ELBOW GREASE ENTERPRISES, LLC

"Safety In All We Do"

SAFETY & HEALTH MANUAL

ELBOW GREASE ENTERPRISES, LLC

10/1/2022

Version 1.00

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Section 1: Safety and Health Plan Basic Principles

Elbow Grease Enterprises, LLC (EGE) is committed to the safety and health of each person on our jobsites. It is our priority that every person on a jobsite goes home safe, every day.

Management Commitment and Responsibilities

Our safety culture is achieved through **mindfulness of safety in everything we do** and collaboration and cooperation of employees, subcontractors and their respective management. Management provides the resources for our safety program, and is committed to the following general responsibilities:

1. To provide a work environment that protects everyone from occupational injuries and illnesses.
2. To design, implement, and monitor company safety policies and procedures.
3. To lead annual reviews in company safety programs and procedures, and to make corrections and improvements as necessary.
4. To provide methods for feedback and input on company safety and health programs.
5. To ensure that periodic work hazard assessments are conducted.
6. To set safety and health improvement goals and create action plans for achieving those goals.
7. To clearly establish the safety and health responsibilities of all persons on our jobsites.
8. To provide required safety and health training.
9. To include safety and health as part of periodic evaluations.
10. To ensure that visitors receive appropriated training on the hazards they will be exposed to.
11. To ensure that contractors have a commitment to safety excellence and meet the same requirements of company safety programs.
12. To provide recognition to those who demonstrate outstanding commitment to safety and health.
13. To ensure that, during the bidding and solution development phase of every project, safety and health of those working on the job-site is considered and adequate resources are allocated to the job cost to accomplish this goal.

Employee & Subcontractor Commitment and Responsibilities

Employees and subcontractors are necessary stakeholders in ensuring workplace safety. Total involvement in all aspects of jobsite safety is critical. **Those closest to the work processes have the best information, so they must actively communicate with management to facilitate proactive solutions to safety problems**. We must collectively be committed to the following responsibilities:

1. To immediately stop work in any instance where safety or health is in jeopardy.
2. To follow company safety and health policies and procedures.
3. To complete necessary training before performing work.
4. To use required personal protective equipment.
5. To inform management of safety and health concerns.
6. To provide input and feedback to company safety and health policies.

Company Profile

Company Name	Elbow Grease Enterprises, LLC (EGE)
Owner or President	Tiffany Melvin
Main Phone	214-544-6620
Website	www.ege-llc.com
Signature	

On-Site Responsible Person (OSRP)

Given that our worksites can change from day to day, or even intraday, we follow the concept set forth by OSHA with the "Competent Person". OSHA defines that concept as "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." 29 CFR 1926.32(f)

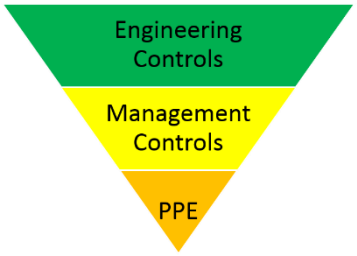
EGE designates all management and each onsite representative, lead, supervisor or superintendent as its On-Site Responsible Person (OSRP).

Analysis of Workplace Hazards

EGE employees and subcontractors will perform a baseline hazard survey of each work site at the beginning of each project and periodically as the areas are transformed.

This function is to be accomplished using a job hazard analysis process. All hazards found in these surveys are to be mitigated, eliminated or controlled. When dealing with workplace hazards, the company's hazard management priority is as follows:

1. Engineer out the hazard.
2. Change the work process to eliminate the hazard.
3. If the hazard cannot be eliminated through engineering or work controls, provide employees with proper personal protective equipment and training.



The hazard control hierarchy

Work processes and hazards are both constantly changing. To ensure safety and protection, new hazard analysis will be performed as work processes, equipment, and environments change. Those on-site will participate in these hazard assessments, which will be reviewed by management. Work will not be allowed to continue until these hazards are properly addressed.

Reporting Safety Concerns

Safety hazards must be reported immediately. Employees and subcontractors must report hazards or concerns to their supervisor and/or the OSRP. A report may be written or verbal but is the responsibility of the supervisor or OSRP to ensure the concerns are recorded. The report will be entered into a safety log, where it will be tracked until the safety concern has been corrected. Serious safety concerns that immediately affect employees must be dealt with quickly. Work must be stopped until the problem is rectified.

EGE encourages employees and subcontractors to report their safety concerns. Anyone can submit a safety concern by sending an email to safety@ege-llc.com. The company has a strict no-retaliation policy. Suggestions are valuable for the improvement of safety, and anyone can make suggestions without fear of reprisal or complaint.

Safety Concern Submission Methods	
#	**Method**
1	Report concern to your immediate supervisor.
2	Submit a report to the safety suggestions email at safety@ege-llc.com

3	Email the COO at jason@ege-llc.com
4	Contact the company CEO & President at tiffany@ege-llc.com

Safety Time Outs

Anyone on the job site, employee, subcontractor or client, can stop all work by simply calling a "safety time out." When a safety time out is called, all work must stop until a supervisor addresses the concern and verifies that the problem has been corrected.

Safety Incident Investigation

Any near miss, first aid incident, or accident is investigated. All investigations have as a goal the identification of the root cause of the accident, rather than assigning blame.

In the event of a workplace accident, the scene should be photographed and conditions noted. In the event of multiple hospitalizations or fatality, the scene should be preserved for OSHA. This process should be followed:

- Preserve the accident scene
- Notify the OSRP
- Inspect all equipment and review preventative maintenance records
- Take photographs
- Draw sketches
- Record measurements to include weight of material involved, lighting, temperature and time of day
- Complete the Accident Investigation Form in Appendix A and submit to the COO.

Near Miss Accidents

Near miss accidents should be reported and an Accident Investigation Form in Appendix A should be submitted to the COO and OSRP.

Annual Incident Review

As part of the annual safety and health program evaluation, management and selected employees will review all near misses, first aid incidents, and entries on the OSHA 300 Log, as well as employee reports of hazards, to determine if any pattern exists that can be addressed. The results of this analysis are considered in setting the goal, objectives, and action plans for the next year.

Maintenance Program

Properly functioning equipment is a critical component of the company safety plan. Scheduled maintenance plans are used to ensures that the worksite and all machinery is cared for properly so that the environment remains safe and healthy. If maintenance needs exceed the capability of the worksite employees, contract employees are hired to do the work and are screened and supervised to ensure they work according to the site's safety and health procedures.

Discipline Policy

Everyone is accountable for safety and each person is held accountable for obeying company safety and health rules. The following four step disciplinary policy will be applied to everyone by their supervisor.

1. **Verbal Warning** - The supervisor will provide a verbal warning to the employee for failing to adhere to a safety policy.
2. **Written Reprimand** - A reprimand will be written by the supervisor and discussed and signed by the employee. The reprimand will be placed in the employee file.

3. **Suspension** - The employee will be suspended without pay for an amount of time determined by management.
4. **Dismissal** - The employee's employment will be terminated.

Employee discipline will typically occur in the order listed above. However, depending on the severity of the infraction, management may decide to skip steps in the process. Any willful violation of policy that places the safety of any employee at risk may result in immediate dismal. Visitors, including contractors who violate safety and health rules and procedures, will be asked to leave the facility immediately.

Emergency Action Plans

EGE and the OSRP will prepare an emergency action plan for potential emergencies and communicate the requirements of these plans to those on-site. The company works with appropriate outside agencies, such as the fire department, the police department, and the hospital to write emergency plans for all potential emergencies, including:

1. Fire.
2. Explosions.
3. Severe Weather.
4. Loss of Power.
5. Bomb Threats.
6. Chemical Spills.
7. Other Potential Emergencies

Emergency Action Plans have been created for potential emergencies.

Each type of emergency will be practiced at least once a year. A total site evacuation drill focusing on one emergency type, with all work shut down, and coordinated with the appropriate agency, is conducted once a year. Each drill, whether simulated or actual evacuation, is evaluated by the drill planning committee, constituted each year with two managers or supervisors and two employee volunteers. When necessary, the emergency procedures are revised because of the evaluation report.

Emergency Exit Routes

The OSRP will ensure that the jobsite has sufficient exit routes for both normal use and emergency evacuation. Exit routes will be clearly marked, and they will conform to OSHA and NFPA requirements. The company will periodically audit the exit routes to assure conformance.

First Aid and Medical Emergencies

The company evaluates the need for first aid trained employees and ensures that there are enough to meet the needs of the facility. Onsite during all shifts designated persons fully trained in cardiac pulmonary resuscitation (CPR), first aid, and the requirements of OSHA's Bloodborne Pathogen Standard, are the first responders to any emergency.

In the event of a medical emergency that requires more than first aid, employees should immediately **call 911** and report the emergency to a supervisor.

Medical Surveillance

For work hazards that require medical surveillance, such as hearing and respiratory protection, the company will provide monitoring. Medical health professionals, working on contract for the site, examine health surveillance data to discern changes in overall employee health screening results to discern any trends that need to be addressed. Health professionals, appropriately trained and knowledgeable about site hazards, immediately treat employees for occupational health problems and follow each case until the individual can return full-time to all aspects of his assigned job.

These professionals ensure that employee medical records are kept confidential so that diagnosis and treatment are not divulged, but management does have information about the employee under treatment as to:

1. Ability to perform job tasks.
2. Job limitations or accommodations needed.
3. Length of time the limitations must be implemented.

Management ensures that supervisors honor these restrictions. This health care is provided free of charge for all employees. The total plan is reviewed annually to assess its effectiveness.

Physical Fitness

All those on a jobsite have a responsibility to themselves to remain in adequate physical condition to perform the necessary functions of the task. If anyone feels unfit or unwell or unable to perform the essential functions of your job, it is your responsibility to report to the OSRP to mitigate risk to yourself and others. It is expected that all those actively working on a job site can lift 50 lbs.

Safety Training Requirements

Proper training is the key to employee safety. Management believes that employee involvement in the site's safety and health program can only be successful when everyone on the site receives sufficient training to understand what their safety and health responsibilities and opportunities are and how to fulfill them. All training time will be paid according to normal company work hour's policy.

Minimum Standards

At a minimum, training will include:

- New Employee Orientation
- New Project Orientation
- New Program Orientation
- Weekly "toolbox" meetings – these meetings are to be held regardless of the nature of the work being performed.
- Supervisor and On-Site Responsible Person (OSRP) training
- Task specific training as determined by the specific circumstances
- OSHA required training
- OSRP training to identify workplace drug and alcohol impairment

- Personal safety training

Company Safety Orientation

All new employees receive a safety and health orientation before they begin work. This training will include a review of all the company safety policies. New employees will not be permitted to work without direct oversight from an experienced employee until they have completed all required safety training and the area supervisor has deemed the competent to perform work on their own.

The safety orientation program will include:

1. The company safety mission statement.
2. The process of identifying, eliminating, and managing hazards.
3. A basic understanding of safety regulations.
4. The purpose and proper use of safety time outs.
5. The prevention of slips, trips, and falls in the workplace.
6. The labeling and safety data sheet requirements for chemicals in the workplace.
7. Common personal protective equipment requirements.
8. The company policy on roughhousing and horseplay.
9. The safe use of mobile phones.
10. The company smoking policy.
11. A basic understanding of the purpose of lockout tag out.
12. Location of first aid kits
13. The importance of good housekeeping.
14. Basic fire prevention techniques.
15. Emergency actions in the event of a fire.
16. How to report safety concerns.
17. How to report injuries.
18. The company disciplinary policy for safety violations.

Additional safety requirements as necessary.

Job Specific Safety Training

In addition to the company orientation safety training, employees will be required to complete training on the various topics that are required as part of their work assignment. Their immediate supervisor is responsible for assigning this training as described in the training matrix. The employee will not be permitted to work until the requisite training is completed.

Specialized Equipment

Only those who have the necessary experience or receive the necessary training may operate specialized or hazardous equipment as determined by the OSRP.

Subcontractor Safety Pre-Qualification

Subcontractors safety are pre-qualified using the form in Appendix B.

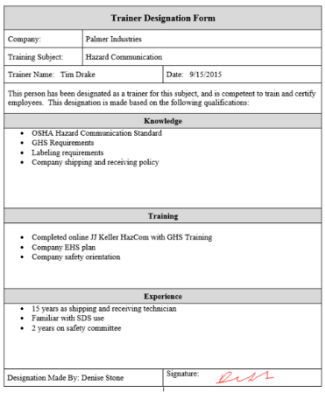
Periodic Training

The company will provide training events, at least monthly, that cover the relevant safety topics of the workplace. The training plan will be scheduled so that employees meet all refresher requirements for their safety training. Management will solicit suggestions from employees for timely and relevant training events.

Designating Trainers

Management will designate trainers for the company training program. All trainers must be:

1. Designated by management.
2. Skilled at communicating important safety concepts to employees.
3. Experts in their area of work.
4. Able to recognize the hazards of the workplace and take steps to mitigate those hazards.
5. Sufficiently qualified to train employees as determined by the relevant OSHA standards.



Trainer Designation Form

Company:	Palmer Industries
Training Subject:	Hazard Communication
Trainer Name: Tim Drake	Date: 9/15/2015

This person has been designated as a trainer for this subject, and is competent to train and certify employees. This designation is made based on the following qualifications:

Knowledge

- OSHA Hazard Communication Standard
- GHS Requirements
- Labeling requirements
- Company shipping and receiving policy

Training

- Completed online JJ Keller HazCom with GHS Training
- Company EHS plan
- Company safety orientation

Experience

- 15 years as shipping and receiving technician
- Familiar with SDS use
- 2 years on safety committee

Designation Made By: Denise Stone	Signature:

Trainers will be designated in writing.

Company Safety Policy Review

The company safety policy will be reviewed at least annually cooperatively by both management and employee representatives. The reviewers will consider:

1. The rate of injury and illnesses in the workplace.
2. The effectiveness of written safety policies.
3. The effectiveness of company safety training.
4. The overall company safety culture.

Once the review has been completed, the group will make recommendations for improvements and assist management in setting the next year's safety and health goals. Recommendations will be presented to management and made available to employees for review.

Site Audits

EGE routinely audits work sites for safety and health compliance in accordance with this manual, OSHA and other applicable regulations.

Section 2: OSHA Injury and Recordkeeping Program

Purpose

The purpose of the Injury and Illness Policy is to record all work-related injuries and illnesses. The company is committed to providing a safe work environment for all employees. Any identified causes of these injuries will be immediately corrected. All company employees and any outside workers that are supervised by company employees are covered by this program. The OSHA recordkeeping program is for data recording only and is separate from the company's incident investigation and correction program.

Program Coordinator

The COO oversees the company injury and illness recordkeeping program. The responsibilities of the coordinator are as follows:

1. Maintain the OSHA 300 Log.
2. Review and file all OSHA 301 Incident Report Forms.
3. Complete the OSHA 300A Annual Summary every January.
4. Assist managers with to determine if injuries are work related.
5. Provide training to managers and employees on the company injury and illness reporting policies.

Determination of Work-Relatedness

An injury or illness will be considered work related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a preexisting injury or illness. Work-Relatedness is presumed for all events or exposures that occur in the work environment, unless an exception specifically applies.

Working from Home

Injuries or illnesses that occur while an employee is working at home, including work in the home office, will be considered work-related if it occurs while the employee is working for pay, and the incident is directly related to the performance of that work. Injuries or illnesses that are caused by the general home environment and are not related to work will not be considered work-related.

Travelling Employees

An injury or illness that occurs while the employee is in work-related travel status will be considered work-related. This includes injuries that may occur in the airport or other

travel location. Injuries or illnesses that occur in the hotel room or temporary residence will not be considered work related. If the employee takes personal side trips, any injury or illness that occurs there will not be considered work related.

Types of Injuries and Illnesses

Any injury or illness must meet one of the following criteria for it to be considered recordable.

1. General Criteria
    a. Death
    b. Days away from work (other than the day of the incident)
    c. Restricted work or job transfer
    d. Medical treatment beyond first aid
    e. Loss of consciousness
    f. A significant injury or illness diagnosed by a licensed health care professional.
2. Needlesticks and Sharp Injuries
    a. All work-related needlesticks will be recorded. Cuts from sharp objects that are contaminated with blood or other potentially infectious material must be recorded.
3. Medical Removal
    a. If an employee is removed from the workplace due to a medical surveillance requirement (such as lead exposure monitoring), the case will be recorded.
4. Occupational Hearing Loss
    a. Any employee who experiences a standard threshold shift and demonstrates a hearing level 25 decibels above audiometric zero in the same ear will be recorded as a recordable injury. If this occurs, the case will be entered in the OSHA 300 Log and referred to the company's Occupational Noise coordinator.
5. Tuberculosis

If any employee has been exposed in the workplace to someone with an active case of tuberculosis, and that person develops the disease, it will be recorded. If the cause of the infection is determined to originate from outside the workplace, it is not a recordable event.

Procedure for Submitting Work-Related Injuries and Illnesses

Supervisor or OSRP Actions

1. Any employee who has a work-related injury or illness must immediately report it to his or her supervisor or OSRP. The supervisor or OSRP will consult the injury and illness decision flowchart to determine if this is a recordable event.
2. If the case is determined to be recordable, the supervisor will complete an OSHA 301 Injury and Illness Report and submit it to the OSHA Recordkeeping Coordinator.
3. The supervisor will also complete an incident report form and submit it to management for further investigation and root cause analysis.

Recordkeeping Coordinator Actions

1. Upon receiving an OSHA 301 Form, the Coordinator will review it for accuracy.
2. Once verified, the Coordinator will enter the information into the OSHA 300 Log.
3. For cases with days away from work, restricted or transferred, on the day after the injury or illness occurs, all days will be counted, including weekends and holidays. This count will stop at 180 days, or if the employee leaves the company for a reason unrelated to the injury or illness.
4. The OSHA 301 Injury and Illness Forms will be filed with the OSHA 300 Log.
5. The Coordinator will contact the COO to ensure that an in-depth investigation of the event is occurring, and that the cause will be identified and eliminated.

Privacy Cases

The following categories are considered to be "Privacy Cases." For these cases, the employee name will not be entered into the OSHA 300 Log. Instead, the Coordinator will enter "Privacy Case" for the name.

1. An injury or illness to an intimate body part or the reproductive system.
2. An injury or illness resulting from a sexual assault.
3. Mental illnesses.
4. HIV infection, hepatitis, or tuberculosis.
5. Needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material.
6. Other illnesses, if the employee voluntarily requests that his or her name not be entered on the log.

Annual Summary

Every year in January, the Coordinator will review the OSHA 300 Log and verify that all entries are complete, accurate, and up to date. Any discrepancies will be corrected. The Coordinator will complete the OSHA 300A Summary of Work Related Injuries and Illnesses.

Summary Certification

The annual summary will be certified by the CEO & President. The certifier will sign the OSHA 300A form declaring it the official document.

Annual Summary Posting

Once certified, the annual summary will be posted for employee review on the company intranet. This information will be posted from February 1st to April 30th of each year.

Employee Review of Records

OSHA 300 Log

The company will allow any employee or authorized representative to review the OSHA 300 Log. This information will be provided by the end of the next business day after it is requested.

OSHA 301 Injury and Incident Report Forms

The company will allow any employee or authorized representative to review OSHA 301 Forms that describe an injury or illness that pertain to that employee. This information will be provided by the end of the next business day after it is requested.

Record Retention and Updating

The OSHA 300 Log and OSHA 301 Injury and Illness Report Forms will be retained for at least five years following the end of the calendar year the records cover. The Coordinator will keep the OSHA 300 Log current to reflect any changes in classification of injuries or illnesses.

Reporting Fatalities or Catastrophes

Any fatality will be reported within eight hours to OSHA. Any hospitalization, amputation, or loss of an eye must be reported within 24 hours. The Coordinator will contact OSHA by calling 1-800-321-OSHA.

Employee Training

All employees will be trained on how to identify workplace injuries and illnesses, and the proper process for reporting them.

Section 3: Job Hazard Analysis

Purpose

The identification, elimination or management of hazards in the workplace is the primary function of the company safety program. The company is committed to providing a safe working environment for all employees and will perform job hazard analysis on every common work task. Once the safety hazards have been identified, the company will take steps to eliminate or manage the hazard.

Program Responsibilities

Management & OSRP's

Management has the following responsibilities:

1. To establish guidelines for job hazard analysis.
2. To ensure that employees are provided with the proper tools and resources to perform job hazard analysis.
3. To identify company employees who have the knowledge and competence to conduct job hazard analysis.
4. To provide training to employees who have been selected as part of the company job hazard analysis program.
5. To respond quickly and correct hazards that are identified in a job hazard analysis.
6. To ensure the company is operating in accordance with this policy by performing periodic reviews and audits.
7. To review this safety policy for effectiveness periodically and when program deficiencies are discovered.

Job Hazard Analysis Coordinator

The company Job Hazard Analysis Coordinator role is currently assumed by the COO. The Job Hazard Analysis Coordinator has the following responsibilities:

1. To administrate the company job hazard analysis program.
2. To provide or coordinate training for the job hazard analysis program.
3. To perform periodic audits to ensure the job hazard analysis program is being adhered to.
4. To manage the retention of documents for the job hazard analysis program.
5. To facilitate communication between employees and management on the identification and management of hazards.

Supervisors & OSRP's

Supervisors have the following responsibilities:

1. To perform and supervise job hazard analysis in accordance with this policy.
2. To provide communication between employees and management on safety issues.
3. To complete job hazard analysis training if assigned by the company.

Employees & OSRP's

Employees have the following responsibilities:

1. To report all safety incidents and near misses immediately to a supervisor.
2. To perform or cooperate with job hazard analysis in accordance with this policy.
3. To complete job hazard analysis training if assigned by the company.

Hazard Management Priorities

Elimination of the Hazard

Eliminating the hazard is the first priority for dealing with identified hazards. Eliminating the hazard eliminates the risk to employees or equipment. The hazard can be eliminated by:

1. Redesigning equipment, tools or workstations.
2. Replace equipment, tools or workstations.
3. Usage of guards and other protective covers.
4. Other methods identified by the company that can eliminate the hazard.

Management of the Hazard

If the hazard cannot be eliminated by reasonable means, then the company will establish managerial and process controls that will manage the risk. This process may include:

1. Changing work processes.
2. Rotating personnel assignments.
3. Change work procedures.
4. Changing design requirements.
5. Other methods identified by the company.

Personal Protective Equipment

If the hazard cannot be eliminated through engineering or management controls, then the workers must be provided with personal protective equipment that provides them complete protection from the hazard. Employees will be provided the protective equipment at no cost and will be trained on their proper use and maintenance.

Uncontrolled Hazards

Hazards must be safely controlled through engineering controls, management controls, or the use of personal protective equipment. If these methods are not sufficient to protect employees from a hazard of a particular job task, then that task will not be allowed. All work involving that task will stop, until a means to safely manage the hazard is determined.

Designating Job Hazard Analysis Duties

The company will select employees to perform job hazard analysis based on the following requirements:

1. The employee been trained to conduct job hazard analysis.
2. Has the requisite technical knowledge for the type of work process being analyzed. (For example, electrical manufacturing processes should be investigated by someone who has a strong technical knowledge of electrical systems.)
3. Is a senior employee or supervisor.
4. Has the ability to communicate details clearly and concisely.
5. Is familiar with the requirements of the company job hazard analysis policy.

Training Requirements

Employees who perform job hazard analysis must have specific training on the job hazard analysis process and the requirements of this program. This training is in addition to all the required safety training that is relevant to the area being observed. The job hazard analysis training must include:

1. The purpose of the job hazard analysis.
2. Understanding of hazard severity factors.
3. The five-step job hazard analysis process.
4. A simulated job hazard analysis activity.
5. The requirements of this safety program.

Training Frequency

Employees must be trained before conducting their first job hazard analysis and:

1. When changes in the company hazard analysis policy are made.
2. When an employee demonstrates a lack of understanding of the policy.
3. Whenever additional and refresher training is determined necessary.
4. At least annually.

Types of Hazards

Employees performing job hazard analysis must identify every potentially hazard to employee safety. The following is a list of commonly identified hazards at our facility:

1. Chemical hazards.
2. Explosive hazards.
3. Electrical shock hazards.
4. Fire hazards.
5. Ergonomic hazards.
6. Repetitive motion stress.
7. Slips, trips and fall hazards.
8. Mechanical vibration and failure.
9. Occupational noise exposure.
10. Vehicle and pedestrian hazards.
11. Temperature stress hazards.
12. Visibility limitations.
13. General office safety hazards.

Assessors should be aware of other hazards that may affect the safety and health of employees.

Job Hazard Analysis Procedure

Step 1 - Observe the Job

The work process must be observed under normal working conditions. The person performing the analysis may not be involved in the job tasks in any way. This person performing the analysis should be familiar with the process but must be a neutral observer. Employees who routinely perform the task observed may be conditioned to ignore safety hazards others may identify. The observer should document the work process with one or more of the following tools:

1. Notes.
2. Photos.
3. Sketches.
4. Videos.

Step 2 - Break the Job into Steps

Each job process must be broken into individual steps. Make sure that each unique operation has its own step. The description of the steps should be clear and concise, so that any worker can understand it.

Step 3 - Describe the Hazards

The hazards in each step of the work process should be identified and described. The assessor should consider what could go wrong during this process that may expose workers to hazards. The assessor should be mindful of less commonly thought of hazards, such as repetitive motion and ergonomics.

Job Hazard Analysis Form

Name of Assessor:			Date:		
Location:			Hazard Analysis Number:		
Instructions: Enter a brief description of the job task. Break the job down into individual steps, and list them in the required job steps column. List the potential hazards of that task, and the recommended controls to manage the hazards. Circle an exposure and severity level. Multiply them and enter the number in the Priority section. Once the JHA is completed, submit it to management or the safety committee.					
Employee Exposure Levels	1- Low chance of exposure.	2 - Moderate chance of exposure.	3 - High chance of exposure.		
Hazard Severity	1 - Result in minor injury or illness.	2 - Result in major injury or illness	3 - Potentially fatal.		
Description of Job Task:					
Required Job Steps	**Potential Hazards**	**Recommended Controls**	**Exposure**	**Severity**	**Priority**
			1 2 3	1 2 3	
			1 2 3	1 2 3	
			1 2 3	1 2 3	
			1 2 3	1 2 3	
			1 2 3	1 2 3	
			1 2 3	1 2 3	
Received By:		Signature:		Date:	

Step 4 - Identify Control Measures

The assessor should list recommended control measures for dealing with the hazards identified in each step. The control measures must follow the hazard management priority as identified in this program. The control measures must eliminate the hazard or fully protect employees from that hazard. The control measures are recommendations. Management will have the final decision on control measures once the hazard analysis is submitted.

Step 5 - Review, Submit and Implement

Once the job hazard analysis is completed, it must be submitted to management. The JHAs will be reviewed and logged for future reference. Once reviewed, management will take the appropriate actions. The assessor should follow up on their recommendations to make sure the hazards they have identified were mitigated.

Job Hazard Analysis Frequency

A job hazard analysis will be completed prior to the start of a new task or process. Work operations that are similar may be covered by the same JHA, but work processes with their own distinct hazards must have their own JHA.

Existing job hazard analyses will be reviewed on a schedule determined by the company. Work areas with high hazard profiles will be evaluated more frequently that work areas with minimal hazards.

Recordkeeping

Once received, the company will keep the most recent job hazard analysis for each work process on file. The company will track each job hazard analysis by number in a log and will make sure that each hazard identified by the analysis is taken care of. Employees may review the company job hazard analysis files at any time.

Program Evaluation

The company job hazard analysis program will be reviewed on a regular basis. The company will evaluate the effectiveness of the program, and correct any deficiencies discovered. Employees will have an opportunity to review and comment on this program. Program reviews will also be conducted whenever any incident causes the company to question the effectiveness of the program.

Section 4: Accident Investigation

Purpose

The purpose of this program is to establish guidelines for performing investigations of safety accidents and near misses. The company is committed to providing a safe working environment for all employees and will investigate every incident or near miss to determine its cause. Once the root cause is established, the company will take steps to prevent it from reoccurring. The investigation process detailed in this program is not designed to determine legal liability, compensability, or fraud. Separate investigations must be conducted for those issues.

Program Responsibilities

Management

Management has the following responsibilities:

1. To establish guidelines for accident investigations at the company.
2. To ensure that employees are provided with the proper tools and resources to perform accident investigations.
3. To identify company employees who have the knowledge and competence to conduct accident investigations.
4. To provide training to employees who have been selected as part of the company accident investigation team.
5. To review and respond promptly to the recommendations that result from accident investigations.
6. To ensure the company is operating in accordance with this policy by performing periodic reviews and audits.
7. To review this safety policy for effectiveness periodically and when program deficiencies are discovered.

Supervisors & OSRP's

Supervisors have the following responsibilities:

1. To ensure that all accidents and near misses are reported.
2. To perform accident investigations in accordance with this policy.
3. To provide communication between employees and management on safety issues.

Employees & OSRP's

Employees have the following responsibilities:

1. To report all safety incidents and near misses immediately to a supervisor.
2. To cooperate with company accident investigations.

Definitions

Accident

Any event that causes any of the following:

1. Death, or critical condition that may result in death.
2. Any injury that requires treatment beyond basic first aid.
3. A release or exposure to a toxic or hazardous substance.
4. Any structural failure, such as the collapse of a building, bridge, tower or crane.
5. An uncontrolled explosion or fire.
6. An uncontrolled event that results in damage to property.

Near Miss

An accident, as defined by this program, that was narrowly avoided due to circumstances or timing. All near misses will be investigated as if they were actual accidents.

Accident Investigation Kit

The company will provide a set of materials for investigating safety accidents. This kit will include at a minimum:

1. Company accident investigation forms.
2. Pens.
3. Notepads.
4. Flashlight.
5. Tape measure.
6. Camera.
7. Safety barricade tape.
8. Tape or video recorder.
9. Work gloves.

Designating Accident Investigators

Company management or the safety committee will designate a person to lead the accident investigation who:

1. Has been trained to conduct accident investigations.
2. Has the requisite technical knowledge for the type of accident being investigated. (For example, electrical safety accidents should be investigated by someone who has a strong technical knowledge of electrical systems.)
3. Is a senior employee or supervisor.
4. Has the ability to communicate details clearly and concisely.
5. Was not involved in any way with the accident that occurred.

Training Requirements

Employees who perform accident investigations must have specific training on conducting investigations and the accident investigation policies of the company. The training must include:

1. The purpose of safety accident investigation.
2. Definitions of accidents and near misses.
3. Understanding of the difference between major and minor incidents.
4. The required qualifications for investigators.
5. The required contents of an accident investigation kit.
6. The five-step process for investigating accidents.
7. The proper techniques for interviewing witnesses.
8. How to make recommendations for corrective action.
9. The proper method for recording investigations and submitting them to management.

Training Frequency

Employees must be trained before conducting their first investigation and:

1. When changes in the company investigation policy are made.
2. When an employee demonstrates a lack of understanding of the policy.
3. Whenever additional and refresher training is determined necessary.

Accident Investigation Procedure

1. Make sure the area is free of hazards before entering.
2. Make sure that employees involved in the accident are in a safe condition and have received any needed emergency services.
3. Define the scope of the investigation, when the incident began and ended.
4. Select appropriate investigators and assign specific tasks to each.

5. Perform a preliminary briefing to the investigating team. Each brief must include:
    a. A description of the accident.
    b. A description of normal operating procedures.
    c. A description of the site layout.
    d. A list of witness.
    e. An account of events preceding the accident.
6. Collect physical evidence, take photos and prepare sketches.
7. Interview each victim and witness privately and separately.
8. Make the following determinations:
    a. What was not normal before the accident?
    b. Where the abnormality occurred.
    c. When the abnormality was first noted.
    d. How the abnormality occurred.
    e. The qualifications of the people involved.
9. Make the following determinations:
    a. Why the accident occurred.
    b. The likely accident sequence of events.
    c. Any alternative sequence of events.
10. Determine the most likely sequence of events and the probable causes of the incident.
11. Conduct a post-investigation briefing with management.
12. Prepare a report of the incident and submit it to management and the safety committee.

Program Evaluation

The company accident investigation program will be reviewed regularly. The company will evaluate the effectiveness of the program, and correct any deficiencies discovered. Employees will have an opportunity to review and comment on this program. Program reviews will also be conducted whenever any incident causes the company to question the effectiveness of the program.

Section 5: Fire Prevention Program

Purpose

The purpose of this Fire Prevention Plan is to eliminate the causes of fire, prevent loss of life and property by fire, and to comply with the Occupational Safety and Health Administration's (OSHA) standard on fire prevention. Fire is a dangerous hazard, and we will take all the precautions necessary to protect our employees.

Summary

EGE is committed to minimizing the threat of fire to employees, visitors, and property. EGE will comply with all applicable laws, regulations, codes, and best practices pertaining to fire prevention. The Fire Prevention Plan serves to reduce the risk of fires at the workplace by:

1. Identifying materials that are potential fire hazards and their proper handling and storage procedures.
2. Distinguishing potential ignition sources and the proper control procedures of those materials.
3. Describing fire protection equipment and/or systems used to control fire hazards.
4. Identifying persons responsible for maintaining the equipment and systems installed to prevent or control ignition of fires.
5. Identifying persons responsible for the control and accumulation of flammable or combustible material.
6. Describing good housekeeping procedures necessary to insure the control of accumulated flammable and combustible waste material and residues to avoid a fire emergency.
7. Providing training to employees on fire hazards to which they may be exposed.

Program Responsibilities

Management

Management has the following responsibilities:

1. To provide adequate controls and procedures to maintain a workplace with minimal fire risk.
2. To ensure that regular fire hazard assessments are performed.
3. To select equipment and work processes that minimize the risk of fire.
4. To create and authorize a fire prevention plan.
5. To designate a company fire prevention coordinator.

6. To provide training to employees on fire prevention and how to manage the fire hazards of the workplace.
7. To develop an emergency action plan for fire and evacuation.
8. To review this program for effectiveness regularly.

Fire Prevention Coordinator

The COO currently acts as the corporate Fire Prevention Coordinator (FPC). On job-sites, the OSRP assumes the role of FPC. The Fire Prevention Coordinator has the following responsibilities:

1. To develop and administer the fire prevention training program.
2. To maintain all records pertaining to this plan.
3. To administrate and supervise the company fire prevention plan.
4. To ensure that fire control equipment and systems are properly maintained.
5. To maintain control of the fuel source hazards.
6. To conduct fire risk surveys and make recommendations to management and/or the safety committee.
7. To provide or coordinate fire prevention training for employees.
8. To perform periodic audits and inspections to ensure compliance with this program.

Supervisors & OSRP's

Supervisors have the following responsibilities:

1. To ensure employees are working within the requirements of this program.
2. To provide proper fire prevention training to relevant employees.
3. To report any new fire hazards to the Fire Prevention Coordinator.
4. To report any safety incidents or concerns to management.

Employees & OSRP's

Employees have the following responsibilities:

1. To complete all required training before working without supervision.
2. To conduct operations safely to limit the risk of fire.
3. To report potential fire hazards to their supervisors.
4. To follow fire emergency procedures.
5. To report any safety incidents or concerns to a supervisor.

Housekeeping and Safe Work Practices

Good housekeeping and safe work practices are important for fire prevention. To limit the risk of fires, employees will take the following precautions:

1. Minimize the storage of combustible materials.
2. Make sure that doors, hallways, stairs, and other exit routes are kept free of obstructions.
3. Dispose of combustible waste in covered, airtight, metal containers.
4. Use and store flammable materials in well-ventilated areas away from ignition sources.
5. Use only nonflammable cleaning products.
6. Keep incompatible (i.e., chemically reactive) substances away from each other.
7. Perform "hot work" (i.e., welding or working with an open flame or other ignition sources) in controlled and well-ventilated areas.
8. Keep equipment in good working order (i.e., inspect electrical wiring and appliances regularly and keep motors and machine tools free of dust and grease.
9. Ensure that heating units are safeguarded.
10. Report all gas leaks immediately. The program coordinator shall ensure that all gas leaks are repaired immediately upon notification.
11. Repair and clean up flammable liquid leaks immediately.
12. Keep work areas free of dust, lint, sawdust, scraps, and similar material.
13. Do not rely on extension cords if wiring improvements are needed and take care not to overload circuits with multiple pieces of equipment.
14. Ensure that required hot work permits are obtained.
15. Turn off electrical equipment when not in use.

Electrical Fire Hazards

Electrical system failures and the misuse of electrical equipment are leading causes of workplace fires. Fires can result from loose ground connections, wiring with frayed insulation, or overloaded fuses, circuits, motors, or outlets. To prevent electrical fires, employees shall:

1. Make sure that worn wires are replaced.
2. Use only appropriately rated fuses.
3. Never use extension cords as substitutes for wiring improvements.
4. Use only approved extension cords [i.e., those with the Underwriters Laboratory (UL) or Factory Mutual (FM) label].
5. Check wiring in hazardous locations where the risk of fire is especially high.

6. Check electrical equipment to ensure that it is either properly grounded or double insulated.

Major Fire Hazards

Jobsite specific fire hazards will be identified and communicated at each job site and periodically as jobs progress.

Portable Heaters

All portable heaters shall be approved by the program coordinator. Portable electric heaters shall have tip-over protection that automatically shuts off the unit when it is tipped over. There shall be adequate clearance between the heater and combustible furnishings or other materials at all times. Portable heaters will not be left on unattended.

Office Fire Hazards

Fires in offices have become more likely because of the increased use of electrical equipment, such as computers and fax machines. To prevent office fires, employees shall:

1. Avoid overloading circuits with office equipment.
2. Turn off nonessential electrical equipment at the end of each workday.
3. Keep storage areas clear of rubbish.
4. Ensure that extension cords are not placed under carpets.
5. Ensure that trash and paper set aside for recycling is not allowed to accumulate.
6. Clean up spills immediately.

Cutting, Welding, and Open Flame Work

Employees will ensure the following work practices are followed for cutting, welding, and open flame work.

1. All necessary hot work permits have been obtained prior to work beginning.
2. Fire watches are established when required.
3. Cutting and welding are done by authorized personnel in designated cutting and welding areas whenever possible.
4. Adequate ventilation is provided.
5. Torches, regulators, pressure-reducing valves, and manifolds are UL listed or FM approved.
6. Oxygen-fuel gas systems are equipped with listed and/or approved backflow valves and pressure-relief devices.

7. Cutters, welders, and helpers are wearing eye protection and protective clothing as appropriate.
8. Cutting or welding is prohibited in sprinklered areas while sprinkler protection is out of service.
9. Cutting or welding is prohibited in areas where explosive atmospheres of gases, vapors, or dusts could develop from residues or accumulations in confined spaces.
10. Cutting or welding is prohibited on metal walls, ceilings, or roofs built of combustible sandwich-type panel construction or have combustible covering.
11. Confined spaces such as tanks are tested to ensure that the atmosphere is not over ten percent of the lower flammable limit before cutting or welding in or on the tank.
12. Small tanks, piping, or containers that cannot be entered are cleaned, purged, and tested before cutting or welding on them begins.

Maintenance of Fire Prevention Equipment

The OSRP will ensure that fire prevention equipment is maintained according to manufacturers' specifications. The company will also comply with requirements of the National Fire Protection Association (NFPA) codes for specific equipment. Only properly trained individuals shall perform maintenance work.

Maintenance of Safeguards on Heat Producing Equipment

The OSRP on a jobsite is responsible for maintaining the safe guards of heat producing equipment. These safe guards prevent accidental ignition of combustible materials. This will be accomplished by following the manufacturer's maintenance requirements and NFPA recommendations.

Flammable and Combustible Materials

The program coordinator shall regularly evaluate the presence of combustible materials in the workplace. Certain types of substances can ignite at relatively low temperatures or pose a risk of catastrophic explosion if ignited. Such substances obviously require special care and handling.

Class A Fires

These include common combustible materials (wood, paper, cloth, rubber, and plastics) that can act as fuel and are found in non-specialized areas such as offices. To handle Class A combustibles safely:

1. Dispose of waste daily.
2. Keep trash in metal-lined receptacles with tight-fitting covers (metal wastebaskets that are emptied every day do not need to be covered).
3. Keep work areas clean and free of fuel paths that could allow a fire to spread.
4. Keep combustibles away from accidental ignition sources, such as hot plates, soldering irons, or other heat- or spark-producing devices.
5. Store paper stock in metal cabinets.
6. Store rags in metal bins with self-closing lids.
7. Do not order excessive amounts of combustibles.
8. Make frequent inspections to anticipate fires before they start.

Water, multi-purpose dry chemical (ABC), and halon 1211 are approved fire extinguishing agents for Class A combustibles.

Class B Fires

These include flammable and combustible liquids (oils, greases, tars, oil-based paints, and lacquers), flammable gases, and flammable aerosols. To handle Class B combustibles safely:

1. Use only approved pumps, taking suction from the top, to dispense liquids from tanks, drums, barrels, or similar containers (or use approved self-closing valves or faucets).
2. Do not dispense Class B flammable liquids into containers unless the nozzle and container are electrically interconnected by contact or by a bonding wire. Either the tank or container must be grounded.
3. Store, handle, and use Class B combustibles only in approved locations where vapors are prevented from reaching ignition sources such as heating or electric equipment, open flames, or mechanical or electric sparks.
4. Do not use a flammable liquid as a cleaning agent inside a building (the only exception is in a closed machine approved for cleaning with flammable liquids).
5. Do not use, handle, or store Class B combustibles near exits, stairs, or any other areas normally used as exits.
6. Do not weld, cut, grind, or use unsafe electrical appliances or equipment near Class B combustibles.
7. Do not generate heat, allow an open flame, or smoke near Class B combustibles.
8. Know the location of and how to use the nearest portable fire extinguisher rated for Class B fire.

Water should not be used to extinguish Class B fires caused by flammable liquids. Water can cause the burning liquid to spread, making the fire worse. To extinguish a fire caused by flammable liquids, exclude the air around the burning liquid. The following fire-

extinguishing agents are approved for Class B combustibles: carbon dioxide, and multi-purpose dry chemical (ABC).

Class C Fires

Class C Fires involve or occur near live electrical equipment. The source of the fire is usually the electrical power.

1. Always use lockout tagout procedures when performing work on electrical equipment.
2. If live work is required, it must be done by a qualified electrical worker.
3. A work permit should be obtained before live electrical work is performed.
4. Before live work is performed, the area must be isolated from conductive materials.
5. All ignition sources must be removed from an area while live work is conducted.
6. The quickest way to put out a Class C fire is usually to de-energize the equipment.
7. A non-conducting firefighting method must be used for Class C fires. Do not use water!
8. CO2 extinguishers can be dangerous if the horn of the extinguisher comes close to the electrical source. Chemical extinguishers are preferred.

Class D Fires

Class D fires involve combustible metals and are extremely difficult to extinguish. A special firefighting team must be summoned in the event of a Class D fire.

1. Safety data sheets must be available for all combustible metals.
2. Do not perform hot work any areas with combustible metals.
3. Combustible metals must be marked with fire hazard warnings.
4. Combustible metals must be stored in designated areas.

Smoking

Smoking is prohibited in all buildings. Certain outdoor areas may also be designated as no smoking areas. The areas in which smoking is prohibited outdoors are identified by NO SMOKING signs.

Fire Emergency Action Plan

Each work area will have an established emergency action plan for fire. Employees will be trained on this emergency action plan as part of this fire prevention training program. This emergency action plan will include:

1. The alarm sound or method.
2. Method of sounding the alarm.
3. A list of any required critical operations.
4. Any rescue or medical duties.
5. Method and route of evacuation.
6. Assembly area and method for determining if employees are missing.
7. The method for receiving the all clear and returning to work.

Fire Fighting

Only designated, trained employees may fight fires. All other employees are required to follow the steps of the emergency action plan and evacuate immediately.

Training

Fire prevention training will be provided to all employees upon employment, and shall maintain documentation of the training, which includes:

1. This Fire Prevention Plan, including how it can be accessed.
2. Good housekeeping practices.
3. Proper response and notification in the event of a fire.
4. Instruction on the use of portable fire extinguishers (if required, as determined by the area emergency action plan).
5. Recognition of potential fire hazards.
6. The company Emergency Action Plan for fires.

Supervisors shall train employees about the fire hazards associated with the specific materials and processes to which they are exposed and will maintain documentation of the training. Employees will receive this training:

1. Prior to starting work.
2. When changes in work processes necessitate additional training.
3. If an employee demonstrates poor understanding of fire prevention practices.

Program Review

The program coordinator and the safety committee shall review this Fire Prevention Plan at least annually for necessary changes.

Section 6: Hazard Communication

Purpose

The company is committed to preventing accidents and ensuring the safety and health of our employees. We will comply with all applicable federal and state health and safety rules and provide a safe, healthful environment for all our employees. To ensure that information about the dangers of all hazardous chemicals used by the company is known by all affected employees, the following hazardous information program has been established. Under this program, employees will be informed of the contents of the OSHA Hazard Communications standard, the hazardous properties of chemicals in the work area, safe handling procedures and chemical protective measures.

This written hazard communication plan will be available at the following location for review by any one on the company website @ www.ege-llc.com

Program Responsibilities

Management

Management has the following responsibilities:

1. To establish guidelines for hazard communication that meets the needs of the company and is compliant with OSHA and local regulations.
2. To ensure that employees are provided with the proper materials for communicating hazards to employees.
3. To designate an employee to administrate and supervise the hazard communication program.
4. To provide training to employees on hazard communication.
5. To ensure the company is operating in accordance with this policy by performing periodic reviews and audits.
6. To review this safety policy for effectiveness periodically and when program deficiencies are discovered.

Hazard Communication Supervisor (OSRP)

The company Hazard Communication Program Coordinator role is filled by the OSRP. The Hazard Communication Supervisor has the following responsibilities:

1. To supervise the implementation and execution of the hazard communication program.

2. To provide or coordinate hazard communication training for employees and subcontractors.
3. To ensure that materials received to the company are properly labeled and have safety data sheets (SDS).
4. To ensure that all chemicals used at the facility are included on the chemical inventory list.
5. To ensure that the company hazard communication program meets the requirements of OSHA.
6. To schedule periodic audits to monitor program effectiveness.

Supervisors & OSRP's

Supervisors have the following responsibilities:

1. To ensure that their functional areas have the appropriate hazard warnings.
2. To ensure that their functional areas have the proper SDS and that they are available to employees.
3. To make sure no employees work with or near chemicals without receiving the appropriate training.
4. To provide communication between employees and management on safety issues.

Employees & OSRP's

Employees have the following responsibilities:

1. To attend required safety training classes prior to starting work.
2. To make sure that all chemicals used in the workplace are properly labeled.
3. To review the material safety data sheet for each chemical prior to using it.

Chemical Shipping Container Labeling

The OSRP will verify that all shipping containers with hazardous chemicals received for use are properly labeled with GHS standards.

Hazard Communication Standard Shipping Labeling Requirements

Chemicals containers must meet the following labeling requirements.

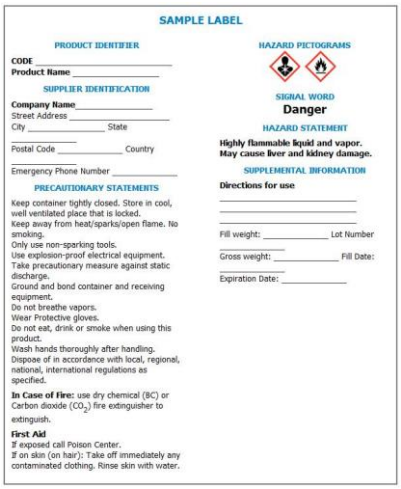
1. Be clearly labeled as to the contents.
2. Have the appropriate hazard warning.
3. List the manufacturers name and address.

GHS Labeling Requirements

Chemical containers must be labeled with the following information.

1. A product identifier.
2. A signal word, either "Danger" or "Warning".
3. A hazard statement.
4. A standard pictogram.
5. A precautionary statement.
6. The name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

It is the policy of the company that no chemicals will be released for work until this information is verified.


SAMPLE LABEL

PRODUCT IDENTIFIER

CODE _____
Product Name _____

SUPPLIER IDENTIFICATION

Company Name _____
Street Address _____
City _____ State _____
Postal Code _____ Country _____
Emergency Phone Number _____

PRECAUTIONARY STATEMENTS

Keep container tightly closed. Store in cool, well ventilated place that is locked.
Keep away from heat/sparks/open flame. No smoking.
Only use non-sparking tools.
Use explosion-proof electrical equipment.
Take precautionary measure against static discharge.
Ground and bond container and receiving equipment.
Do not breathe vapors.
Wear Protective gloves.
Do not eat, drink or smoke when using this product.
Wash hands thoroughly after handling.
Dispoae of in accordance with local, regional, national, international regulations as specified.

In Case of Fire: use dry chemical (BC) or Carbon dioxide (CO_2) fire extinguisher to extinguish.

First Aid
If exposed call Poison Center.
If on skin (on hair): Take off immediately any contaminated clothing. Rinse skin with water.

HAZARD PICTOGRAMS

SIGNAL WORD
Danger

HAZARD STATEMENT

Highly flammable liquid and vapor.
May cause liver and kidney damage.

SUPPLEMENTAL INFORMATION

Directions for use

_____
_____
_____

Fill weight: _____ Lot Number _____
Gross weight: _____ Fill Date: _____
Expiration Date: _____

Secondary Chemical Container Labeling

The supervisor of each work area will ensure that all secondary chemical containers are properly labeled. Secondary chemical container labeling can be labeled with the same shipping container labels, or information that communicates the following:

1. The identity of the chemical.
2. The hazards of the chemical.

The label may use a combination of words, symbols or pictures to communicate this information. The company will use a standard labeling method for all secondary containers.

All chemicals will be labeled properly.

Safety Data Sheets

The OSRP will establish and maintain the company Safety Data Sheet program. This person will ensure that procedures are in place that maintains the necessary SDSs and that new ones are reviewed for new or significant safety and health information.

If an SDS is not received with a shipment of chemicals, those chemicals will be kept away from employees and out of use in a staging area until a proper SDS is obtained. Old safety data sheets that are no longer applicable must be removed from the SDS binder.

Hazardous Non-Routine Tasks

Periodically, employees must perform hazardous non-routine tasks. Before starting work on such projects, each affected employee will be given information by the owner or area supervisor about hazardous chemicals to which they may be exposed during such activity.

This information will include:

- Specific chemical hazards.
- Protective/safety measures employees can take.
- Measures the enterprise has taken to reduce the hazard, including ventilation, respirators, presence of other employees, and emergency procedures.

Hazardous Chemical List

The OSRP will maintain a list of all hazardous chemicals in use at each jobsite as part of this written program. The following is a list of all known hazardous chemicals on site. More information on each chemical noted is available by reviewing the SDSs.

Training Requirements

The COO is responsible for the Hazard Communication Training program and will ensure that its elements are carried out. Prior to starting work, each new employee will attend a health and safety orientation and will receive information and training on the following:

1. An overview of the requirements contained in 1910.1200 – Hazard Communication Rule.
2. Chemicals present in their workplace operations.
3. Location and availability of our written hazard communication program and SDSs.
4. Physical and health effects of the hazardous chemicals.
5. The symptoms of overexposure to hazardous chemicals.
6. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area.
7. How to reduce or prevent exposure to these hazardous chemicals through the use of control/work practices and personal protective equipment.
8. Steps the company has taken to reduce or prevent exposure to the chemicals.
9. Safety emergency procedures to follow if they employee is exposed to these chemicals.

10. How to read labels and review SDSs to obtain proper hazard information.

This training program will consist of two parts. The first part is a classroom training session, where the requirements of the OSHA Hazard Communication Standard and the company Hazard Communication Plan are covered. The second part consists of a workplace evaluation where the employee demonstrates the required knowledge, understanding, and abilities of the course. After completing the training class, each employee will sign a form to verify they attended the training and understood the policies on hazard communication.
Prior to a new hazardous chemical being introduced into any area of this workplace, each employee of that area will be given training as outlined above.

Contractor Requirements

It is the responsibility of the OSRP to provide contractors the following information:

- Hazardous chemicals to which they may be exposed to while on the job site, and the procedure for obtaining SDSs.
- Precautions employees may take to lessen the possibility of exposure, by using appropriate protective measures, and an explanation of the labeling system used.
- The company hazardous chemical labeling system.

This information will be communicated as part of a contractor site safety orientation.
It is the responsibility of on-site responsible party to identify and obtain SDSs for the chemicals that contractors bring into the workplace.

Program Evaluation

The company hazard communication program will be reviewed on a yearly basis. The company will evaluate the effectiveness of the program, and correct any deficiencies discovered. Employees will have an opportunity to review and comment on this program. Program reviews will also be conducted whenever any incident causes the company to question the effectiveness of the program.

Section 7: Personal Protective Equipment

Purpose

The Personal Protective Equipment Plan provides direction to managers, supervisors, and employees about their responsibilities in the selection, use, care and disposal of personal protective equipment.

Program Responsibilities

Management

Management has the following responsibilities:

1. Establish a written company personal protective equipment policy that outlines the requirements for selection and use of personal protective equipment.
2. Provide personal protective equipment at no cost to employees.
3. Prioritize management and engineering controls for the elimination of work hazards. PPE should only be required when these methods are not feasible.
4. Perform hazard analysis to determine the appropriate personal protective equipment.
5. Provide training to employees on the use of personal protective equipment.
6. Use signs and other techniques to inform employees of PPE requirements.
7. Designate a PPE program administrator.
8. Ensure that workplace PPE evaluations are performed at least annually.

PPE Program Administrator

The PPE Program Administrator is the OSRP. The program administrator has the following responsibilities.

1. To administer the company PPE program.
2. To facilitate communication between employees, supervisors, and management on PPE issues.
3. To ensure the company is adhering to this PPE policy by performing periodic inspections and audits.
4. To coordinate or provide training to supervisors and employees on PPE use and requirements.
5. To assist supervisors in procuring proper PPE.
6. To provide signs and other PPE awareness tools.
7. To review this written policy periodically for effectiveness.

Supervisors & OSRP's

Supervisors have the following responsibilities:

1. Conduct job hazard analysis to assess the need for personal protective equipment.
2. Certify in writing the tasks evaluated, hazards found, and actions recommended.
3. Enforce PPE and safety rules.
4. Select appropriate PPE for the work process.
5. Include employees in the evaluation process for selecting appropriate PPE.

Employees & OSRP's

Employees have the following responsibilities:

1. To work in accordance with company safety policies.
2. To use and wear all required personal protective equipment.
3. To inspect PPE before every use.
4. To discard worn or defective PPE.
5. To give supervisors feedback about the fit, comfort, and suitability of the PPE that is selected.
6. To immediately report any safety incidents.

The Hazard Control Hierarchy

Personal protective equipment may only be used when there are no feasible engineering or administrative alternatives to eliminate the hazard. When evaluating existing hazards and creating recommendations for abatement, employers will utilize the hazard control hierarchy.

Engineering Controls

Engineering controls is the preferred method for dealing with hazards. Engineering controls are changes made to the work environment that eliminates the hazard. Engineering controls can include:

1. Eliminating the use of chemicals or hazardous substances in a work process.
2. Add guardrails in elevated work areas.
3. Adding protective shielding in areas with electrical hazards.
4. Use of increased ventilation to eliminate exposure hazards.

Administrative Controls

If administrative controls cannot be implemented, administrative controls will be considered. These may include:

1. De-energizing equipment before work or inspections are done.

2. Using work schedules to minimize exposure.
3. Scheduling work for times where hazards are lower, such as moving work in hot weather to a cooler time of day.
4. Moving the work to a safer location.

PPE Selection

PPE Evaluation

The company will evaluate PPE requirements at least annually. High hazard work areas will have the PPE requirements evaluated more frequently.

If there is any indication the PPE is inadequate, PPE requirements must be immediately evaluated. The PPE Program Administrator may perform PPE evaluations more frequently if deemed necessary,

Eye and Face Protection

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.
Eye and Face Protection Must comply with any of the following consensus standards:

1. ANSI Z87.1-2003
2. ANSI Z87.1-1989 R-1989
3. ANSI Z87.1-1989

Head Protection

Employees who work in areas where there is a potential for head injury from falling objects must wear head protection.
Head protection must comply with any of the following consensus standards:

1. ANSI Z89.1-2009
2. ANSI Z89.1-2003
3. ANSI Z89.1-1997

Foot Protection

Protective footwear must be worn when working in areas where there is a danger of foot injuries due to falling or rolling objects, objects piercing the sole, or where employees' feet are exposed to electrical hazards. Employees may provide and pay for their own foot protection if it is compliant and will be worn outside the workplace.
Foot protection must comply with one of these consensus standards.

1. ASTM F-2412-2005

2. ANSI Z41-1999
3. ANSI Z41-1991

Hand Protection

Employees must use appropriate hand protection when their hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns and harmful temperature extremes. Supervisors must base the selection of hand protection on evaluation of the performance characteristics of the hand protection relative to the specific tasks to be performed, conditions present, duration of use and the hazards and potential hazards identified.

Protective Clothing

Employees will wear protective clothing when required by the hazard.

Respiratory Protection

Employees will wear appropriate respiratory protection when adequate ventilation or substitution with non-toxic chemicals, etc., is not possible or feasible. Respirator protection must comply with ANSI Z288.2-1969 and provisions detailed in 29 CFR 1910.134.
Respirator protection is a complex requirement. The policies for respiratory protection are described in the company Respirator Protection Program.

Fall Protection

EGE's fall protection program shall apply to all jobsite personnel who are exposed to unprotected sides or edges of surfaces that present a fall hazard of six (6) feet or more to a lower level. No one will be required or allowed to perform duties that require the employee to get closer than six (6) feet to an unprotected edge, platform, walkway of any building or utilize elevated equipment unless the employee is properly secured from falling.

Utilize the acronym PET

Plan

When working from heights, such as ladders, scaffolds, and roofs, employers must plan projects to ensure that the job is done safely. Begin by deciding how the job will be done, what tasks will be involved, and what safety equipment may be needed to complete each task

Equipment

Jobsite personnel who are six feet or more above lower levels are at risk for serious injury or death if they should fall. To protect these employees, employers must provide fall protection and the right equipment for the job, including the right kinds of ladders, scaffolds, and safety gear

Train

Train each jobsite attendee that might be exposed to a fall hazard. The program shall enable each person on the jobsite to recognize the hazards of falling and shall train each in the procedure to be followed in order to minimize these hazards.

PPE Operating Procedure for Employees

Select the Appropriate PPE

Employees should select the PPE that is appropriate for the hazard. The work area should be labeled with the PPE that is required. If there are any questions, consult a supervisor.

Inspect the PPE prior to Use

PPE must be inspected prior to each use. The company will provide training on the proper maintenance and inspection of PPE. If there is a problem with the PPE, it may not be used. Remember, if there is any doubt about its effectiveness, there is no doubt. Do not use it.

Don the PPE

PPE should be put on in accordance with the manufacturer's instructions. Test the PPE to make sure that it fits properly and provides a proper barrier to the hazard.

Wear the PPE

PPE should not inhibit form the ability to work. If a task cannot be done while using the PPE, do not attempt it. Ask a supervisor for help. If there is any indication that the PPE has failed, leave the work area immediately and notify a supervisor.

Remove and Store the PPE

Do not remove the PPE until you have left the hazard area. Reusable PPE should be cleaned and placed into the appropriate storage location. Disposable PPE should be placed in the proper container.

PPE Training Requirements

Train exposed employees before they are assigned to the hazardous task. Training must include:

1. When PPE is necessary.
2. What PPE is necessary.
3. How to properly don, doff, adjust, and wear PPE.
4. The limitations of the PPE.
5. The proper care, maintenance, useful life, and disposal of PPE.

After the employee(s) demonstrate correct use, care, and disposal procedures of the PPE, the supervisor and employee will certify completion of training.

Monitoring and Review

Supervisors will monitor worksite tasks for changes in, or the introduction of new hazards. If new hazards are discovered, they will conduct a task analysis for appropriate PPE. A worksite analysis will be conducted at least annually for each task that requires employees to use PPE.

The PPE program administrator will monitor the effectiveness of this plan and make recommendations to management to improve the plan. This PPE written policy will be reviewed at least annually for effectiveness.

Section 8: Walking and Working Surfaces

Purpose

The purpose of this program is to provide employees with a work environment that is free of slip, trip, and fall hazards. This policy should not be considered a substitute for applicable OSHA regulations. Employees with occupational fall risk have additional requirements covered by the company Fall Prevention Program.

Policy

This policy applies to all company work areas and operations. Every employee must be trained on the requirements of the program and will adhere to its policies. This policy has three areas of emphasis.

First, the company will proactively identify hazards. Once identified, the company will take steps to eliminate the hazard by either changing work practices or engineering out the hazard. If the hazard cannot be eliminated, the company will provide personal protective equipment and training to employees.

Program Responsibilities

Management

Management has the following responsibilities:

1. To provide a workplace free of slips, trips, and falls hazards.
2. To develop and maintain a written slips, trips, and falls prevention plan.
3. To provide training to employees on how to identify, manage, and eliminate hazards.
4. To perform job hazard assessment to identify potential hazards.
5. To include slips, trips, and falls hazards in the company safety orientation program.
6. To provide engineering solutions to eliminate hazards.
7. To provide all required PPE, at no cost to the employees.
8. To perform periodic inspections and audits to ensure compliance with this program.

Program Administrator

The Slips, Trips, and Falls Prevention Coordinator is the on-site responsible person. This person has the following responsibilities:

1. To administrate and supervise the company slips, trips, and falls prevention program.
2. To perform or coordinate required training for employees.

3. To identify engineering solutions to hazards and make recommendations to management.
4. To perform periodic inspections and audits to ensure compliance with this program.
5. To acquire and distribute required PPE for this program.

Supervisors

Supervisors have the following responsibilities:

1. To ensure that all employees have completed the required safety training before starting work.
2. To monitor the work area for new slips, trips, and falls hazards.
3. To take immediate corrective action when hazards are identified.
4. To verify that all employees are using the required PPE.
5. To facilitate communication between employees and management on work and safety issues.

Employees

Employees have the following responsibilities:

1. To follow the safe work practices that are required by this program.
2. To keep their work areas clean, organized, and free of spills.
3. To report any new hazards to a supervisor.
4. To take immediate corrective action when a hazard is identified.
5. To report all safety incidents to a supervisor.

Common Hazards

There are many causes for slips, trips, and falls. The following are the most common causes, which will be emphasized in all hazard assessments.

1. Wet or contaminated floors.
2. Uneven walking surfaces, holes, changes in level, broken or loose floor tiles,
3. Defective or wrinkled carpet or uneven steps/thresholds.
4. Mats or rugs not laying flat on the floor.
5. Obstructions and accumulation of objects in walkways.
6. Unguarded platforms, walkways, and work areas 30 inches above ground.
7. Poor lighting.

Job Hazard Assessment

Job hazard assessments are a key part of any accident and injury prevention program. Hazard assessments must be performed for all work areas. Management, supervisors

and employees must all be involved in the hazard assessment process. The assessment should include, but not be limited to, the following elements:

1. Evaluation of the worksite.
2. Evaluation of the work tasks.
3. Evaluation of the various tools and equipment to be used.
4. Identify affected employees.
5. The assessment will be used to:
    a. Determine the possible use of administrative and engineering controls.
    b. Determine the need for PPE.
    c. Determine training needs.
    d. Determine emergency/medical response needs.

When changes in the work area or work processes are made, a new hazard assessment may be required. It is the responsibility of the work area supervisors to initiate the new hazard assessments.

Slips, Trips, and Falls Hazard Profile

Slips, trips, and falls hazards are constantly changing. Supervisors and employees are responsible for identifying and removing these hazards. This chart contains the most common hazards, where they occur, and how they are managed.

Slips, Trips, and Falls Hazards		
Hazard	**Location(s)**	**Notes & Hazard Management**
Wet and slippery floors	Building entryways	Water from rain and snow is often tracked in the building. Mats will be placed inside the doorways for people to wipe their shoes on. Any standing water will be cleaned up immediately. On days with heavy precipitation, signs will be hung reminding employees to dry their shoes on the mats and be careful while walking on the potentially wet floors.

Slips, Trips and Falls Prevention

Employees, supervisors and management should work together to establish a safe working environment. Safe behavior should be emphasized at all times. Unsafe working conditions, equipment and/or tools should immediately be reported to a supervisor. Preventing slips, trips and falls is an ongoing task. Inspect work areas before work and monitor throughout the day for hazards or potential hazards. Be aware that the potential for hazards can change frequently.

Employees must be aware of their surroundings and take steps to minimize or eliminate hazards daily. Good housekeeping is the most basic, yet important step to preventing slip, trip and fall accidents. Listed below are some steps and procedures to follow to avoid slip, trip and fall accidents. These steps are highlights, and not a comprehensive list. It is up to the supervisors to enforce practices and behaviors that are appropriate for their functional area.

Housekeeping

1. Clean spills immediately.
2. Use wet floor signs or barricade the area to identify wet areas.
3. Remove debris and scrap frequently from work areas and place in designated locations.
4. Keep walkways clear of materials, debris and clutter.
5. Keep floors swept.
6. Run cords, cables and hoses overhead when possible, otherwise secure and cover cords, cables and hoses that cross walkways.

Lighting

1. Keep work areas well lit.
2. Replace burned-out bulbs immediately.
3. Maintain appropriate lighting through the use of portable light stands if necessary.
4. Move cautiously in darker areas and when moving from well-lit to darker areas.

Stairways

1. Keep stairwells free of materials and debris.
2. Walk slowly and use handrails when going up or down stairs.
3. Take one step at a time.
4. Keep outside steps free of ice and snow.

Walking/Working Surfaces

1. Mark uneven walking and working surfaces with warning tape or signs.
2. Create smooth transitions between different floor levels with the use of ramps or wedges.
3. Tape temporary floor covers together.
4. Cover or guard all floor openings and holes to prevent people from falling into the area.

Ladders

1. Never use a chair, box, table or other objects not specifically made for standing on to reach elevated levels. Always use a ladder.
2. Use only ladders meeting OSHA requirements, are appropriate, and meet the weight requirements for the work being performed.
3. Place ladders at a 4:1 ratio from the vertical support. For every 4 feet of working length the ladder base should be 1 foot out from the top support.
4. Never use a metal ladder on or around electrical elements. Always use a wood or fiberglass ladder.
5. Whenever climbing, descending or working from a ladder, maintain a 3-point contact with the ladder.

Scaffolds

1. Construct all scaffolds according to the manufacturer's instructions.
2. Install guardrail systems along all open sides and ends of platforms.
3. Use appropriate fall protection for scaffolds more than 10 feet above a lower level.
4. Use caution when working with tools and building materials on the limited space of a scaffold.
5. Provide safe access to scaffold platforms.
6. Do not climb cross-bracing as a means of access.

Miscellaneous

1. Use appropriate Personal Protective Equipment (PPE). Make sure you are properly trained on PPE and its use. If you are unsure then talk to your supervisor.
2. Wear proper footwear.
3. Watch where you are walking. Pay attention and do not allow yourself to be distracted from the task at hand.
4. Never rush through a task, work at a normal pace.
5. Carry fewer objects and make more trips.
6. Get help moving large, heavy or awkward shaped items.

7. Report all slip, trip or fall accidents, or near accidents, even if no one was hurt. This will allow changes to be made to avoid the incident from reoccurring.

Fall Prevention Program

The slips, trips, and falls program is designed to protect employees from injuries due to trips and falls. It is not designed for workers who work at heights and have an occupational risk of serious falls. Employees with this type of risk must adhere to the company Fall Prevention Program. Construction employees working at elevations of six feet or more and all other employees working at elevations of four feet or more must be protected from falling by following the requirements of the company Fall Prevention Program.

Personal Protective Equipment

The company will prioritize hazard elimination by changing work processes. If a work practice cannot be changed, employees will be protected by personal protective equipment. Each department/work area will determine the need for PPE and provide appropriate storage facilities. All necessary PPE will be provided by the company at no cost to the employee. The specific PPE required will be listed in the company PPE safety policy.

Training

All affected employees will receive initial training on the various slip, trip and fall hazards and this policy before starting work. Training will be interactive and will enable each employee to recognize the various hazards that lead to slip, trip and fall accidents. Each employee will have the opportunity to ask questions regarding this policy and the work practices that it requires.

Contractors

All outside contractors will be required to follow this policy and utilize the appropriate slip, trip and fall safety protection measures. Outside contractors will be informed of these requirements during initial contract discussion. It is the responsibility of the area supervisors to ensure that contractors are observing all required safety precautions.

Program Review

This slip, trip and fall safety program will be evaluated regularly to determine its effectiveness and need for change. The program will should be immediately reevaluated when deficiencies are identified in the program, when major changes to the work environment are made, or when there is a change to related OSHA and state regulations.

Section 9: Emergency Action Plans

The company is committed to protecting employees in the event of an emergency. The purpose of this program is to establish policies for action plans to guide employees in the event of an emergency. These plans will be developed, approved by management, and communicated to all employees.

Program Responsibilities

Management

Management has the following responsibilities:

1. To identify potential work-related emergencies.
2. To develop policies and procedures to protect employees in the event of an emergency.
3. To establish clearly marked exit routes.
4. To establish a system for warning employees of emergencies.
5. To provide all required equipment for emergency action response.
6. To identify employees to coordinate and assist with emergency action response.
7. To establish procedures for personnel who must operate critical equipment before they evacuate.
8. To provide training to employees for emergency action.

Program Administrator

The company Emergency Action Program administrator is the OSRP. The responsibilities of the program administrator include:

1. To identify potential workplace emergencies.
2. To coordinate the development of emergency action plans.
3. To coordinate or conduct training with employees.
4. To coordinate emergency drills.
5. To assist in the evaluation of this written program.
6. To ensure this program is compliant with OSHA and other regulations.

Emergency Action Coordinators

Emergency Action Coordinators coordinate the emergency action and response for specific emergencies. The responsibilities of the Emergency Action Supervisors include:

1. Coordinate with the Program Administrator to develop emergency action plans.
2. Supervise the response in the event of an emergency.
3. Receive muster reports from emergency coordinators.
4. Receive reports on critical operations from emergency coordinators.

5. Coordinate with emergency services during emergencies.
6. Work with emergency services to determine when it is safe to return to work.
7. Other duties as required by the Emergency Action Plan.

Emergency Assistants

Emergency assistants help employees in their functional area to execute the emergency action plan. The responsibilities of the emergency assistants include:

1. Assisting employees in evacuating the work area.
2. Making sure that critical operations are performed in accordance with the Emergency Action Plan.
3. Take muster at the assembly area and report to the Emergency Action Supervisors.
4. Follow the directions of the Emergency Action Supervisors.
5. Other duties as required by the Emergency Action Plan.

Supervisors & OSRP's

Supervisors have the following responsibilities:

1. To monitor employees to ensure that they are working in accordance with the requirements of this program.
2. To ensure that employees have received appropriate training.
3. To ensure that emergency exit routes are clearly marked in their work area.
4. To identify employees to assist in emergency response.

Employees & OSRP's

Employees have the following responsibilities:

1. To complete the required safety training before performing work.
2. To follow the directions of emergency response coordinators.
3. To provide feedback to supervisors on emergency response issues.

Emergency Action Plan Requirements

The company will develop emergency action plans for all potential emergencies. These action plans will include:

1. Procedure for reporting the emergency.
2. Procedures for emergency evacuation, including type of evacuation and exit route assignments.
3. Procedures to be followed by all employees who remain to operate critical plant operations before they evacuate.
4. Procedures to account for all employees after evacuation.
5. Procedures to be followed by employees performing rescue or medical duties.

6. The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

Identification of Potential Emergencies

The Program Administrator will create a list of possible emergencies for this facility. This will include potential fires, weather related events, and medical emergencies. The program administrator will also review the company job hazard analyses, to identify potential process related emergencies, which may include hazardous material spills.

Emergency Contact Procedures

The company will rely on local emergency services for response to most emergency situations. These services will be briefed on the potential company emergencies. The Program Administrator will coordinate visits with emergency service providers to ensure they are familiar with the facility and the company emergency action plans.

Warning and Evacuation Alarms

The company must communicate emergencies and evacuation warnings with the use of distinct sounding alarm devices. These alarms will be specific to the type of emergency, so that employees can determine what actions are required. Some alarms will be triggered facility wide, while others may be for specific parts of the workplace. In areas with high noise, a visual alarm may accompany the audible alarm.

Emergency Alarm Requirements

The Program Administrator will make sure that the alarm used meets the following requirements.

1. The alarm system must be loud enough to be heard above ambient noise. For areas with high noise, visual alarms may be used.
2. The alarm system must provide adequate warning of the type of emergency and should allow enough reaction time for employees to evacuate or execute the necessary emergency actions.
3. The alarm must be distinct and recognizable as to the type of emergency that is occurring.
4. The procedure for sounding the alarm must be included in the emergency action plan.
5. Employees will be trained on the proper method for initiating alarms.
6. Emergency contact information will be posted on employee notice boards, and anywhere the telephone is used a method for sounding an alarm.

7. The company will keep spare alarm components to ensure that alarms are not disabled due to broken or faulty parts.
8. The alarm systems must be restored to normal operating conditions as soon as possible after each alarm.
9. Non-supervised employee alarms must be tested every two months. If the alarm has multiple actuation devices, a different one must be activated for each test, so that no individual device is used for each test.

Employee Training

The company will establish a training program for all employees. Basic training will be provided to regular employees who have no extra responsibilities other than following the directions of the emergency plan. Supervisors and emergency coordinators will receive advanced training on the procedures for emergency evacuation.

General Employee Training Requirements

General employee training must include:

1. The requirements of the OSHA Emergency Action standard 1910.38.
2. The types of potential emergencies at this facility.
3. The requirements of the applicable emergency action plan.
4. The emergency action assistants for their area.
5. Any special actions or procedures that must occur before evacuating.

Emergency Action Assistants

Emergency Action Supervisors training must include:

1. The requirements of the OSHA Emergency Action standard 1910.38.
2. The types of potential emergencies at this facility.
3. The requirements of the applicable emergency action plan.
4. The emergency action supervisors for their area.
5. Any special actions or procedures that must occur before evacuating.
6. The method for ensuring that all employees have evacuated.
7. Method for determining if situation is all clear.
8. Any information that must be provided to emergency services.

Training Frequency

Employees will be trained on the emergency action plans at least annually and:

1. Whenever a plan is developed.
2. Whenever an employee is assigned to a new position that has different emergency action plans.
3. Whenever an emergency action plan is changed.

4. When employees' responsibilities under the plan change.

Emergency Drills

The company will conduct periodic drills to ensure employees are familiar with the procedures and that the emergency action plans are sufficient. These drills will be scheduled by the program coordinator. Emergencies with higher likelihoods will be prioritized and practiced more frequently.

Program Evaluation

The Program Administrator will review this program at least annually. The program will also be reviewed if conditions change, or if there is any sign that this program is ineffective. All employees who are affected by changes in the emergency action plan will be trained on the changes.

Section 10: Drug Free Workplace

Drug & Alcohol Testing Policy

The issue of drug testing is now a myriad of state and federal laws. Efforts by some states to legalize cannibus has compounded the complexity of this issue, although cannibus remains an illegal controlled substance pursuant to federal law.

EGE is committed to remaining a drug and alcohol free workplace and as such we:

- Perform pre-employment testing
- Post-accident testing
- For-cause testing

Our policy is subject to state and federal law.

Appendix A

Accident Investigation Form

Follows on next page.

ACCIDENT INVESTIGATION FORM

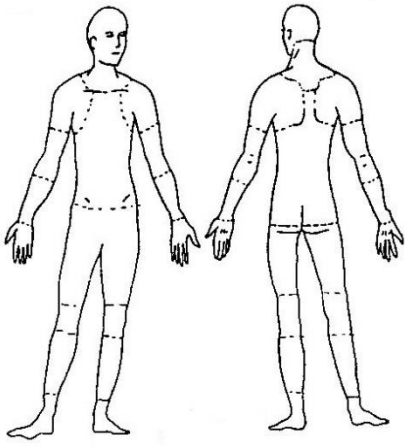
Instructions: Complete this form as soon as possible after an incident that results in serious injury or illness. (Optional: Use to investigate a minor injury or near miss that *could have resulted in a serious injury or illness*.)

This is a report of a: ❑ Death ❑ Lost Time ❑ Dr. Visit Only ❑ First Aid Only ❑ Near Miss	
Date of incident:	This report is made by: ❑ Employee ❑ Supervisor ❑ Team ❑ Final Report

Step 1: Injured employee (complete this part for each injured employee)

Name:	Sex: ❑ Male ❑ Female	Age:
Department:	Job title at time of incident:	

Part of body affected: (shade all that apply)



Nature of injury: (most serious one)
- ❑ Abrasion, scrapes
- ❑ Amputation
- ❑ Broken bone
- ❑ Bruise
- ❑ Burn (heat)
- ❑ Burn (chemical)
- ❑ Concussion (to the head)
- ❑ Crushing Injury
- ❑ Cut, laceration, puncture
- ❑ Hernia
- ❑ Illness
- ❑ Sprain, strain
- ❑ Damage to a body system:
- ❑ Other _____

This employee works:
- ❑ Regular full time
- ❑ Regular part time
- ❑ Seasonal
- ❑ Temporary

Months with this employer

Months doing this job:

(e.g.: nervous, respiratory, or circulatory systems)

Step 2: Describe the incident

Exact location of the incident:	Exact time:

What part of employee's workday? ❑ Entering or leaving work ❑ Doing normal work activities ❑ During meal period ❑ During break ❑ Working overtime ❑ Other

Names of witnesses (if any):

Number of attachments	Written witness statements:	Photographs:	Maps / drawings:

What personal protective equipment was being used (if any)?

Describe, step-by-step the events that led up to the injury. Include names of any machines, parts, objects, tools, materials and other important details.

Description continued on attached sheets: ❑

Step 3: Why did the incident happen?

Unsafe workplace conditions: (Check all that apply)
- ❑ Inadequate guard
- ❑ Unguarded hazard
- ❑ Safety device is defective
- ❑ Tool or equipment defective
- ❑ Workstation layout is hazardous
- ❑ Unsafe lighting
- ❑ Unsafe ventilation
- ❑ Lack of needed personal protective equipment
- ❑ Lack of appropriate equipment / tools
- ❑ Unsafe clothing
- ❑ No training or insufficient training
- ❑ Other: _____

Unsafe acts by people: (Check all that apply)
- ❑ Operating without permission
- ❑ Operating at unsafe speed
- ❑ Servicing equipment that has power to it
- ❑ Making a safety device inoperative
- ❑ Using defective equipment
- ❑ Using equipment in an unapproved way
- ❑ Unsafe lifting by hand
- ❑ Taking an unsafe position or posture
- ❑ Distraction, teasing, horseplay
- ❑ Failure to wear personal protective equipment
- ❑ Failure to use the available equipment / tools
- ❑ Other: _____

Why did the unsafe conditions exist?

Why did the unsafe acts occur?

Is there a reward (such as "the job can be done more quickly", or "the product is less likely to be damaged") that may have encouraged the unsafe conditions or acts? ❑ Yes ❑ No

If yes, describe:

Were the unsafe acts or conditions reported prior to the incident? ❑ Yes ❑ No

Have there been similar incidents or near misses prior to this one? ❑ Yes ❑ No

Step 4: How can future incidents be prevented?
What changes do you suggest to prevent this injury/near miss from happening again? ❑ Stop this activity ❑ Guard the hazard ❑ Train the employee(s) ❑ Train the supervisor(s) ❑ Redesign task steps ❑ Redesign work station ❑ Write a new policy/rule ❑ Enforce existing policy ❑ Routinely inspect for the hazard ❑ Personal Protective Equipment ❑ Other: _____
What should be (or has been) done to carry out the suggestion(s) checked above? Description continued on attached sheets: ❑

Step 5: Who completed and reviewed this form? (Please Print)	
Written by: Department:	Title: Date:
Names of investigation team members:	
Reviewed by:	Title: Date:

Appendix B

Subcontractor Safety Pre-Qualification Form

Follows on next page.

ELBOW GREASE ENTERPRISES, LLC

Subcontractor Safety Pre-Qualification Form

Company Name		Type of Company	Type of Work Performed	
Street Address			Phone Number	Fax Number
City/State/Zip	Principal Contact		Email Address	
Year Business was Established	States We Do Work In	Union Non-Union	Previous Name of Company (if applicable)	
Contractor's License #	D&B #	Qualified Minority Business? MBE WBE DBE		

List your Company's # of Injuries/Illnesses from your OSHA 300 Logs as follows:	Last Year	1st Prior Year	2nd Prior Year
Experience Modification Rate (EMR).			
Total # of Fatalities. (From Column G on the OSHA 300 Log)			
Total # of OSHA Recordable Incidents. (Total of Columns H, I, and J on the OSHA 300 Log)			
Total # of Lost Work Day Incidents. (Column H on the OSHA 300 Log)			
Total # of other recordable cases. (Column J on the OSHA 300 Log)			
Total # of Annual Man-Hours Worked.			

Please check if your Company implements the following safety controls:	Yes	No
Has a Written Safety Program.		
Has an Implemented Drug Screening Policy for all Employees.		
Performs Safety Orientation & Training for all Employees.		
Performs Continuing Safety Education for all Employees.		

Safety/Health Professional Contact:			
Name	Title	Phone Number	Email Address

Appendix C

Other Forms

Other forms can be located at:

www.ege-llc.com/safety