardrail requirements for scaffolding:
 - Baker/Perry/Narrow Frame type scaffolding shall have guardrails (top, mid and toe) installed on all open sides regardless of height.
 - *When the requirement for guardrails (top, mid and toe) to be installed on open sides cannot be met, a personal fall arrest system (PFAS) shall be connected to a self-retracting lifeline (SRL) anchored overhead.
- 5. All scaffolding planks shall be scaffolding grade or equivalent. Any scaffolding planks that are damaged shall be taken out of service immediately.
- 6. All planking of platforms shall be overlapped a minimum of **12**" or secured from movement.
- 7. Scaffolding planks shall extend over their end supports by a minimum of 6" and maximum of 12".
- 8. Safe access shall be provided to the scaffolding platform, specifically a ladder with a safe means of access to the platform from the ladder. Climbing of the scaffold rungs is **STRICTLY FORBIDDEN.**

- 9. To prevent movement the scaffolding shall be secured to the structure at intervals not to exceed **30'** horizontally and **20'** vertically.
- 10. The use of shore or lean-to scaffolds is **prohibited**.
- 11. Manually propelled mobile scaffolding shall meet the following requirements:
- The height of free-standing towers shall not exceed four times the minimum base dimension.
- All casters shall be equipped with positive locking devices and in the locked position when employees are on the working platform.
- Scaffolding shall have all cross braces in position including a horizontal diagonal brace as closeto the bottom of the scaffold to ensure the scaffold is square.
- No employee shall be allowed to ride a mobile scaffold when scaffold is being moved.
- All work platforms will be planked solid, no matter what the height of the work platform.
- 12. All carpenter brackets, scaffolds platform shall consist of not less than **two (2) 2" x 10"** nominal size planks.
- 13. Employees working on suspended scaffolds shall wear a personal fall arrest system (PFAS) attached to an independent lifeline with a self-retracting lanyard (SRL).
- 14. All employees working on scaffold shall receive training prior to beginning work. The training program must include hazards (fall, electrical, falling objects), fall protection, use and load capacity. Retraining shall be required if scaffold type changes or any other deficiencies are determined by safety representative. Prior to erection, a competent person is to inspect all scaffolding and components.

- 15. When scaffolding erection has been completed, a competent person shall check the scaffolding and all its components to insure proper erection.
- 16. When angel wing type devices are used, employees will utilize personal fall arrest systems (PFAS) attached to independent structures, not the angel wing device.
- 17. A scaffold tag system shall be implemented stating if scaffold is complete or has deficiencies.
 - Red tagged scaffolds are scaffolds that are defective or incomplete. Red tagged scaffolds shall not be used.

- Yellow tagged scaffolds are scaffolds that may have missing or uneven decking, missing guardrails or gates due to obstructions.
 Yellow tagged scaffolds can be used but require 100% tie off.
- Green tagged scaffolds are scaffolds that are complete. All decking, gates, and guard rails are in place, and there are no defects to the scaffold. Green tagged scaffolds do not require fall protection.
- Green and Yellow scaffold tags must be updated daily, after inspection by a competent person, before they can be used.



Signs, Signals and Barricades

- 1. Signs, signals and barricades shall be visible at all times where a hazard exists.
- 2. Signs, signals and barricades shall be removed when the hazard no longer exists.
- 3. Barricades and warning lines are to be tagged showing ownership and contact information.
- 4. Where the general public is exposed to hazards, all signs, signals and barricades will be checked at the start of the work shift and at the end of the work shift.
- 5. When signs, signals and barricades are removed for short periods of time, a flagman shall be posted until signs, signals and barricades are replaced.

- 6. Prior to installing signs, signals and barricades along highway right of way, the proper authority will be contacted.
- 7. Flagman shall wear ANSI certified reflective/high visibility clothing while flagging.
- 8. Flagman at night will wear reflective material garments.
- 9. When hand signaling by flagman a red flag at least 18" sq. or a sign paddle will be used and in lowlevel light or a night, a red light.
- 10. When using a warning line system, the supervisors name and contact information shall be posted.



Stairways and Ladders

- 1. A stairway or ladder will be provided where there is a break in elevation of **19**" or more if no ramp, runway or sloped embankment will be provided.
- 2. When only one point of access between levels is provided, the access area **SHALL** be kept clear at all times.
- All metal pan landings and metal pan treads
 SHALL be filled either with concrete, wood or other solid materials prior to being put into use.
- 4. Stairways having 4 or more risers or rises more than **30**" whichever is less **SHALL** be equipped with a stair- rail system or a handrail system to enclose the stairway.
- 5. Stairrails shall be not less than 36 inches (91.5 cm) from the upper surface of the stairrail system to the surface of the tread.
- 6. Handrails shall be not more than 37 inches (94 cm) nor less than 30 inches (76 cm) from the upper surface of the handrail to the surface of the tread.
- 7. When the top edge of a stairrail system also serves as a handrail, the height of the top edge shall be not more than 37 inches nor less than 36 inches from the upper surface of the stairrail system to the surface of the tread.
- 8. The minimum clear distance between side rails for all portable ladders (this includes jobbuilt ladders) shall be **11 1/2"**. All ladder rungs must be uniformly spaced or meet OSHA/ANSI specifications.
- All spacer blocks on job built wooden ladders, SHALL be installed between each rung to include the bottom rung. **DO NOT** cut into the side rail to receive the ladder rung.

- 10. The top or top step of a stepladder **SHALL NOT** be used as a step along with any other step the manufacturer states to not use.
- 11. All non-self-supporting ladders shall extend **3'** above the landing and ladder will be secured to avoid displacement. Ladders shall be placed at a 4:1ratio.
- 12. Aluminum, metal type or wooden (other than job built) ladders are **prohibited**.
- 13. When descending or ascending a ladder, employee will face the ladder utilizing 3 points of contact.
- 14. Carrying tools or material up or down a ladder is prohibited.
- 15. A rope shall be installed at all ladders for the purpose of hoisting tools and materials.
- 16. All ladders shall be inspected each day prior to use. Any ladders that are damaged or defective shall be removed from service and tagged Out of Service/Do Not Use.
- 17. Each employee shall receive training in the following areas:
 - The nature of fall hazards
 - The correct procedures for erecting, maintaining and disassembling of fall protection systems
 - The maximum intended load carrying capacity of ladders
 - Ladders should be used for intended purpose, and not as walking planks, etc.
 - The contents of OSHA 1926.subpart X.

Steel Erection

- Prior to commencement of steel erection, written notification must be provided to the Erection Trade partner that the concrete footing, piers, walls or mortar in masonry piers and walls have attained either 75% of the intended minimum compressive design strength or sufficient strength to support loads imposed during steel erection. Test will be based on appropriate ASTM standard.
- 2. Prior to start of work activities a Fall Protection and a Fall Rescue plan must be submitted and approved by the project team.
- 3. Written notification of repairs, replacement or modifications to anchor bolts. All repairs, replacement, or modification must be approved by the project structural engineer of record.
- 4. Site layout plan will be established prior to steel erection and delivery. The site plan will address access roads for movement of trucks, cranes and other equipment, and will include a firm, properly graded, drained and readily accessible access to the storage area.
- Suspended loads shall be routed to minimize employee exposure to overhead hazards. Employees shall not work directly below a suspended load.
- Decking holes and openings shall not be cut until essential to the construction process. When holes and openings are cut into the decking, they shall be immediately protected with either covers or guard rails.
- 7. All employees performing work in the erection process and decking process shall be protected from falls at or above 6 feet.
- 8. During all steel erection and metal decking installation, when not in an aerial lift, Steel connection devices (SRLs) shall be used to

- connect to an anchor point. Synthetic SRLs, lanyards, and rope grab systems are prohibited during these activities.
- 9. All loads that are hoisted shall have a tag line attached, with no knots, in a manner that the employee receiving the load can control the load while not being under the suspended load.
- 10. Climbing of steel is strictly forbidden.
- 11. The riding of headache ball, hook, or load is strictly forbidden.
- 12. Safety latches on hooks shall not be deactivated or made in operable.
- 13. Before Flintco, LLC will accept control of the cable guardrail system installed by the steel erection trade partner, the following installation requirements must be met.
- 3/8" cable or larger shall be used and flags installed at 6' intervals.
- Each termination end of cable will have 2 clamps per end and shall have a torque to manufactures requirements
- The length of run of cable will be no more than 100' straight run, and will have at least one tension device for each cable top rail and mid-rail
- Erection trade partner will coordinate with Flintco, LLC for location of material feed points.
- The top rail will have no more than two inches deflection in any direction
- Documented sign off acceptance from the Flintco, LLC Superintendent.

See **OSHA 29 CFR 1926 Subpart R** for other regulations for steel erection. Refer to FCO Steel Erection Procedure Manual located on the Commons for additional steel erection procedures for self-perform work.

Tools Hand and Power

- All hand and power tools shall be inspected daily prior to use. Tools will be maintained in a safe condition (this includes employee furnished tools). Any tool which is not in compliance with any applicable requirement of this part is prohibited and shall be identified as unsafe by tagging or locking the controls to render them inoperable
- Guard(s) on tool(s) shall be in operating condition. Any employee operated tool that requires a guard shall not be removed, altered or in any manner render the guard inoperable. If an employee disregards the above requirements, the employee will <u>IMMEDIATELY</u> be dismissed from employment.
- Power operated hand tools shall be of the double insulated type or comply with the grounding requirements in OSHA CFR 1926 subpart K.
- 4. All cords on electrical power operated tools will be checked each day prior to use to ensure that the cord does not have damaged outer sheath insulation and that the ground pin is in place. Extension cords must be 12 gauge or larger and designated for hard or extra hard usage. Extension cords shall be ran six (6) feet overhead where practical.
- 5. All handheld circular saws, table saws, and radial arm saws shall be locked out by means of disconnecting the saw from power source and the male end of the cord tagged or in plain view of the operator at all times while changing the sawblade.

- 6. All pneumatic power tools and hoses shall be secured by a positive means at each connection. Whip checks shall be installed at all connections.
- 7. All fuel powered tools will be stopped, and motors will not be running while refueling is in progress. A fire extinguisher rated at not less than **10B** will be available for immediate use (within **5**' of fueling operation).
- 8. Only employees with appropriate experience or training will be allowed to operate power tools.
- Only employees who have received training by a powder actuated tool (P.A.T.) manufacturing representative and have in their possession a certification card will be allowed to operate powder actuated tools.
- 10. Compressed air hose connection fitting(s) shall be safety wired or protected with whip check device prior to use to avoid accidental disconnection which will cause a whipping action.
- 11. Sawhorses or work benches shall be utilized to secure material prior to using hand held circular saws, grinders, band-saws, drills and similar tools.

Welding - Cutting

- 1. Cylinders shall be in an upright position at all times.
- 2. A cylinder truck with steadying device shall be used while cylinders are in use.
- 3. When hoisting cylinders, they shall be secured on a cradle, sling board or pallet, **NEVER** use valve protection cap for lifting of cylinder.
- 4. Torches shall be lighted by a friction lighter. The use of matches, hot work or butane lighter to light a torch is **FORBIDDEN**.
- 5. Proper eye protection shall be used when welding and cutting. For welding operation, a flash shield shall be used when other employees may be exposed to flash and arc burn.
- 6. Prior to transporting cylinder, the gauges shall be removed, and valve protection caps will be in place.
- 7. Cylinders containing oxygen or acetylene, or other fuel gas shall not be taken into confined space. All work areas must be determined safe by a supervisor prior to hot work to make certain all procedures are used when evolution of hazardous fumes, gases, or dust is possible. Any welding, cutting or burning of lead base metals, zinc, cadmium, mercury, beryllium or exotic metals or paints not listed here shall have proper ventilation or respiratory protection.
- 8. Gauges, torches and hoses shall be inspected at the beginning of each work shift. Defective gauges, torches and hoses shall be taken out of service. Equipment operators must report equipment defects and discontinue use until it has been repaired or replaced

- 9. Only cables free of repairs and splices will be used for a minimum distance of **10'** from the cable end which the electrode holder is attached. All other cable may be spliced or repaired with rubber and friction tape, or other equivalent insulation.
- 10. A hot work permit must be filled out and posted in the work area prior to start of welding or cutting activity. This shall be filled out and signed by the trade partner performing this work, their supervisor or by Flintco, LLC.
- 11. A fire watch with proper fire extinguishing equipment shall be provided during all Hot Work activity. All supervisors, welders and fire watch shall receive documented training in the use of fire extinguishing equipment. A fire watch will remain in the work area 30 minutes after completion of hot work or until all embers are extinguished.
- 12. All fire hazards must be relocated prior to hot work. If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed. If the hazard cannot be relocated, then guards shall be used to confine the heat, sparks and slag and to protect the immovable fire hazards.
- 13. If at any time the welding cannot be conducted safely the welding and cutting shall not be performed.

Temporary Labor Service

Purpose

The purpose of this SOP is to (1) define the responsibilities of Flintco supervisors and the HSE department in requesting, coordinating and managing temporary workers; (2) outline the procedure for requesting Temporary Labor; (3) outline the procedure for Temporary Labor invoice processing; and (4) outline the means and methods of evaluation and oversight of temporary workers. This SOP shall be followed when utilizing workers provided by a Temporary Labor Service Provider.

Definitions

Temporary Labor

An employment arrangement where workers employed by a Service Provider are assigned to Flintco on a temporary basis to perform work as specified by Flintco.

Service Provider

Company providing workers for Temporary Labor.

Responsibilities

Flintco Supervisors

- Verify with Flintco Project Manager that a Temporary Labor agreement and all other required documentation is in place prior to requesting work.
- 2. Service providers shall provide on-site supervisors for all projects and activities using temporary workers.
- 3. Communicate in writing with Service Provider the skill level and/or training needed for the work to be performed.
- 4. Verify with Service Provider that temporary workers are adequately trained to perform the assigned job/task.

- 5. Temporary workers must receive annual orientation and jobsite specific orientation prior to work beginning.
- 6. Flintco supervision shall instruct the Service Provider supervisor that he/she must supervise and direct temporary workers as required for the scope of work being performed.
- 7. Flintco supervision shall assist Service Provider supervisor with preparation of pre-task plans, as needed. Pre-task plans must be reviewed with temporary workers prior to work being performed.
- 8. Confirm that Service Provider on-site supervisors and Flintco on-site supervisors participate in daily huddles prior to starting work.
- 9. Work execution should include teaming less experienced temporary workers with more experienced workers if available. After observing the temporary workers and competency has been determined, pairing may be adjusted, if necessary, in consideration of each worker's skill and experience.
- 10. Flintco supervisors are authorized to remove from the project any temporary workers who work in an unsafe way or put people or property at risk of injury or damage.

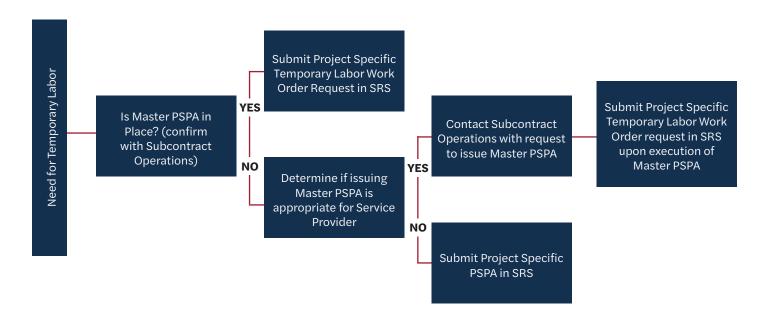
Procedure

Requesting Work - see flow chart below

- Verify that a Master Personnel Services Provider Agreement ("Master PSPA") approved by legal is in place prior to submitting Work Order request. (The Master PSPA is separate from the Work Order described below.)
- 2. If a Master PSPA is in place, submit a complete Work Order request for the Service Provider with a description of the scope of work to be performed, number of workers required, worker skill level and training required, tools/equipment to be provided, hours to be worked, and any other information relevant to the assignment in SRS to the Subcontract Operations department (reference the Appendix for a sample).
- Request a Service Provider on-site supervisor as part of the Work Order request.

- If no Master PSPA exists, determine if issuing a Master PSPA is appropriate for this Service Provider.
 - If a Master PSPA is appropriate, coordinate with Subcontract Operations to issue a Master PSPA.
 - If a Master PSPA is not appropriate, proceed with a project-specific Personnel Services Provider Agreement ("PSPA").
- 5. If a Master PSPA is not appropriate for the Service Provider, submit a project-specific PSPA request for the Service Provider with a description of the scope of work to be performed, number of workers required, worker skill level and training required, tools/equipment to be provided, hours to be worked, and any other information relevant to the assignment in SRS to the Subcontract Operations department (reference the Appendix for a sample).

Requesting Work Flow Chart



- 6. Request a Service Provider on-site supervisor as part of the PSPA request.
- 7. A fully executed project-specific Work Order or PSPA and approved certificate of insurance must be in place prior to beginning work with temporary workers.
- 8. Confirm Service Provider has provided documentation of each assigned worker's certifications, qualifications, and training. Instruct Service Provider to ensure all temporary workers report to jobsite office, Project Superintendent, or designated field supervision, prior to starting work.

Service Provider Payment – see Temporary Labor Agreement Invoice Processing – attached.

Means/Methods

- 1. All training provided by Flintco to temporary workers while working on Flintco projects must be documented and maintained by Flintco.
- 2. Temporary workers shall not perform any tasks for which they have not been trained or for which they do not have the requisite skill and knowledge.
- 3. Periodic worker evaluations shall be conducted for long term (more than one-year of continuous work) temporary workers to evaluate competency.

Coring, Cutting and Drilling

Purpose

The purpose of this SOP is intended for use in determining the precautionary measures and hazard identification when coring, cutting, or drilling into existing slabs or walls.

Note: Not to include saw cut expansion joints.

Definitions

Coring

Any work utilizing a coring bit or hole saw to penetrate and existing slabs or walls

Cutting

Any work utilizing a saw or blade to penetrate existing slabs or walls

Drilling

Any work utilizing a drill bit or hammer drill to penetrate existing slabs or walls

Competent Person

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

Responsibilities

Employees / Performing Contractor

- Walk and identify areas coring, cutting, or drilling will be performed
- Complete Method of Procedure (MOP), Pre-task Plan (PTP), and Coring, Cutting, & Drilling (CCD) permit; turn into Flintco Supt. or PM or HSE upon completion (Appendix A)

Flintco Supervisors

- 1. Submit MOP to Owner if applicable
- 2. Walk and identify areas coring, cutting, or drilling will be performed with the Performing Contractor
- 3. Confirm Ground Penetrating Radar (GPR) scan or schedule GPR scan to confirm utility locations
- 4. Review as-built drawings, BIM models and property owner to identify active line conflicts if applicable
- 5. Notify Owner of timeline for work to be performed if applicable
- 6. Review Performing Contractor's MOP, PTP and Coring, Cutting, & Drilling Permit

HSE Department

Coordinate and/or assist in appropriate response to Coring, Cutting, & Drilling

Procedure

Identify Slab Type and In-Slab / In-wall Utilities

- 1. If the slab is post-tensioned, identify tendon locations prior to performing work
- 2. Schedule GPR scan service, review as-builts, and overlay drawings
- 3. Layout utility locations that were identified in the area to be penetrated

Collect Information

- 1. Flintco, LLC Superintendent and Performing Contractor shall walk the proposed area
- 2. Review GPR Scans, as-built drawings, BIM models, and consult property owner to identify all utilities
- 3. Review Performing Contractor's submittals (MOP, PTP, CCD Permit, etc.)

Means / Methods

Determine what methods are to be used to identify existing utilities

- 1. Ground penetrating radar
- 2. As-built construction documents
- 3. BIM models
- 4. All energized sources shall be controlled as needed
- 5. Utilize appropriate fall protection when needed

Performing the Task

- Performing Contractor's competent person shall prepare a MOP & Pre-task Plan to review with Flintco Superintentent or PM or HSE prior to operations starting
- 2. Flintco confirms with Owner timeline to perform task
- 3. Performing Contractor's to protect adjacent surfaces, equipment, and materials
- 4. Utilize applicable silica controls per OSHA Table 1
- 5. Establish drop prevention plan for cores and tools
- 6. Immediate clean-up of area and adjacent surfaces that may have been affected by coring procedure

Complete Coring, Cutting, & Drilling Permit

Separate permits *must* be issued for each independent disturbance area.

- 1. Include drawing of the proposed area and drawings of as-builts
- 2. Attach BIM model if available
- 3. Required signatures
 - Performing authority
 - Authorizing / Issuing party
 - Either Flintco Superintentent or PM
 - HSE or OE/PE can be utilized if one of the above is not available

Coring, cutting, or drilling should not commence prior to obtaining all signatures.

Respiratory Procedure

General

- 1. This procedure is applicable to all Flintco employees. The guidelines set forth herein are designed to help reduce employee exposures to occupational dusts, fumes, mists, radon nuclide, gases, and vapors.
- 2. The primary objective of this procedure is to avoid employee exposure to contaminants above the Permissible Exposure Limit (PEL).
- 3. Respiratory protection through respirators is the last option. Before resorting to respirators, Flintco will make every reasonable effort to remove the respiratory hazards through engineering and administrative controls first.
- 4. Where feasible, exposure to contaminants will be eliminated by engineering controls (such as general and local ventilation, enclosure or isolation, and substitution of a less hazardous process or material). Administrative controls, (such as job rotations, limited exposure times, and sub scope to trade partner) should also be considered.
- 5. Flintco shall designate a program administrator who is qualified by appropriate training or experience commensurate with the complexity of the potential exposure to administer or oversee the respiratory protection program and conduct the required evaluations of program effectiveness.
 - The HSE Area Managers for each area will be the program administrator for their respective areas, unless a different program administrator is designated by Flintco.
- 6. Flintco will identify and evaluate the respiratory hazard(s) in the workplace. This evaluation shall include a reasonable estimate of employee

- exposures to respiratory hazard(s) and an identification of each known contaminant's chemical state and physical form.
- If Flintco cannot identify or reasonably estimate the employee exposure, Flintco shall consider the atmosphere to be Immediately Dangerous to Life and Health (IDLH). Documentation of air sampling hazard evaluation will be done per Flintco's "Hazard Communication" program and the health hazard inventory.
- 7. If project teams anticipate the need for respiratory protection, they should contact the HSE Department for guidance regarding the procedures required and the necessity of following the Respiratory Protection Program as outlined in OSHA 29CFR 1926.103 and 29CFR 1910.134.
- 8. Flintco will provide respirators to employees when the following conditions exist.
 - A process or operation requires respiratory protection to protect the health or safety of the employee. For example, respiratory protection is mandatory when effective engineering control measures are not feasible to reduce contaminant levels to applicable permissible exposure limits or when engineering control measures are being installed.
 - Respiratory protection is necessary to effectively control an employee medical condition such as allergy or hypersensitivity to chemical agents.
- Flintco will provide an appropriate respirator based on the hazard(s) to which the employee is exposed and workplace/ user factors that affect respirator performance and reliability.

- A NIOSH-certified respirator will be selected and issued per OSHA Table 1, NOISH, and SDS recommendations, based on the exposure.
- The respirator shall be used in compliance with the conditions of its certification.
- 10. Employees may not unilaterally determine whether or not use of a respirator is required for a particular task. Employees are not allowed to use respirators that have not been provided by Flintco. Hazards will be assessed to determine the level of protection needed. If it is determined that there is a need for a respirator Flintco will provide the respirator and determine if the employee is trained and medically fit to wear the respirator.

Medical Evaluation and Fit Testing

- Flintco employees will be qualified to use a respirator only after successful medical evaluation and fit testing respirator use training.
 - Medical evaluations, fit testing and training shall occur before first exposure, and at a minimum of annually thereafter.
 - Fit testing and training shall occur for each type, make, and model of respirator to be used.
 - Employees who are required to wear a respirator to perform their work will first undergo a medical evaluation to determine if they can perform the tasks requiring the use of a respirator.
 - Employees with medical conditions, including but not limited to, respiratory impairments, or who suffer from claustrophobia when wearing a respirator, will not be assigned to tasks requiring the use of respirators unless it has been determined by a physician that they are physically able to perform the work.
 - Non-qualified employees will receive the following temporary or permanent medical restriction: "Not medically qualified for work assignments requiring use of a respirator."

- Flintco will identify a physician or other licensed health care professional (collectively, "LHCP") to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire in the OSHA 29 CFR 1910,134 Appendix C.
- Flintco will ensure that a follow-up medical evaluation is provided for an employee who gives a positive response to any of the questions 1-8 in OSHA 29 CFR 1910.134 Section 2, Part A of Appendix C or whose initial medical examination demonstrates the need for a follow-up examination.
- Additionally, Flintco will provide medical evaluations if:
 - An employee reports medical signs or symptoms that are related to their ability to wear a respirator.
 - Information from the questionnaire, including observations made during fit testing and program evaluation, indicates a need for employee reevaluation; or
 - A change occurs in workplace conditions (e.g., physical work effort, protective clothing, temperature) that may result in a substantial increase in the physical or physiological burden placed on an employee.
- 2. The medical questionnaire and examination will be administered confidentially during the employee's normal working hours or at a time and place convenient to the employee. The medical questionnaire shall be administered in a manner that ensures that the employee understands the content. A translator will be provided by Flintco when needed.
- 3. The following information should be provided to the LHCP before a recommendation concerning an employee's ability to use a respirator:
 - The type and weight of the respirator to be used by the employee.

- The duration and frequency of respirator use (including use for rescue and escape).
- The expected physical work effort.
- Additional protective clothing and equipment to be worn.
- Temperature and humidity extremes that may be encountered.
- Any supplemental information provided previously to the LHCP regarding an employee will not be provided for a subsequent medical evaluation if the information and the LHCP remain the same.
- 4. Flintco will provide the LHCP with a copy of this written procedure.
- 5. If Flintco replaces a LHCP, we will ensure that the new LHCP receives all relevant information concerning an employee's ability to use a respirator. However, employees will not be medically reevaluated solely because a new LHCP has been selected.

- 6. In determining the employee's ability to use a respirator, Flintco will:
 - Obtain a written recommendation regarding the employee's ability to use the respirator from the LHCP. The recommendation shall provide only the following information:
 - Any limitations on respirator use related to the medical condition of the employee or relating to the workplace conditions in which the respirator will be used, including whether the employee is medically able to use the respirator.
 - The need, if any, for follow-up medical evaluations.
 - A statement that the LHCP has provided the employee with a copy of the LHCP's written recommendation.

TESTING / CHECK TYPES

Pulmonary Function Testing (PFT)

As part of the medical evaluation, a complete evaluation of the respiratory system including patient history, physical examination, and tests of pulmonary function shall be performed. The primary purpose of pulmonary function testing is to identify the severity of pulmonary impairment.

Qualitative Fit Test

A qualitative respirator fit test will be used to determine the ability of the wearer to demonstrate a satisfactory fit with a negative-pressure and a positive-pressure respirator with face piece. This test relies on senses to detect leaks.

Quantitative Fit Test

A quantitative respirator fit test will be used to determine the ability of the wearer to demonstrate a satisfactory fit with a negative-pressure and a positive-pressure respirator with face piece. This test relies on a machine to detect leaks.

Negative-Pressure Fit Check

To perform a negative pressure fit check, the inlet opening of the respirator's canister, cartridge, or filter should be closed off by covering it with the palm of the hand, replacing the inlet seal on the canister, or squeezing the breathing tube or blocking its inlet so it will not allow the passage of air. The wearer should then inhale gently and hold his/her breath for at least ten seconds. If the wearer can hold the mask against his/her face during this time without the straps attached, then it can be reasonably assumed the respirator fit is satisfactory.

Positive-Pressure Fit Check

To perform a positive pressure fit check, the exhalation valve is closed off and the wearer exhales gently. The fit of a respirator equipped with a face piece is considered satisfactory if a slight positive pressure can be built up inside the face piece without the detection of any outward leakage of air between the sealing surface of the face piece and the wearer's face.

Respirator Selection

- This section provides information essential
 to selecting the appropriate respirator for
 specific hazardous situations. The employee
 will be allowed to select the most comfortable
 respirator face piece from a selection of various
 sizes.
- 2. Determine the applicable permissible exposure limit by reviewing the Safety Data Sheet (SDS); Occupational Safety and Health Administration (OSHA) standard for air contaminants OSHA Title 29, Code of Federal Regulations, part 1910.1000; or the latest edition of the American Conference of Governmental Industrial Hygienists publication entitled Threshold Limit Values and Biological Exposure Indices.
- 3. Review the requirements of Table 1 in Flintco's Silica Program in the HSE Manual.
- 4. Respirator selection will be based on the following criteria.
 - Oxygen Deficiency: For atmospheres containing less than 19.5% oxygen, eliminate all air-purifying respirators from consideration.
 - Poor Warning Properties of the Contaminant: Eliminate all air-purifying respirators from consideration for substances with poor warning properties.
 - Eye Irritation: For routine work, any perceptible eye irritation is considered unacceptable. Only full-face piece respirators, or half-mask respirators with eye protection, are permissible for contaminant concentrations that produce eye irritation.
 - Systemic Poison Contaminant: If the contaminant is a systemic poison, eliminate single-use or disposable respirators from consideration.

- Particulate or Asbestos: For particulates with a permissible exposure limit less than 0.05 milligrams per cubic meter, or for asbestos, eliminate negative-pressure respirators except those with high efficiency particulate filters.
- Other Considerations: Select the best respirator by considering the capabilities and limitations of the respirators, and applicable substance-specific or process-specific requirements (table 3-4).

TABLE 3: PROCESS-SPECIFIC RESPIRATORY PROTECTION REQUIREMENTS			
Specific Process	Required Respirator		
Working with materials that contain Crystalline Silica	Air-Purifying Respirator with an APF of 10 or 25, reference Table 1 of the silica standard for proper APF required		
Sandblasting	Supplied-Air Respirator		
Brush/Roller painting and Spray painting	Air-Purifying Respirator with paints, lacquer, enamel mists, and organic vapors cartridge (1000 ppm)		
Herbicide and Pesticide application	Air-Purifying Respirator with pesticide cartridge		
Welding and cutting operations in confined spaces without mechanical ventilation	Supplied-Air Respirator		
Welding and cutting operations in confined space with mechanical ventilation and >19.5% oxygen level.	Air-Purifying Respirator with dust, fumes, and mists cartridge		
Confined space entry or rescues into unknown or potentially hazardous atmospheres.	Positive-Pressure Supplied-Air Respirator		

TABLE 4: AIR PURIFYING RESPIRATORY CARTRIDGE SELECTION			
Atmospheric Contaminants	Color Codes on Cartridges		
Chlorine	White		
Sulfur Dioxide	White		
Chlorine Dioxide	White		
Organic Vapors	Black		
Paint, Lacquer, Enamel Mists, Pesticides, Dust & Fumes	Black with prefilter and retainer		
Ammonia/Methylamine	Green		
Formaldehyde & Organic Vapor	Brown		
Chloride	Yellow		
Hydrogen Chloride	Yellow		
Sulfur Dioxide	Yellow		
Organic Vapors	Yellow		
Hydrogen Fluoride	Yellow		
Radioactive Materials	All color-coded cartridges will work		
Asbestos Containing Dusts	With HEPA filter and		
and Mists	adapter		
*Cartridges do not protect against IDLH conditions and are			

*Cartridges do not protect against IDLH conditions and are limited to the concentrations of the contaminants specified.

5. Types of Respiratory Protective Equipment

Nuisance Dust Mask | No Medical Evaluation or Fit Test Required

Paper filter dust masks offer protection against low levels of airborne nuisance dusts, but do not provide protection against mist, vapors or metal fumes.

N95 Mask (Air Purifying Respirator) | Medical Evaluation, Fit Test, and Training Required

A N95 respirator shall only be used in situations where a particulate APF of 10 is required, per NIOSH, Table 1, or SDS.

Half Mask, Full Face Mask (Air Purifying Respirator) | Medical Evaluation, Fit Test, and Training Required for Each Type

- A half mask respirator shall only be used in situations where an **APF of 10** is required, per NIOSH, Table 1, or SDS.
- A full face respirator shall only be used in situations where an APF up to 50 is required, per NIOSH, Table 1, or SDS.
 - Half Mask and Full Face Mask respirators afford protection against concentrations of certain airborne dusts, acid gases and organic vapors utilizing various filtering and/or chemical agents to purify the inhaled air.
 - Particulate or chemical cartridge (halfmask or full face) shall not be used for protection against:
 - Atmospheres that are oxygen deficient.
 - Gaseous material that is extremely toxic in small concentrations (hydrogen, cyanide, and sulfide).
 - Exposure to harmful gaseous material that cannot be detected by odor (carbon monoxide).
 - Gaseous material in concentrations that are highly irritating to the eyes.

Air-Supplied Hood | Medical Evaluation, Fit Test, and Training Required -The air-supplied hood is normally used where the user only requires protection against levels of material or requires airflow for cooling purposes and shall not be used in any situation where the user would be endangered by airborne contaminants.

Airline Respirator | Medical Evaluation, Fit Test, and Training Required

- The airline respirator consists of a fullface mask supplied with breathing air by a compressor or multiple stationary cylinders.
- The airline respirator will provide protection in any atmosphere regardless of the degree of contamination.

- Whenever an airline respirator is issued in an atmosphere Immediately Dangerous to Life and Health (IDLH), a rope shall be attached to the harness and a standby person or persons shall be present with rescue equipment. A five-minute escape pack shall also be provided to the employee.
- Care must be exercised to prevent damage to the hose and regulator while in use, and the assembly shall be stored in such a way that damage will be avoided.

Cylinder-Type Self-Contained Breathing Apparatus | Medical Evaluation, Fit Test, and Training Required

- The self-contained breathing apparatus uses compressed breathing air and will provide respiratory protection in any atmosphere regardless of contamination or level of oxygen.
- When anticipating the use of this apparatus, consideration shall be given to the life of the cylinders. Although this equipment should provide breathing air for approximately 30 minutes, excessive physical work, emotional stress and other factors will reduce the rated time.
- Users of this equipment shall immediately begin exiting the hazardous atmosphere when the low pressure alarm sounds. A fiveminute escape pack shall also be worn by the employee.
- Whenever compressed-air apparatus is used in an atmosphere immediately dangerous to life, a standby person or persons shall be present with suitable rescue equipment.

Maintenance and Care of Respiratory Protective Equipment Inspection for Defect

- 1. All respiratory protective equipment shall be inspected routinely before and after each use.
- 2. Spare breathing air cylinders shall be maintained at a minimum of 1800 pounds pressure except when depleted during use.

- The regulator and any warning devices shall be tested during inspections to determine if they function.
- 3. Inspection of equipment shall include a check of the tightness of connections.
- 4. Equipment that is not routinely used but is kept ready for emergency use shall be inspected after each use and at least monthly to ensure that it is in satisfactory working condition. The Emergency Respiratory Protective Equipment Monthly Inspection Report shall be completed by each applicable project, and a copy shall be forwarded to the Safety Department by the last day of the month.

Cleaning of Respiratory Protective Equipment

- 1. Equipment issued for routine use by one person shall be cleaned and inspected by the wearer after each day's use.
- 2. Equipment maintained for emergency use shall be cleaned and disinfected after each use by the users.

Repair of Respiratory Protective Equipment

Flintco shall ensure that respirators that fail an inspection or are otherwise found to be defective are removed from service and are discarded or repaired or adjusted in accordance with the following procedures:

- Repairs or adjustments to respirators are to be made only by persons appropriately trained to perform such operations and shall use only the respirator manufacturer's NIOSH-approved parts designed for the respirator.
- 2. Repairs shall be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed; and
- 3. Reducing and admission valves, regulators and alarms shall be returned to the manufacturer, or a technician trained by the manufacturer.

Storage of Respiratory Equipment

- 1. Dust Masks and N95 Masks shall be thrown away and replaced after each use.
- Respiratory protective equipment shall be stored to protect against dust, sunlight, heat, extreme cold, excessive moisture or damaging chemicals.
- 3. Respiratory protective equipment placed in a work area shall be stored in clearly marked compartments that are quickly accessible at all times.
- 4. Respiratory protective equipment shall be stored so that the face piece and exhalation valve will rest in a position and function will not be impaired by the elastometer becoming set in an abnormal position.
- Respiratory protective equipment shall not be stored in places such as lockers or toolboxes unless the equipment is protected in cases or cartons.

Training

- 1. Employees who are required to wear a respirator will be trained to ensure proper use of respirators. Training will be provided to employees before they perform the tasks requiring a respirator, and annually thereafter.
- 2. Training shall include:
 - The reasons for respiratory protection.
 - The nature, extent, and effects of respiratory hazards to which the person may be exposed.
 - Why engineering controls have not been applied, or what engineering control efforts are in progress.

- Why a respirator has been selected for a specific respiratory hazard.
- The operation, capabilities, and limitations of the respirator selected.
- How maintenance and storage is carried out.
- How to recognize and cope with emergency situations.
- Instructions, as needed, for special respirator use.
- Applicable regulations concerning respirator use.
- Instructions and training on how to wear a respirator, including practice demonstrations, will be given to each user and will cover the following:
 - Donning, wearing, and removing the respirator.
 - Adjusting the respirator so the inlet covering is properly fitted on the wearer and the respirator causes a minimum of discomfort to the user.
 - Allow the respirator user to wear the respirator in a safe atmosphere for an adequate time period to ensure familiarity with its operational characteristics.
 - Provide the user an opportunity to wear the respirator in a test atmosphere. A test atmosphere is any atmosphere in which the user can carry out activities simulating work movements to detect respirator leakage or malfunction.

To ensure an effective respiratory protection program, HSE Department representatives will monitor and evaluate various operations to assure that respiratory protective equipment is properly selected, used, cleaned, and maintained. Anyone desiring assistance with this procedure should contact the HSE Department.